



Planning Policy  
London Borough of Hillingdon,  
Civic Centre,  
High Street,  
Uxbridge,  
Middlesex  
UB8 1UW

Robert Deanwood  
Consultant Town Planner

████████████████████  
████████████████████

**Sent by email to:**  
████████████████████

19 November 2015

Dear Sir / Madam

**Hillingdon LBC: Local Plan Part 2 Proposed Changes Consultation  
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

National Grid owns and operates the high voltage electricity transmission system in England and Wales and operates the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customer. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.

**National Grid infrastructure within Hillingdon LBC**

Electricity Transmission

National Grid has one high voltage overhead line (listed below) and two underground cables within Hillingdon LBC's administrative area. This forms an essential part of the electricity transmission network in England and Wales.

| Line Ref.         | Description  |
|-------------------|--|
| ZC Route          | 275kV two circuit route from Watford South substation in Three Rivers to Iver substation in South Bucks. |
| Underground Cable | 266363 from North Hyde substation in Hillingdon to Iver substation in South Bucks                        |
| Underground Cable | 264165 from North Hyde substation in Hillingdon to Iver substation in South Bucks                        |

National Grid has provided information in relation to electricity transmission assets via the following internet link:

<http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/>

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## Gas Distribution

National Grid has a high number of gas distribution apparatus within the administrative area of Hillingdon LBC  
This includes:

- Low Pressure (LP) and Medium Pressure (MP) (below 2 bar) Gas Pipes and associated equipment
- Four High Pressure (HP) (above 2 bar) and nine intermediate Pressure (IP) Gas Pipelines and associated equipment as listed below:

| <b>Pipe Pressure</b> | <b>Description</b>                           |
|----------------------|--|
| HP                   | 2257 Haste Hill to Mill Hill 18"             |
| HP                   | 2256 Fulmer to Haste Hill 18"                |
| HP                   | 0153 Harefield to Southall (Nt116)           |
| IP                   | 0016 Esso WIt to Southall 8"                 |
| IP                   | 0016a Nestles Spur 6"                        |
| IP                   | 0009 Esso WIt to Southall 6"                 |
| HP                   | 2263 Fulmer to Southall 24"                  |
| IP                   | 0021 E.M.I. Branch 8"                        |
| IP                   | 0054 Dawley Spur (Off Fulmer/Southall) 18"   |
| IP                   | 1442 Staines 7 Bar                           |
| IP                   | 0007 Esso Terminal to Staines - (Ip) 6"      |
| IP                   | 10000 Baa Heathrow Energy Centre Supply 7bar |
| IP                   | 009a Shrewsbury Rd - Stn369 H'throw 6"       |

The first point of contact for all works within the vicinity of gas distribution assets is Plant Protection

Please note that Gas pipeline diversions may take up to three years, please bear this in mind when engaging with National Grid.

National Grid may have a Deed of Grant Easement for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally written permission will be required before any works commence within the National Grid easement strip, and a deed of consent is required for any crossing of the easement. In the first instance please consider checking with the Land Registry for the development area. If further information is required in relation to an easement please contact Laura Kelly, Town Planner, [REDACTED]

## Electricity Distribution

Scottish and Southern Energy Power Distribution owns and operates the local electricity distribution network in Hillingdon LBC. Contact details can be found at [www.energynetworks.org.uk](http://www.energynetworks.org.uk).

## **SPECIFIC COMMENTS**

### Electricity Transmission

The following sites have been identified as being crossed by or within close proximity to underground cable apparatus:

- Land South of the Railway, including Nestle Site, Nestle Avenue, Hayes

Our underground cables are protected by renewable or permanent agreements with landowners or have been laid in the public highway under our licence. These grant us legal rights that enable us to achieve efficient and reliable operation, maintenance, repair and refurbishment of our electricity transmission network. Hence we require that no permanent structures are built over or under cables or within the zone specified in the agreement, materials or soil are not stacked or stored on top of the cable route or its joint bays and that unrestricted and safe access to any of our cable(s) must be maintained at all times

The information supplied is given in good faith and only as a guide to the location of our underground cables. The accuracy of this information cannot be guaranteed. The physical presence of such cables may also be evident from physical protection measures such as ducts or concrete protection tiles. The person(s) responsible for planning, supervising and carrying out work in proximity to our cable(s) shall be liable to us, as cable(s) owner, as well as to any third party who may be affected in any way by any loss or damage resulting from their failure to locate and avoid any damage to such a cable(s).

The relevant guidance in relation to working safely near to existing underground cables is contained within the Health and Safety Executive's ([www.hse.gov.uk](http://www.hse.gov.uk)) Guidance HS(G)47 "Avoiding Danger From Underground Services" and all relevant site staff should make sure that they are both aware of and understand this guidance.

Our cables are normally buried to a depth of 1.1 metres or more below ground and cable profile drawings showing further details along the route of the particular cable can be obtained from National Grid's Plant Protection Team. Cables installed in cable tunnels, deeper underground, whilst less likely to be affected by surface or shallow works may be affected by activities such as piling. Ground cover above our cables should not be reduced or increased.

If a landscaping scheme is proposed as part of the works, we request that no trees and shrubs are planted either directly above or within 3 metres of the existing underground cable, as ultimately the roots may grow to cause damage to the cable.

The relocation of existing underground cables is not normally feasible on grounds of cost, operation and maintenance and environmental impact and we believe that successful development can take place in their vicinity.

### Gas Distribution

Intermediate / High Pressure: The following sites have been identified as being crossed by or within close proximity to IP/ HP apparatus:

- The Old Vinyl Factory, Gatefold Building, Hayes
- Land South of the Railway, including Nestle Site, Nestle Avenue, Hayes
- Master Brewer and Hillingdon Circus

National Grid Gas Distribution would like to take this opportunity to advise prospective land developers and the local authority of the following:

Crossing of assets: Construction traffic should only cross the pipeline at locations agreed with National Grid. To facilitate these crossings protection or diversion may be required; depending on site condition and pipe parameters.

Cable Crossings: For all assets, the contractor / developer will need to consider the clearance and necessary protection measures. The crossing must be perpendicular to the asset. The crossing may require a deed of consent to be agreed prior to work commencing.

Piling: No piling should take place within 15m of gas distribution assets without prior agreement from a National Grid Representative.

Pipeline Safety: National Grid will need to ensure that access to the pipelines is maintained during and after construction.

Our HP/IP pipelines are normally buried to a depth cover of 1.1 metres, however; actual depth and position must be confirmed on site by trial hole investigation to be monitored by a National Grid representative. Ground cover above gas distribution mains should not be reduced or increased. Our MP/LP mains will not be as deep as the pipelines.

A National Grid representative may be required to monitor any excavations or any embankment or dredging works within 3 metres of a HP/IP pipeline or within 10 metres of an Above Ground Installations (AGI). Monitoring of works in relation to MP/LP assets may be required by a National Grid representative.

National Grid steel pipelines are cathodically protected to prevent corrosion to the pipeline. For further information please refer to SSW/22 (see further advice section below).

If you require any further information in relation to the above please contact National Grid's Plant Protection team via the email address at the top of this letter.

## **Appendices - National Grid Assets**

Please find attached in:

- Appendix 1 maps of the sites referenced above in relation to the affected National Grid Transmission assets outlined above.
- Appendix 2 provides a table of the Low / Medium Pressure apparatus and the sites crossed in the consultation document.
- Appendix 3 provides maps of the sites referenced above in relation to the affected National Grid Gas Distribution (Intermediate Pressure /High Pressure) assets outlined above.

## **Further Advice**

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition the following publications are available from the National Grid website or by contacting us at the address overleaf:

- National Grid's commitments when undertaking works in the UK - our stakeholder, community and amenity policy;
- Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties; and
- A sense of place - design guidelines for development near high voltage overhead lines.
- T/SP/SSW22 – Specification for safe working in the vicinity of National Grid high pressure gas pipelines and associated installations – requirements for third parties.  
<http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=33968>
- IGE/SR/18 – Safe working practices to ensure the integrity of gas pipelines and associated installations.
- HS(G)47 – Avoiding Danger from Underground Services.

Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Robert Deanwood  
Consultant Town Planner

[REDACTED]

Laura Kelly  
Town Planner, National Grid

[REDACTED]

I hope the above information is useful. If you require any further information please do not hesitate to contact me.

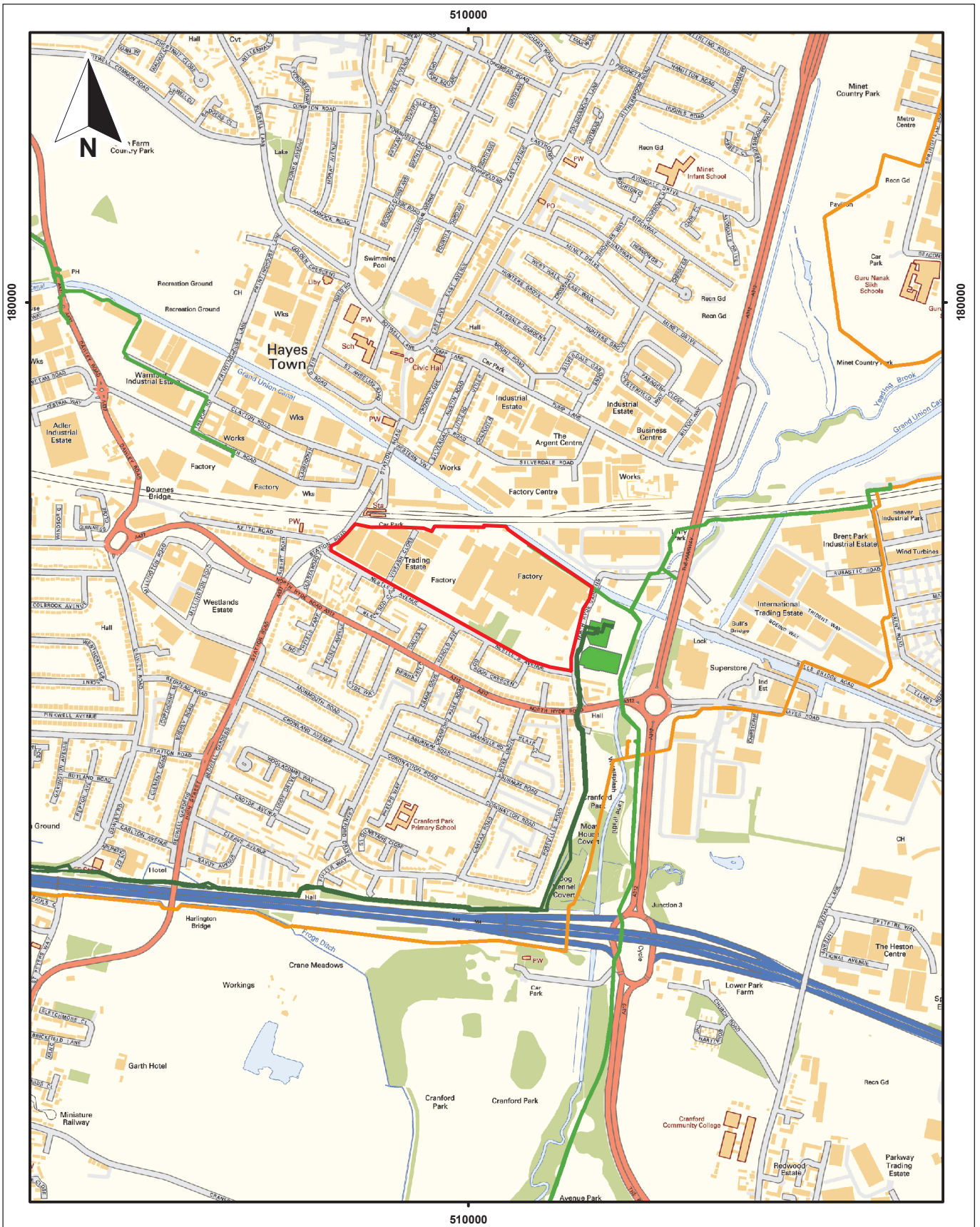
Yours faithfully

[via email]  
**Robert Deanwood**  
**Consultant Town Planner**

cc. Laura Kelly, National Grid

## **APPENDIX 1: NATIONAL GRID TRANSMISSION ASSETS AFFECTED**

*Insert graphics as usual*



**Key**

- ET56
- Gas pipeline (intermediate pressure)
- Gas distribution pipeline (high pressure)
- Underground Cable
- Substation

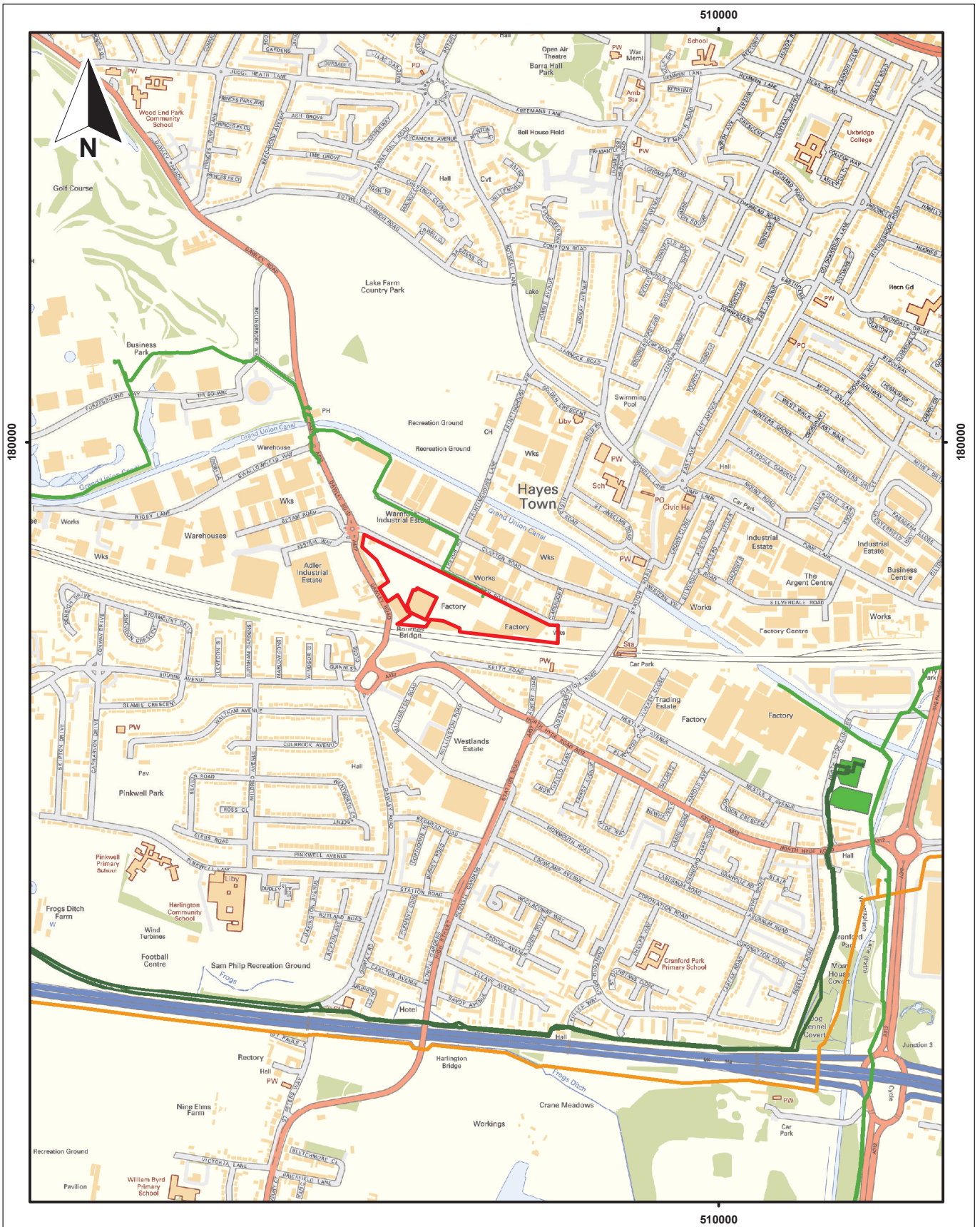
Development Plan Monitoring  
**National Grid Reference:**  
**Site ET56**  
**Land to the south of the Railway,**  
**including Nestle Site, Nestle Avenue, Hayes**

**Proposed Development Sites**  
**Mixed Use**

November 2015  
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**Key**

- GD41
- Gas pipeline (intermediate pressure)
- Gas distribution pipeline (high pressure)
- Underground Cable
- Substation



**Development Plan Monitoring**

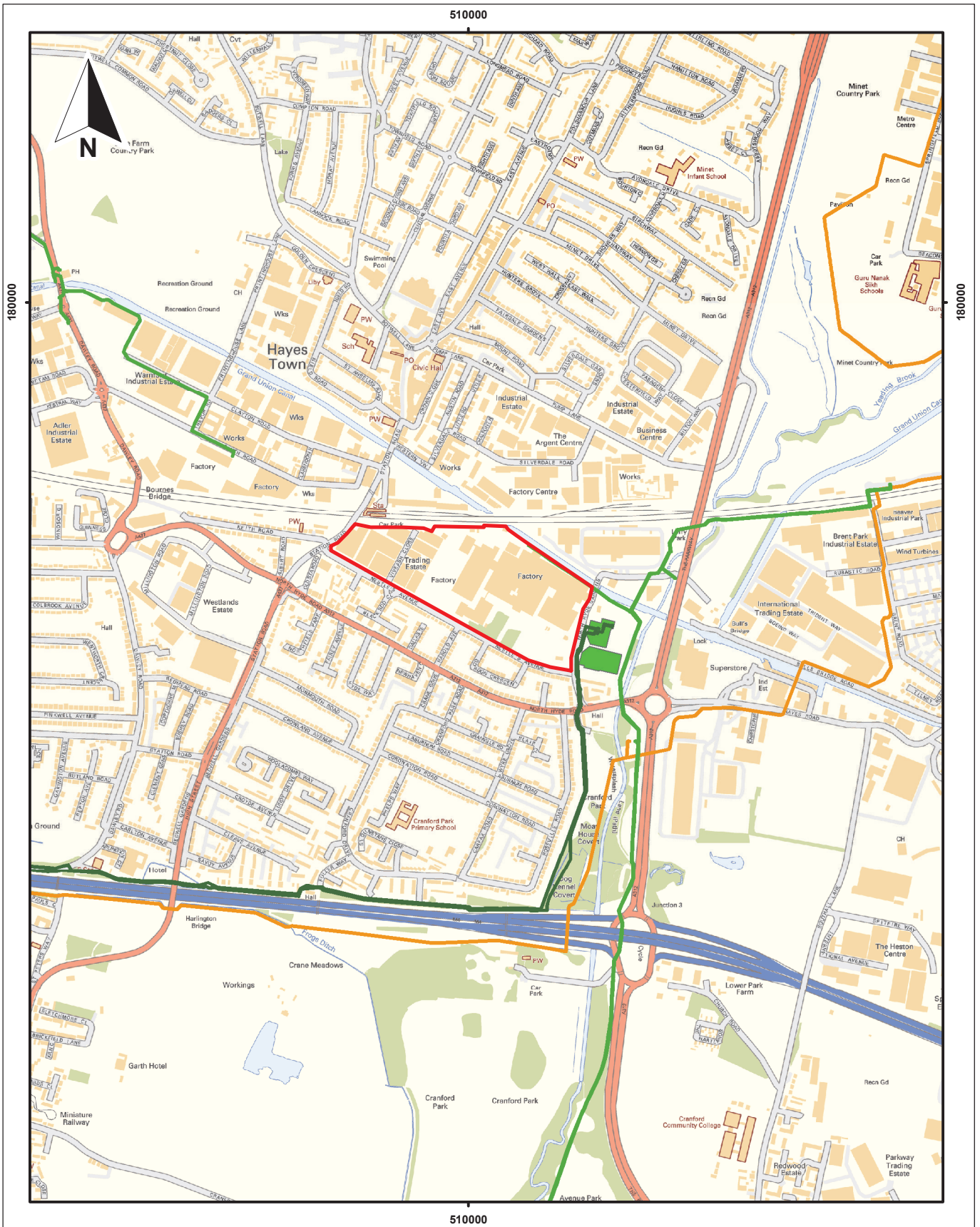
**National Grid Reference:**  
**Site GD41**  
**The Old Vinyl Factory and**  
**Gateford Building, Hayes**

**Proposed Development Sites**  
**Mixed Use**

November 2015  
 36791-Lea119.mxd smitv







**Key**

- GD42
- Gas pipeline (intermediate pressure)
- Gas distribution pipeline (high pressure)
- Underground Cable
- Substation

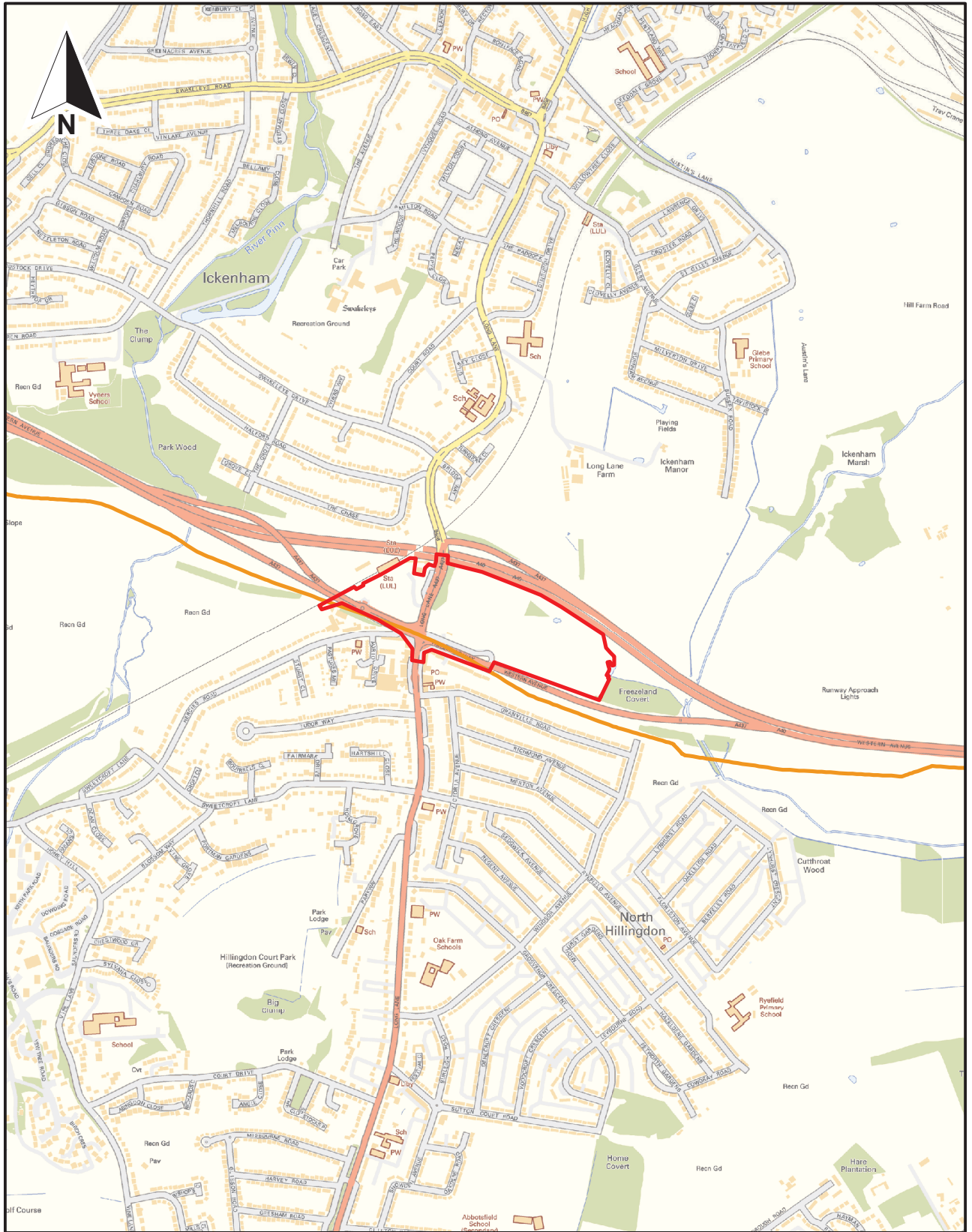


Development Plan Monitoring  
**National Grid Reference:**  
**Site GD42**  
**Land to the south of the Railway,**  
**including Nestle Site, Nestle Avenue, Hayes**

**Proposed Development Sites**  
**Mixed Use**

November 2015  
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**Key**

- GD43
- Gas distribution pipeline (high pressure)

Development Plan Monitoring  
**National Grid Reference:**  
**Site GD43**  
**Master Brewer and Hillingdon Circus**  
**Hillingdon Borough Council**  
**Proposed Development Sites**  
**Mixed Use**



November 2015  
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# HILLINGDON

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## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |                                     |            |  |
|----------------------------|-------------------------------------|------------|--|
| Title                      | Mr                                  |            |  |
| First name                 | Paul                                |            |  |
| Last Name                  | Stone                               |            |  |
| Organisation (if relevant) | Harefield Tenants and Residents Ass |            |  |
| Unit                       | House number                        | [REDACTED] |  |
| House name                 | [REDACTED]                          |            |  |
| Address 1                  | [REDACTED]                          |            |  |
| Address 2                  | [REDACTED]                          |            |  |
| Town                       | [REDACTED]                          |            |  |
| County                     | [REDACTED]                          |            |  |
| Postcode                   | [REDACTED]                          |            |  |
| Telephone                  | [REDACTED]                          |            |  |
| Email                      | [REDACTED]                          |            |  |

| 2. Agent's Name and Address (if applicable) |              |            |  |
|---|--------------|------------|--|
| Title                                       | [REDACTED]   |            |  |
| First name                                  | [REDACTED]   |            |  |
| Last name                                   | [REDACTED]   |            |  |
| Company                                     | [REDACTED]   |            |  |
| Unit  | House number | [REDACTED] |  |
| House name                                  | [REDACTED]   |            |  |
| Address 1                                   | [REDACTED]   |            |  |
| Address 2                                   | [REDACTED]   |            |  |
| Town  | [REDACTED]   |            |  |
| County                                      | [REDACTED]   |            |  |
| Postcode                                    | [REDACTED]   |            |  |
| Telephone                                   | [REDACTED]   |            |  |
| Email                                       | [REDACTED]   |            |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2 |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------|-----------------------------------|--|---|
| yes               | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| yes               | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| yes               | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |  |
|-------------------------------|--|
| Policy number;                | The Harefield Tenants and Residents Ass Support and endorse the further changes to the LDP Part 2. This has been discussed at a number of our open meetings. |
| Paragraph number;             |  |
| Table or figure number; or    |  |
| Map number (Atlas of Changes) |  |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes | No                       |
|---|-----|--------------------------|
| Sound?  | yes | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | yes | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*



**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary



## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|     |  |
|-----|--|
| yes | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| yes | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| yes | <b>The adoption of the Local Plan Part 2.</b>  |

## **Returning your form**

Completed representation forms may be returned to the Planning Policy Team by either:



- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

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**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup>  
December 2015.**

## Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

### 1) What is your gender?

Male  Female

### 2) To which age group do you belong?

under 15  25 – 44  65 – 85  
 15 - 24  45 - 64  85+

### 3) Do you consider yourself to be a disabled person?

No  Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |



# HILLINGDON

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| 1. Name and Address        |                                       |              |  |
|----------------------------|---------------------------------------|--------------|--|
| Title                      |                                       |              |  |
| First name                 |                                       |              |  |
| Last Name                  |                                       |              |  |
| Organisation (if relevant) | Henry Streeter (Sand and Ballast) Ltd |              |  |
| Unit                       |                                       | House number |  |
| House name                 |                                       |              |  |
| Address 1                  | [REDACTED]                            |              |  |
| Address 2                  | [REDACTED]                            |              |  |
| Town                       | [REDACTED]                            |              |  |
| County                     | [REDACTED]                            |              |  |
| Postcode                   | [REDACTED]                            |              |  |
| Telephone                  | As agent                              |              |  |
| Email                      | As agent                              |              |  |

| 2. Agent's Name and Address (if applicable) |                      |              |            |
|---|----------------------|--------------|------------|
| Title                                       | Mr                   |              |            |
| First name                                  | Simon                |              |            |
| Last name                                   | Chaffe               |              |            |
| Company                                     | Matthews and Son LLP |              |            |
| Unit  |                      | House number | [REDACTED] |
| House name                                  |                      |              |            |
| Address 1                                   |                      |              |            |
| Address 2                                   | [REDACTED]           |              |            |
| Town  | [REDACTED]           |              |            |
| County                                      |                      |              |            |
| Postcode                                    | [REDACTED]           |              |            |
| Telephone                                   | [REDACTED]           |              |            |
| Email                                       | [REDACTED]           |              |            |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |   |
|-------------------------------|---|
| Policy number;                | MIN 1 / MIN2: Safeguarded Areas for Minerals and Aggregates Railheads |
| Paragraph number;             |   |
| Table or figure number; or    |   |
| Map number (Atlas of Changes) |   |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |



**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

On the basis of the proposed change our previous representation is not withdrawn.

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

The issues described above are fundamental to mineral provision and apportionment and would warrant further elaboration at an EiP hearing.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

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|-------------------------------------|--|
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| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
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### 2) To which age group do you belong?

under 15  25 – 44  65 – 85  
 15 - 24  45 - 64  85+

### 3) Do you consider yourself to be a disabled person?

No  Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

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|--|---|
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| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
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|----------------------------|---------------------------------------|--------------|--|
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| Last Name                  |                                       |              |  |
| Organisation (if relevant) | Henry Streeter (Sand and Ballast) Ltd |              |  |
| Unit                       |                                       | House number |  |
| House name                 |                                       |              |  |
| Address 1                  | ██████████                            |              |  |
| Address 2                  | ██████████                            |              |  |
| Town                       | ██████████                            |              |  |
| County                     | ██████                                |              |  |
| Postcode                   | ██████████                            |              |  |
| Telephone                  | As agent                              |              |  |
| Email                      | As agent                              |              |  |

| 2. Agent's Name and Address (if applicable) |  |              |    |
|---|--|--------------|----|
| Title                                       | Mr                                       |              |    |
| First name                                  | Simon                                    |              |    |
| Last name                                   | Chaffe                                   |              |    |
| Company                                     | Matthews and Son LLP                     |              |    |
| Unit  |  | House number | ██ |
| House name                                  |  |              |    |
| Address 1                                   |  |              |    |
| Address 2                                   | ██████████                               |              |    |
| Town  | ██████                                   |              |    |
| County                                      |  |              |    |
| Postcode                                    | ██████████                               |              |    |
| Telephone                                   | ██████████                               |              |    |
| Email                                       | ██ |              |    |



## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                         |
|-------------------------------|-------------------------|
| Policy number;                | MIN4: Minerals Capacity |
| Paragraph number;             |                         |
| Table or figure number; or    |                         |
| Map number (Atlas of Changes) |                         |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

The Consultation Statement (October 2015, ID16, Rep No3) responds with a reference to paragraph 6.65 & then 'No Proposed Change'.

However, MIN4 seems to have been deleted. Paragraph 6.65 has also been deleted but there is now a different paragraph with that number.

On this basis our previous representation is not withdrawn.

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

The issues described above are fundamental to mineral provision and apportionment and would warrant further elaboration at an EIP hearing.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

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- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

### 1) What is your gender?

Male  Female

### 2) To which age group do you belong?

under 15  25 – 44  65 – 85  
 15 - 24  45 - 64  85+

### 3) Do you consider yourself to be a disabled person?

No  Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |



# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |                                       |              |  |
|----------------------------|---------------------------------------|--------------|--|
| Title                      |                                       |              |  |
| First name                 |                                       |              |  |
| Last Name                  |                                       |              |  |
| Organisation (if relevant) | Henry Streeter (Sand and Ballast) Ltd |              |  |
| Unit                       |                                       | House number |  |
| House name                 |                                       |              |  |
| Address 1                  | [REDACTED]                            |              |  |
| Address 2                  | [REDACTED]                            |              |  |
| Town                       | [REDACTED]                            |              |  |
| County                     | [REDACTED]                            |              |  |
| Postcode                   | [REDACTED]                            |              |  |
| Telephone                  | As agent                              |              |  |
| Email                      | As agent                              |              |  |

| 2. Agent's Name and Address (if applicable) |                      |              |            |
|---|----------------------|--------------|------------|
| Title                                       | Mr                   |              |            |
| First name                                  | Simon                |              |            |
| Last name                                   | Chaffe               |              |            |
| Company                                     | Matthews and Son LLP |              |            |
| Unit  |                      | House number | [REDACTED] |
| House name                                  |                      |              |            |
| Address 1                                   |                      |              |            |
| Address 2                                   | [REDACTED]           |              |            |
| Town  | [REDACTED]           |              |            |
| County                                      |                      |              |            |
| Postcode                                    | [REDACTED]           |              |            |
| Telephone                                   | [REDACTED]           |              |            |
| Email                                       | [REDACTED]           |              |            |



## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                        |
|-------------------------------|------------------------|
| Policy number;                |                        |
| Paragraph number;             | 8 Mineral Safeguarding |
| Table or figure number; or    |                        |
| Map number (Atlas of Changes) |                        |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

On the basis of the proposed change our previous representation is not withdrawn.

In the context of our representations regarding MIN1 and MIN2 this section should be deleted and rewritten.

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

The issues described above are fundamental to mineral provision and apportionment and would warrant further elaboration at an EIP hearing.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

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- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

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**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

### 1) What is your gender?

Male                       Female

### 2) To which age group do you belong?

under 15                       25 – 44                       65 – 85  
 15 - 24                       45 - 64                       85+

### 3) Do you consider yourself to be a disabled person?

No                       Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |



# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

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### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |                                       |              |  |
|----------------------------|---------------------------------------|--------------|--|
| Title                      |                                       |              |  |
| First name                 |                                       |              |  |
| Last Name                  |                                       |              |  |
| Organisation (if relevant) | Henry Streeter (Sand and Ballast) Ltd |              |  |
| Unit                       |                                       | House number |  |
| House name                 |                                       |              |  |
| Address 1                  | [REDACTED]                            |              |  |
| Address 2                  | [REDACTED]                            |              |  |
| Town                       | [REDACTED]                            |              |  |
| County                     | [REDACTED]                            |              |  |
| Postcode                   | [REDACTED]                            |              |  |
| Telephone                  | As agent                              |              |  |
| Email                      | As agent                              |              |  |

| 2. Agent's Name and Address (if applicable) |                      |              |            |
|---|----------------------|--------------|------------|
| Title                                       | Mr                   |              |            |
| First name                                  | Simon                |              |            |
| Last name                                   | Chaffe               |              |            |
| Company                                     | Matthews and Son LLP |              |            |
| Unit  |                      | House number | [REDACTED] |
| House name                                  |                      |              |            |
| Address 1                                   |                      |              |            |
| Address 2                                   | [REDACTED]           |              |            |
| Town  | [REDACTED]           |              |            |
| County                                      |                      |              |            |
| Postcode                                    | [REDACTED]           |              |            |
| Telephone                                   | [REDACTED]           |              |            |
| Email                                       | [REDACTED]           |              |            |



## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |  |
|-------------------------------|--|
| Policy number;                |  |
| Paragraph number;             |  |
| Table or figure number; or    | Table 5.4 – Wall Garden Farm Sand Heaps – SINC New 1 |
| Map number (Atlas of Changes) |  |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

The deletion of the SINC at Wall Garden Farm Sand Heaps is supported.

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | <b>No, I do not want to participate in the oral examination</b> |
| <input type="checkbox"/>            | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

Provided there is no attempt to reintroduce this particular SINC then I do not wish to participate at the oral examination.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

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## Monitoring Questions

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### 1) What is your gender?

Male  Female

### 2) To which age group do you belong?

under 15  25 – 44  65 – 85  
 15 - 24  45 - 64  85+

### 3) Do you consider yourself to be a disabled person?

No  Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |



Local Plan &lt;localplan@hillington.gov.uk&gt;

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**Publication of Proposed Changes to the Local Plan Part 2**

1 message

Gregory, Andree [REDACTED]

19 November 2015 at 15:32  
[REDACTED]**For the Attention of:** James Gleave**Consultation:** Publication of proposed changes to the local plan part 2

Dear James,

Thank you for your letter dated 23 October 2015, advising Highways England of the above consultation.

Please note that as from the 1 April 2015, the Highways Agency is now Highways England. Please amend any references in the document(s) accordingly.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN). In the case of Hillingdon, this relates to the M25 Junctions 14 to 17, the M4 Junctions 3 to 4b, the M40 Junctions 1 and 1a and the A3113.

Having reviewed the consultation document we would like to reiterate our comment previously made in October 2014 in response to the Hillingdon Local Plan Part 2 Regulation 19 Consultation.



As a fundamental point we would expect the local plan not to rely on future transport assessments that accompany planning applications. This may lead to an underestimation of the real impacts of the Local Plan in transport terms. Given that many developments across the borough identified in the site allocations may not individually have any significant impact, the combined impact may be significant and should be examined. Therefore, we would expect Hillingdon to produce a transport assessment covering the cumulative impacts of the Local Plan development as a whole compared to a scenario with only committed development. This should be done for the Local Plan horizon year. Without such an assessment there is no real evidence on transport grounds to declare the plan sound based upon the NPPF “justified” criteria.

The plan should demonstrate that all development can be accommodated on transport grounds including evidence that any required mitigation (infrastructure or other measures) is affordable from identified funding sources and deliverable. Without such an assessment, significant Local Plan related transport impacts may pass unnoticed, or the plan may be reliant upon allowing development that cannot be realised because mitigation measures for individual developments are not affordable and viable, and therefore the plan will not be sound. Please refer to Department for Transport guidelines “Transport Evidence Bases in Plan Making” <http://planningguidance.planningportal.gov.uk/blog/guidance/transport-evidence-bases-in-plan-making/transport-evidence-bases-in-plan-making-guidance/>.

**Sent on behalf of Stephen Hall (Asset Manager) at Highways England**

**Andree Gregory**

Highways England



Web: <http://www.highways.gov.uk>

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# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

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### PART A - Your details

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| 1. Name and Address        |                               | 2. Agent's Name and Address (if applicable) |             |
|----------------------------|-------------------------------|---|-------------|
| Title                      |                               | Title                                       | Miss        |
| First name                 |                               | First name                                  | Wakako      |
| Last Name                  |                               | Last name                                   | Hirose      |
| Organisation (if relevant) | LaSalle Investment Management | Company                                     | Rapleys LLP |
| Unit                       | House number                  | Unit  |             |
| House name                 |                               | House name                                  |             |
| Address 1                  | C/O Agent                     | Address 1                                   |             |
| Address 2                  |                               | Address 2                                   |             |
| Town                       |                               | Town  |             |
| County                     |                               | County                                      |             |
| Postcode                   |                               | Postcode                                    |             |
| Telephone                  |                               | Telephone                                   |             |
| Email                      |                               | Email                                       |             |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |      |
|-------------------------------|------|
| Policy number;                | DME1 |
| Paragraph number;             |      |
| Table or figure number; or    |      |
| Map number (Atlas of Changes) |      |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

### **Policy DME1: Employment Uses on Designated Employment Sites**

#### Policy DME1 (C) B Class Uses Supported within LSEs

We consider that it is appropriate to provide policy support for the prosperity and growth of the high quality office sites. In this regard, we continue to **support** Policy DME1 (C) which supports Class B1 a,b,c uses within LSEs, as it clearly defines the distinct role of LSEs in contrast to the Locally Significant Industrial Sites, which are safeguarded for Classes B2 and B8 uses.

#### Policy DME1 (D) Alternative Uses on LSEs and Policy Criteria

We maintain our **objection** to Policy DME1 (D) as stated in our previous representations. The current occupancy level of Odyssey Business Park is good. That said, however, circa 20,600 sq.ft of office floorspace is currently vacant. Part (including the parking area) or whole of the site could become available for alternative use/development in the future, in the event that the current vacancy does not improve despite our client's marketing campaign, and/or occupier demand declines.

It is noted that the adopted London Plan (2015) has increased the minimum housing target across all London Boroughs. For Hillingdon, the annual housing target has increased from 425 dwellings to 559 dwellings. Odyssey Business Park is in a highly sustainable location for housing and isolated from other designated employment sites. As such, it represents a potential opportunity site to address the Borough's housing needs in the event that part or whole of the site becomes available for alternative use or redevelopment, in the event that the demand for office accommodation in that location declines.

Policy DME1 (D) should therefore recognise that existing office sites, such as Odyssey Business Park, are suitable for residential use, and could be released for alternative uses that meet the Borough's identified development needs. This approach is endorsed by the NPPF which advises that alternative uses of land or building should

be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities (paragraph 22). This is also considered appropriate in the context of the Government's approach to boosting housing stock through the introduction of permitted development rights for the change of use from offices to residential.

Additionally, we consider that Policy DME1 (D), as drafted, is too restrictive, and does not allow for sufficient flexibility to respond to changing economic circumstances. This is contrary to the NPPF, which advises against the long term protection of designated employment sites where there is no reasonable prospect of a site being used for that purpose (Paragraph 22).

More specifically, we maintain our **strong objection** to criteria i) and ii), as follows:

- Criterion i) *There is no realistic prospect of the land being used for industrial or warehousing purposes in the future.*

This is an inappropriate and unjustified criterion for LSEs on the basis that the role and function of LSEL sites are clearly defined as employment uses falling within Class B1 only. The criterion would appear to suggest that LSEs should be safeguarded for Class B2 and B8 uses in addition to B1. Odyssey Business Park adjoins residential areas, and has constraints in terms of access by heavy goods vehicles or for distribution and logistic purposes. This makes the site inappropriate for B2 and B8 uses, and therefore should not be safeguarded for such uses. Moreover, the Council's evidence base (Updated Employment Land Study 2014) projects a decreasing demand (surplus) for industrial and warehousing land between 2013 and 2026, in the region between 16.3 and 20.6ha. There is a clear conflict between the objectives of the LSEL designation and the requirement of the criterion, which is not supported by the Council's evidence base.

It is therefore considered that there is no sound basis for this criterion to be applied to LSEL sites, as it will potentially lead to unnecessarily delay the delivery of alternative use/development that would meet the needs of the Borough.

- Criterion ii) *Sites have been vacant and consistently marketed for a period of 2 years.*

It is considered that this criterion would place an unnecessary barrier for sites which are designated as employment land of local importance, rather than Strategic Industrial Locations and Strategic Office Locations, having London-wide strategic importance. The approach is contrary to the NPPF which requires that policies should

allow a rapid response to changes in economic circumstance (paragraph 21). In this context, the 2 year marketing period is excessively long, and will inevitably delay the delivery of alternative uses or development which would contribute to local economy and/or meet the needs of the Borough at that time. Therefore, the marketing period should be reduced from 2 years to 12 months.

We therefore request that the following amendments are made to Policy DME1 (D):

**Separate the policy criteria for SILs and LSIS from LSEL and amend the criteria for LSEL as follows:**

*“Proposals for other uses **defined as economic development and residential use** will be acceptable in ~~SILs~~, LSELS ~~and on LSIS~~ only where:*

:

- ~~i) There is no realistic prospect of the land being used for industrial or warehousing purposes in the future; and~~
- ii) Sites have been vacant and consistently marketed for a period of **12 months** ~~2 years~~, **or it can be demonstrated that there is no realistic prospect of the land being used for B1 purposes in the future, taking into account viability issues**; and
- iii) The proposed alternative use(s) does not conflict with the policies and objectives of this Plan.”

Policy DME1 New Criterion (F) Non-B Class Uses Permissible within LSELS

It is noted that the support for amenity type uses within the designated employment sites is incorporated in Policy DME under a new criterion (F) in response to our previous representations. We support this revision, as it is vital that there are a variety of ‘amenities’ and ‘facilities’ for the workforce in order to maintain and enhance the Business Park.

That said, however, ‘walk to’ services should be expanded to also include small scale retail outlets, and gym, as requested in the previous representations. In addition, “small scale” ancillary development is subject to interpretation, and it would depend on the scale of the designated employment sites to be served by proposed facilities. We therefore consider it inappropriate and unnecessary to define the ancillary development as “small scale”. Accordingly, suggested amendments to criterion F is as follows:

*“Proposals for ~~small-scale~~ ancillary development which supports occupiers and the workforce on designated employment sites, such as ‘walk to’ services including **but not limited to** workplace crèches, **gym**, cafes and small scale food/**retail** outlets, will*

*be supported.”*

Please refer to the accompanying letter for full representations

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

To ensure that matters raised are fully explored and discussed at examination hearings.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

N/A

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |   |
|-------------------------------------|---|
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| <input checked="" type="checkbox"/> | The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2. |
| <input checked="" type="checkbox"/> | The adoption of the Local Plan Part 2.  |

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## Monitoring Questions

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### 1) What is your gender?

Male  Female

### 2) To which age group do you belong?

under 15  25 – 44  65 – 85  
 15 - 24  45 - 64  85+

### 3) Do you consider yourself to be a disabled person?

No  Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |



# HILLINGDON

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| 1. Name and Address        |                               |              | 2. Agent's Name and Address (if applicable) |             |
|----------------------------|-------------------------------|--------------|---|-------------|
| Title                      |                               |              | Title                                       | Miss        |
| First name                 |                               |              | First name                                  | Wakako      |
| Last Name                  |                               |              | Last name                                   | Hirose      |
| Organisation (if relevant) | LaSalle Investment Management |              | Company                                     | Rapleys LLP |
| Unit                       |                               | House number | Unit  |             |
| House name                 |                               |              | House name                                  |             |
| Address 1                  | C/O Agent                     |              | Address 1                                   |             |
| Address 2                  |                               |              | Address 2                                   |             |
| Town                       |                               |              | Town  |             |
| County                     |                               |              | County                                      |             |
| Postcode                   |                               |              | Postcode                                    |             |
| Telephone                  |                               |              | Telephone                                   |             |
| Email                      |                               |              | Email                                       |             |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |      |
|-------------------------------|------|
| Policy number;                | DME3 |
| Paragraph number;             |      |
| Table or figure number; or    |      |
| Map number (Atlas of Changes) |      |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

**Policy DME3: Office Development**

- Policy DME3 (E): Proposals for office use in LSEs

We **support** the policy as it makes it clear that proposals for office uses in LSEs will be permitted, and justification with evidence is only necessary for the loss of light industrial location.

- Policy DME3 (F): Offices outside Town Centres and Office Growth Locations

This criterion contradicts Policy DME3 criterion E, as it states that proposals for offices outside town centre and identified office growth locations will generally not be permitted. We therefore object to criterion F and should be amended as follows:

“Proposals for offices outside town centres, and identified office growth locations and LSEs will generally not be permitted.”

Please refer to the accompanying letter for full representations.

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

To ensure that matters raised are fully explored and discussed at examination hearings.

Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.

N/A

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|                                     |   |
|-------------------------------------|---|
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Male  Female

### 2) To which age group do you belong?

under 15  25 – 44  65 – 85  
 15 - 24  45 - 64  85+

### 3) Do you consider yourself to be a disabled person?

No  Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
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| First name                 |                               |              | First name                                  | Wakako      |
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| County                     |                               |              | County                                      |             |
| Postcode                   |                               |              | Postcode                                    |             |
| Telephone                  |                               |              | Telephone                                   |             |
| Email                      |                               |              | Email                                       |             |

## PART B - Your responses

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**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |      |
|-------------------------------|------|
| Policy number;                | DME5 |
| Paragraph number;             | 2.26 |
| Table or figure number; or    |      |
| Map number (Atlas of Changes) |      |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/>            | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |



**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

**Policy DME5: Hotels and Visitor Accommodation**

We **support** Policy DME5 as it is consistent with Policy E2 of the Local Plan Part 1, and it supports a range of visitor accommodation, conference and related uses in accessible sustainable locations, with clarification provided in the supporting paragraph 2.26 that hotel development of an appropriate scale will be acceptable in town centres.

Please refer to the accompanying letter for full representations.

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

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**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

|     |
|-----|
| N/A |
|-----|

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|-------------------------------------|--|
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under 15  25 – 44  65 – 85  
 15 - 24  45 - 64  85+

### 3) Do you consider yourself to be a disabled person?

No  Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

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|--|---|
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| First name                 |                               |
| Last Name                  |                               |
| Organisation (if relevant) | LaSalle Investment Management |
| Unit                       | House number                  |
| House name                 |                               |
| Address 1                  | C/O Agent                     |
| Address 2                  |                               |
| Town                       |                               |
| County                     |                               |
| Postcode                   |                               |
| Telephone                  |                               |
| Email                      |                               |

| 2. Agent's Name and Address (if applicable) |             |
|---|-------------|
| Title                                       | Miss        |
| First name                                  | Wakako      |
| Last name                                   | Hirose      |
| Company                                     | Rapleys LLP |
| Unit  |             |
| House name                                  |             |
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|-------------------------------------|-----------------------------------|--|---|
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| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |       |
|-------------------------------|-------|
| Policy number;                | DMTC1 |
| Paragraph number;             |       |
| Table or figure number; or    |       |
| Map number (Atlas of Changes) |       |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

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**Policy DMTC1: Town Centre Developments**

The Eagle House site is located in the South Ruislip Local Centre. As such Policy DMTC1 is relevant to the site's future redevelopment. Criterion A supports development proposals for "main town centre uses' in town centres. We consider that residential development should also be included as it is not defined as a main town centre use in the NPPF. Whilst we are seeking flexibility in the site specific allocation as noted above to include uses other than residential use for the Eagle House site, the principle of residential use is accepted in the local centres through the Council's intention to designate the Eagle House for residential use. As such, it is appropriate for Policy DMTC1 to recognise that residential development will also be supported where appropriate.

Criterion i) of Policy DMTC1 A requires applicants to demonstrate adequate width and depth of floorspace is provided for the town centre uses. We consider that this is an unnecessary and onerous requirement, as the configuration and floorspace of any proposed development will be informed by a number of factors including commercial requirements and site's circumstances. We therefore **object** to criterion i) and request that it is removed.

Please refer to the accompanying letter for full representations.

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

---

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

To ensure that matters raised are fully explored and discussed at examination hearings.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

N/A

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|                                     |  |
|-------------------------------------|--|
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## Monitoring Questions

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### 1) What is your gender?

Male  Female

### 2) To which age group do you belong?

under 15  25 – 44  65 – 85  
 15 - 24  45 - 64  85+

### 3) Do you consider yourself to be a disabled person?

No  Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |



# HILLINGDON

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### PART A - Your details

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|----------------------------|-------------------------------|--------------|--|---|-------------|
| Title                      |                               |              |  | Title                                       | Miss        |
| First name                 |                               |              |  | First name                                  | Wakako      |
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| Town                       |                               |              |  | Town  |             |
| County                     |                               |              |  | County                                      |             |
| Postcode                   |                               |              |  | Postcode                                    |             |
| Telephone                  |                               |              |  | Telephone                                   |             |
| Email                      |                               |              |  | Email                                       |             |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |      |
|-------------------------------|------|
| Policy number;                | DME5 |
| Paragraph number;             | 5.32 |
| Table or figure number; or    |      |
| Map number (Atlas of Changes) |      |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

**Policy DMHB 10: High Buildings and Structures**

We **object** to the policy on the basis that the definition of “high buildings and structures” as provided in Paragraph 5.32 is those that are substantially taller than their surroundings, causing a significant change to the skyline. This is subject to interpretation and any buildings or structures which are higher than the surroundings, depending on the site context, could fall under Policy DMHB10. In these terms, we **object** to criterion i), which states that a high building or structure should be located in Uxbridge or Hayes town centres or an area identified by the Borough as appropriate for such buildings. This is very restrictive and ambiguous as it is not clear how the Council will identify appropriate areas for high buildings.

Please refer to the accompanying letter for full representations.

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

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**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

|     |
|-----|
| N/A |
|-----|

**PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
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Male  Female

### 2) To which age group do you belong?

under 15  25 – 44  65 – 85  
 15 - 24  45 - 64  85+

### 3) Do you consider yourself to be a disabled person?

No  Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
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# HILLINGDON

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|----------------------------|-------------------------------|---|-------------|
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| First name                 |                               | First name                                  | Wakako      |
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| Unit                       | House number                  | Unit  |             |
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| Town                       |                               | Town  |             |
| County                     |                               | County                                      |             |
| Postcode                   |                               | Postcode                                    |             |
| Telephone                  |                               | Telephone                                   |             |
| Email                      |                               | Email                                       |             |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input checked="" type="checkbox"/> | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |           |
|-------------------------------|-----------|
| Policy number;                | SA21      |
| Paragraph number;             |           |
| Table or figure number; or    |           |
| Map number (Atlas of Changes) | Map 19.21 |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |



**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

### **Policy SA21: Eagle House, The Runway**

Eagle House site is allocated under new allocation **Policy SA21** for residential development up to a maximum of 24 units, in light of the recently approved conversion of the office building to residential development through the prior approval process. However, the approved conversion does not utilise the previously developed urban site in a highly sustainable location to its maximum potential. As such, our client is in the process of considering the redevelopment potential for the site, which would be appropriate in the context of the site's accessible town centre location, adjoining the high quality office site.

In light of these aspirations and the potential to deliver a redevelopment scheme that would be more appropriate for the site and bring about wider benefits than the approved residential conversion, the allocation should allow for flexibility rather than restricting it to residential development only. Furthermore, as the site's capacity in terms of the number of residential units was only identified through the confines of the existing building, it is not appropriate to restrict the number of residential units to 24.

In light of the town centre designation of the site, a wide range of other uses appropriate in the centre, including hotel and Class A uses, should be identified as appropriate alternative uses for the site, in addition to residential use. Such flexibility is necessary for the previously developed site to maximise its development potential.

As such, we **object** to Policy SA21, and the allocation should be amended to provide a positive framework to secure the delivery of appropriate and viable development for the site. The allocation should be flexible, and as such, we request that the site is allocated as redevelopment opportunity, with the potential to deliver one or more of the following uses appropriate in the town centre location, including retail, restaurant, café, hotel and office, and residential use. We consider that the amendment to the allocation is necessary for the soundness of the Local Plan, as the NPPF requires that Local Plans should allocate sites to promote development and flexible use of land, bringing forward new land where necessary (Paragraph 157).

Please refer to the accompanying letter for full representations.

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
(Please tick appropriate box)

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

To ensure that matters raised are fully explored and discussed at examination hearings.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

N/A

## **PART C - Progress of the Local Plan Part 2**

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|                                     |   |
|-------------------------------------|---|
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### 2) To which age group do you belong?

under 15  25 – 44  65 – 85  
 15 - 24  45 - 64  85+

### 3) Do you consider yourself to be a disabled person?

No  Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
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| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |      |
|-------------------------------|------|
| Policy number;                | SEA2 |
| Paragraph number;             | 4.44 |
| Table or figure number; or    |      |
| Map number (Atlas of Changes) |      |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

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**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

**Policy SEA 2: Hotel and Office Growth Locations**

We do not object to the principle of identifying strategic hotel locations in the Borough. However, We **object** to paragraph 4.44, which states that hotel growth will be directed to the strategic hotel locations *as a first preference*, as there is ambiguity as to how hotel development in accessible locations, including town centres, which are supported in Hillingdon Local Plan Part 1 Policy E2, will be assessed outside the identified strategic hotel growth locations. We consider it necessary that the paragraph is amended to make it clear that the identified strategic hotel locations are *safeguarded* for hotel growth, rather than expressed as where the Council will direct hotel growth to as a first preference.

The requested amendment is necessary to ensure compliance with the NPPF paragraph 154 which states that “only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the Plan.”

Please refer to the accompanying letter for full representations

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

To ensure that matters raised are fully explored and discussed at examination

hearings.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

N/A

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|                                     |  |
|-------------------------------------|--|
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Male                       Female

### 2) To which age group do you belong?

under 15                       25 – 44                       65 – 85  
 15 - 24                       45 - 64                       85+

### 3) Do you consider yourself to be a disabled person?

No                       Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
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| Telephone                  |                               |              |  | Telephone                                   |             |
| Email                      |                               |              |  | Email                                       |             |

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|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |      |
|-------------------------------|------|
| Policy number;                | SEA2 |
| Paragraph number;             | 4.44 |
| Table or figure number; or    |      |
| Map number (Atlas of Changes) |      |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

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*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

### **Policy SEA 2: Hotel and Office Growth Locations**

The new **Policy SEA2** and associated Changes to the Policies Map identifies strategic office locations where office growth will be promoted. Paragraph 4.44 states that *“the purpose is to spatially define the extent of the area that hotel and office development will be directed to as a first preference.”* Whilst we do not object to the Council’s approach to identifying strategic office locations in addition to the designation of the LSEs, we **object** to the supporting paragraph 4.44 which states that office growth will be directed to the strategic office locations *as a first preference*, as it somewhat contradicts the policy objectives for other office sites within the LSEL (Policy DME1 (C), such as Odyssey Business Park. Paragraph 4.44 makes it ambiguous how proposals for additional development or renewal of existing Office sites in the LSEs will be assessed, notwithstanding the support for office development expressed in Policy DME1 (C). This is contrary to the NPPF paragraph 154, which states that *“only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the Plan.”*

We request that Paragraph 4.44 is amended to make it clear that the strategic office locations are *safeguarded* for office growth, rather than expressed as where the Council will direct office growth to as a first preference. This ensures that the Policy SEA2 is in line with the Development Management Policy DME3 which seeks to protect office floorspace in the strategic locations for office growth (please refer to the representations on Policy DME3 in this submission).

In addition, as a general point, we consider that the reference to the strategic office locations should be consistent across all Local Plan Part 2 documents. For example, Development Management Policy DME3 refers to “preferred location for office growth” and “identified office growth locations.” We therefore suggest that the Local Plan Part 2 refers to “the strategic office locations” throughout, for clarity and consistency.

Please refer to the accompanying letter for full representations.

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

To ensure that matters raised are fully explored and discussed at examination hearings.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

N/A

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate *(tick)* which stage(s) you would like to be informed of:**

|                                     |   |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | When the Local Plan Part 2 Plan has been submitted for independent examination.   |
| <input checked="" type="checkbox"/> | The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2. |
| <input checked="" type="checkbox"/> | The adoption of the Local Plan Part 2.  |

## Returning your form

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**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

### 1) What is your gender?

Male  Female

### 2) To which age group do you belong?

under 15  25 – 44  65 – 85  
 15 - 24  45 - 64  85+

### 3) Do you consider yourself to be a disabled person?

No  Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |



# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

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### PART A - Your details

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| 1. Name and Address        |                               |              |  | 2. Agent's Name and Address (if applicable) |             |
|----------------------------|-------------------------------|--------------|--|---|-------------|
| Title                      |                               |              |  | Title                                       | Miss        |
| First name                 |                               |              |  | First name                                  | Wakako      |
| Last Name                  |                               |              |  | Last name                                   | Hirose      |
| Organisation (if relevant) | LaSalle Investment Management |              |  | Company                                     | Rapleys LLP |
| Unit                       |                               | House number |  | Unit  |             |
| House name                 |                               |              |  | House name                                  |             |
| Address 1                  | C/O Agent                     |              |  | Address 1                                   |             |
| Address 2                  |                               |              |  | Address 2                                   |             |
| Town                       |                               |              |  | Town  |             |
| County                     |                               |              |  | County                                      |             |
| Postcode                   |                               |              |  | Postcode                                    |             |
| Telephone                  |                               |              |  | Telephone                                   |             |
| Email                      |                               |              |  | Email                                       |             |



## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |       |
|-------------------------------|-------|
| Policy number;                |       |
| Paragraph number;             | 4.34  |
| Table or figure number; or    |       |
| Map number (Atlas of Changes) | Map J |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

### **Proposed Locally Significant Employment Location**

LaSalle is committed to its significant interest in Odyssey Business Park, and continues to invest in the ongoing maintenance and management of the site in order to ensure that the Business Park will retain its attractiveness and high quality office environment. In this context, we consider that the recognition of the importance of Odyssey Business Park as a vibrant office park, as a Locally Significant Employment Locations ('LSEL') is appropriate.

However, the revised **Site Designation for Odyssey Business Park (MAP J)** Paragraph 4.34 states that the Business Park is suitable for *a range of employment activities*. In addition, the revision has deleted the recognition of the Business Park's contribution to Hillingdon's economy as Class B1 offices providing office accommodation for a wide range of businesses. We consider that the revised text is factually incorrect and inappropriate to designate the site as a LSEL as a site with potential to provide a wide range of employment activities, as the site's established use is Class B1 office.

As such, we **object** to the revised Site Specific Designation for Odyssey Business Park at Paragraph 4.34, as there is no evidence to suggest that the site would provide a range of employment activities other than the existing Class B1 offices. Therefore, the revised designation is unsound and should be amended to reflect the importance of the site as Class B1 office.

In addition, we maintain our objection to the proposed designation of Odyssey Business Park as a LSEL unless further changes are made to the Development Management Policies for proposals within LSEL (as set out in our representations on the Development Management Policies).

Please refer to the accompanying letter for full representations.

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

|  |
|--|
| <p>To ensure that matters raised are fully explored and discussed at examination hearings.</p> |
|--|

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

|            |
|------------|
| <p>N/A</p> |
|------------|

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate *(tick)* which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

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### 1) What is your gender?

Male                       Female

### 2) To which age group do you belong?

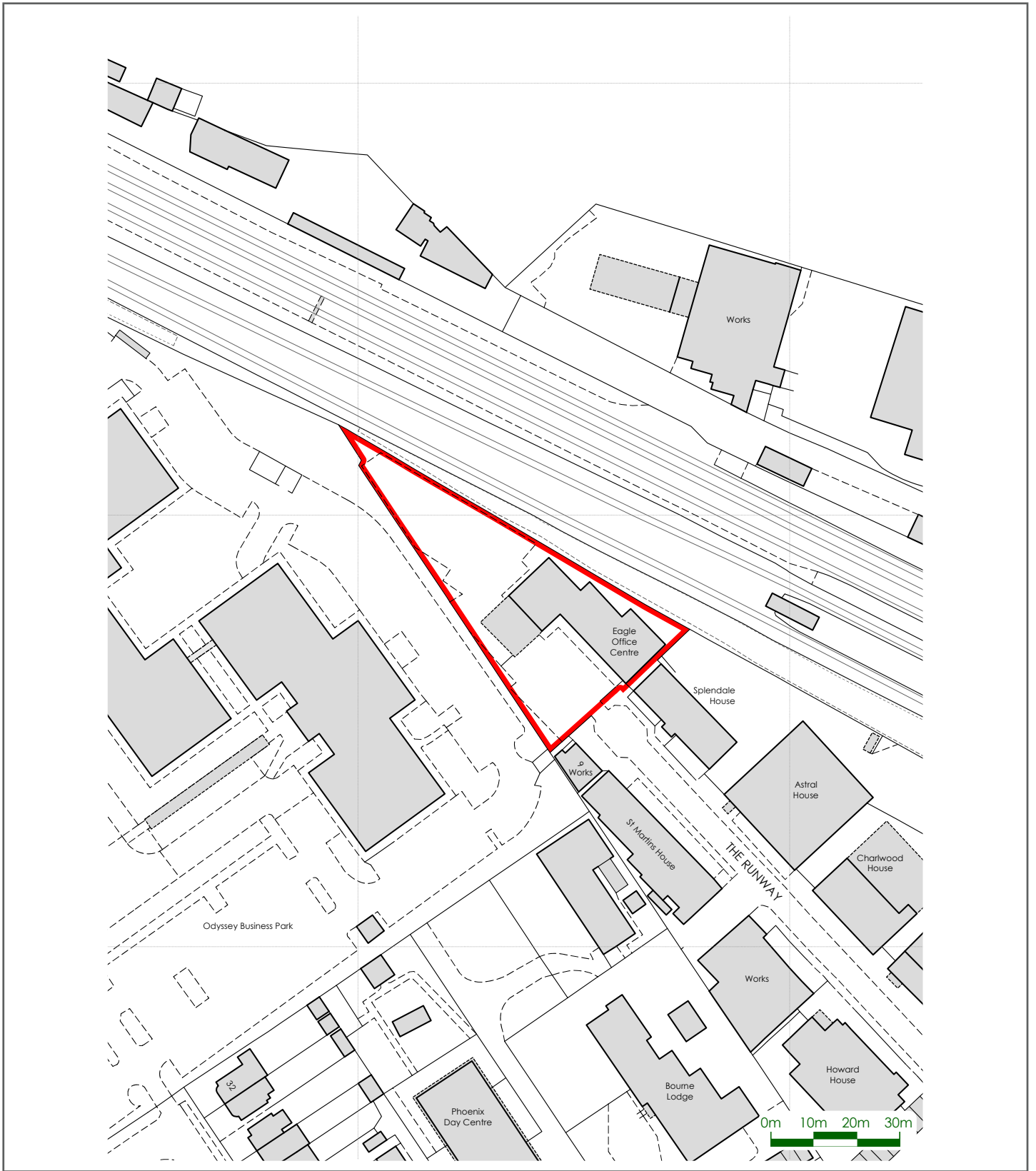
under 15                                       25 – 44                                       65 – 85  
 15 - 24                                       45 - 64                                       85+

### 3) Do you consider yourself to be a disabled person?

No                                       Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |



**SITE LOCATION PLAN**

Eagle House,  
The Runway,  
SOUTH RUISLIP. HA4 6SE.



Scale @ A4 : 1:1250

Plan No. : 840/64/1\_SLP01

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# HILLINGDON

LONDON

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### PART A - Your details

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| 1. Name and Address        |                             |
|----------------------------|-----------------------------|
| Title                      | Mrs                         |
| First name                 | Lesley                      |
| Last Name                  | Crowcroft                   |
| Organisation (if relevant) | Eastcote Conservation Panel |
| Unit                       |                             |
| House name                 |                             |
| Address 1                  |                             |
| Address 2                  |                             |
| Town                       |                             |
| County                     |                             |
| Postcode                   |                             |
| Telephone                  |                             |
| Email                      |                             |

| 2. Agent's Name and Address (if applicable) |              |  |
|---|--------------|--|
| Title                                       |              |  |
| First name                                  |              |  |
| Last name                                   |              |  |
| Company                                     |              |  |
| Unit  | House number |  |
| House name                                  |              |  |
| Address 1                                   |              |  |
| Address 2                                   |              |  |
| Town  |              |  |
| County                                      |              |  |
| Postcode                                    |              |  |
| Telephone                                   |              |  |
| Email                                       |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                    |
|-------------------------------|--------------------|
| Policy number;                | DME4, DHM6, DME 15 |
| Paragraph number;             |                    |
| Table or figure number; or    |                    |
| Map number (Atlas of Changes) |                    |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                          |   |
|-------------------------------------|-------------------------------------|--------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |



**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

***We are disappointed that the proposal put forward by the Eastcote Conservation Panel For the upgrading of Warrender Park/Highgrove Woods and the Bessingby/Cavendish/Pine Gardens Parks to MOL status was not accepted. That the document relied upon by the LPA 'Metropolitan Open lands & Green Chain Assessment' was not available to members of the general public at the time of the first consultation.  
We have been assured that this document will be available on line by the time that the Oral Examination takes place.***

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

We would like to participate in the oral examination. **Please note that I am unable to mark the appropriate boxes the system is not working**

As the council has not in our opinion given a satisfactory answer to the refusal for including the above mentioned parks into Metropolitan Open Land.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                                     |  |
|-------------------------------------|--|
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| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
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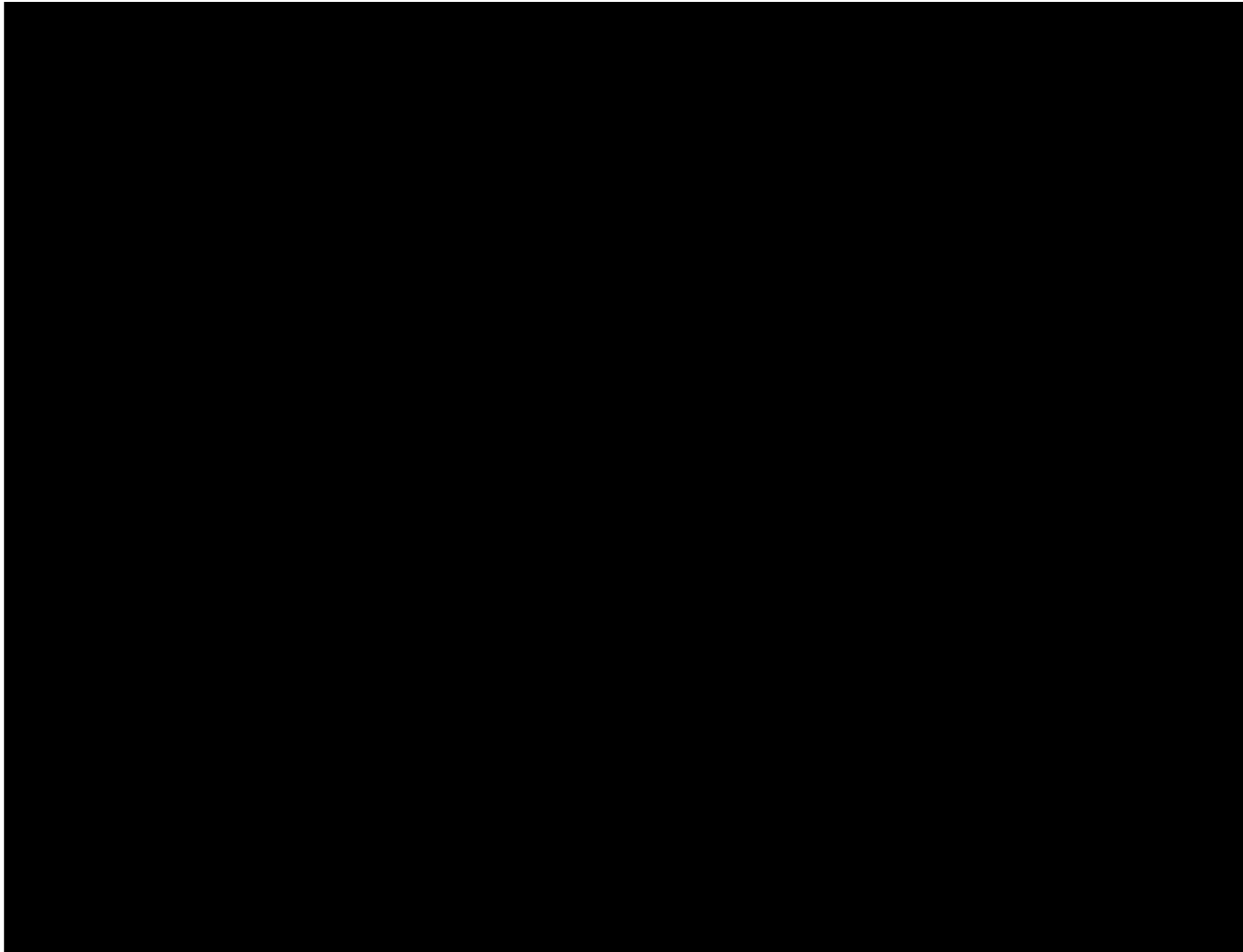
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Local Plan &lt;localplan@hillingdon.gov.uk&gt;

---

## Hillingdon Local Plan Part II

1 message

**Vicky Aston**

7 December 2015 at 21:45

To: "localplan@hillingdon.gov.uk" &lt;localplan@hillingdon.gov.uk&gt;

Dear Planning Policy Team,

Thank you for consulting Sport England on the above. Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national, regional and local policy as well as supporting local authorities in developing the evidence base for sport. The Government's National Planning Policy Framework (NPPF) is clear about the role that sport plays in delivering sustainable communities through promoting health and well-being. As such, Sport England wishes to see local planning policies that seek to protect, enhance and provide for sports facilities based on robust and up-to-date assessments of need in accordance with paragraphs 73 and 74 of the NPPF.

Sound policy can only be developed in the context of objectively assessed needs, in turn used to inform the development of a strategy for sport and recreation. Policies which protect, enhance and provide for sports facilities should reflect this work, and be the basis for consistent application through development management. Sport England is not prescriptive on the precise form and wording of policies, but advises that a stronger plan will result from attention to taking a clearly justified and positive approach to planning for sport. In this way, planning authorities will be able to demonstrate that their plan has been positively prepared (based on objectively assessed needs in accordance with paragraph 73 of the NPPF), is consistent with national policy (reflecting the NPPF), is justified (having considered alternatives) and effective (being deliverable). Without such attention there is a risk that a local plan or other policy document could be considered unsound.

For more information on how to forward planning for sport please see: Sport England's Planning for Sport Forward Planning Guidance - <http://www.sportengland.org/media/351266/planning-for-sport-forward-planning-guide-july-2014-.pdf>

Sport England is aware that the Council is intending to bring forward a Playing Pitch Strategy (PPS) and we look forward to discussing this important piece of work with you before the Local Plan is submitted to the Planning Inspectorate. A PPS is required to meet the requirements of paragraph 73 of the NPPF.

I note that the Council is only consulting on the proposed changes. Sport England has already commented on the Local Plan (attached) but we are concerned that the changes made are not sufficient to address our concerns.

### Policy DMCI1

Sport England welcomes the removal of 'sport' from Policy DMCI 1 (although the reference to 'sport' should also be removed from the contents page).

However Sport England considers that the remaining policies in the Plan are not sufficient to meet the requirements set out for Local Authorities in paragraphs 73 and 74 of the National Planning Policy Framework (NPPF). The Council's policies should seek to protect existing indoor and outdoor sports facilities from development.

## Policy DMCI6

Sport England welcomes **Policy DMCI 6** which explains that the council will seek to protect and enhance indoor sport and leisure facilities. However, there is no other specific policy or reference to outdoor sports facilities including playing fields. The Council should seek to address this issue immediately. There are references to 'Formal Recreation Facilities' in Paragraph 7.32 but these are not then referenced in Policy DMCI6.

Sport England therefore recommends that **Policy DMCI 6** is amended to include outdoor sports facilities and the policy should be updated to take into account the findings of the Playing Pitch Strategy when it is completed.

Without amendments to **Policy DMCI 6** to include, existing outdoor sport facilities, it would not be clear which policy planning applications for the redevelopment of outdoor sports facilities.

For example, it would not be appropriate for them to be assessed against Policy DMCI 3 as this refers only to public open space as the criteria in section 'A' is not compatible with the bullet points in paragraph 74 of the NPPF. In addition, many outdoor sports facilities are in private or educational ownership and may therefore not be 'public' open space.

Sport England therefore **objects** to Section 7 of the Plan. The plan is also not **positively prepared**. In this respect, Local Plan Part 2 is not sound as it fails to be underpinned by an up to date and robust assessment of need for open space (utilised for outdoor sports activity) in accordance with NPPF Par 73 and fails to incorporate appropriate policies that protect, enhance or provide local sports facilities to reflect local needs. Sport England therefore considers that the Local Plan is not sound as it fails to be underpinned by an up to date and robust assessment of need for open space (utilised for outdoor sports activity) in accordance with NPPF Par 73 and fails to incorporate policies that protect, enhance or provide local sports facilities to reflect local needs. By not meeting the requirements set out in Paragraphs 73 and 74 the Local Plan is also **not consistent with national policy**.

## Active Design

Additionally, please note that Sport England along with Public Health England have recently launched the new Active Design Guidance, October 2015. It may therefore be useful to provide a cross-reference (and perhaps a hyperlink) to [www.sportengland.org/activedesign](http://www.sportengland.org/activedesign). Sport England believes that being active should be an intrinsic part of everyone's life pattern. As such, Sport England would expect to see the principles on Active Design embedded in any subsequent Local Plan policy.



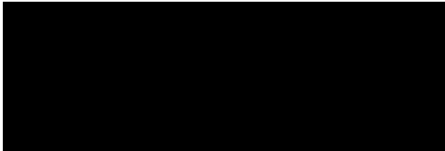
Lastly, as you may be aware, Sport England will oppose development resulting in the loss of playing field land or formal built sports facilities unless its loss is justified by a robust and up-to-date assessments of need. Any loss of sports provision should be incorporated into formal policy such that it may be considered through the policy making process and scrutinised at Examination in Public. As such, should any policy in the site allocation plan seek to allocate any existing playing field land or formal built sports facilities for redevelopment, we would strongly urge the Council to discuss this directly with Sport England.

If you would like to discuss any of the above comments further or require any additional information or advice please contact me via the details below.

Regards

**Vicky Aston**

Planning Manager



**Please note: Sport England planning services will be operating a Christmas shut down from Wednesday 23rd December 2015 at 5.00pm until 9.00am Monday 4<sup>th</sup> January 2016.**

**Therefore all planning applications and consultations sent during this period cannot be accepted as formally received until Monday 4<sup>th</sup> January 2016.**

**Merry Christmas and a Happy New Year!**



National Sports Centre, near Marlow, Buckinghamshire, SL7 1RR

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# HILLINGDON

LONDON

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| 1. Name and Address        |                                |
|----------------------------|--------------------------------|
| Title                      | Mr                             |
| First name                 | John                           |
| Last Name                  | Williams                       |
| Organisation (if relevant) | Ruislip Residents' Association |
| Unit                       |                                |
| House name                 |                                |
| Address 1                  |                                |
| Address 2                  |                                |
| Town                       |                                |
| County                     |                                |
| Postcode                   |                                |
| Telephone                  |                                |
| Email                      |                                |

| 2. Agent's Name and Address (if applicable) |              |  |
|---|--------------|--|
| Title                                       |              |  |
| First name                                  |              |  |
| Last name                                   |              |  |
| Company                                     |              |  |
| Unit  | House number |  |
| House name                                  |              |  |
| Address 1                                   |              |  |
| Address 2                                   |              |  |
| Town  |              |  |
| County                                      |              |  |
| Postcode                                    |              |  |
| Telephone                                   |              |  |
| Email                                       |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input checked="" type="checkbox"/> | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |  |
|-------------------------------|--|
| Policy number;                | DME15 Development in Green Chains) and Policy EM2 (Review of Designations) |
| Paragraph number;             |  |
| Table or figure number; or    |  |
| Map number (Atlas of Changes) |  |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                                     |   |
|--------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/>            | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

Several of the Association's comments on the original Part 2 consultation in November 2014 were rejected by the Council and we are not convinced that the reasons given were entirely appropriate Therefore we wish to reiterate the original comments (in blue type) as follows :

**Development Management Policies**

**Policy DME15 - Green Chains – Page 80**

As mentioned in email correspondence last year with Brian Whitely (20/05/13), we wish to see Policy DME15 amended to include important parts of the current UDP Policy EM2 i.e.

Clause (i) “the need to conserve and enhance the visual amenity and physical break in the built up area.”

Clause (iv) add to “ suitable suitable recreational facilities where they are compatible with the conservation value of the area, and retain the openness of the Green Chain.”

We feel that the reasons given by the Council in their response to our comments i.e. that to adopt such proposals would be against the NPPF's requirement for a “presumption in favour of development” are not relevant. We recognise that sites may have potential for some form of development but where this is proposed it should be sensitive to the areas affected. Some types of recent development in Green Belt land have clearly not achieved this. The policy as drafted clearly weakens the existing protection, hence our request that the above mentioned clauses should be retained.

**Site Allocation and Designation Document**

**Green Belt, Metropolitan Open Land (MoL) and Green Chains**

Policies DME14 & 15 – Green Belt, Metropolitan Open Land (MoL) and Green Chain – List of Proposals

The proposal to upgrade the status of many of the Green Chain sites to MoL status is welcomed. However to ensure maximum protection against unsuitable development of these important sites in the future they should be given dual designation of Green Chain and MoL status. We understand there are precedents for this elsewhere in London, e.g. LB Southwark, and see no reason why the same should not apply in Hillingdon. Sites to which dual designation should be applied include the following :

Item 9 – Haydon Hall Park, Eastcote House Gardens and Cheney Street Parkway.

Item 10 - Kings College Playing Fields

This site has recently been the subject of inappropriate development proposals and it is therefore essential that the protection offered by the existing Policy EM2 should be retained as well as granting it MoL status.

Item 11 – Manor Farm and Winston Churchill Hall

The site should also be extended to include the remainder of the land enclosing the adjacent Great Barn, Cow Byre and Manor Farmhouse buildings. These are all of historic interest and are an integral part of the area.

Item 13 – Field End Recreation Ground, Ruislip Manor

(We believe this Ground is actually within Cavendish Ward in Eastcote and not Ruislip Manor). It should be noted that this site is also adjacent to Roxbourne Park and Yeading Brook in the LB Harrow and forms an extensive area of valuable open space.

Item 15 – New Pond Playing Fields, Sidmouth Drive Recreation Grounds And West End Road Open Space

Items 16/17 – New Green Chain

We welcome the upgrade of these sites to Green Chain designation. However joint designation of MoL status should be applied for the reasons previously given (see above reference to Page 103).

With regard to item 16 (Grosvenor Vale Sports Ground) it has been rumoured for some time that this site could be the subject of redevelopment proposals. It is therefore essential that is provided with the maximum protection to ensure it continues to provide the openness and recreational facilities currently enjoyed by the community.

Items 16/17 – New Green Chains

Four other sites should be added to the list i.e.

- Bessingby Playing Fields, Bessingby Road, Ruislip Manor and Cavendish Sports Ground, Field End Road, Eastcote.

An important area of recreational land that should be given equal status to that of the other local open spaces listed above.

- Park Way Green, Park Way, Ruislip Manor.

This site was part of the land transferred by Kings College Cambridge to the RNUDC in the 1930s and should have similar protection as the remainder of that land (i.e. Kings College Fields, Manor Farm Complex etc).

The site also abuts a railway corridor which is adjacent to the small open space at Columbia Avenue, Eastcote. Together they form A Green Chain similar to that proposed in item 16 (Ruislip Green Chain Link).

- BWI School, Southcote Rise, Ruislip.  
The playing field is within Ruislip Conservation Area, abuts the River Pinn Green Chain and Nature Conservation Area. It is therefore a natural extension to the Green Chain.
- Warrender Park, Myrtle Ave, Eastcote  
Adjacent to the Highgrove Nature Conservation Site and Bishop Ramsey School playing fields it creates both a natural wildlife corridor and break in the urban environment.

The above proposals were all rejected by the Council.

In respect of dual designation the Council believe this would confuse matters. We understand such designations have been applied in other London Boroughs and see no reason why this should not apply in Hillingdon.

The exclusion of the Park Way Green, the TfL railway line and Columbia Avenue open space from Green Chain status is unreasonable as that designation is proposed on the similar corridor between Shenley Park, Ruislip Manor and Ruislip Rugby Club open space.

The exclusion of the other sites at Bessingby Playing Fields, Warrender Park and BWI School playing fields from Green Chain status are also inconsistent with similar designations elsewhere e.g. Grosvenor Vale Sports Ground.

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

To explain fully the reasoning behind our comments on the proposed draft Policies.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary



## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | When the Local Plan Part 2 Plan has been submitted for independent examination.   |
| <input type="checkbox"/> | The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2. |
| <input type="checkbox"/> | The adoption of the Local Plan Part 2.  |

## Returning your form

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- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

**Ruislip Residents' Association covers an area inhabited by persons of both gender all ages and ethnic origin.**

### 1) What is your gender?

Male                       Female

### 2) To which age group do you belong?

under 15                       25 – 44                       65 – 85  
 15 - 24                       45 - 64                       85+

### 3) Do you consider yourself to be a disabled person?

No                       Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |



# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |                         |              |  |
|----------------------------|-------------------------|--------------|--|
| Title                      | MR                      |              |  |
| First name                 | Robert                  |              |  |
| Last Name                  | Cousins                 |              |  |
| Organisation (if relevant) | Friends of Pinn Meadows |              |  |
| Unit                       |                         | House number |  |
| House name                 |                         |              |  |
| Address 1                  |                         |              |  |
| Address 2                  |                         |              |  |
| Town                       |                         |              |  |
| County                     |                         |              |  |
| Postcode                   |                         |              |  |
| Telephone                  |                         |              |  |
| Email                      |                         |              |  |

| 2. Agent's Name and Address (if applicable) |  |              |  |
|---|--|--------------|--|
| Title                                       |  |              |  |
| First name                                  |  |              |  |
| Last name                                   |  |              |  |
| Company                                     |  |              |  |
| Unit  |  | House number |  |
| House name                                  |  |              |  |
| Address 1                                   |  |              |  |
| Address 2                                   |  |              |  |
| Town  |  |              |  |
| County                                      |  |              |  |
| Postcode                                    |  |              |  |
| Telephone                                   |  |              |  |
| Email                                       |  |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |   |
|-------------------------------|---|
| Policy number;                | Site Allocations Document P103 and Policy DME15 |
| Paragraph number;             |   |
| Table or figure number; or    |   |
| Map number (Atlas of Changes) |   |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                          |   |
|-------------------------------------|-------------------------------------|--------------------------|---|
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| <input checked="" type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

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*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

**As detailed in our response to the first consultation we object i) Removing Green Chain Designation from new Metropolitan Open Land sites and ii) the weakening of Green Chain policy and are disappointed that these objections have not been upheld for the reasons given in our original response.**

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

As the Council have not agreed to allow Kings College Playing Fields to keep its Green Chain designation alongside the Metropolitan Open Land designation then I would like the opportunity to make an oral representation.  
Also, as the Council has weakened the wording of the existing Green Chain policy (EM2) I would like the opportunity to make an oral representation.

A large, empty rectangular box with a thin black border, intended for providing comments on the technical reports.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

A large, empty rectangular box with a thin black border, intended for providing detailed comments on the technical reports.



Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

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|                                     |  |
|-------------------------------------|--|
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| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

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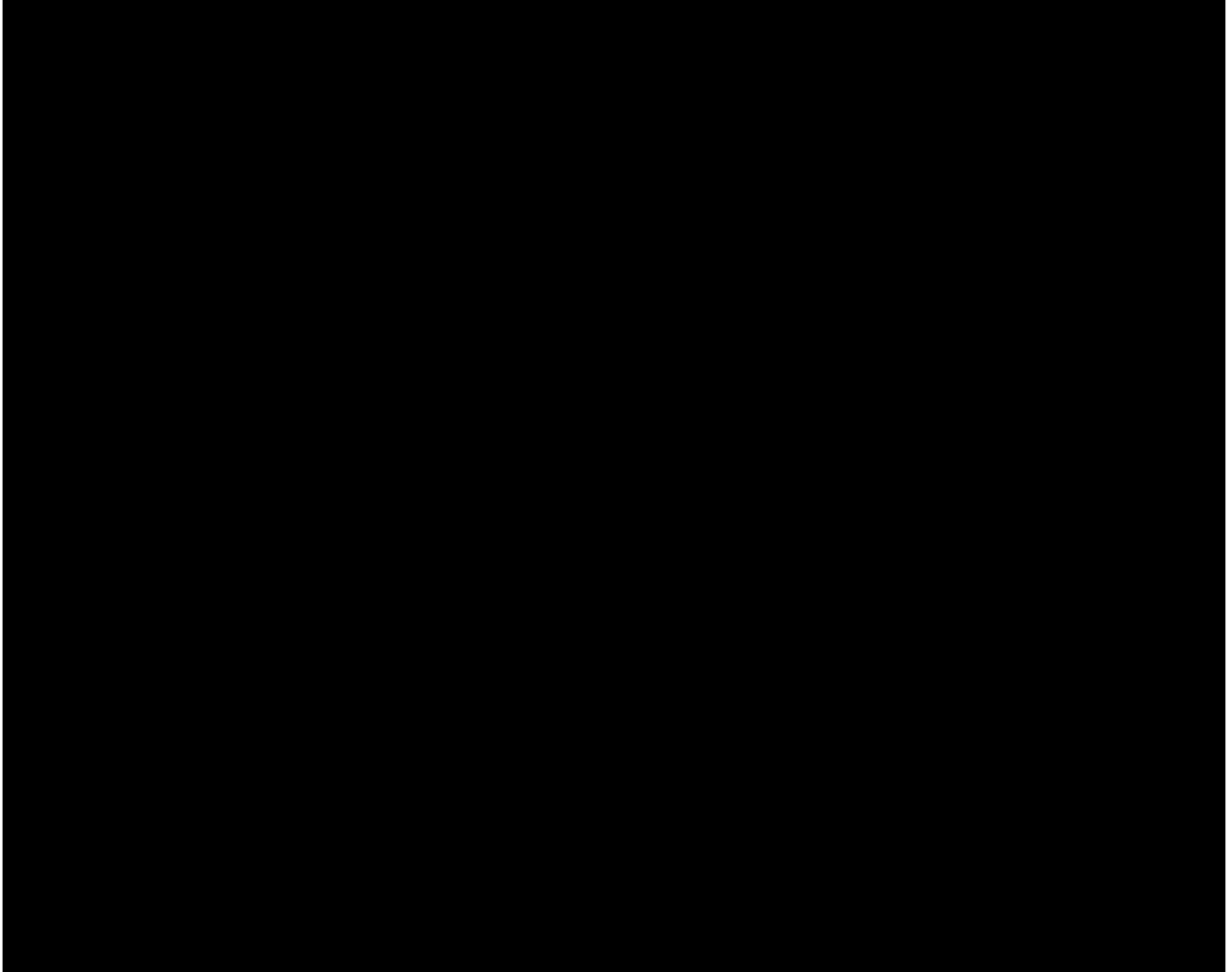
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## **Monitoring Questions**

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Local Plan &lt;localplan@hillington.gov.uk&gt;

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## Friends of Pinn Meadows Response re Hillingdon's Local Plan Part 2 2nd Consultation

1 message

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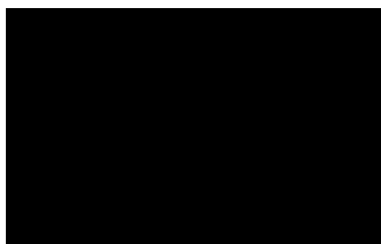
**Rob Cousins** [REDACTED]  
To: localplan@hillington.gov.uk

8 December 2015 at 03:35

Please find attached the Local Plan Part 2 2nd consultation response from the Friends of Pinn Meadows.

In summary, we have reiterated our responses to the first consultation that we believe that the Kings College Playing Fields area, which is proposed to be designated as Metropolitan Open land, should also retain its Green Chain Designation and that the current Green Chain policy (EM2) which was adopted in Local Plan Part 1, should be retained rather than replaced by the weaker policy DMEI5 and have requested to participate in the oral examination of LPP2.

Rob Cousins  
Chairman – Friends of Pinn Meadows



**Friends of Pinn Meadows\_Response\_Form\_Part\_2\_2nd Consultation.pdf**

174K

Date: 08 December 2015  
Our ref: 169727



FAO: Efua Dadze-Arthur,  
London Borough of Hillingdon,  
A357,  
Civic Centre,  
High Street,  
Uxbridge,  
UB8 1UW

**BY EMAIL ONLY**

Dear Efua Dadze-Arthur,

**Planning consultation:** Hillingdon Council Local Plan Part 2.

**Location:** London Borough of Hillingdon.

Thank you for your consultation on the above dated 26 October 2015.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**The Conservation of Habitats and Species Regulations 2010 (As amended)  
Wildlife And Countryside Act 1981 (As amended)**

**Local Plan Part 2**

Having taken a look at the previous comments made by Natural England in relation to the Local Plan Part 2 there would seem to be some alignment in the outcomes within this latest draft. In terms of the comments made regarding open space designation and de-designation the fact that there is a net decrease in Green Belt land in Table 5.1 of the Site Allocations and Designations document isn't made up for by the net increase in Metropolitan Open Land (MOL) as this still results in an overall net decrease across the two.

There is still no mention made of the Ruislip Woods Site of Special Scientific Interest (SSSI) among the others that the borough plays host to. This was mentioned in our previous correspondence back in April 2014 and it appears that the paragraph that mentions the National Nature Reserve at the same site has been deleted with no evident addition elsewhere to compensate. Without this recognition of these nationally designated sites and their protection in policy it would be harder to show at examination that the plan is "Justified" and "Consistent with National Policy" as part of the tests of soundness.

The amendment to DMEI 1 to propose that all new major development should include some form of green roofs and or green walls is positive and should be ensured on as many new developments as possible where there is a roof space or wall that would otherwise be left bare. It is welcomed that there is now mention made of applying the Accessible Natural Greenspace Standards (ANGSt) for new development as highlighted in our correspondence dated November 2014.

Given the previous comments made by Natural England in relation to the Hillingdon Local Plan Part 2 and the findings of the Appropriate Assessment (AA) under the Habitats Regulations the current version doesn't change that agreement that no further assessment is required.



We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Piotr Behnke on 0300 060 1963. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely,

Piotr Behnke  
Sustainable Development and Regulation  
Thames Valley Team



Our ref: 02B450664

8<sup>th</sup> December 2015



[gva.co.uk](http://gva.co.uk)

Planning Policy Team  
3N/02  
Residents Services, Civic Centre  
High Street  
Uxbridge  
UB8 1UW



Sir or Madam

**Site Allocations and Designations - Revised Proposed Submission Version, October 2015 Consultation**

We write on behalf of our client, Transport for London (TfL) regarding the consultation being undertaken by London Borough Hillingdon in preparation of the Local Plan Part 2.

As you are aware, we previously submitted representations on behalf of TfL in response to the Proposed Submission Local Plan Part 2 – Site Allocations and Designations Consultation in November 2014. Our representations were informed by a comprehensive engagement exercise with the local community to ascertain the opportunities, concerns and aspirations for the site alongside its contribution to Northwood town centre, which commenced in July 2014.

Since that submission, TfL has continued to engage with the local community and stakeholders over a 14 month period leading up to submission of a planning application in October 2015. The feedback and support from the local community has shaped the proposed development which has also been the subject of pre-application discussions with the London Borough of Hillingdon and Greater London Authority. This has resulted in the culmination of a hybrid planning application for comprehensive redevelopment of the site comprising full planning permission involving the demolition of existing buildings to provide 93 residential units (C3) and associated car parking, 1,440 sq. m of retail (A1-A5), a new operational station (Sui Generis) with step free access and associated car parking for the station; new bus interchange, and a new piazza. Outline planning consent for up to 34 residential units, car parking (all matters reserved apart from access) and refurbishment works to existing retail units along Station Approach.

This representation relates to the TfL owned land to which the above planning application relates; proposed Policy 'SA 16' (Northwood Station, Green Lane) of the Site Allocations and Designations Revised Proposed Submission Version. Proposed Policy SA 16 confirms the site suitable for residential and retail redevelopment subject to a nine criteria. TfL supports the proposed wording of these criteria, subject to the following suggested minor amendments (deletions shown in strikethrough and additions shown in red).

## POLICY SA 16: Northwood Station, Green Lane

- Redevelopment of Northwood Station, including the provision of an improved station entrance, transport interchange and step - free access;
- Provision of residential units, which must include affordable housing and an appropriate mix of units. Other main town centre uses may be acceptable.
- Retention of existing retail units and the or re-provision of new retail uses at ground floor level, providing active road frontages. New retail provision (comparison and convenience) should enhance viability and vitality, be of scale that is appropriate for Northwood District Centre and take account of the latest evidence on retail need.
- The redevelopment should include the provision of a public space, landscaping and public realm improvements and enhance east-west pedestrian linkages within the District Centre;
- Provision of amenity space in accordance with the Council's standards. Consideration should also be given to neighbouring amenity, in terms of traffic, noise, light, odour and dust as well as impacts from the railway;
- Retention or re-provision of existing commuter car parking spaces; provision of drop off/pick up spaces and parking spaces for residential units in accordance with the Council's standards;
- Retention or re-provision of bus/vehicle circulation space;
- The redevelopment should sustain and enhance the significance of the adjacent Conservation Areas and their settings and retain buildings that contribute to the character and appearance of the local area. Justification for any loss of significance will need to accord with the requirements of the NPPF; and
- The Council will expect redevelopment proposals to reflect the scale and character of the surrounding townscape and make a positive contribution to local character and distinctiveness. Whilst the London Plan density guidance indicates that a density range for urban settings is suitable near transport nodes, capacity on this site should be led by high quality design, taking account of the site's prominent location and sub-urban character of the surrounding area.

| Site name                                     | Northwood Station, Green Lane  |
|---|--|
| Ward  | Northwood  |
| Location                                      | Junction of B469 Green Lane / Eastbury Road  |
| Area (ha/sqm)                                 | 1.6 ha - 2.67 ha   |
| PTAL Rating                                   | 3  |
| Proposed Development                          | Mixed use  |
| Current UDP Designations                      | District Centre, Primary and Secondary Retail Frontages Conservation Area, adjacent to Area of Special Local Character and Locally Listed Buildings; |
| Proposed New Designations                     | None   |
| Existing Use                                  | Employment, retail, residential and station  |
| Relevant Planning History (most recent)       | No relevant history Undetermined planning application (ref: 71083/APP/2015/4037)   |
| Proposed Number of Units                      | Proposed number of units to be determined by design  |
| Existing Units                                | 14   |
| Net completions                               | Proposed number of units to be determined by design  |
| Infrastructure Considerations and Constraints | To be negotiated as part of the planning application.  |
| Flood Risk                                    | Flood Zone 1, Critical Drainage Area   |
| Contamination                                 | Potentially contaminated land due to former land use. Land Remediation may be required.  |
| Indicative Phasing                            | 2021-2026; development phasing to be agreed prior to submission of a planning application - 2017-2020: subject to planning                           |
| Other Information                             | Appropriate design to be agreed prior to the submission of a planning application.   |



TfL welcomes the inclusion of this site within the Revised Proposed Submission document and its potential to provide an opportunity for a mix of high quality retail and residential development that will improve the appearance of Northwood District Centre as well as enhancing the significance of the Northwood Town Centre/Green Lane and Frithwood Conservation Areas.

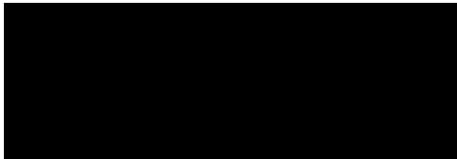
The proposed site allocation recognises the opportunity to deliver numerous public benefits. In bringing forward TfL's aspirations, the proposed planning application seeks to deliver on this through:

- A new ticket hall to the Underground Station with step-free access;
- Improved accessibility for all users in and around the station;
- Improved interchange at the transport hub between underground trains, buses, vehicle users, pedestrians and cyclists;
- A total of 298 parking spaces (including 180 public spaces)
- A total of cycle parking spaces (including 28 public spaces);
- A dedicated area for drop off/pick up and taxis;
- Contributing to the need for housing by delivering 127 new residential units (1, 2, 3 and 4-bed) comprising a mix of 93 apartments (detailed) and 34 townhouses (outline);
- A new public space in the form of a piazza; and
- Improving and enhancing the vitality and viability of the existing centre the retail through the refurbishment of existing units and creation of new units.

As a key stakeholder, landowner and transport provider across the LB Hillingdon, TfL is committed to working closely with the LPA and local community to bring forward a positive mixed-use development of its landholdings at Northwood. We welcome the LB Hillingdon's recognition of the site's potential through its inclusion within the emerging Site Allocations DPD. The current planning application provides an opportunity to deliver positive growth and sustainable development underpinned by an allocation progressed through a plan-led process.

We trust our representation will be taken into account in the preparation of the Site Allocations DPD prior to submission for examination and we would be happy to meet with you should you wish to discuss our representations in further detail.

Yours faithfully



**Tim Sturgess**  
**Principal Planner**  
**For and on behalf of GVA Grimley Limited**



# HILLINGDON

LONDON

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| 1. Name and Address        |                      |              |  |
|----------------------------|----------------------|--------------|--|
| Title                      |                      |              |  |
| First name                 |                      |              |  |
| Last Name                  |                      |              |  |
| Organisation (if relevant) | Transport For London |              |  |
| Unit                       |                      | House number |  |
| House name                 |                      |              |  |
| Address 1                  | C/O Agent            |              |  |
| Address 2                  |                      |              |  |
| Town                       |                      |              |  |
| County                     |                      |              |  |
| Postcode                   |                      |              |  |
| Telephone                  |                      |              |  |
| Email                      |                      |              |  |

| 2. Agent's Name and Address (if applicable) |          |              |  |
|---|----------|--------------|--|
| Title                                       | Mr       |              |  |
| First name                                  | Tim      |              |  |
| Last name                                   | Sturgess |              |  |
| Company                                     | GVA      |              |  |
| Unit  |          | House number |  |
| House name                                  |          |              |  |
| Address 1                                   |          |              |  |
| Address 2                                   |          |              |  |
| Town  |          |              |  |
| County                                      |          |              |  |
| Postcode                                    |          |              |  |
| Telephone                                   |          |              |  |
| Email                                       |          |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                                      |
|-------------------------------|--------------------------------------|
| Policy number;                | SA 16: Northwood Station, Green Lane |
| Paragraph number;             |                                      |
| Table or figure number; or    |                                      |
| Map number (Atlas of Changes) |                                      |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                       |
|---|--------------------------|--------------------------|
| Sound?  | <input type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

TfL are a significant local economic stakeholder and would like to reserve their right to participate to discuss the proposed mixed use allocation as identified within the accompanying representation.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**



## Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

### 1) What is your gender?

Male                       Female

### 2) To which age group do you belong?

under 15                       25 – 44                       65 – 85  
 15 - 24                       45 - 64                       85+

### 3) Do you consider yourself to be a disabled person?

No                       Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |

# Ickenham Residents' Association



8<sup>th</sup> December 2015

Planning Policy Team  
London Borough of Hillingdon  
Civic Centre  
Uxbridge  
Middx. UB8 1UW

## **LB HILLINGDON LOCAL PLAN PART 2**

### **Consultation response from the Ickenham Residents' Association**

**December 2015**

**About us:** The Association was formed in 1924 and two thirds of the households in the village are paying members. The aim of the Association is to reflect its members' views regarding the desired character of Ickenham, to protect the civic rights and community privileges of its members and to initiate or take action as necessary and appropriate for the provision, protection, preservation and enhancement of local amenities.

### **Summary**

- We continue to support the principle of development at Hillingdon Circus/Master Brewer. We urge the London Borough of Hillingdon (LBH) to make changes to the draft development management planning policies that have been drawn up specifically for those sites to ensure that future developments are sustainable. We are seeking changes on air quality, Green Belt designation, residential/commercial mix and on affordable housing.
- We are seeking changes or further dialogue with LBH on other local issues including our conservation area, retail and green space designations, the enforcement of permitted development rights and on the provision of new secondary schools.
- We have made more general Borough-wide observations and suggestions on affordable housing, climate change and Green Belt policies.

Page 1 of 5

*E-Mail Address: [ickenhamresidents@hotmail.com](mailto:ickenhamresidents@hotmail.com)*

*Website: [www.ickenhamresidents.co.uk](http://www.ickenhamresidents.co.uk)*

*Twitter account [www.twitter.com/IckenhamRA](http://www.twitter.com/IckenhamRA)*

*Affiliated to: Hillingdon Alliance of Residents' Associations*

*Member of: London Wildlife Trust and Herts*

*& Middx. Wildlife Trust and London Green Belt Council and the Community Voice*

## Our full response, on behalf of our members:

Following advice from LBH, we have not used the consultation response template - details at **Annex A**. The Association supports the continued designation of both the Hillingdon Circus and Master Brewer sites as strategically important development sites for the Borough – as outlined in **Policy SA (Strategic Allocation) 14 Master Brewer (site B) and Hillingdon Circus (Site A)**. Both sites (from here on collectively referred to as SA14) are important for the village because of their potential to provide additional retail capacity, jobs and affordable homes.

After careful consideration of the Local Plan Part 2 draft development management policies, we strongly urge LBH to consider changes to several policies to ensure that future development is both sustainable and broadly in line with local needs. We will support development proposals for SA14 that:

- (a) minimise the risk of adverse health impacts being suffered by future residents as a result of poor local **air quality**,
- (b) do not involve development on any **green belt** land,
- (c) are for mixed-use development, and
- (d) achieve the Local Plan Part 1 onsite Affordable Housing target of 35%.

Below we outline why the draft development management policies do not give us sufficient reassurance on these important considerations, and what planning policy changes we think are needed to ensure our Local Plan gives us and LBH a sufficiently robust suite of planning policies to ensure SA14 is developed sustainably.

On **air quality**, recent evidence from a variety of sources has proven that the area around SA14 is already regularly exceeding maximum EU levels for acceptable air quality. More and more research is emerging on the clear link between poor local air quality on ill health and premature death. Bearing this in mind, we want to be sure that SA14 planning policies do all they realistically can to minimise the risk of future residents suffering adverse health impacts as a result of poor local air quality, both outside and inside their homes. Unfortunately the cumulative impact of LBH's suite of air quality policies, guidance and action plans for the Borough and for the SA14 specifically is not clear to us. We would welcome clarification on this important issue, for instance, Air Quality Policy (DMEI 14) states that "development proposals should include sufficient mitigation to ensure there is no unacceptable risk". How is the risk determined? We are concerned that the Greater London Authority "air quality neutrality" concept does not provide a satisfactory methodology for reducing the risk of people becoming ill as a result of poor air quality. We are also concerned that the LBH Supplementary Planning Guidance on Air Quality and the LBH Air Quality Action Plan are both out-of-date.

On **Green Belt**, the latest Composite Policies Map (north sheet) clearly shows that the Site B development boundary (red-line area) extends east beyond the footprint of the old site Master Brewer hotel into the greenfield Freezland Covert Green Belt. **Policy SA14 Site B policy** sets out conditions for development within the Green Belt. In our view, taken together, the map and the policy constitute a clear proposal from LBH to support significant development on Green Belt land without proper consideration, consultation or inclusion of SA14 in the recent LBH Green Belt review. As important as SA14 developments could be for the village, we do not feel that the exceptional circumstances tests laid out in the NPPF or indeed LBH policy (DMEI 4) to justify development in the Green Belt could conceivably be met at this time. Furthermore, the specific SA14 Site B policies on Green Belt do not seem to entirely align with policy DMEI 6: New development adjacent to the Green Belt, on peripheral landscaping requirements. The Green Belt is referred to as London's green lung. Never was this more fitting than in

relation to this site, where the established green infrastructure is surely preventing even worse air quality. We urge LBH to clarify the SA14 Green Belt situation, and adjust the policies map by moving the development red line for SA14 westward to ensure that no Green Belt is within SA14.

Our clear preference for a **mixed-use development** at SA14 is in line with the policy in the earlier draft of the Local Plan part 2. We do not support the proposed policy wording change in the current draft, which shifts the development emphasis towards **residentially-led mixed use**. To us, this sounds like an attempt to increase the number of new homes across the sites. Our preference for a mixed-use development stems from widespread local concerns that infrastructure development has not kept up with the rising population of the village over the last few years. Shopping options are limited for our population of around 12,000 and there is no hotel nearby.

We support the application of policy **DMH 7: Provision of Affordable Housing** at SA14 and across the Borough, including the emphasis on prioritising the provision on new shared-ownership properties. However we feel that there is an important element of the policy missing. We do not believe that we can properly consider whether to support or oppose applications without understanding if and by how much applicants are proposing to undercut the 35% affordable housing requirement set out in the Local Plan part 1. We call for an open-book viability assessment policy on such issues, so we can understand and objectively consider why applicants claim to be unable to achieve the requirement. We acknowledge that this would be a relatively unusual step, but a recent case, explained at **Annex B** highlights our concerns clearly. With the latest Zoopla average property value estimate for the village standing at £675k, and recent news that Hillingdon house prices rose by more than any other London Borough last year, our members are acutely aware that young Ickenhamers struggle to afford to live in the village in which they grew up. With this in mind, we are keen to see that all residential developments of over 10 units provide the 35%, and fully meet policy H2 from Local Plan Part 1, which states that affordable housing should be built to the same standards and should share the same level of amenity as private housing. An open-book viability assessment policy would help the Association work with LBH to deliver the Local Plan policies on this important issue.

We support the continued strong policy wording on **Conservation Areas**, and request that LBH work with the Association to develop a Management Plan for the Ickenham Conservation Area. Recent reports and public statements by LBH officials regarding the status of our Conservation Area have left us rather confused about its status. A 1990s review has been quoted, which references three areas within the conservation area. We have no record of such a review ever having taken place, and for it to be quoted for the first time in 2015 seems extremely odd. It is our view that if such a review is to be quoted in future, it should be consulted on and published as part of the LBH development management policies.

We very much welcome the adjustments to the **Sites of Important Nature Conservation (SINC)** list – which slightly extends the Ickenham Marshes complex designation and adds the Celandine Route along the River Pinn from Swakeleys Drive to Swakeleys Road to the list. Ickenham's environment is under great threat from HS2, and we welcome this extra protection for some of our most treasured local green spaces. We ask that the next SINC review ensures that the entire Marshes complex is at least considered for inclusion, and that the parts of the Colne Valley within Hillingdon is also properly considered. The latest review also incorrectly allocates land next to the North Hillingdon Allotments to the Ickenham Marshes complex.

We do not understand the rationale for the designation of a Primary Shopping Area within the Ickenham shopping area, so we would be grateful for clarification.

The Local Plan explains that a new secondary school will not be needed in the Borough until 2019. We ask that the Association is kept updated on negotiations about possible expansion of the two secondary schools in the village.

We support the 'No Hip to Gable' development management policy and urge LBH to consider whether it is doing all it can to restrict the use of permitted development rights on loft conversions in areas that might qualify for Article 4 exemptions. This might include, for instance, areas in Ickenham (or Hillingdon more widely) that are outside Conservation Areas, but do have clear local built environment distinctiveness which is being severely damaged by hip to gable loft extensions - Ickenham's Glebe Estate for instance.

On Green Belt, we support the LBH refusals to de-designate parts of Green Belt around the village. We would welcome clarity on **Policy DMEI 4: Development in the Green Belt or on Metropolitan Open Land**. The current drafting uses inconsistent language by explaining that development will not be permitted unless there are "very special" and then "very exceptional" circumstances. If this is not a mistake, an explanation of the difference between the two would be gratefully received.

We support the wider policies on climate change adaptation and mitigation in the Local Plan. The village suffered flooding in summer 2014 and since then we have worked closely with LBH to improve our awareness and resilience to local flooding issues. We urge LBH to consider whether a specific development management policy on concreting over driveways might be suitable in areas at higher risk of surface water flooding and this would support our work with members to raise awareness of this issue.

**Policy DMEI 2: Reducing Carbon Emissions** is out-of-date and should be updated to reflect the latest position, as outlined on p.45 of Government's recent Productivity Plan: "The government does not intend to proceed with the zero carbon Allowable Solutions carbon offsetting scheme, or the proposed 2016 increase in on-site energy efficiency standards"<sup>1</sup>.

## Annex A

LBH officers helpfully told us that we are free to submit a consultation response in whatever format we choose. This discussion took place at the November consultation drop-in session at the Uxbridge Library. We do not think that the formal consultation response form is user-friendly, and we feel that we did not have anywhere near enough time to digest the 80+ documents (some more than 200 pages long) within the six week consultation period. We are a community group run by volunteers. The idea that we must follow a rigid response process, including asking us to comment on the 'soundness' of the Plan is unhelpful and in our view presents a clear barrier to other community groups and individuals engaging in this extremely important process.

The formal response form makes it clear that all responses will be made public. We acknowledge this. We also choose to not comment on the overall soundness of the Plan, as requested on the form. Our understanding is that it's up to a Planning Inspector to decide if the plan is sound or not.

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1

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/443897/Productivity\\_Plan\\_print.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/443897/Productivity_Plan_print.pdf)

Bearing in mind the scope and scale of our comments and suggestions above, especially in relation to SA14, and our contributions to previous Local Plan consultations, we would like to participate in the oral examination. We would also like to be informed when any future key Local Plan dates are announced.

We also want to mention that the discussion that took place between LBH and Association representatives at the Uxbridge Library drop-in was extremely valuable and insightful. The LBH officers were knowledgeable and engaging and the discussion provided invaluable insights into the plan making process.

## **Annex B – Affordable housing**

In October 2015 we wrote to LBH requesting information about the level of affordable housing planned for a proposed development of over 10 new homes in the village. We were happy to acknowledge that the 35% might not be achievable on the particular development on viability grounds because of costs associated with the restoration and incorporation of a listed building. LBH confirmed that the applicant had submitted a case to deliver under the 35% requirement, but claimed that they were unable to provide further details on the grounds of commercial confidentiality. We were broadly happy with the proposed scheme, but felt that we had to oppose the proposal because without knowing the proposed affordable housing percentage, we could not be sure that the proposal would be a truly sustainable development.

Yours sincerely,



June Reyner  
GENERAL SECRETARY  
ICKENHAM RESIDENTS' ASSOCIATION

Cc  
Cllrs R Puddifoot, D Simmonds, J Hensley, P Corthorne, B Crowe J Riley J Duduca, A Kaufman, J Kelly,  
W Bridges, A Chapman, P Jackson, G Cooper, R Graham, D Yarrow



Local Plan <localplan@hillington.gov.uk>

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## Local Plan consultation Part 2

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Cllr John Hensley [REDACTED]

8 December 2015 at 11:27

[REDACTED]

Cc: "localplan@hillington.gov.uk" <localplan@hillington.gov.uk>

Hi June

Many thanks for your input from the association. I have met with the planners and made my input also.

I would however with this email request that planners re visit the condition "external surfaces to match". This only applies however to the property in question and not to an adjacent property ie terraced or semi detached and incorporate this in our Local Plan. Reference that all external surfaces should match adjacent properties.

Regards

John

[Quoted text hidden]



# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |            |              |  |
|----------------------------|------------|--------------|--|
| Title                      | Councillor |              |  |
| First name                 | Ian        |              |  |
| Last Name                  | Edwards    |              |  |
| Organisation (if relevant) |            |              |  |
| Unit                       |            | House number |  |
| House name                 |            |              |  |
| Address 1                  |            |              |  |
| Address 2                  |            |              |  |
| Town                       |            |              |  |
| County                     |            |              |  |
| Postcode                   |            |              |  |
| Telephone                  |            |              |  |
| Email                      |            |              |  |

| 2. Agent's Name and Address (if applicable) |  |              |  |
|---|--|--------------|--|
| Title                                       |  |              |  |
| First name                                  |  |              |  |
| Last name                                   |  |              |  |
| Company                                     |  |              |  |
| Unit  |  | House number |  |
| House name                                  |  |              |  |
| Address 1                                   |  |              |  |
| Address 2                                   |  |              |  |
| Town  |  |              |  |
| County                                      |  |              |  |
| Postcode                                    |  |              |  |
| Telephone                                   |  |              |  |
| Email                                       |  |              |  |



## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                                   |
|-------------------------------|-----------------------------------|
| Policy number;                | 7. Community Infrastructure Sites |
| Paragraph number;             | 7.8 et sec                        |
| Table or figure number; or    |                                   |
| Map number (Atlas of Changes) |                                   |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                          |   |
|-------------------------------------|-------------------------------------|--------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/>            | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

***The plan fails to make sufficient provision for secondary school places available to residents of Yiewsley, West Drayton & Harmondsworth in the later period of the strategy period up to 2026.***

***The residents of Yiewsley ward often make comment about the lack of choice for secondary school places in the south west of the borough.***

***The table 3.3: Proposed Site Allocations identifies a capacity of 1577 new dwellings in the wards of Yiewsley and West Drayton during the strategy period which will add further pressure to the demand for secondary school places.***

***At para 7.11 Site Allocations and Designations indicates that a new secondary school is likely to be required in order to meet identified need. The planning application for the development of Abbotsfield and Swakeleys School (LBH Ref 3505/APP/2015/3030) refers to the future need for additional places in southern parts of the borough.***

***Consideration should be given to inclusion of a secondary school within the mixed development proposed at site SA37 with use being made of part of the Green Belt immediately to the north for new school playing fields which will restore to open land an area that is commonly used used for open air storage of vehicles amongst other commercial uses.***

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | <b>No, I do not want to participate in the oral examination</b> |
| <input type="checkbox"/>            | <b>Yes, I would like to participate in the oral examination</b> |

---

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input type="checkbox"/>            | <b>The adoption of the Local Plan Part 2.</b>  |



## Returning your form

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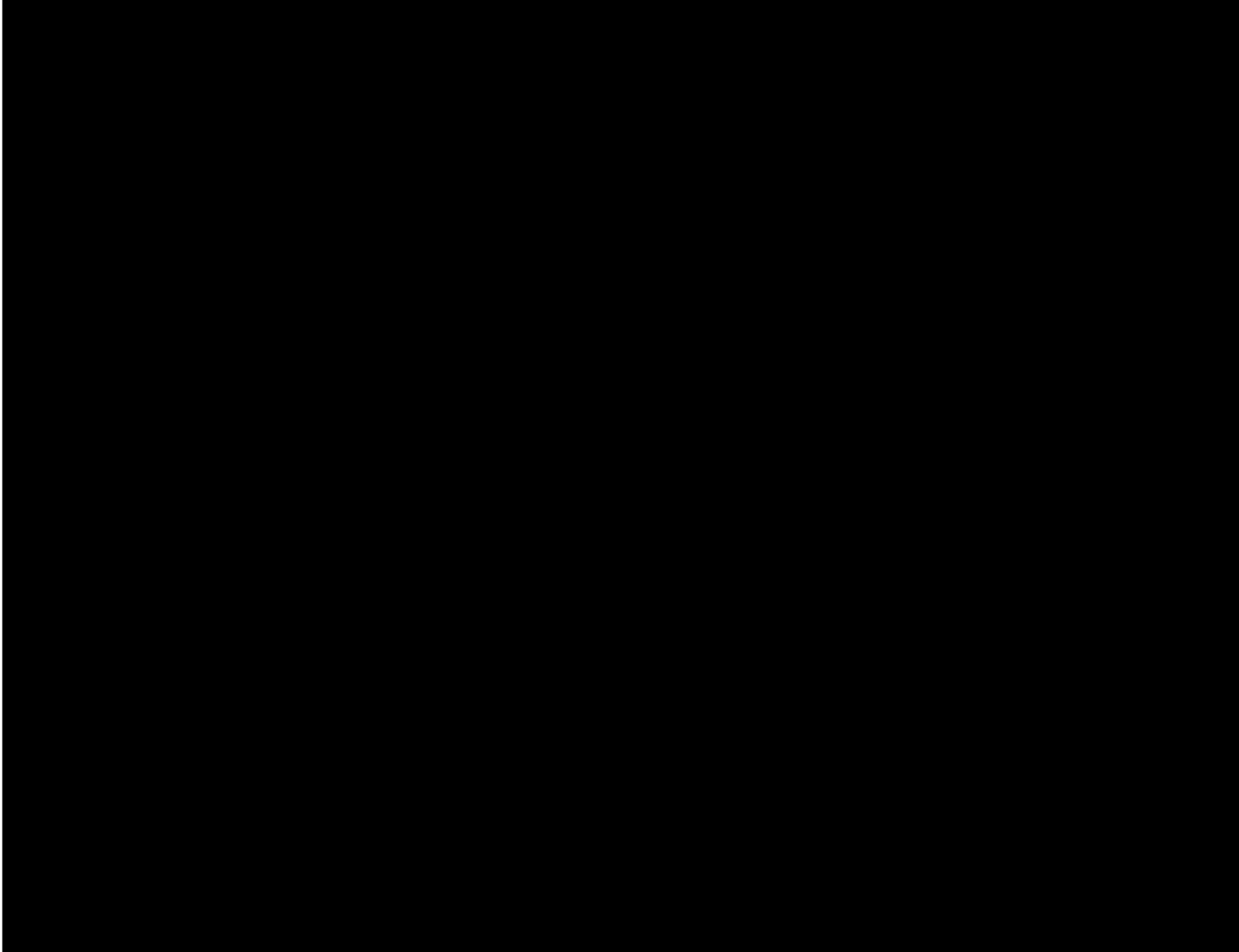
- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

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# HILLINGDON

LONDON

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| 1. Name and Address        |            |              |  |
|----------------------------|------------|--------------|--|
| Title                      | Councillor |              |  |
| First name                 | Ian        |              |  |
| Last Name                  | Edwards    |              |  |
| Organisation (if relevant) |            |              |  |
| Unit                       |            | House number |  |
| House name                 |            |              |  |
| Address 1                  |            |              |  |
| Address 2                  |            |              |  |
| Town                       |            |              |  |
| County                     |            |              |  |
| Postcode                   |            |              |  |
| Telephone                  |            |              |  |
| Email                      |            |              |  |

| 2. Agent's Name and Address (if applicable) |  |              |  |
|---|--|--------------|--|
| Title                                       |  |              |  |
| First name                                  |  |              |  |
| Last name                                   |  |              |  |
| Company                                     |  |              |  |
| Unit  |  | House number |  |
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| County                                      |  |              |  |
| Postcode                                    |  |              |  |
| Telephone                                   |  |              |  |
| Email                                       |  |              |  |



## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |       |
|-------------------------------|-------|
| Policy number;                | SA 37 |
| Paragraph number;             |       |
| Table or figure number; or    |       |
| Map number (Atlas of Changes) |       |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

***The redesignation of the Former Coal Depot, Tavistock Road, Yiewsley for mixed use development as described in Policy SA37 is most welcomed by the local community. This site has been a source of nuisance to the community over a number of years by way of noise, dust and HGV movements. Its location does not make it suitable for industrial use and its redesignation to will permit the enhancement of the area to the benefit of nearby residents as well as to the wider community.***

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | <b>No, I do not want to participate in the oral examination</b> |
| <input type="checkbox"/>            | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

A large, empty rectangular box with a thin black border, intended for providing comments on the technical reports mentioned in the question below.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input type="checkbox"/>            | <b>The adoption of the Local Plan Part 2.</b>  |



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## **Monitoring Questions**

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Local Plan &lt;localplan@hillington.gov.uk&gt;

---

## Local Plan Part 2 North Sheet Map

1 message

**Anthony Wilkinson** 

16 November 2015 at 16:43

To: localplan@hillington.gov.uk

Dear Hillingdon Council,

Thank you for the letter dated 23 Oct 2015 from Mr James Gleave concerning "Publication of changes to the local plan part 2"

I am sending you my comments on the plan. I would like to draw your attention to inaccuracies in your map (Local Plan Part 2 North Sheet Map. I am attaching your form which I have completed.

My comments are:

***I would like to draw your attention to an inaccuracy in your map. My property, 8 Woodfield Terrace, Harefield, Is incorrectly mapped on your map for the following reasons.***

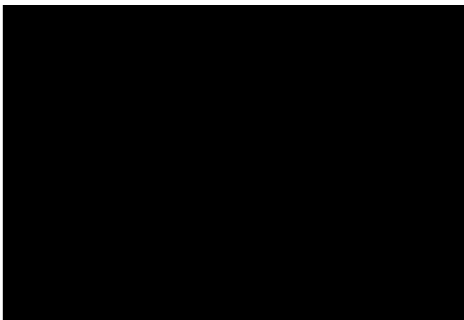
***7 & 8 Woodfield Terraces are shown to be of equal size on the map. In fact No. 8 is larger having been extended in the 1970's somewhat further south than is shown on your map.***

***The map does not show a garage / outbuilding and summerhouse located to the east of my house which is part of my property.***

***The map does not show a swimming pool located to the south of my property.***

***The boundary of the Green Belt shown on your map passes through my house and the outbuilding. Also the swimming pool is in what you show as Green Belt. All the above mentioned items were as they are today when I purchased the property in 1983. At that time I was led to believe that the Green Belt boundary lay to the south of the swimming pool, not as shown now. You should be able verify the lay out of the buildings and pool by referring to Google Maps.***

Anthony Wilkinson





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340K



# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

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### PART A - Your details

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|----------------------------|----------------------|--------------|--|
| Title                      | Mr                   |              |  |
| First name                 | John                 |              |  |
| Last Name                  | McDonnell            |              |  |
| Organisation (if relevant) | Member of Parliament |              |  |
| Unit                       |                      | House number |  |
| House name                 |                      |              |  |
| Address 1                  |                      |              |  |
| Address 2                  |                      |              |  |
| Town                       |                      |              |  |
| County                     |                      |              |  |
| Postcode                   |                      |              |  |
| Telephone                  |                      |              |  |
| Email                      |                      |              |  |

| 2. Agent's Name and Address (if applicable) |  |              |  |
|---|--|--------------|--|
| Title                                       |  |              |  |
| First name                                  |  |              |  |
| Last name                                   |  |              |  |
| Company                                     |  |              |  |
| Unit  |  | House number |  |
| House name                                  |  |              |  |
| Address 1                                   |  |              |  |
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| Town  |  |              |  |
| County                                      |  |              |  |
| Postcode                                    |  |              |  |
| Telephone                                   |  |              |  |
| Email                                       |  |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |      |
|-------------------------------|------|
| Policy number;                | SA24 |
| Paragraph number;             |      |
| Table or figure number; or    |      |
| Map number (Atlas of Changes) |      |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                          |   |
|-------------------------------------|-------------------------------------|--------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/>            | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

The balance of the loss of employment land has not been fully considered. The community infrastructure policy has not been reviewed and therefore the needs of potential residents have not been fully considered or planned for  
This is a building of historical significance and should be treated and protected as such

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

As above

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
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### 1) What is your gender?

Male                       Female

### 2) To which age group do you belong?

under 15                       25 – 44                       65 – 85  
 15 - 24                       45 - 64                       85+

### 3) Do you consider yourself to be a disabled person?

No                       Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |



# HILLINGDON

LONDON

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| First name                 | John                 |              |  |
| Last Name                  | McDonnell            |              |  |
| Organisation (if relevant) | Member of Parliament |              |  |
| Unit                       |                      | House number |  |
| House name                 |                      |              |  |
| Address 1                  |                      |              |  |
| Address 2                  |                      |              |  |
| Town                       |                      |              |  |
| County                     |                      |              |  |
| Postcode                   |                      |              |  |
| Telephone                  |                      |              |  |
| Email                      |                      |              |  |

| 2. Agent's Name and Address (if applicable) |  |              |  |
|---|--|--------------|--|
| Title                                       |  |              |  |
| First name                                  |  |              |  |
| Last name                                   |  |              |  |
| Company                                     |  |              |  |
| Unit  |  | House number |  |
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| Town  |  |              |  |
| County                                      |  |              |  |
| Postcode                                    |  |              |  |
| Telephone                                   |  |              |  |
| Email                                       |  |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |          |
|-------------------------------|----------|
| Policy number;                | 5.12     |
| Paragraph number;             |          |
| Table or figure number; or    | Page 159 |
| Map number (Atlas of Changes) |          |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/>            | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

This is not in line with national policy

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

To support the need to protect green belt land which is consistent with national policy

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
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### 1) What is your gender?

Male  Female

### 2) To which age group do you belong?

under 15  25 – 44  65 – 85  
 15 - 24  45 - 64  85+

### 3) Do you consider yourself to be a disabled person?

No  Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
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# HILLINGDON

LONDON

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| Postcode                   |                      |              |  |
| Telephone                  |                      |              |  |
| Email                      |                      |              |  |

| 2. Agent's Name and Address (if applicable) |  |              |  |
|---|--|--------------|--|
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| Town  |  |              |  |
| County                                      |  |              |  |
| Postcode                                    |  |              |  |
| Telephone                                   |  |              |  |
| Email                                       |  |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                    |
|-------------------------------|--------------------|
| Policy number;                | SA 5 Nestles site, |
| Paragraph number;             |                    |
| Table or figure number; or    |                    |
| Map number (Atlas of Changes) |                    |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                          |   |
|-------------------------------------|-------------------------------------|--------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/>            | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

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*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

This has not been positively prepared. The balance of loss of employment land and residential dwellings has not been fully considered. The community infrastructure has not been fully considered. The proposed changes are not sound

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

This has not been positively prepared and is therefore not sound

The Community Infrastructure policy is yet to be reviewed and yet there are developments being built already with more being proposed in this document. This is without a full and considered review of community infrastructure and the health and educational needs of the residents

A large, empty rectangular box with a thin black border, occupying the upper half of the page. It is intended for providing comments on the technical reports mentioned in the question below.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

A large, empty rectangular box with a thin black border, occupying the lower half of the page. It is intended for providing comments on the technical reports mentioned in the question above.

Please continue on a separate sheet if necessary

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|                                     |  |
|-------------------------------------|--|
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Male  Female

### 2) To which age group do you belong?

under 15  25 – 44  65 – 85  
 15 - 24  45 - 64  85+

### 3) Do you consider yourself to be a disabled person?

No  Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |



# HILLINGDON

LONDON

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| 1. Name and Address        |                      |              |  |
|----------------------------|----------------------|--------------|--|
| Title                      | Mr                   |              |  |
| First name                 | John                 |              |  |
| Last Name                  | McDonnell MP         |              |  |
| Organisation (if relevant) | Member of Parliament |              |  |
| Unit                       |                      | House number |  |
| House name                 |                      |              |  |
| Address 1                  |                      |              |  |
| Address 2                  |                      |              |  |
| Town                       |                      |              |  |
| County                     |                      |              |  |
| Postcode                   |                      |              |  |
| Telephone                  |                      |              |  |
| Email                      |                      |              |  |

| 2. Agent's Name and Address (if applicable) |  |              |  |
|---|--|--------------|--|
| Title                                       |  |              |  |
| First name                                  |  |              |  |
| Last name                                   |  |              |  |
| Company                                     |  |              |  |
| Unit  |  | House number |  |
| House name                                  |  |              |  |
| Address 1                                   |  |              |  |
| Address 2                                   |  |              |  |
| Town  |  |              |  |
| County                                      |  |              |  |
| Postcode                                    |  |              |  |
| Telephone                                   |  |              |  |
| Email                                       |  |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                             |
|-------------------------------|-----------------------------|
| Policy number;                | SA22,SA23, SA24, SA35, SA36 |
| Paragraph number;             |                             |
| Table or figure number; or    |                             |
| Map number (Atlas of Changes) |                             |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                          |   |
|-------------------------------------|-------------------------------------|--------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/>            | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

This has not been positively prepared and is therefore not sound

Please continue on a separate sheet if necessary

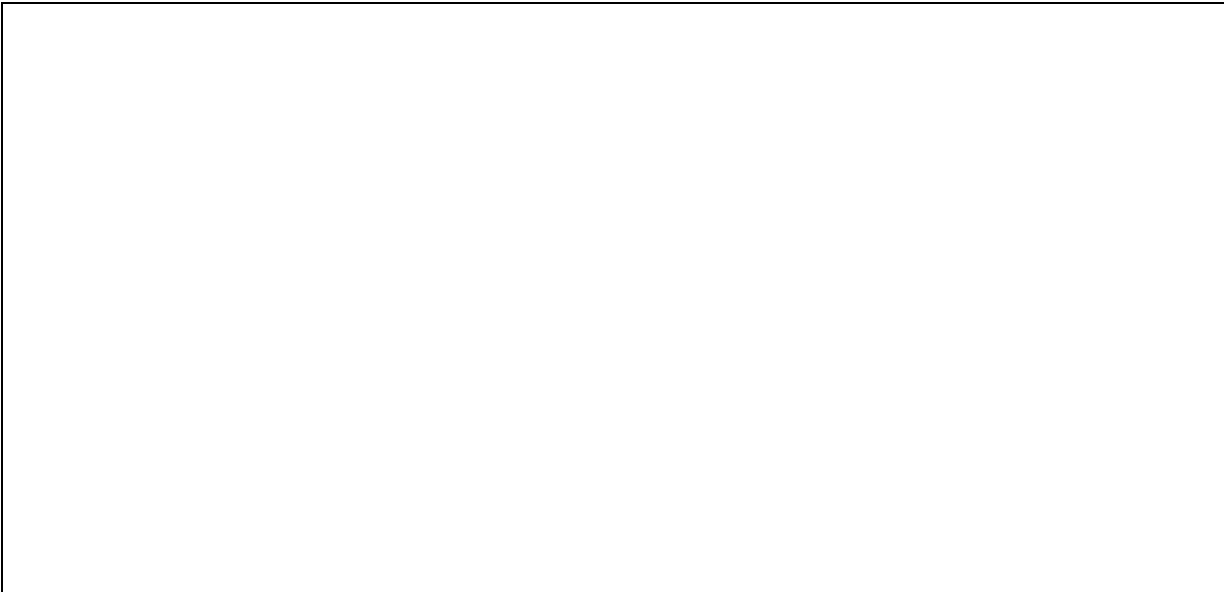
**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

This has not been positively prepared and is therefore not sound

The Community Infrastructure policy is yet to be reviewed and yet there are developments being built already with more being proposed in this document without a full and considered review of community infrastructure and the needs of the residents



**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**



Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

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## Monitoring Questions

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### 1) What is your gender?

Male  Female

### 2) To which age group do you belong?

under 15  25 – 44  65 – 85  
 15 - 24  45 - 64  85+

### 3) Do you consider yourself to be a disabled person?

No  Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |



# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

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### PART A - Your details

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| 1. Name and Address        |                  |              |  | 2. Agent's Name and Address (if applicable) |  |              |  |
|----------------------------|------------------|--------------|--|---|--|--------------|--|
| Title                      | Councillor       |              |  | Title                                       |  |              |  |
| First name                 | Janet            |              |  | First name                                  |  |              |  |
| Last Name                  | Duncan           |              |  | Last name                                   |  |              |  |
| Organisation (if relevant) | LBH Labour Group |              |  | Company                                     |  |              |  |
| Unit                       |                  | House number |  | Unit  |  | House number |  |
| House name                 |                  |              |  | House name                                  |  |              |  |
| Address 1                  |                  |              |  | Address 1                                   |  |              |  |
| Address 2                  |                  |              |  | Address 2                                   |  |              |  |
| Town                       |                  |              |  | Town  |  |              |  |
| County                     |                  |              |  | County                                      |  |              |  |
| Postcode                   |                  |              |  | Postcode                                    |  |              |  |
| Telephone                  |                  |              |  | Telephone                                   |  |              |  |
| Email                      |                  |              |  | Email                                       |  |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on proposed changes to: (please tick relevant box)

| Local Plan Part 2                   |                                   | Technical Reports (answer Q1 & Q9 only) |   |
|-------------------------------------|-----------------------------------|---|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                | Addendum to the Strategic Flood Risk Assessment |

Q2. Please indicate the Proposed Change on which you wish to comment:

|                               |                    |
|-------------------------------|--------------------|
| Policy number;                | DMC1 1             |
| Paragraph number;             | 7.5, 7.6, 7.7, 7.8 |
| Table or figure number; or    |                    |
| Map number (Atlas of Changes) |                    |

Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is (please tick)

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below (Tick relevant box/es)

|                          |                                     |                                     |   |
|--------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/>            | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

*This policy is easily addressed by developers who market for 2 years and then develop commercially. More protection needs to be given to existing community facilities and their incorporation into any future redevelopment proposals for sites. We are seeing a loss of community facilities despite a massive increase in population and thousands more homes. This is one policy that should be negatively worded in order to be positive i.e. Proposals involving the loss of community facilities will not be permitted unless .....*

*with criteria to be specified*

*The difference in land values between residential and community uses is defeating this policy.*

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

**No, I do not want to participate in the oral examination**

**Yes, I would like to participate in the oral examination**

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

*To support the strengthening of this policy.*

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
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### 1) What is your gender?

Male                       Female

### 2) To which age group do you belong?

under 15                       25 – 44                       65 – 85  
 15 - 24                       45 - 64                       85+

### 3) Do you consider yourself to be a disabled person?

No                       Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |



# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

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### PART A - Your details

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| 1. Name and Address        |                  |              |  | 2. Agent's Name and Address (if applicable) |  |              |  |
|----------------------------|------------------|--------------|--|---|--|--------------|--|
| Title                      | Councillor       |              |  | Title                                       |  |              |  |
| First name                 | Janet            |              |  | First name                                  |  |              |  |
| Last Name                  | Duncan           |              |  | Last name                                   |  |              |  |
| Organisation (if relevant) | LBH Labour Group |              |  | Company                                     |  |              |  |
| Unit                       |                  | House number |  | Unit  |  | House number |  |
| House name                 |                  |              |  | House name                                  |  |              |  |
| Address 1                  |                  |              |  | Address 1                                   |  |              |  |
| Address 2                  |                  |              |  | Address 2                                   |  |              |  |
| Town                       |                  |              |  | Town  |  |              |  |
| County                     |                  |              |  | County                                      |  |              |  |
| Postcode                   |                  |              |  | Postcode                                    |  |              |  |
| Telephone                  |                  |              |  | Telephone                                   |  |              |  |
| Email                      |                  |              |  | Email                                       |  |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on proposed changes to: (please tick relevant box)

| Local Plan Part 2                   |                                   | Technical Reports (answer Q1 & Q9 only) |   |
|-------------------------------------|-----------------------------------|---|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                | Addendum to the Strategic Flood Risk Assessment |

Q2. Please indicate the Proposed Change on which you wish to comment:

|                               |       |
|-------------------------------|-------|
| Policy number;                |       |
| Paragraph number;             | 7. 16 |
| Table or figure number; or    |       |
| Map number (Atlas of Changes) |       |

Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is (please tick)

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below (Tick relevant box/es)

|                                     |                                     |                          |   |
|-------------------------------------|-------------------------------------|--------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/>            | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

No site has been identified for a Health Hub for West Drayton. As thousands of new homes have been built in recent years in Yiewsley & West Drayton with no additional health facilities the situation is now critical and a site must be positively identified and agreed for the Plan.

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

*To support the need for a health hub site to be identified in Yewsey / West Drayton and included positively in the Plan*

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
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### 1) What is your gender?

Male                       Female

### 2) To which age group do you belong?

under 15                       25 – 44                       65 – 85  
 15 - 24                       45 - 64                       85+

### 3) Do you consider yourself to be a disabled person?

No                       Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |



# HILLINGDON

LONDON

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| 1. Name and Address        |                  |              |  |
|----------------------------|------------------|--------------|--|
| Title                      | Councillor       |              |  |
| First name                 | Janet            |              |  |
| Last Name                  | Duncan           |              |  |
| Organisation (if relevant) | LBH Labour Group |              |  |
| Unit                       |                  | House number |  |
| House name                 |                  |              |  |
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| Address 2                  |                  |              |  |
| Town                       |                  |              |  |
| County                     |                  |              |  |
| Postcode                   |                  |              |  |
| Telephone                  |                  |              |  |
| Email                      |                  |              |  |

| 2. Agent's Name and Address (if applicable) |  |              |  |
|---|--|--------------|--|
| Title                                       |  |              |  |
| First name                                  |  |              |  |
| Last name                                   |  |              |  |
| Company                                     |  |              |  |
| Unit  |  | House number |  |
| House name                                  |  |              |  |
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| Address 2                                   |  |              |  |
| Town  |  |              |  |
| County                                      |  |              |  |
| Postcode                                    |  |              |  |
| Telephone                                   |  |              |  |
| Email                                       |  |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on proposed changes to: (please tick relevant box)

| Local Plan Part 2                   |                                   | Technical Reports (answer Q1 & Q9 only) |   |
|-------------------------------------|-----------------------------------|---|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                | Addendum to the Strategic Flood Risk Assessment |

Q2. Please indicate the Proposed Change on which you wish to comment:

|                               |       |
|-------------------------------|-------|
| Policy number;                |       |
| Paragraph number;             | 7, 11 |
| Table or figure number; or    |       |
| Map number (Atlas of Changes) |       |

Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is (please tick)

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below (Tick relevant box(es))

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

Para 7.11 should cover the need for a new secondary school in the south of the borough in the West Drayton area.

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

*To support the provision of a new secondary school in the south.*

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
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Male                       Female

### 2) To which age group do you belong?

under 15                       25 – 44                       65 – 85  
 15 - 24                       45 - 64                       85+

### 3) Do you consider yourself to be a disabled person?

No                       Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |



# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |                  |              |  |
|----------------------------|------------------|--------------|--|
| Title                      | Councillor       |              |  |
| First name                 | Janet            |              |  |
| Last Name                  | Duncan           |              |  |
| Organisation (if relevant) | LBH Labour Group |              |  |
| Unit                       |                  | House number |  |
| House name                 |                  |              |  |
| Address 1                  |                  |              |  |
| Address 2                  |                  |              |  |
| Town                       |                  |              |  |
| County                     |                  |              |  |
| Postcode                   |                  |              |  |
| Telephone                  |                  |              |  |
| Email                      |                  |              |  |

| 2. Agent's Name and Address (if applicable) |  |              |  |
|---|--|--------------|--|
| Title                                       |  |              |  |
| First name                                  |  |              |  |
| Last name                                   |  |              |  |
| Company                                     |  |              |  |
| Unit  |  | House number |  |
| House name                                  |  |              |  |
| Address 1                                   |  |              |  |
| Address 2                                   |  |              |  |
| Town  |  |              |  |
| County                                      |  |              |  |
| Postcode                                    |  |              |  |
| Telephone                                   |  |              |  |
| Email                                       |  |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on proposed changes to: (please tick relevant box)

| Local Plan Part 2                   |                                   |
|-------------------------------------|-----------------------------------|
| <input type="checkbox"/>            | Development Management Policies   |
| <input checked="" type="checkbox"/> | Site Allocations and Designations |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| Technical Reports (answer Q1 & Q9 only) |   |
|---|---|
| <input type="checkbox"/>                | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                | Consultation Statement                          |
| <input type="checkbox"/>                | Addendum to the Strategic Flood Risk Assessment |

Q2. Please indicate the Proposed Change on which you wish to comment:

|                               |       |
|-------------------------------|-------|
| Policy number;                | SA 37 |
| Paragraph number;             | ALL   |
| Table or figure number; or    |       |
| Map number (Atlas of Changes) |       |

Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is (please tick)

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below (Tick relevant box/es)

|                          |                                     |
|--------------------------|-------------------------------------|
| <input type="checkbox"/> | It has not been positively prepared |
| <input type="checkbox"/> | It is not justified                 |

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

*we welcome the removal of the former Coal Depot, Tavistock Road, Yiewsley from the 1BA designation and the more appropriate designation for mixed use development as detailed. It would be helpful if health facilities could be included to serve the thousands of new homes built in recent years in Yiewsley & West Drayton.*

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

*To support the proposals and the addition of health facilities.*

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**



## Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

### 1) What is your gender?

Male                       Female

### 2) To which age group do you belong?

under 15                       25 – 44                       65 – 85  
 15 - 24                       45 - 64                       85+

### 3) Do you consider yourself to be a disabled person?

No                       Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |

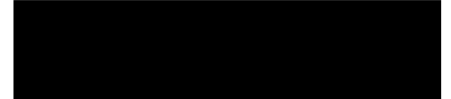
07 December 2015



Planning Policy

Sent by email: [localplan@hillindgon.gov.uk](mailto:localplan@hillindgon.gov.uk)

Carmelle Bell



savills.com

Dear Sir / Madam,

**HILLINGDON LOCAL PLAN: PART 2 – DEVELOPMENT MANAGEMENT POLICIES – REVISED PROPOSED SUBMISSION VERSION, OCTOBER 2015 – ON BEHALF OF THAMES WATER UTILITIES LTD**

Thames Water Utilities Ltd (Thames Water) Property Services function is now being delivered by Savills (UK) Limited as Thames Water's appointed supplier. Savills are therefore pleased to respond to the above consultation on behalf of Thames Water.

Thames Water are the statutory water and sewerage undertaker for the Borough and are hence a "specific consultation body" in accordance with the Town & Country Planning (Local Planning) Regulations 2012. In this context I have the following comments:

DMEI (J)

Thames Water would like to support Policy DMEI and specifically DMEI (J). However for clarification and to strengthen the policy the addition of the below wording is recommended.

*'Where there is a capacity constraint the Local Planning Authority will require the developer to provide detailed water and/or drainage strategy informing what infrastructure is required, where, when and how it will be delivered.'*

Supporting Paragraph 6.53

Again Thames Water support paragraph 6.53. However they feel that the sentence stating *'the Sites Allocations document identifies sites that might have capacity issues and notes this as a constraint.'* should be removed as it infers that all the other sites in the Site Allocations Document do not have capacity constraints. This might be true at the present time but if the scale and phasing of a site changes then a site which previously had no constraints could then become one for concern.

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Thames Water support a policy on Basement Development but would recommend the addition of a paragraph on the need to fit basements with a positive pumped device (or equivalent reflecting technological advances). This will help to ensure basements properties are protected from sewer flooding

caused by backflow, and will ensure the policy complies with paragraph 103 of the NPPF which highlights the need to avoid flooding.

I trust the above is satisfactory, but please do not hesitate to contact me if you have any queries.

Yours sincerely



**Carmelle Bell BA (Hons), MSc, MRTPI  
Planner**



# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |                          |              |  |
|----------------------------|--------------------------|--------------|--|
| Title                      | Mr                       |              |  |
| First name                 | Stephen                  |              |  |
| Last Name                  | Allen                    |              |  |
| Organisation (if relevant) | Heathrow Airport Limited |              |  |
| Unit                       |                          | House number |  |
| House name                 |                          |              |  |
| Address 1                  |                          |              |  |
| Address 2                  |                          |              |  |
| Town                       |                          |              |  |
| County                     |                          |              |  |
| Postcode                   |                          |              |  |
| Telephone                  |                          |              |  |
| Email                      |                          |              |  |

| 2. Agent's Name and Address (if applicable) |  |              |  |
|---|--|--------------|--|
| Title                                       |  |              |  |
| First name                                  |  |              |  |
| Last name                                   |  |              |  |
| Company                                     |  |              |  |
| Unit  |  | House number |  |
| House name                                  |  |              |  |
| Address 1                                   |  |              |  |
| Address 2                                   |  |              |  |
| Town  |  |              |  |
| County                                      |  |              |  |
| Postcode                                    |  |              |  |
| Telephone                                   |  |              |  |
| Email                                       |  |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                          |
|-------------------------------|--------------------------|
| Policy number;                | DME3: Office Development |
| Paragraph number;             |                          |
| Table or figure number; or    |                          |
| Map number (Atlas of Changes) |                          |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/>            | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

Our previous response to the November 2014 consultation highlighted that this policy does not apply the most sustainable solution to the location of office development insofar as it relates to Heathrow Airport. The draft policy seeks to direct office development to Uxbridge, Stockley Park and the Heathrow Perimeter. Our response pointed out that the airport locations of the Central Terminal Area, Terminal 4, Terminal 5 and Hatton Cross are also sustainable locations for office development owing to the high public transport accessibility along with the free public transport travel zones surrounding the airport. The future public transport improvements to Heathrow were also noted in our previous response, including the committed Crossrail and Western Rail Link schemes. It would therefore seem logical to include the whole of Heathrow Airport as a suitable location for office development. However, the Council's response to this submission was simply to state that:

*"The Council seeks to locate airport related uses within the airport boundary, whilst other uses such as office development are directed to appropriate locations on the Heathrow perimeter."*

With such a vague response to our submission, HAL feels that its previous consultation response has not been properly considered.

We note that a range of changes has occurred in the latest version of the Development Management Policies document in relation to office policy. One particular revision we note is the deletion of reference to Stockley Park's accessibility issues with the removal of the following sentence:

*"For Stockley Park in particular, proposals should include measures to improve accessibility by public transport, walking and cycling to reduce car dependence."*

We do not dispute that Stockley Park should be a location for office development, but this highlights the flaw in the draft policy whereby locations with apparent accessibility issues have been prioritised for office development over locations which offer far superior accessibility and interchange opportunities, such as Heathrow Airport.

We maintain that the draft policy is not consistent with policy 4.2 of the London Plan or the NPPF which both seek to locate high trip generating uses such as offices in areas of high public transport accessibility.

We suggest that part A of the policy is amended to read:

*"A) The Council will support proposals for new office development in the preferred locations of Heathrow Perimeter, Stockley Park and Uxbridge Town Centre, as defined in the Site Allocations and Designations document, as well as sustainable locations such as Heathrow Airport."*

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

We consider this policy has the potential to negatively affect the future development of the airport.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |  |
|-------------------------------|--|
| Policy number;                | DME5: Hotels and Visitor Accommodation |
| Paragraph number;             | Paragraph 2.26, 2.27                   |
| Table or figure number; or    |  |
| Map number (Atlas of Changes) |  |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/>            | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |



**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

Our previous consultation response acknowledged that Policy E2 of the Local Plan Part 1 seeks to direct hotel developments toward Uxbridge, Hayes and the Heathrow Perimeter. We also noted that Policy E2 refers to 'other sustainable locations' for the location of hotel development and requested that locations within the airport and with high public transport accessibility be confirmed as fulfilling this criteria and included within draft policy DME 5.

In the revised draft Local Plan Part 2, paragraph 2.26 makes reference to Policy E2 of the Local Plan Part 1 but makes no mention of 'other sustainable locations'. As with our comments regarding Policy DME 3, we consider that Heathrow Airport as a whole is also a sustainable location for high trip generating uses not least because it is the primary source of hotel guest demand and public transport accessibility in the Borough. This would ensure consistency with the NPPF and London Plan, in particular Policy 4.5 which directs hotel accommodation outside of the Central Activity Zone to opportunity and intensification areas (including Heathrow) and where there is good public transport access to central London and transport termini.

We suggest that the first sentence of paragraph 2.26 should be amended as follows:

*Policy E2: Location of Employment Growth in the Local Plan Part 1 notes that hotel growth will be encouraged in Uxbridge, Hayes and on site outside of designated employment sites on the Heathrow perimeter and in other sustainable locations such as within Heathrow Airport given its excellent public transport accessibility."*

Paragraph 2.27 also refers to the Heathrow area being subject to specific pressures for airport related land uses. The paragraph makes reference to the Local Plan Part 1 where it states that there is a requirement for airport related development to remain on-airport so as not to encroach upon the Green Belt. We continue to reject this assertion. In the first instance, the Green Belt already benefits from a high level of policy protection through the NPPF, London Plan and the policies contained within Part 1 and 2 of the Hillingdon's own Local Plan. Secondly, it is unrealistic to assume that all airport related development can remain within the airport boundary. In fact, most airport related uses are located off-airport in industrial locations such as Feltham, Poyle, Hayes and further afield. We therefore see no reason for retaining this paragraph and ask that it be removed.

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

**No, I do not want to participate in the oral examination**

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            |   |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

We consider this policy has the potential to negatively affect the future development of the airport.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                           | Consultation Statement                          |
| <input checked="" type="checkbox"/> | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |  |
|-------------------------------|--|
| Policy number;                | Policy SEA 2 Location of Office and Hotel Growth |
| Paragraph number;             |  |
| Table or figure number; or    |  |
| Map number (Atlas of Changes) | Map O  |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                                     |   |
|--------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

In addition to the additional wording within policy DME 3 and in paragraph 2.26 in support of Policy DME 5, we consider that Heathrow Airport should be included under point i) within Policy SEA 2 as a location designated for both hotel and office growth. The suggested wording for a third bullet point under i) is as follows:

***“Heathrow Airport as defined in map 13.1.”***

Map O identifies locations for hotel and office growth and shows these locations in detail as ‘clusters 1-6’. We would question the suitability of some of these allocations as locations for ‘growth’, as each of the sites in clusters 1-6 have little opportunity for further growth. For the Local Plan to properly encourage office and hotel growth, greater flexibility to allow the introduction of such uses at sustainable locations needs to be written into the relevant policies.

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

We consider this policy has the potential to negatively affect the future development of the airport.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

|  |
|--|
|  |
|--|

**PART B - Your responses**

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   |
|-------------------------------------|-----------------------------------|
| <input checked="" type="checkbox"/> | Development Management Policies   |
| <input type="checkbox"/>            | Site Allocations and Designations |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|--|---|
| <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                             |
|-------------------------------|-----------------------------|
| Policy number;                | DME1 Living Walls and Roofs |
| Paragraph number;             |                             |
| Table or figure number; or    |                             |
| Map number (Atlas of Changes) |                             |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |
|-------------------------------------|-------------------------------------|
| <input type="checkbox"/>            | It has not been positively prepared |
| <input checked="" type="checkbox"/> | It is not justified                 |

|                                     |   |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/>            | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

We are comfortable with the revised wording of Policy DME1 1 part i) as it enables flexibility in the application of the policy where the provision of living walls and roofs is not suitable or possible. We do not support part ii) of the policy however, which requires offsite contributions where on site provision is not possible. This incorrectly implies that all major development in AQMAs will have adverse air quality impacts and that such impact will be materially reduced by living walls and roofs. Hence, the draft policy states that where it is not possible to provide living walls and roofs, an offsite contribution may be sought.

The policy requires greater flexibility in its approach to take account of the feasibility of provision and the nature of mitigation required (if any). An offsite contribution may not always be necessary or appropriate. We would therefore recommend the deletion of part ii) of the policy since part i) provides the necessary and more proportionate approach to securing living walls and roofs.

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

We consider this policy has the potential to negatively affect the future development of the airport.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and,**

Addendum to the Strategic Flood Risk Assessment), please provide your comments below.

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**PART B - Your responses**

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                                      |                     |
|--------------------------------------|---------------------|
| <b>Policy number;</b>                | DMEI 14 Air Quality |
| <b>Paragraph number;</b>             |                     |
| <b>Table or figure number; or</b>    |                     |
| <b>Map number (Atlas of Changes)</b> |                     |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|  | Yes                      | No                                  |
|--|--------------------------|-------------------------------------|
| <b>Sound?</b>  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <b>Prepared in accordance with the duty to cooperate, legal and procedural requirements?</b> | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|  |   |
|--|---|
| <input type="checkbox"/> It has not been positively prepared | <input checked="" type="checkbox"/> It is not effective |
|--|---|

|                          |                            |
|--------------------------|----------------------------|
| <input type="checkbox"/> | <b>It is not justified</b> |
|--------------------------|----------------------------|

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>It is not consistent with national policy</b> |
|-------------------------------------|--|

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

|   |
|---|
| <p>We are pleased that the final paragraph of the draft policy has been deleted. However, we still consider the draft policy to be confusing and contradictory. Therefore, we suggest the draft policy is amended in its entirety to state:</p> <p><i>To sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants, development proposals should:</i></p> <ol style="list-style-type: none"> <li>1. <i>be at least 'air quality neutral', that is, result in no material worsening of existing air quality emissions;</i></li> <li>2. <i>where possible demonstrate appropriate reductions in emissions; and</i></li> <li>3. <i>where points 1. and 2. cannot be met, sufficiently mitigate any air quality effects that may occur as a result of the development.</i></li> </ol> |
|---|

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

|  |
|--|
| <p>We consider this policy has the potential to negatively affect the future development of the airport.</p> |
|--|



**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                                   |
|-------------------------------|-----------------------------------|
| Policy number;                | DMAV1 Safe Operations of Airports |
| Paragraph number;             | Paragraph 8.35                    |
| Table or figure number; or    |                                   |
| Map number (Atlas of Changes) |                                   |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                                     |   |
|--------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/>            | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

Our comments relate to three specific areas:

1. Land uses and air noise.  

Our previous consultation response noted the wording at section B) ii) which states that sensitive land uses should not be located in areas significantly affected by aircraft noise without acceptable mitigation measures. Our response suggested that this policy should go further and specify where planning permission would be refused for sensitive uses within specific air noise contours.

The Council's response to our suggestion was not to change the wording, as the policy would provide the Council with flexibility to manage the potential impacts of noise. In this respect, we maintain our previous comments but suggest that if the Council are unwilling to adopt a noise contour based approach then reference needs to be made to the Aviation Policy Framework, specifically to paragraphs 3.20 to 3.23 which clearly sets out the Government's position toward land use planning and management in areas exposed to air noise.
2. Aviation safety  

We note the deletion of the following sentence:

*"iii) development which has the ability to deleteriously impact on the safe movement of aircraft through location, height, operation, design, materials or ability to attract birds, is not supported."*

No justification has been provided for this deletion. Under these circumstances, we object to the revised draft policy as it now lacks the necessary safeguards for protecting airport operations.
3. Terminals  

At paragraph 8.35, reference to Heathrow having four terminals has been changed to five terminals. The original text was in fact correct. Heathrow currently operates four terminals, numbered 2 to 5. Terminal 1 was closed in June of this year.

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                          |  |
|--------------------------|--|
| <input type="checkbox"/> |  |
|--------------------------|--|

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

We consider this policy has the potential to negatively affect the future development of the airport.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                            |
|-------------------------------|----------------------------|
| Policy number;                | DMAV2 Heathrow Airport     |
| Paragraph number;             | Paragraph 8.46, 8.47, 8.51 |
| Table or figure number; or    |                            |
| Map number (Atlas of Changes) |                            |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/>            | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

1. Airport related uses.

We have set out our position with regard to office and hotel accommodation being located on airport. On this basis we do not agree with part i) of Policy DMAV 2 which seeks to restrict on-airport development proposals to only airport related uses.

We also refer to our previous consultation response with respect to Part B) of the draft policy and maintain that part B) is not necessary given that the local planning authority cannot control the occupation of developments outside the airport boundary once implemented. For example, an off-airport B8 warehouse could be approved through the planning system in the usual way, but later let to an airport related use without any planning implications. Continuing the policy stance to restrict all such uses to within the airport boundary is inconsistent with reality on the ground and runs counter to the general aspirations of other boroughs to welcome such economic development. As stated previously, many of the commercial land uses in the surrounding boroughs are airport related given the significant economic influence of the airport. We therefore ask that part B) is deleted.

2. Pressure on the Green Belt and congestion.

Para 8.46 suggest that non-airport related uses located on airport have the potential to put pressure on the Green Belt as well as contributing to congestion. HAL has set out its position on the potential for Green Belt encroachment, being that the Green Belt already has a high level of protection at all levels of policy to protect against such encroachment.

In terms of congestion, Heathrow Airport benefits from greater public transport accessibility than the suggested locations for office and hotel accommodation and is therefore likely to be more favourable in sustainability terms for a number of ancillary uses. On this basis, we consider that paragraph 8.46 should be deleted.

3. Other matters.

The final sentence of paragraph 8.47 refers to 'BAA'. This should be changed to 'Heathrow Airport Limited'.

Paragraph 8.51 rightly makes reference Airports Commission report being published in July 2015. Should the Government decide to endorse the Commission's recommendation, the result will have a significant influence on the Plan area. We consider it sensible to mention this possibility in this paragraph.

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

|   |
|---|
| We consider this policy has the potential to negatively affect the future development of the airport. |
|---|

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

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## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                        |
|-------------------------------|------------------------|
| Policy number;                | MIN 2 Prior Extraction |
| Paragraph number;             |                        |
| Table or figure number; or    |                        |
| Map number (Atlas of Changes) |                        |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/>            | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |



**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

We were content with the original wording of the policy which included a caveat of where prior extraction of minerals would not be required:

*“ii) where there is, having regard to all relevant planning considerations, an overriding case in favour of allowing the proposed surface development to proceed without prior extraction...”*

This part of the policy has been deleted and replaced by a sentence under iii) allowing for surface development where there is an overriding community need that outweighs the mineral resource.

We consider that the original policy text as quoted above should be reinstated. Alternatively, the new part iii) to the policy should include an ‘overriding need’ caveat that includes surface developments that are in the national interest. With such text in place, the policy would be more aligned with the NPPF where it states under paragraph 143 that mineral safeguarding policies should not create “...a presumption that resources defined will be worked...” and that prior extraction should only occur “...where practicable and environmentally feasible.”

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

We consider this policy has the potential to negatively affect the future development of the airport.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and,**

**Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

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## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                           | Consultation Statement                          |
| <input checked="" type="checkbox"/> | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                   |
|-------------------------------|-------------------|
| Policy number;                |                   |
| Paragraph number;             |                   |
| Table or figure number; or    |                   |
| Map number (Atlas of Changes) | Map 13.1 (i) (ii) |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                                     |   |
|--------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/>            | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

The airport boundary shows a number of errors and should be amended to include the following land parcels:

- Pod Parking;
- The gap shown to the south east of the Longford Roundabout;
- Spout Lane reservoir;
- The Esso Petrol Station on the Southern Perimeter Road;
- The commercial buildings along A30 Great South West Road between Stanwell Road and the Twin Rivers.

We are happy to provide the airport boundary in whichever format is convenient for the Council.

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

We consider this policy has the potential to negatively affect the future development of the airport.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**



## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                           | Consultation Statement                          |
| <input checked="" type="checkbox"/> | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |  |
|-------------------------------|--|
| Policy number;                |  |
| Paragraph number;             |  |
| Table or figure number; or    |  |
| Map number (Atlas of Changes) | Map 20.5 PTR5 – Heathrow Bus Interchange |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                                     |   |
|--------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/>            | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

The title should be changed from 'Heathrow Bus Interchange' to 'Heathrow CTA Public Transport Interchange', as the site links to other forms of public transport directly below ground and not only busses.

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

We consider this policy has the potential to negatively affect the future development of the airport.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                          |  |
|--------------------------|--|
| <input type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |



## Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** [localplan@hillingdon.gov.uk](mailto:localplan@hillingdon.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillingdon.gov.uk](mailto:localplan@hillingdon.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## **Monitoring Questions**

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.





Local Plan &lt;localplan@hillington.gov.uk&gt;

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**REPRESENTATIONS TO THE LB HILLINGDON LOCAL PLAN: PART 2**

1 message

**Charlotte Scotney** [REDACTED]

8 December 2015 at 10:56

To: [REDACTED]  
Cc: Jane Barnett [REDACTED]

Dear Sir / Madam

**REPRESENTATIONS TO THE LB HILLINGDON LOCAL PLAN: PART 2**

Please find attached formal planning representations prepared and submitted by Savills on behalf of the London Diocesan Fund (LDF) in response to the Hillingdon Local Plan Part 2 (specifically the Site Allocations Document and the Development Management Policies Document).

The following information has been attached as part of this submission:

- **Submission cover letter**
- **Representations in respect of Site Allocations document**
- **Representations in respect of Development Management Policies document**
- **Representation form**

These representations form an objection to policy SA 22 of the revised Proposed Submission version of the Site Allocations document, which excludes the site from the mixed use allocation and seek to reallocate the LDF site for part A1 retail (employment generating use) with the remainder of the site allocated as residential.

It is considered necessary to participate in the oral part of the examination due to the fact that the policy alteration (as explained above) is a fundamental change to the draft Site Allocations plan and significantly impacts on housing (and retail) and supply issues, which go to the heart of the plan and its soundness. On this basis we request that we are able to attend the examination to present further evidence.

We have also submitted these representations by post and we would be grateful if you could confirm receipt of these documents. We would also appreciate if you could notify us of any future consultations or publications.

Please do not hesitate to contact me on the details below or my colleague Jane Barnett on [REDACTED] should you have any queries regarding the above.

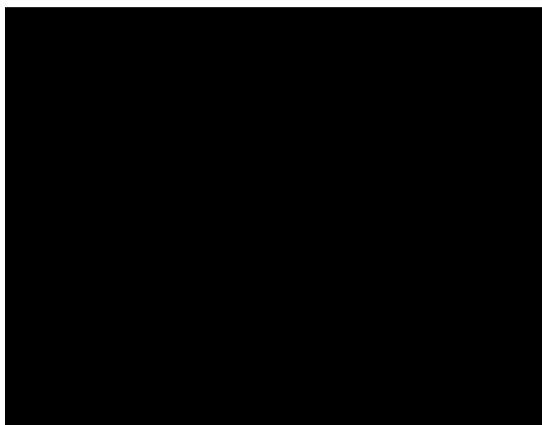
Yours faithfully,

Charlotte

**Charlotte Scotney BA (Hons), MA, MRTPI**

**Senior Planner**

**Planning**



Before printing, think about the environment



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Registered office: 33 Margaret Street, London, W1G 0JD. Registered in England No. 2605138

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#### 4 attachments



**LBH representation SA policies with design document final.pdf**

17854K



**LBH representation DM policies final.pdf**

211K



**Representation form final.pdf**

143K



**Cover Submission Letter.pdf**

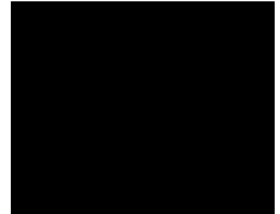
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8 December 2015



Planning Department,  
Civic Centre,  
High Street,  
Uxbridge, Middlesex  
UB8 1UW

Jane Barnett



**BY EMAIL:** [planning@hillingdon.gov.uk](mailto:planning@hillingdon.gov.uk)

Dear Sirs,

## **REPRESENTATIONS TO THE HILLINGDON LOCAL PLAN: PART 2**

Please find enclosed formal planning representations prepared and submitted by Savills on behalf of the London Diocesan Fund (LDF) in response to the Hillingdon Local Plan Part 2 (specifically the Site Allocations Document and the Development Management Policies Document).

### Background

The LDF recently acquired the freehold of the Matalan site, Pump Lane, Hayes UB3 3NB in mid-October 2015. The property comprises a 40,450 sq ft single storey retail warehouse occupying a 1.89 acre site on Pump Lane in Hayes. The red line plan attached at Appendix 1 of the representations illustrates the extent of the land ownership. The property is let in its entirety to Matalan Retail Ltd under a current lease expiring in May 2026 (10.4 years unexpired).

The LDF consider that the land offers an ideal medium or more likely longer term solution to meeting primarily the pressing housing needs and demands of the borough and local area whilst also meeting employment needs. From initial discussions with Matalan, there could be an opportunity to consider an alternative retail format for their continued retail occupation and therefore on that basis the site offers a post-2021 opportunity (third LDF cycle) with the possibility of an earlier release for redevelopment (i.e. post 2016).

The LDF site (known as Site 'B') was allocated as part of the Chailey Industrial Estate alongside the site to west (known as Site 'A'). Site B (the LDF site) was allocated for mixed use development suitable for 40% employment generating uses under Policy SA 18 of the Proposed Submission version of the document. This document was subject to consultation between 22 September and 4 November 2014. Policy SA 22 of the revised Proposed Submission version of the Site Allocations document excludes the site from the mixed use allocation and allocates the land to the west (previously known as site A under policy SA 18) for 100% residential use).

### Representations

These representations form an objection to policy SA 22 of the revised Proposed Submission version of the Site Allocations document, which excludes the site from the mixed use allocation and seek to reallocate the LDF site for part A1 retail (employment generating use) with the remainder of the site allocated as residential.

Oral Examination

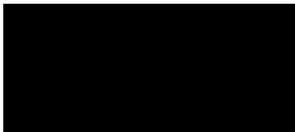
It is considered necessary to participate in the oral part of the examination due to the fact that the policy alteration (as explained above) is a fundamental change to the draft Site Allocations plan and significantly impacts on housing (and retail) and supply issues, which go to the heart of the plan and its soundness. On this basis we request that we are able to attend the examination to present further evidence.

Summary

We have submitted these representations by both post (enclosed with this letter) and email, and we would be grateful if you could confirm receipt of these documents. We would also appreciate if you could notify us of any future consultations or publications.

In the meantime, should you require any additional information or have any further queries, please do not hesitate to contact my colleague Charlotte Scotney at [REDACTED] or myself.

Yours faithfully,

A large black rectangular redaction box covering the signature area.

**Jane Barnett**  
**Director**  
**Savills Planning and Regeneration**

cc. Will Hagger, London Diocesan Fund



# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |                            |              |  |
|----------------------------|----------------------------|--------------|--|
| Title                      | Mr                         |              |  |
| First name                 | William                    |              |  |
| Last Name                  | Hagger                     |              |  |
| Organisation (if relevant) | London Diocesan Fund (LDF) |              |  |
| Unit                       |                            | House number |  |
| House name                 |                            |              |  |
| Address 1                  |                            |              |  |
| Address 2                  |                            |              |  |
| Town                       |                            |              |  |
| County                     |                            |              |  |
| Postcode                   |                            |              |  |
| Telephone                  |                            |              |  |
| Email                      |                            |              |  |

| 2. Agent's Name and Address (if applicable) |         |              |  |
|---|---------|--------------|--|
| Title                                       | Ms      |              |  |
| First name                                  | Jane    |              |  |
| Last name                                   | Barnet  |              |  |
| Company                                     | Savills |              |  |
| Unit  |         | House number |  |
| House name                                  |         |              |  |
| Address 1                                   |         |              |  |
| Address 2                                   |         |              |  |
| Town  |         |              |  |
| County                                      |         |              |  |
| Postcode                                    |         |              |  |
| Telephone                                   |         |              |  |
| Email                                       |         |              |  |



## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                           | Consultation Statement                          |
| <input checked="" type="checkbox"/> | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |   |
|-------------------------------|---|
| Policy number;                | Site Allocations policy SA 22   |
| Paragraph number;             | N/A   |
| Table or figure number; or    | Site Allocations Table 3.3  |
| Map number (Atlas of Changes) | <ul style="list-style-type: none"> <li>• Site Allocations map accompanying policy SA 22</li> <li>• Site Allocations document Map B: Hayes Industrial Area SIL (PIL) showing clusters 1-7 near Hayes Town (and cluster 7 individual map)</li> <li>• Composite Policies Map North Sheet</li> <li>• Policies Map Atlas of Changes (Map 19.22)</li> </ul> |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>It has not been positively prepared</b> |
| <input checked="" type="checkbox"/> | <b>It is not justified</b>                 |

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>It is not effective</b>                       |
| <input checked="" type="checkbox"/> | <b>It is not consistent with national policy</b> |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

Please refer to Savills representation statement which seeks amendments to the following:

- Site Allocations Policy SA 22 (and accompanying map)
- Site Allocations Table 3.3
- Site Allocations Map B: Hayes Industrial Area SIL (PIL) showing clusters 1-7 near Hayes Town (and cluster 7 individual map)
- Composite Policies Map (North Sheet)
- Policies Map Atlas of Changes (Map 19.22)

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

The LDF site (located at Pump Lane, Hayes) was originally allocated in the Proposed Submission version of the Site Allocations document (under draft policy SA 18) as a mixed use development site.

The Revised Proposed Submission version of the document excludes the site from the draft site allocation (as per draft policy SA 22).

It is considered necessary to participate in the oral part of the examination due to the fact that the policy alteration (as explained above) is a fundamental change to the draft Site Allocations plan and significantly impacts on housing (and retail) and supply issues, which go to the heart of the plan and it's soundness. On this basis we request that we are able to attend the examination to present further evidence.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

N/A

**PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

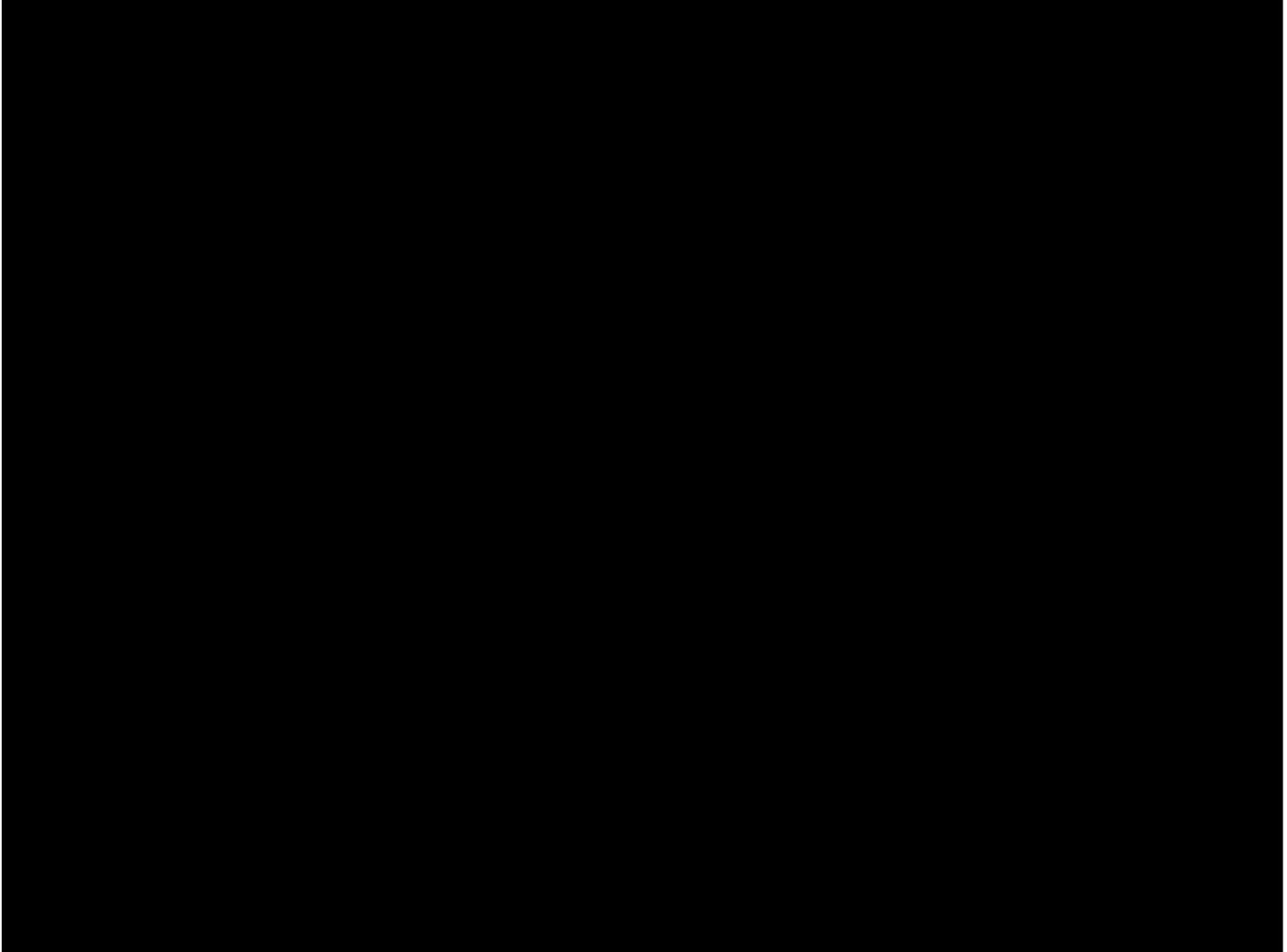
- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.



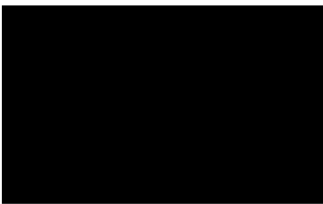
December 2015

# **London Borough of Hillingdon Local Plan Part 2 Revised Proposed Submission Consultation**

## **Site Allocations and Designations and Policies Map (October 2015)**

### **Planning Representations in Response to Representation Form**

Prepared by Savills UK on Behalf of London Diocesan Fund (LDF)



# 1. Introduction

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- 1.1 These planning representations have been prepared by Savills on behalf of The London Diocesan Fund (LDF) in response to the Local Plan Part 2 Revised Proposed Submission Consultation - comprising Development Management Policies, Site Allocations and Designations and Policies Map - which is undergoing consultation from 26 October – 8 December 2015.
- 1.2 These representations provide a formal response to the Site Allocations Document and should be read in conjunction with, the Local Plan Part 2 Representation Form and the questions that have been put forward by London Borough of Hillingdon (LBH).
- 1.3 The LDF recently acquired the freehold of the site in October 2015. The property comprises a 40,450 sq ft single storey retail warehouse occupying a 1.89 acre site on Pump Lane in Hayes, which is well-located for access to Hayes town centre and Hayes & Harlington rail station. The property is let to Matalan Retail Ltd under a current lease expiring in May 2026 (10.4 years unexpired).
- 1.4 The tenant currently operates the site for the sale of discount clothing, shoes and homeware in accordance with the consent granted by a planning permission in 2000 (referenced 34731/APP/2000/1740) which extended the permitted use to "*clothing, household goods and textiles, shoes, china, glassware and pottery, seasonal goods and ancillary items in addition to the range of goods previously granted in 1996*". An earlier planning permission granted in October 1996 (referenced 34371X/96/916), which sought to vary the original permission (referenced 262AD/83/1141), approved a widening of the sales of non-bulky goods to "*non-food retail development limited to the sale of DIY articles, garden materials and goods, building and decorating equipment and related goods, furniture and furnishings, self-assembly furniture, carpets, floor coverings, white goods and other electrical goods and accessories, computers, office stationery and equipment, pets and pet products.*"
- 1.5 A red line plan illustrating the extent of landownership is found at **Appendix 1** of these planning representations. The land shown on the red line plan indicates the land that these representations consider suitable for residential and retail uses and as a result should be re-instated for such purposes as part of a Further Modification to the Revised Proposed Submission Site Allocations (SA) DPD.
- 1.6 The LDF consider that the land offers an ideal medium or more likely longer term solution in meeting primarily the pressing housing needs and demands of the borough



and local area whilst also meeting employment needs. From initial discussions with Matalan, there could be an opportunity to consider an alternative retail format for their continued retail occupation and therefore on that basis the site offers a post 2021 opportunity (third LDF cycle) with the possibility of an earlier release for redevelopment (i.e. post 2016).

1.7 On the above basis, formal representations and proposed changes are made to the following draft policies in relation to the Revised Submission Site Allocations DPD which specifically concern the LDF site, as follows:

**a. Draft Site Allocations Policy SA 22**

**b. Draft Site Allocations Table 3.3 Proposed Allocations**

**c. Proposed Map Changes:**

**i. Site Allocations SA 22 accompanying map**

**ii. Site Allocations Draft Map B Hayes Industrial Area SIL (PIL) showing clusters 1-7 near Hayes Town (and cluster 7 individual map)**

**iii. Composite Policies Map (North Sheet)**

**iv. Policies Map Atlas of Changes (Map 19.22)**

1.8 Each of these policies will be discussed in turn in the following sections of this representation.

## 2. Draft Site Allocations Policy SA 22

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### Submission Site Allocation B under draft Policy SA18

- 2.1 By way of background, the site has been included as a mixed use allocation in the previous Site Allocations Document (“Proposed Submission” version which was subject to consultation between September to November 2014). The site was identified within a wider designation (labelled “Site B”) under draft Policy SA18 considered appropriate for residential with 40% of Site B allocated for employment generating uses.
- 2.2 The adjoining site known as “Site A” was allocated under the same draft policy for residential uses on up to 50% of the site with the remaining area of Site A retained for employment uses. In the Council’s assessment at the time of both Sites A and B for mixed use development, it was concluded that *“whilst there has been some recent investment, it is evident that the employment area could benefit from some more new development. In particular the redevelopment of some isolated bulky goods retail buildings into medium sized business units would benefit the employment site. The Chailey Industrial Estate on the south western section of Pump Lane provides an opportunity to enhance Hayes Town centre and is identified for mixed use development proposals in Chapter 2 of this document. The remaining area of Pump Lane, as shown on the map below should be re-designated as a Locally Significant Industrial Location and part of the Hayes Industrial Area – Preferred Industrial Location.”* The full extract of draft policy SA18 is attached at **Appendix 2** of these representations.
- 2.3 The Council then approved consultation on further changes to the draft Plan in March 2015 which included the proposed removal of the LDF’s site from “Site B” within the current Revised Submission document and allocation of Chailey Industrial Estate (land to the west) for 100% residential uses. We are not aware of any local plan evidence that supports this fundamental policy change at this stage of the plan review process. However, it is clear that the Council considered the principle of residential redevelopment appropriate on the LDF’s site (forming part of “Site B”) with an offer of employment generating uses as part of a mixed use development at this specific location.
- 2.4 As a result, it is the view that the LDF site continues to offer this opportunity and should be re-instated as a mixed use allocation.

## Planning Commentary

- 2.5 These representations seek to amend the site allocations policy SA 22 to be broadly in line with the site allocation published in the proposed submission consultation version of the document in Autumn 2014.

### *The Proposals*

- 2.6 The site should be allocated for a mixed use development, with the Council requiring part of the site for employment generating uses in the form of A1 retail use with the remaining part of the site in residential use.
- 2.7 The proposals relate to employment generating uses in the form of a reconfigured retail use at ground floor level accommodating 20,000 sq ft of re-formatted retail floorspace based on current market requirements with potential for a full-cover mezzanine floor level given double height and good frontage onto Pump Lane. The employment generating use is based on the existing employment offer at the site but with an improved configuration to meet current retailer demands and specification requirements whilst achieving the Council's overall objective for retained employment generating uses at the site. The proposals also include residential development (at a potential unit capacity of circa 80-100 units) above the retail unit and at the rear of the site.
- 2.8 An initial design feasibility has been undertaken by Coleman Architects to broadly illustrate proposed layout of the scheme and how it responds to the existing and future context of the site. The scheme has been designed to fit well with the surrounding uses and to create a site which is an attractive place to live and to shop, with landscaped areas and shared external amenity courtyard spaces. The initial design feasibility brochure showing how a mixed use scheme for residential and retail could come forward is found at **Appendix 4**.
- 2.9 It is proposed that the land surrounding the re-instated mixed use allocation should be defined within the existing employment designation, as defined within the draft Site Allocations document (September 2013) an extract can be found at **Appendix 3**.

### *Employment Generating Uses*

- 2.10 The Revised Submission document has redrawn the boundary of the Hayes Preferred Industrial Location to include the LDF site which the Fund strongly objects to. The LDF site currently occupies a non food retail store and the Fund's proposals for its future redevelopment continue this retail use as part of a mixed use development. It is considered that the LDF site does not offer potential for industrial uses which would apply under the Council's redrawn Preferred Industrial Location designation given that industrial demand is declining within the area more generally where the Council accept alternative land uses through regeneration in the area and the site does not offer a good office location following advice from Savills Office Agency Team. Therefore on this basis, other employment generating uses beyond retail will not achieve the Council's aspirations and in fact will result in an underutilised employment site with sterilised alternative use potential to meet actual development needs and demands in the area.
- 2.11 The A1 (non food / discount use) which will occupy part of the site would provide significant opportunities for employment in the local area and would seek to provide a much improved open A1 retail use (20,000 sq ft with a mezzanine level), which is more suited to modern occupiers than the current outdated retail format of 40,000 sq ft on one level.
- 2.12 From discussions with Matalan and Savills retail agents with knowledge of retailer requirements within this specific area, it is advised that there is a current and future requirement for a 20,000 sq ft format with mezzanine floor level. In relation to a discount retail store, it is normal format within urban locations to develop residential above and alongside the retail which is reflected in the Fund's proposals. The location of this site for mixed uses therefore offers the opportunity for the redevelopment of the site to provide a more suitable and modernised retail format to meet the needs of a modern day open A1 user with good frontage onto Pump Lane and adequate customer parking and delivery/ servicing areas.
- 2.13 Furthermore, there is no evidence to support the alteration to the boundaries of the mixed use allocation to exclude the LDF site. The Employment Land Study prepared by URS (published in February 2014) provides no evidence for redrawing the boundaries of Hayes Industrial Estate to include the LDF site in the revised Submission version and in fact recognises that industrial land requirements are on the decline as indicated in the below extract at paragraph 8.1:

*“There is projected to be a decrease in demand for industrial land of between 20.6ha and 16.3ha (not including frictional floorspace) in the period 2013 to 2026. This is due largely to a forecast decrease in industrial employment as projected by the GLA and a corresponding continuation of a historic declining trend in*

*industrial floorspace take-up...overall it is projected that over the planning period there will be decreasing demand for industrial uses as a whole..Corresponding to this conclusion the GLA Land for Industry and Transport SPG (2012) suggests that demand for industrial land in Hillingdon is likely to be negative in the period to 2031 (at -26 ha or -1.3ha per annum<sup>18</sup>). It places LB Hillingdon in the ‘Limited’ category of transfer of industrial land to other uses. This means that the Council should seek to release industrial land where there is proven to be a surplus of supply to meet forecast demand as per London Plan Policy 4.4.”*

- 2.14 The Fund’s proposals are therefore considered to be entirely in accordance with NPPF paragraph 22 where it states *“Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.”*
- 2.15 This is also consistent with the Government’s direction in policy to ensure that employment land allocated is “fit for purpose” and supported by robust and up to date evidence. Further, both the NPPF, the adopted London Plan 2015 and its Interim Housing SPG (May 2015) actively encourage additional housing at surplus employment sites to optimise housing potential. The retail element proposed as part of the Fund’s proposals is reduced in floor area from existing (although the mezzanine floor would provide an opportunity for an equivalent floorspace as the existing), but offers a better format and accords with the London Plan aspirations (set out in policy 4.8) to encourage a *“successful, competitive and diverse retail sector which promotes sustainable access to the goods and services that Londoners need”* whilst creating employment and continued job opportunity.
- 2.16 These proposals achieve these national, regional and local policy aspirations.

## **Housing**

### *National Policy and Draft Statute*

- 2.17 The National Planning Policy Framework (NPPF) (March 2012) establishes key priorities to *“boost significantly the supply of housing”* (NPPF 47), *“meet the needs of*

*present and future generations” (NPPF 7) and deliver a “wide choice of high quality homes” (NPPF 9).*

- 2.18 A key element of the NPPF’s presumption in favour of sustainable development in plan-making, is that authorities should allocate sufficient land to meet “*full, objectively assessed needs for market and affordable housing*” (paragraph 47); importantly also indicating that Local Authorities should “*use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.*”
- 2.19 The NPPF further states that authorities should “*identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their requirements with an additional buffer of 5% ... where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% ... to provide a realistic prospect of achieving the planned supply*” (paragraph 47). The NPPF also states that authorities should “*identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and where possible, for years 11-15*” (NPPF 47).
- 2.20 The National Planning Practice Guidance (NPPG) (March 2014) states that the starting point for calculating objectively assessed need for housing should be latest household projections published by the Department for Communities and Local Government (DCLG).
- 2.21 The Government published their draft Planning and Housing Bill in October 2015 which is very clear that planning and Local Plans are the mechanism for driving up the rates of housebuilding to meet critical housing needs and demands across the country and London; with the aim to meet the one million homes’ target announced by the current Government, an average of 200,000 dwellings per year would need to be completed over the course of this Parliament. This very clearly places continued pressure on London boroughs such as LBH to identify more housing land to meet a very pressing housing need across the capital. The Government’s Autumn Statement (November 2015) encourages new housing at underutilised employment sites (in accordance with NPPF/ NPPG guidelines) stating that there is a need to: “*accelerate housing supply and get more homes built by...ensuring the release of unused and previously undeveloped commercial, retail, and industrial land for Starter Homes.*”

2.22 This is only apparent again through the very recently published National Population Projections (November 2015) which conclude that the population of UK England is predicted to increase from 54.3m in 2014 to 60.9m in 2031, an increase of 6.5m people. This compares to the previous 2012NPP which projected an increase of 6.2m people. The rate of population growth is therefore predicted to be 4.8% faster over this period than previously envisaged. Over the next 6-8 months ONS will disaggregate the 2014NPP to produce the 2014-based Sub National Population Projections (2014SNPP) for each local authority. These will then be used to formulate the 2014-based Sub National Household Projections (2014SNHP) by DCLG, which should be published in early 2017. Although these projections are national figures at this stage they do clearly indicate that LBH should be driving up their emerging Local Plan targets, given also the likely significant increase in international migration expected to translate to a local level, which appears to have been significantly under-estimated.

#### *LBH's Housing Position*

2.23 The latest 2012 household projections (February 2015) indicate that there is an expected requirement of 29,000 additional households in LBH between 2015 and 2031.

2.24 The adopted Further Alterations to the London Plan (FALP) (adopted March 2015) indicate an increase in the borough's housing target to 5,590 new dwellings between 2011 and 2021. Looking forward to 2026, the London Plan provides a target of 8,385 additional units to be provided over the plan period. This represents a significant 32% increase in housing target and a minimum annual housing target of 559 units per annum.

2.25 Whilst this is an increase from LBH's 2011 housing target, the FALP Inspector's Report did levy criticism that the overall housing target for London within the FALP is at least 6,600 dwellings short of objectively assessed need per annum. The plan was found to be sound, only on the basis that the Greater London Authority (GLA) begins preparation of a new London Plan immediately after the adoption of the FALP. As a result, it could be reasonable to assume that housing targets within LBH will rise again significantly within the next 5 years and beyond.

2.26 It is clear from all of the above that LBH face current and future housing pressures which are very significant and need to be planned for properly within the plan period in identifying readily available housing sites to meet current and future housing demands. The LDF site (in conjunction with the adjoining site allocated for housing in the current plan) represents an ideal opportunity for a residential, mixed use development at this



location. The Council by allocating the site for residential purposes as part of a wider mixed use allocation within their proposed submission (2013) document have acknowledged themselves that these alternative land uses are suitable and appropriate at this location. The site's location is significant again given it is located within a Crossrail area which is a real catalyst for significant housing regeneration (with early evidence of this at High Point Village (Ballymore scheme)). By allocating the LDF site for housing as part of a mixed use allocation, the proposals will not only meet the critical housing needs of the borough and local area but also absorb additional housing demand generated from the "Crossrail effect" at this location in line with London Plan and local planning policy aspirations.

2.27 The Fund seeks a medium to longer term allocation post 2021 to meet longer term housing needs within the plan period.

2.28 As currently worded draft Policy SA 22 does not meet the following NPPF tests of soundness in being:

1. *positively prepared*
2. *justified*
3. *It is not consistent with national policy*

2.29 The recommended policy changes below are considered to make the SA22 sound in assisting the Council meets their minimum housing targets within the plan period in delivering much needed private and affordable housing in the borough; whilst ensuring a better, more market facing retail format as the retained employment generating use at this location.

#### **Recommended Revisions to Policy SA 22**

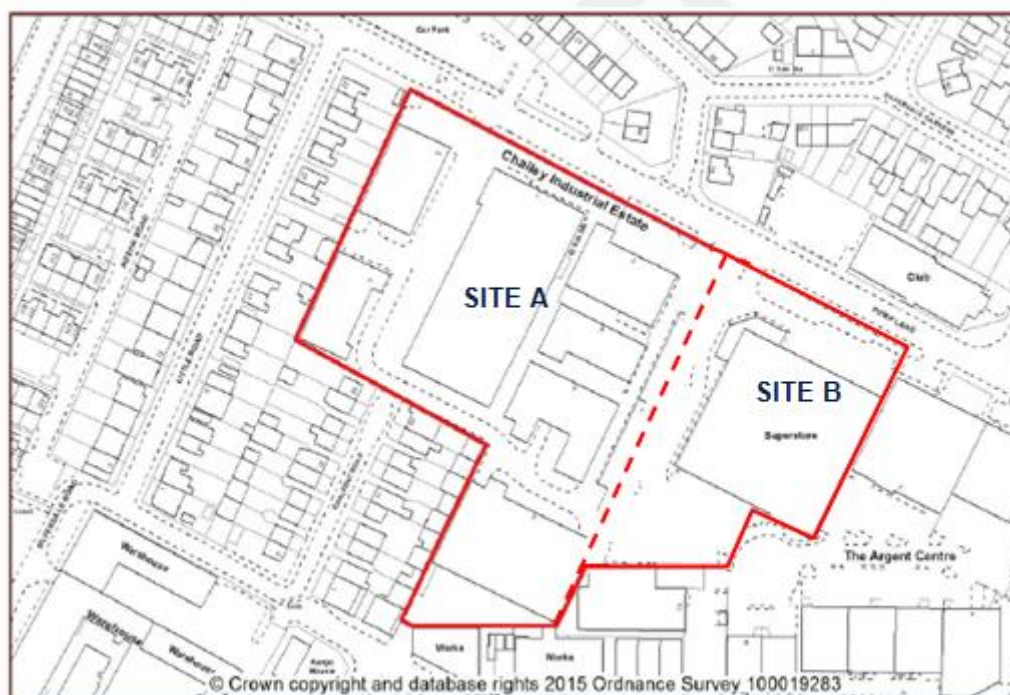
2.30 For all of the reasons set out above, it is recommended that draft Policy SA 22 is amended to read as follows [strikethrough text are deletions; bold text are additions].

#### **Chailey Industrial Estate, Pump Lane, Hayes**

Chailey Industrial Estate forms part of the Pump Lane Industrial Business Area in Hayes and is located in close proximity to Hayes Town Centre. The Council's



Employment Land study identifies the opportunity ~~to~~ **for the** release of the sites for mixed use development.



#### **POLICY SA 22: Chailey Industrial Estate, Pump Lane**

The Chailey site is currently vacant and provides an opportunity for residential, **mixed use development** to enhance Hayes Town Centre and take advantage of the future Crossrail link at Hayes. The following development principles will apply:

- Site A – the site should be released for residential development at a development density of 110 units per hectare.
- Small scale commercial uses at ground floor level to support residential uses will be considered suitable; and
- Development proposals should include a buffer along the eastern boundary of the site to mitigate impacts on residential amenity from the adjacent retail use.
- **Site B – The site should be released for residential and an improved retail offer based on the existing A1 retail use at the site and as an employment generating use at this location;**
- The Council will seek to achieve a proportion of community infrastructure on the site to assist in the regeneration of Hayes;
- Proposals should be provided to a high quality design;

- Open space and amenity space should be provided in accordance with the Council's standards; and
- Proposals should meet the provisions of relevant policies in other parts of the Local Plan.

### Site Information

|   |   |
|---|---|
| <b>Site Name</b>                              | <b>Chailey Industrial Estate Pump Lane</b>  |
| Ward  | Townfield   |
| Location                                      | Chailey Industrial Estate, Pump Lane  |
| Area (ha/sq m)                                | <b>2.6 hectares</b>   |
| PTAL Ratings                                  | 3   |
| Proposed Development                          | <b>Residential and Mixed Use</b> Development  |
| Current UDP Designations                      | Industrial Business Area  |
| Proposed New Designations                     | <b>None adjacent to Strategic Industrial Location</b>                                   |
| Existing Use                                  | Industrial Buildings  |
| Relevant Planning History (Most Recent)       | No Relevant History   |
| Proposed Number of Units                      | <b>Circa 300 units</b>  |
| Existing Units                                | 0   |
| Net Completions                               | <b>Circa 300 units</b>  |
| Infrastructure Considerations and Constraints | To be negotiated as part of the planning application.                                   |
| Flood Risk                                    | Flood Zone 1; surface water ponding; Flood Risk Assessment required.                    |
| Contamination                                 | Potentially contaminated land due to former land use. Land remediation may be required. |
| Indicative Phasing                            | Site A: 2016 – 2021<br><b>Site B: 2021 – 2026</b>                                       |
| Other   | The Chailey Industrial Estate provides an opportunity to                                |

|             |  |
|-------------|--|
| Information | enhance Hayes Town Centre through a site allocation policy for development post 2017 in the forthcoming LDF. The rest of the area should be re-designated as a Locally Significant Industrial Location and part of the Hayes Industrial Area – Preferred Industrial Location. Site is identified for release to other uses in Hillingdon’s Housing Trajectory. |
|-------------|--|

### 3. Site Allocations Table 3.3 – Proposed Allocations

#### Introduction

3.1 To ensure consistency with our recommended policy changes to draft SA22 the following recommended changes are proposed for Table 3.3 as described below.

#### Recommended Revisions to Table 3.3

3.2 The recommended revisions below seek to amend the potential capacity for the site as a whole and also the expected delivery figures as below to include the residential units proposed for the LDF site to come forward during years 2021 – 2026 in the medium to long term.

| Site   | Ward      | (Extant) Planning Permission / Prior Approval for Change of Use | Potential Capacity | Years 2011 - 2016 | Years 2016 - 2021 | Years 2021 - 2026 |
|--|-----------|---|--------------------|-------------------|-------------------|-------------------|
| SA 22<br><br>Chailey Industrial Estate, Pump Lane, Hayes | Townfield | None  | <del>198</del> 282 | 0                 | 198               | 84                |

## 4. Proposed Map Changes

---

### Introduction

4.1 To ensure consistency with our recommended policy changes to draft Site Allocations policy SA 22 the following recommended changes are proposed to the following maps:

*i. Site Allocations SA 22 accompanying map*

*ii. Site Allocations Draft Map B Hayes Industrial Area SIL (PIL) showing clusters 1-7 near Hayes Town (and cluster 7 individual map)*

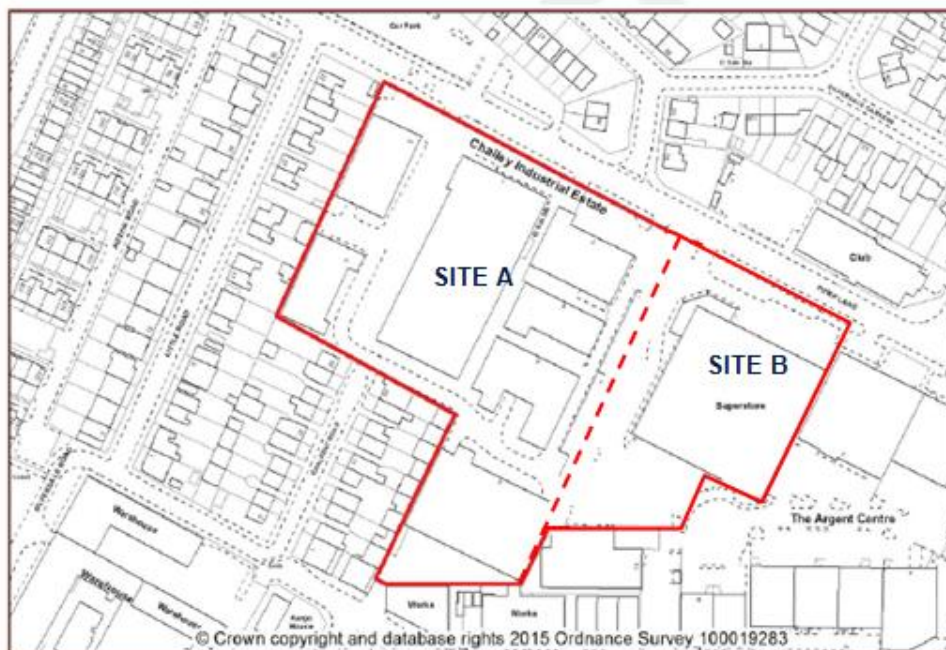
*iii. Composite Policies Map (North Sheet)*

*iv. Policies Map Atlas of Changes (Map 19.22)*

### Recommended Revisions to Maps

*i. Site Allocations SA 22 accompanying map*

4.2 As set out in section 2 of this report, it is recommended that the plan accompanying draft policy SA 22 is amended as follows:

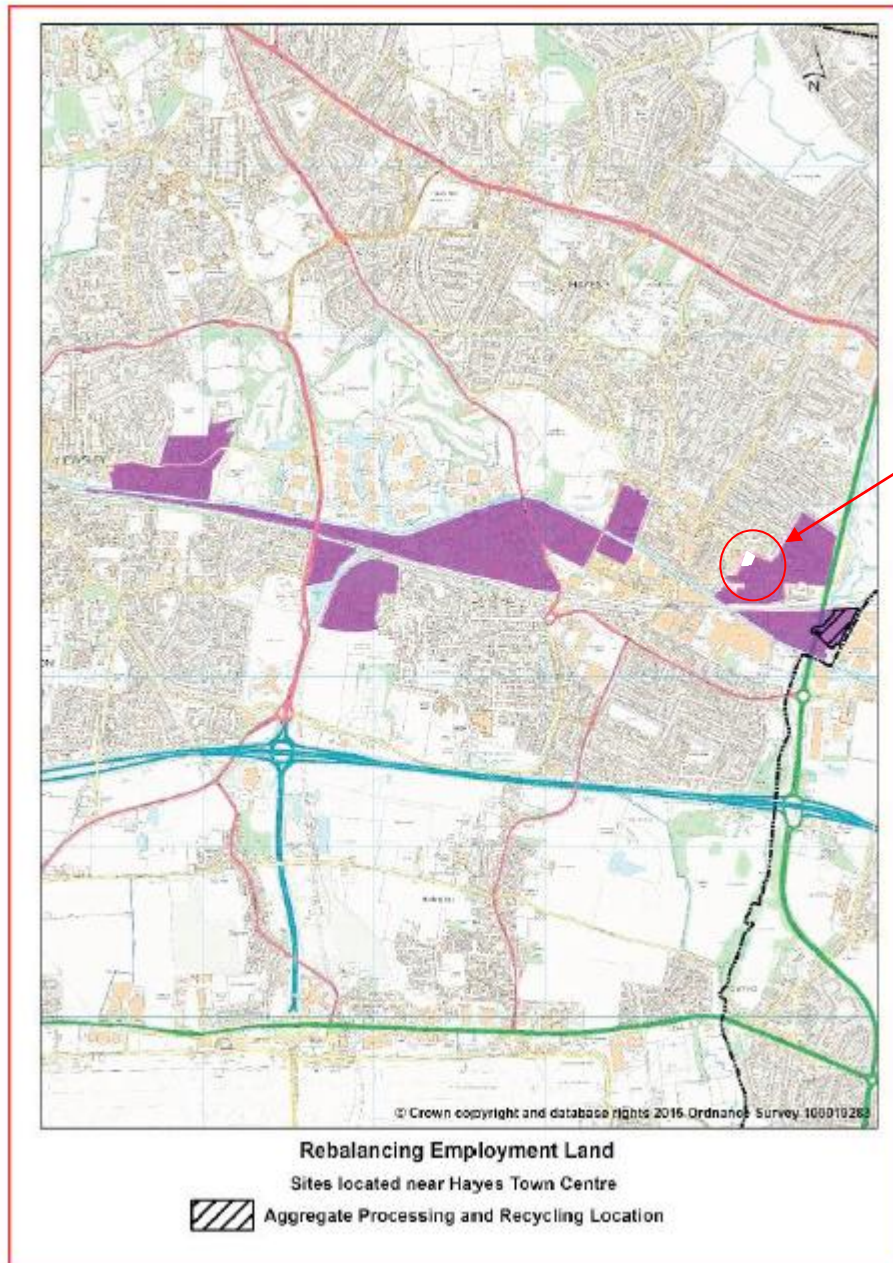




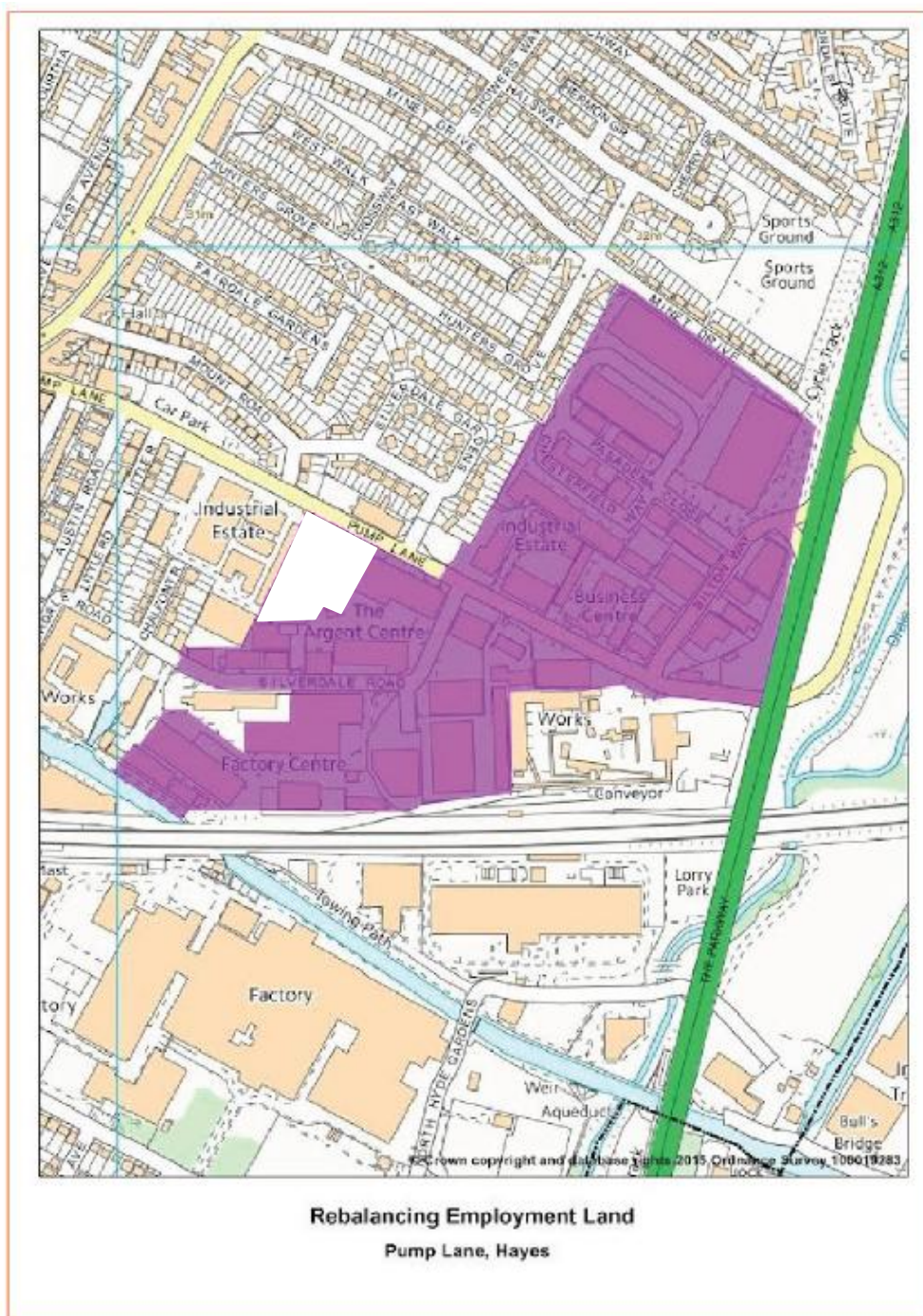
*i. Site Allocations (Rebalancing Employment Lane chapter) Draft Map B Hayes Industrial Area SIL (PIL) showing clusters 1-7 near Hayes Town (and cluster 7 individual map)*

4.3 Site Allocations Draft Map B should be amended to remove the LDF site from the Industrial Area SIL designation as follows (site location indicated by red arrow):

**Map B: Hayes Industrial Area SIL (PIL) showing clusters 1 - 7 near Hayes Town**



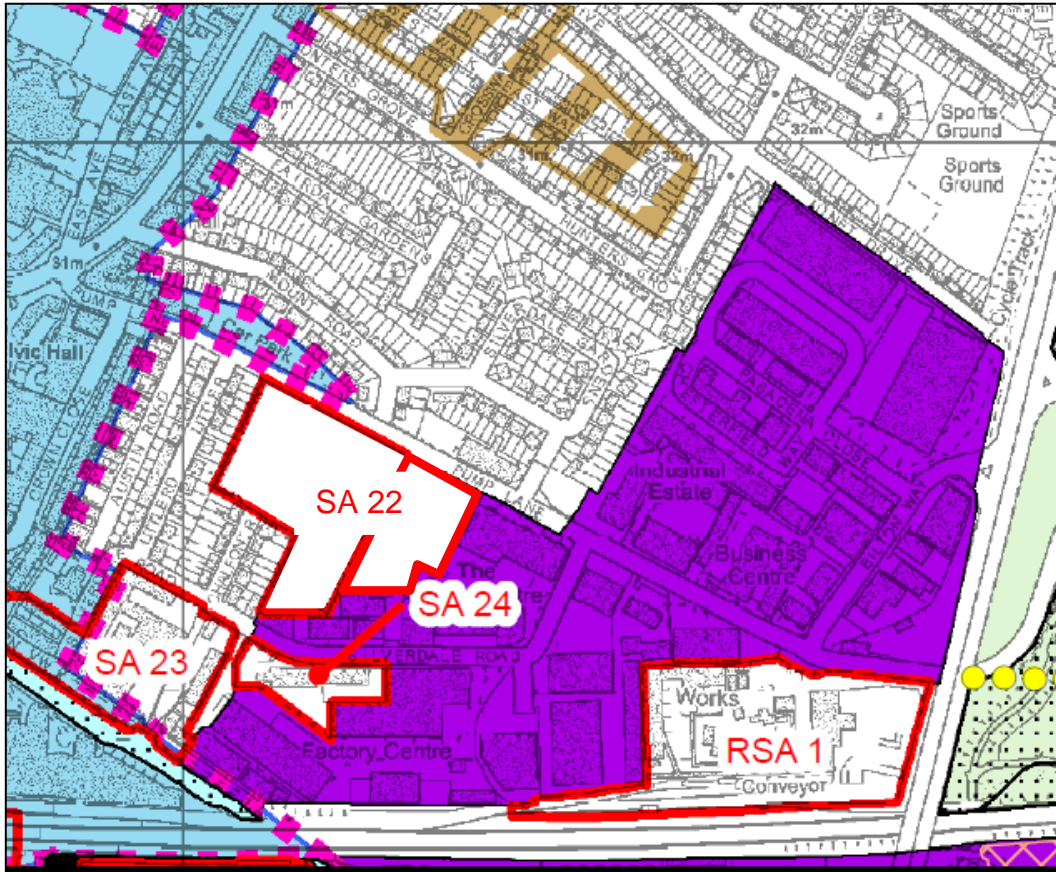
- 4.4 The zoomed in map showing cluster 7 (within which the LDF site is located) should also be amended to again remove the LDF site from the Industrial Area SIL as follows:



***i. Composite Policies Map (North Sheet)***

- 4.5 The extract from the Composite policies map North sheet below should be amended to include the LDF site within the 'SA 22' site allocation and exclude the site therefore from the Hayes Preferred Industrial Location Designation.

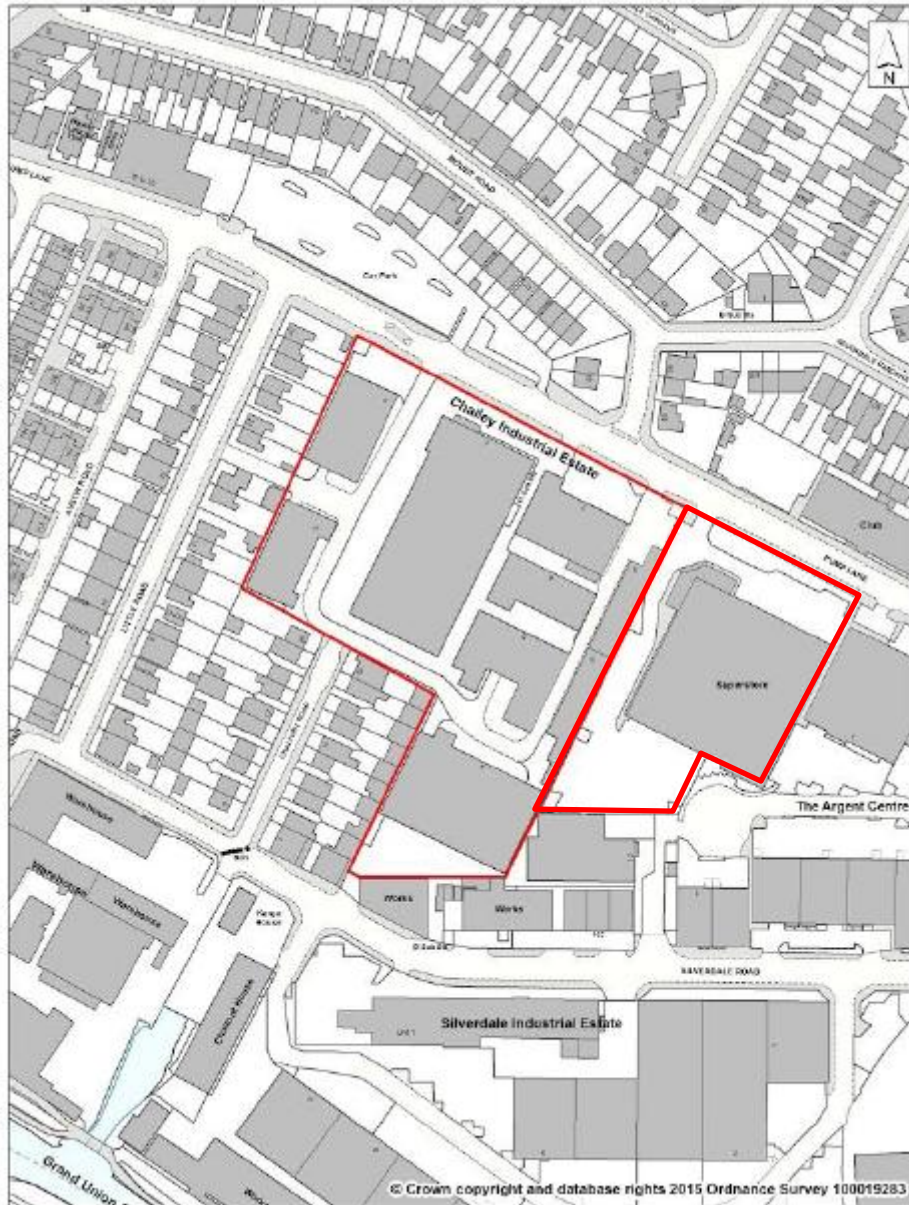




*i. Policies Map Atlas of Changes (Map 19.22)*

- 4.6 Map 19.22 included within the Atlas of Changes document should also be amended to include the LDF within the SA 22 site allocation as per the below:





## 5. Conclusions

---

- 5.1 Formal comments and objections have been made to draft Policy SA 22 from the Site Allocations document.
- 5.2 The LDF site is considered to represent a sustainable mixed use site which could accommodate employment generating uses in the form of open A1 and residential development.
- 5.3 In summary, in respect of the NPPF four tests of soundness it is considered that the Local Plan: Part 2, does not meet these tests. Firstly, given that the FALP (2015) housing target for Hillingdon represents a 32% increase on the 2011 London Plan target, LBH should be identifying more suitable sites for housing if they are to meet this target. The policy has therefore not been positively prepared, as it has not taken into account this pressing need for housing. The inclusion of the LDF site in the Site Allocation document as a mixed use site can contribute to meeting the borough's housing needs in the medium to long term.
- 5.4 Secondly, the Employment Study which appears to form part of the Local Plan part 2 evidence base sets out that industrial land should be released for alternative uses where there is a surplus of supply to meet demand. The Employment Study then goes on to set out that there is projected to be a decrease in demand for industrial land of between 20.6ha and 16.3ha in the period 2013 to 2026, due largely to a forecasted decrease in industrial employment as projected by the GLA. There is no logical reason for including the LDF site within the Hayes Industrial designation if there is no need for additional industrial land and where the site operates as a retail use at the moment. The site instead offers an ideal opportunity for a reformatted retail offer to meet more closely market requirements and deliver much needed housing. Housing demand will be especially significant at the site's location given the Crossrail effect which is a catalyst for extensive mixed use regeneration within the Hayes area within and beyond the town centre.
- 5.5 This approach is in accordance with the NPPF where it is indicated that there should be no unnecessary protection of existing employment land uses and that change of use from employment to residential should be encouraged. The Framework further indicates that planning should respond to market signals and changes in market demand.
- 5.6 For the above reasons, we recommend that:

- The LDF site should be re-introduced within the SA 22 Site designation as set out in the Site Allocations document (and on the composite North policies map and the Atlas of Changes) for mixed use development to include retail (as employment generating uses) and residential. The extent of this proposed site area is identified at **Appendix 1** outlined in red.
- Recommended policy changes are found within this statement.

# Appendix 1: Site Ownership Boundary and Extent of Promoted Land

Matalan, Pump Lane, Hayes



## Appendix 2: Policy SA 18 Site Allocations - Proposed Submission Version (2013) published for consultation September 2014

### New Homes

#### Chailey Industrial Estate, Pump Lane, Hayes

Chailey Industrial Estate forms part of the Pump Lane Industrial Business Area in Hayes. The Council's Employment Land Study identifies the opportunity for some release of this land.



#### POLICY SA 18: Chailey Industrial Estate, Pump Lane

The Chailey site is currently vacant and provides an opportunity for mixed use development to enhance Hayes town centre. The following development principles will apply:

- Site A - Up to 50% of the site should be released for residential development at a development density of 110 units per hectares,
- Site B - The Council will require 40% of the site to be used for employment generating uses;
- The Council will seek to achieve a proportion of community infrastructure on the site to assist in the regeneration of Hayes;
- Proposals should provided to a high quality design;
- Open space and amenity space should be provided in accordance with Council standards; and
- Proposals should meet the provisions of relevant policies in other parts of the Local Plan.



## New Homes

### Site Information

|  |  |
|--|--|
| <b>Site name</b>                               | <b>Chailey Industrial Estate, Pump Lane</b>  |
| <b>Ward</b>                                    | Townfield  |
| <b>Location</b>                                | Chailey Industrial Estate, Pump Lane   |
| <b>Area (ha/sqm)</b>                           | 2.6 ha   |
| <b>PTAL Ratings</b>                            | 3  |
| <b>Proposed Development</b>                    | Mixed use development  |
| <b>Designations</b>                            | Industrial Business Area   |
| <b>Existing Use</b>                            | Industrial buildings   |
| <b>Relevant Planning History (Most recent)</b> | No relevant planning history   |
| <b>Proposed Number of Units</b>                | 150  |
| <b>Existing Units</b>                          | 0  |
| <b>Net Completions</b>                         | 150 units  |
| <b>Infrastructure Considerations</b>           | To be negotiated as part of the planning application.  |
| <b>Indicative Phasing</b>                      | 2016-2021  |
| <b>Other Information</b>                       | The Chailey Industrial Estate provides an opportunity to enhance Hayes town centre through a site allocation policy for development post 2017 in the forth coming LDF. The rest of the area should be redesignated as a Locally Significant Industrial Location and part of the Hayes Industrial Area – Preferred Industrial Location. Site is identified in Hillingdon's Employment Land Study. |

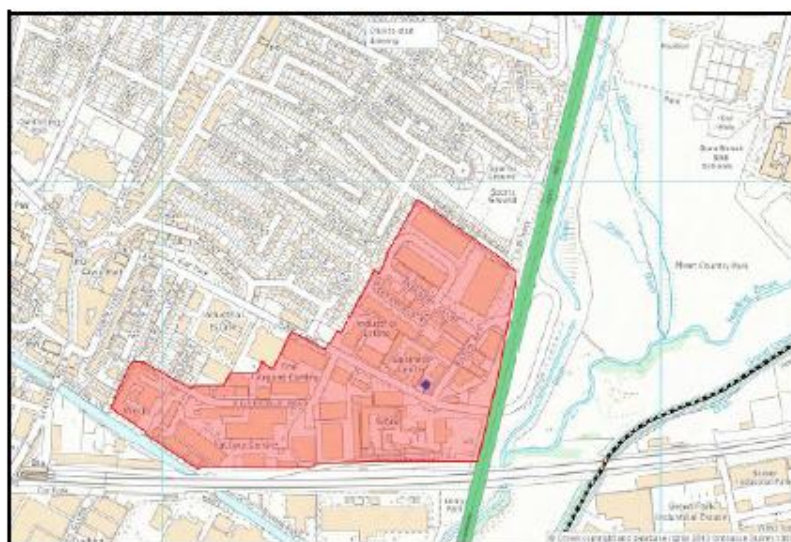
## Appendix 3: Draft Proposed Site Allocations and Designations Document Proposed Submission Version (September 2014) - Rebalancing Employment Land Chapter (Map)

### REBALANCING EMPLOYMENT LAND

#### Pump Lane, Hayes

Pump Lane is a vibrant industrial location with a wide range of businesses. The Council is of the view that the range of industrial business activities justifies the strategic designation. Whilst there has been some recent investment, it is evident that the employment area could benefit from some more new development. In particular the redevelopment of some isolated bulky goods retail buildings into medium sized business units would benefit the employment site.

The Chailey Industrial Estate on the south western section of Pump Lane provides an opportunity to enhance Hayes Town centre and is identified for mixed use development proposals in Chapter 2 of this document. The remaining area of Pump Lane, as shown on the map below should be redesignated as a Locally Significant Industrial Location and part of the Hayes Industrial Area – Preferred Industrial Location.



## Appendix 4: Initial Design Feasibility Brochure





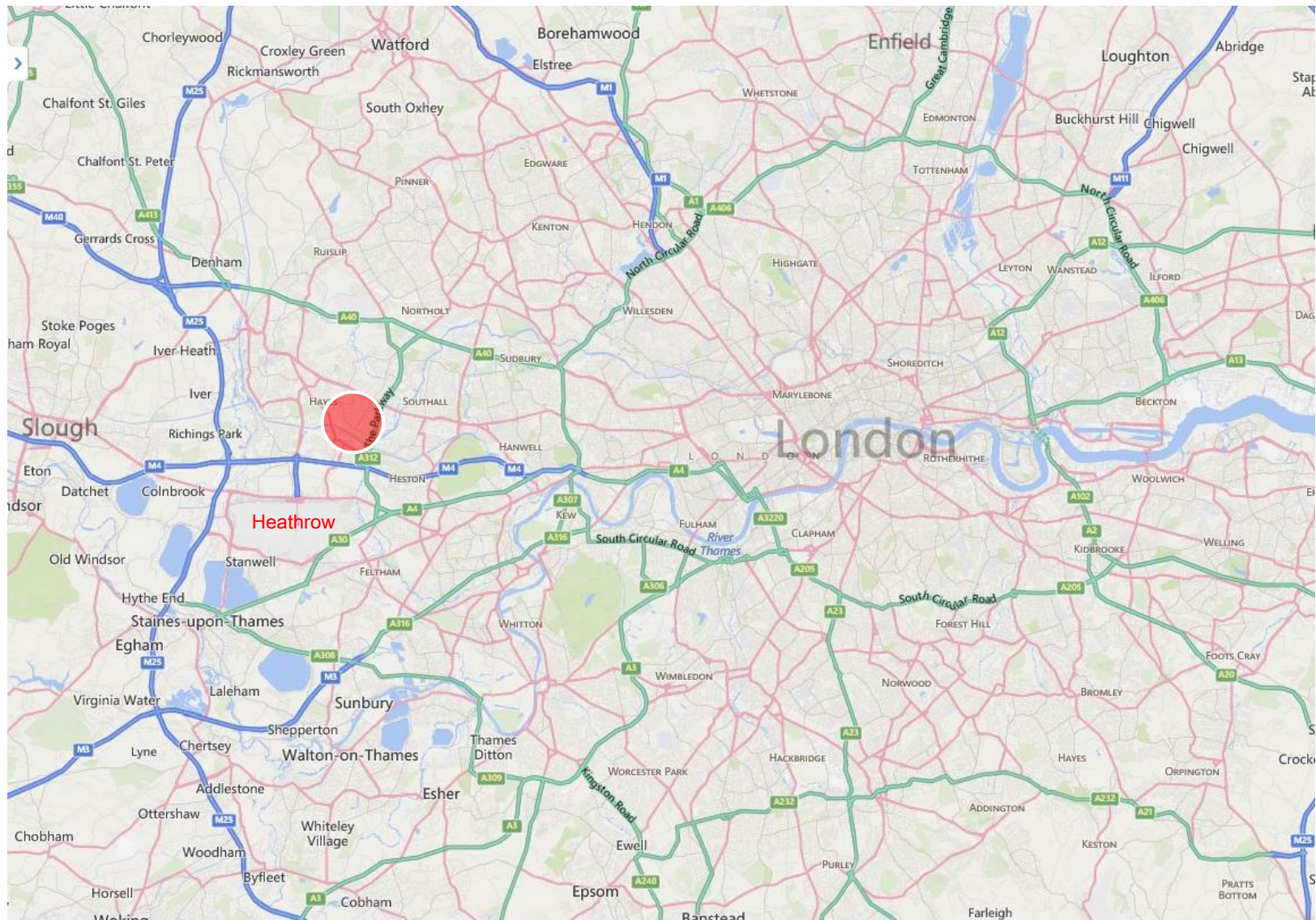
Pump Lane  
Hayes

# A Presentation To London Borough of Hillingdon

by

colman architects







**NetworkRail**

## Crossrail services will be fully operational in 2019

The new service will bring a number of improvements to the Great Western line:

- new electric trains for cleaner and quieter journeys
- longer trains with more space for passengers
- easier journeys into the West End, City and east London, with no need to change trains

For more information about the project visit: [crossrail.co.uk](http://crossrail.co.uk)

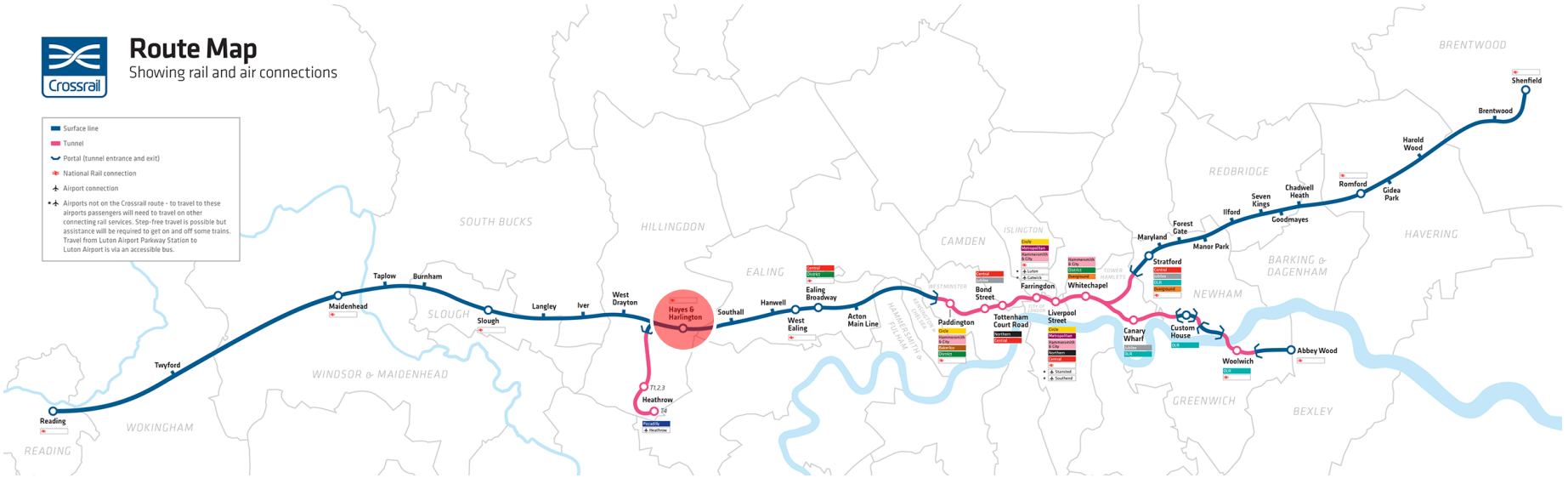
Network Rail Helpline: 08457 114141



### Route Map

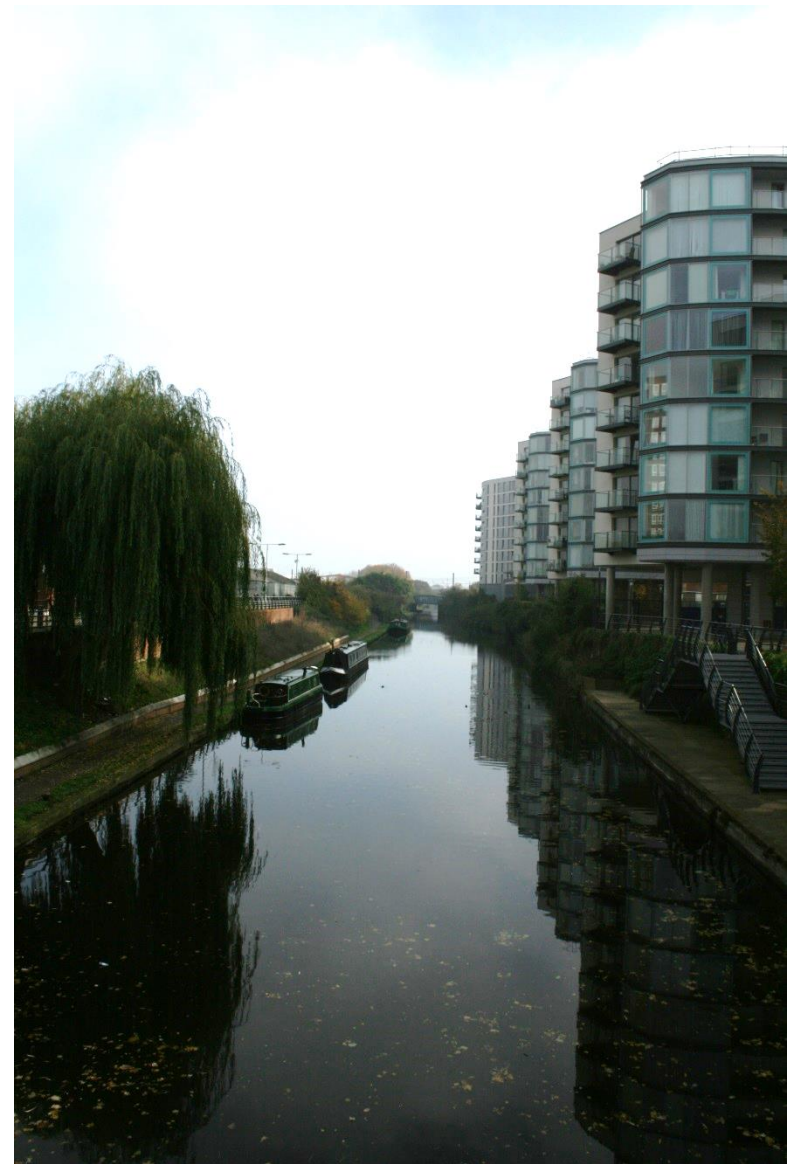
Showing rail and air connections

— Surface line  
— Tunnel  
— Portal (tunnel entrance and exit)  
— National Rail connection  
— Airport connection  
 \* Airports not on the Crossrail route - to travel to these airports passengers will need to travel on other connecting rail services. Step-free travel is possible but assistance will be required to get on and off some trains. Travel from Luton Airport Parkway Station to Luton Airport is via an accessible bus.



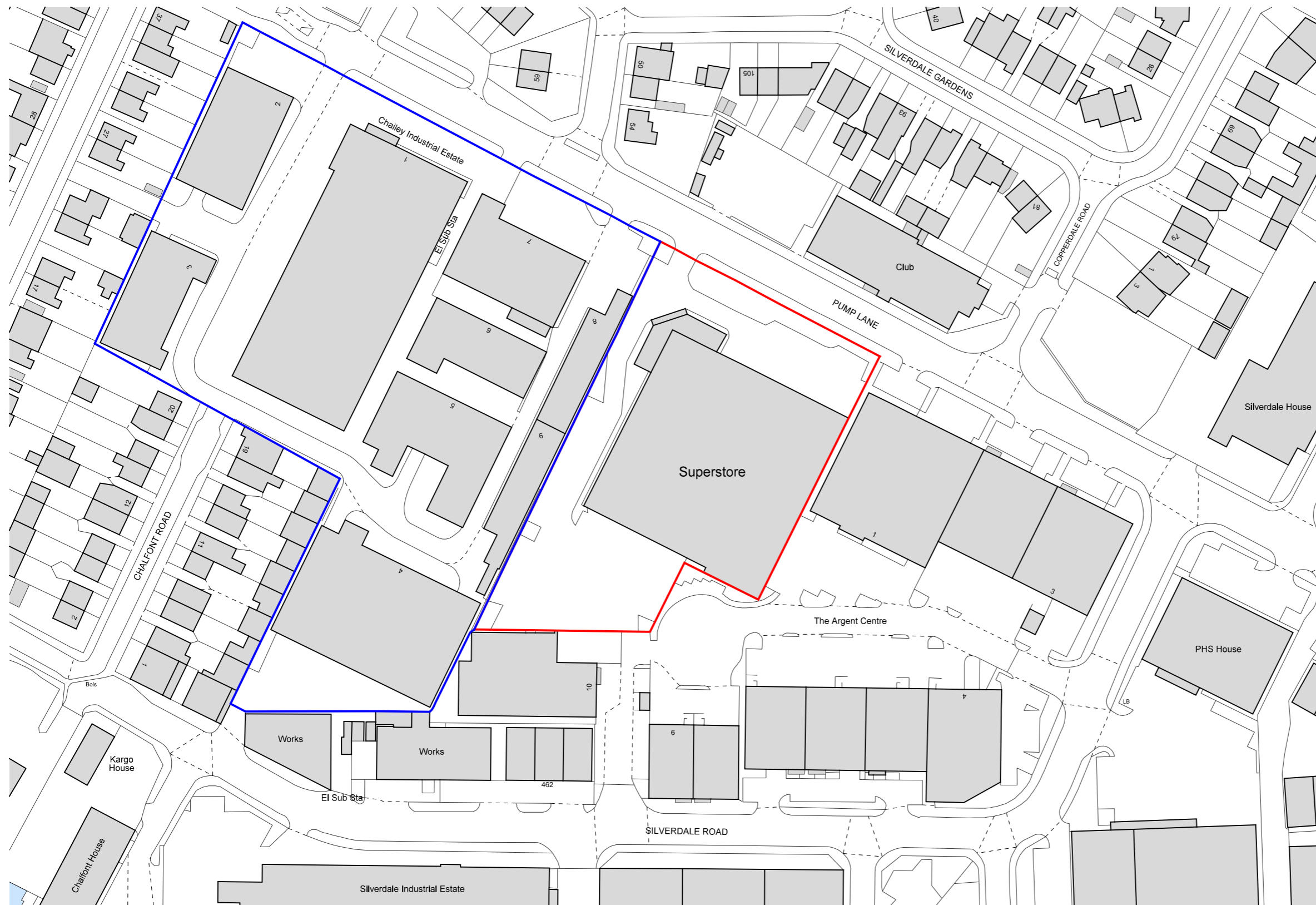








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Key Plan:

- Application Site
- Chailey Industrial Estate Site

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Project  
 Pump Lane, Hayes, UB3 3NB

Title  
 Existing  
 Location Plan

|                            |                        |                    |
|----------------------------|------------------------|--------------------|
| Scale<br>1:1250@ A3        |                        | Date<br>02/11/2015 |
| Drawn by<br>TD             | Checked by Proj. Arch. | Checked By Manager |
| Drawing No.<br>1531/L(-)01 |                        | Revision<br>-      |

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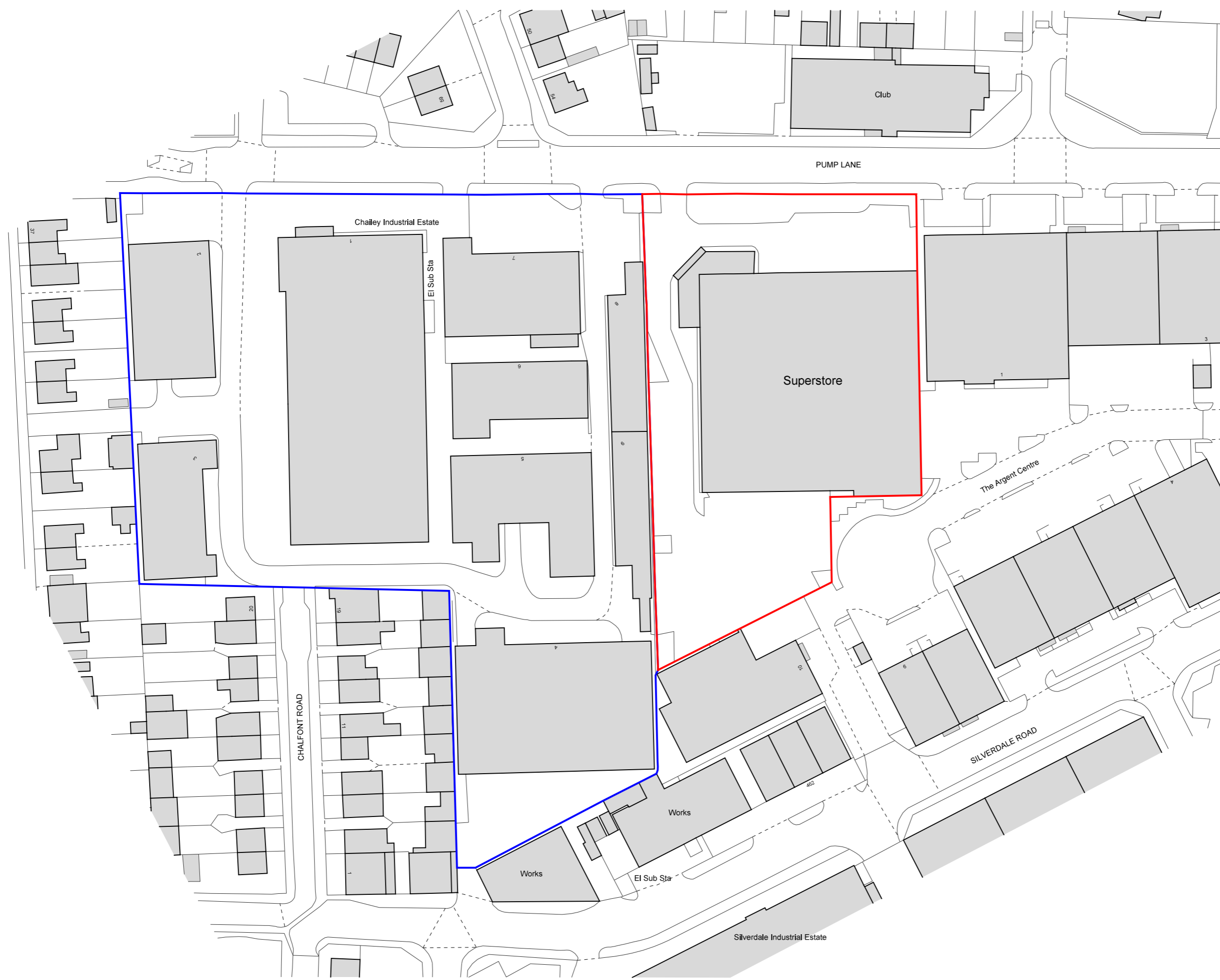




## Pump Lane, Hayes

Aerial View - Site  
- December 2015 -

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- Key Plan:
- Application Site
  - Chailey Industrial Estate Site

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Title  
 Existing  
 Site Plan

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Front Elevation



Rear Elevation

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To HAYES TOWN Centre

PUMP LANE

To A312 & M4

Key Plan:

- Application Site
- Chailey Industrial Estate Site
- Soft Landscaping
- Hard Landscaping
- Protected trees
- ↔ Public Access
- ↔ Service Access
- Vehicle Circulation
- ↔ Retail Entrance
- Commercial Frontage
- Commercial Floor plate
- Residential above
- Residential Floor Plate
- Permeability with Chailey Ind. Est. Site
- ✱ Sun path
- Existing Industry

Chailey Industrial Estate Development

Proposed 110 Residential Units/Hectare = 198 units as policy SA22 of Local Plan Part 2, October 2015

Argent Trade Park



INFORMATION ONLY



Project  
 Pump Lane, Hayes, UB3 3NB

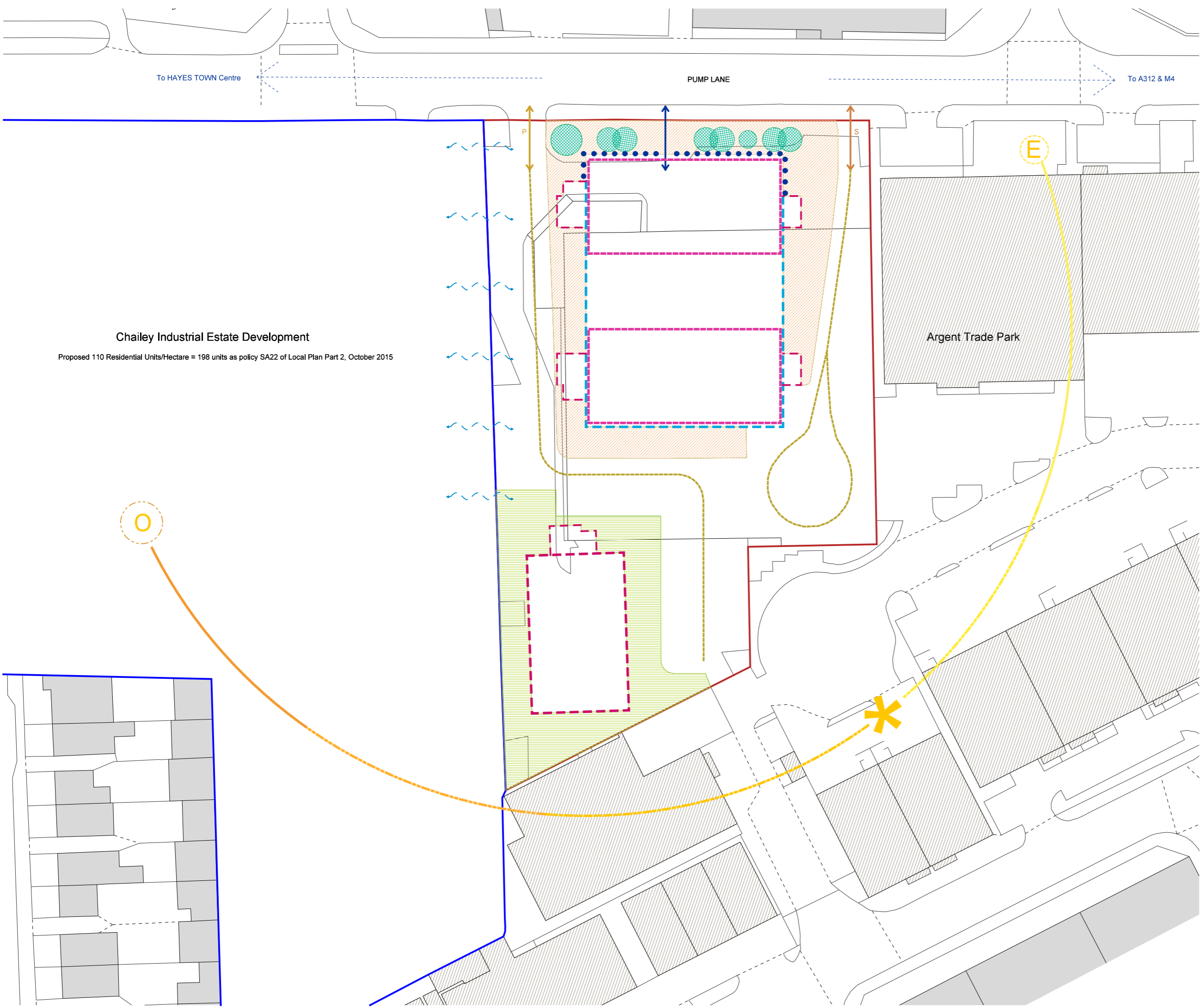
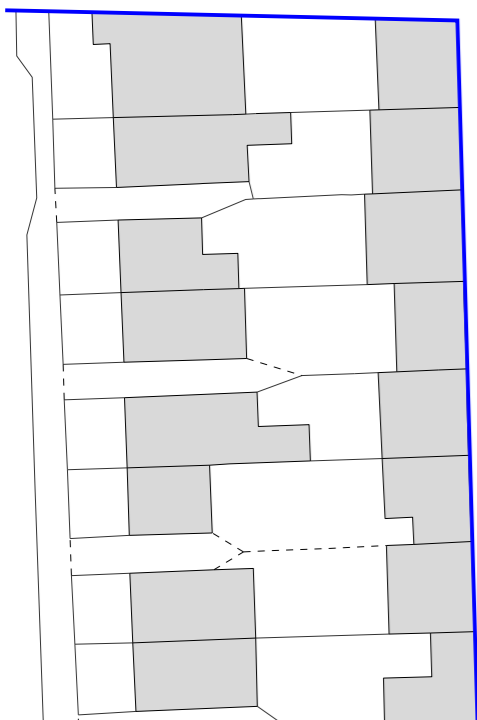
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 Site Analysis

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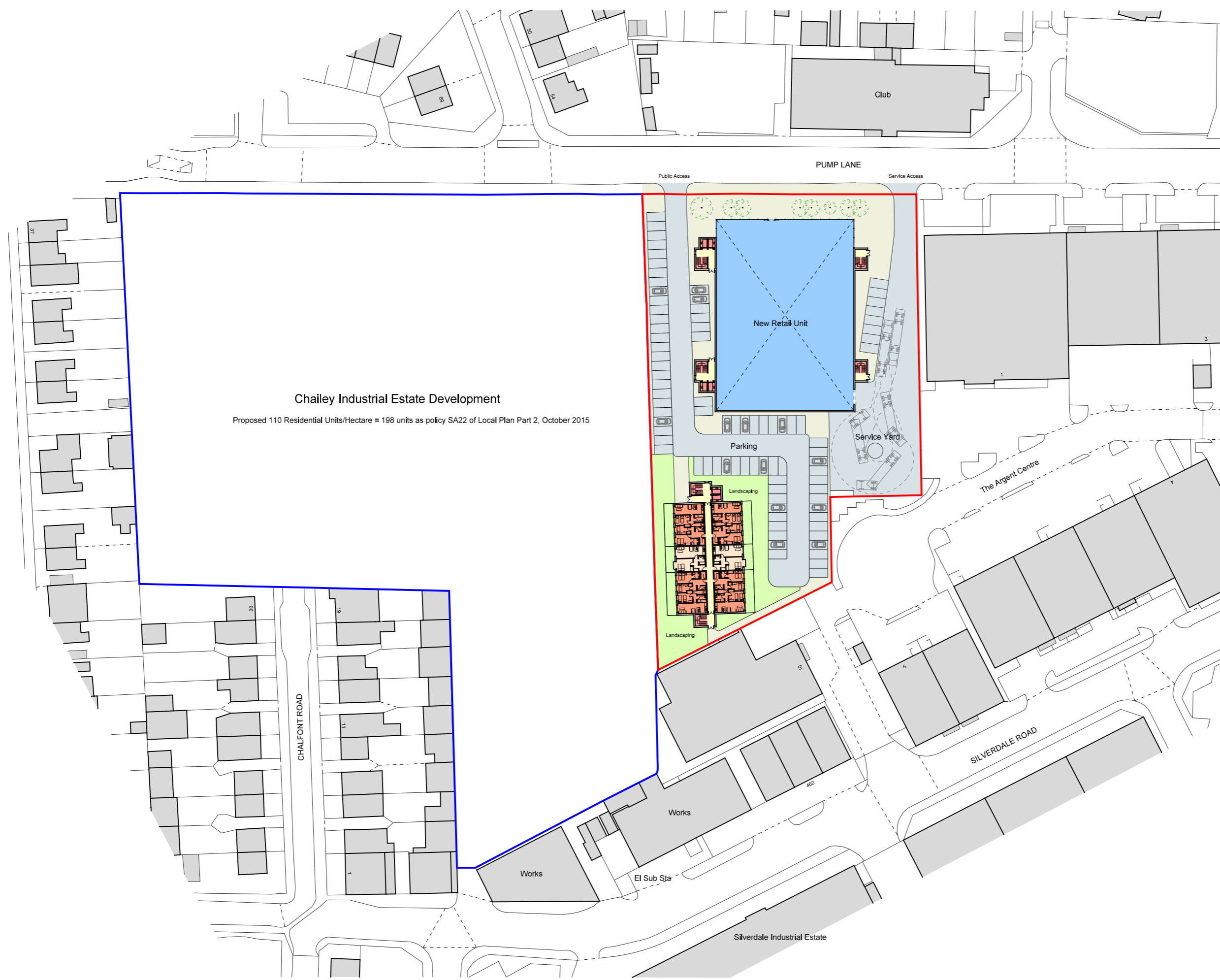
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**Chailey Industrial Estate Development**  
 Proposed 110 Residential Units/Hectare = 198 units as policy SA22 of Local Plan Part 2, October 2015



Key Plan:  
 Application Site  
 Chailey Industrial Estate

**INFORMATION ONLY**



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Project  
 Pump Lane, Hayes, UB3 3NB

Title  
 Proposed Site Plan

|                               |  |
|-------------------------------|--|
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## Introduction.

- This Statement is prepared to accompany our proposals for the redevelopment of the existing “Matalan” site previously included within “Site B” of Hillingdon’s “Policy SA18 : Chailey Industrial Estate”.
- In accordance with that policy, these proposals include continued employment generating use and also create residential development to a high quality of design including substantial areas of open and amenity space.
- The design represents a very high level design feasibility for the site as part of a development capacity exercise as to how the scheme might work on the site.

## Location.

- The site is located close to the East of Hayes Town Centre, within a 10 minute walk of Hayes & Harlington station (currently being upgraded as part of Crossrail). It currently has a PTAL rating of 3 and benefits from good road connections to the A312 (and thereafter the A40 and M4).
- Frontage to Pump Lane.
- The existing Lombardy Poplar trees are protected and will be located within enhanced public realm to Pump Lane. The commercial floor space will provide active frontage and has been brought forward from the current building line to enhance pedestrian access from the Pump Lane footpath.

## Proposed Commercial Accommodation.

- The existing Retail Unit appears to have traded well since its creation in the mid 1980’s. Our proposals seek to consolidate this success by continuing a Retail offer within an updated format. This includes double height glazed display frontage to Pump Lane (with return display to both East and West Elevations). The double height improves sight lines to and within the new Unit and provides the opportunity for Mezzanine space within the Unit (increasing its attractiveness to a wide range of prospective Retailers).



## Access.

- Service access from Pump Lane is separated to the Eastern edge of the site (adjacent to the Argent Trade Park) with public access directly from the Northern edge (to the Retail Unit) and Western edge (encouraging connectivity with the proposals for the existing Chailey Industrial Estate site).
- This access strategy allows servicing efficiencies between Retail and Residential uses whilst retaining dedicated access routes.
- Customer parking is provided close to the Pump Lane frontage, with Visitor and Residential parking continuing to the South of the site. Staff parking is accessed directly from the Service area.

## Residential Accommodation.

- In accordance with the proposed density of 110 Units/Hectare, Eighty Four apartments are proposed (in a range of 1, 2 & 3 Bedroom configurations).
- Two Blocks (A & B) of Twenty Four 2 Bedroom/4 Person apartments are located above the Retail Unit with private and shared Garden space between them.
- A separate Block (C) of Twelve 1 Bedroom/2 Person, Sixteen 2 Bedroom/4 Person and Eight 3 Bedroom/6 Person apartments is located within a Garden within the Southern part of the site.
- All apartments have a private balcony (or garden) and attain the Mayor of London's recommended space standards.

## Height & Massing.

- Blocks A & B are restrained to 3 stories above the Retail Unit on Pump Lane. Block C rises from Garden level on the Southern part of the site to 5th Floor level to create similar height to the Pump Lane frontage (and provide opportunities for views towards the Grand Union Canal from upper levels).

## Form & Materials.

- As the initial sketch views show, the buildings are articulated in both form and materials palette to create visual interest and reduce their apparent bulk.

## Sustainability.

- This highly sustainable regeneration of an increasingly prominent Town Centre site will be accompanied with energy efficient design, including the provision of Semi-Intensive Green Roof for the Garden between Blocks A & B and an Extensive Green Roof to Blocks A, B & C.
- They will fully comply with contemporary Building Regulations to provide this site with an energy efficient, highly sustainable future.







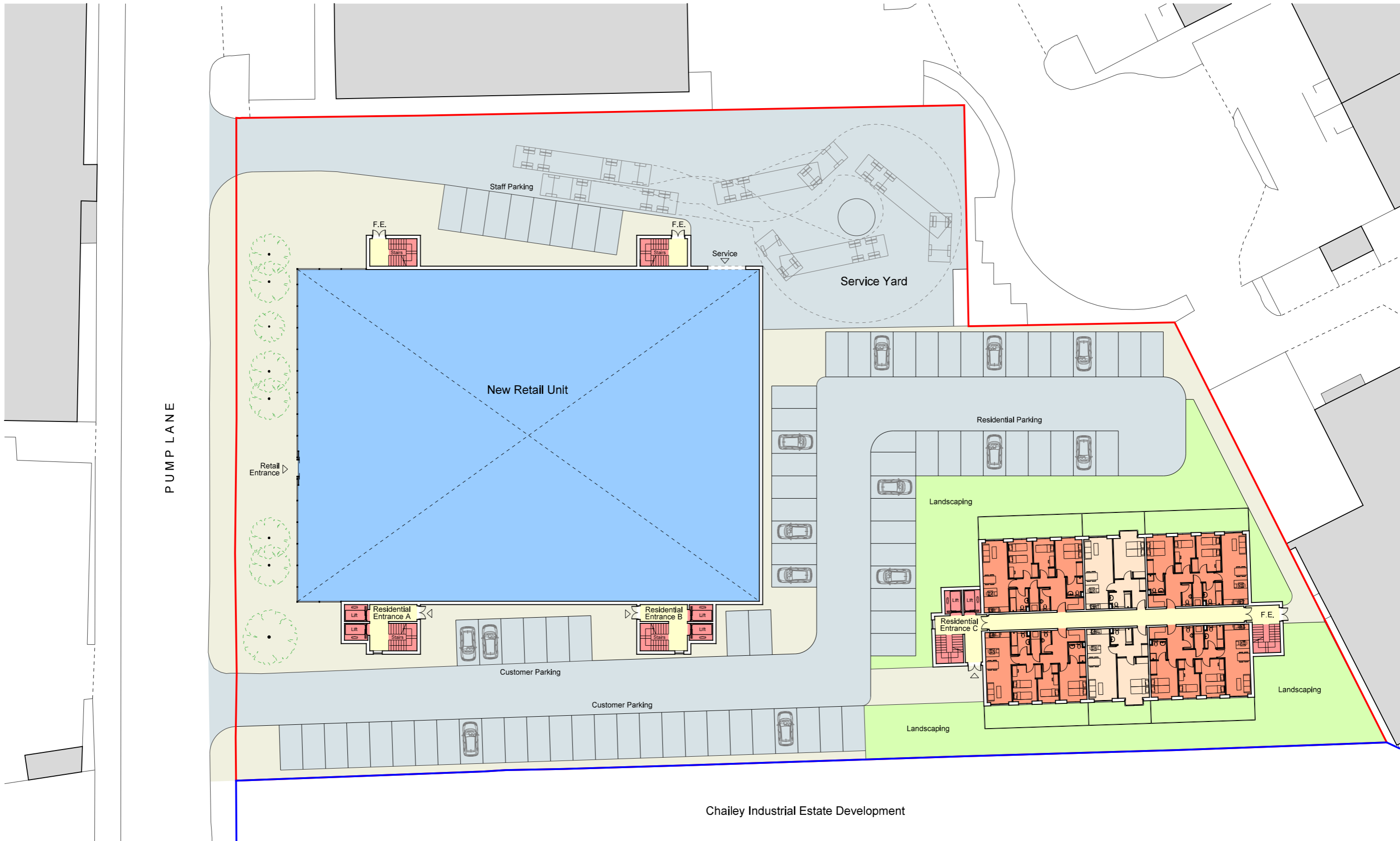
Chailey Industrial Estate



Chalfont Road



Argent Centre



Chailey Industrial Estate Development


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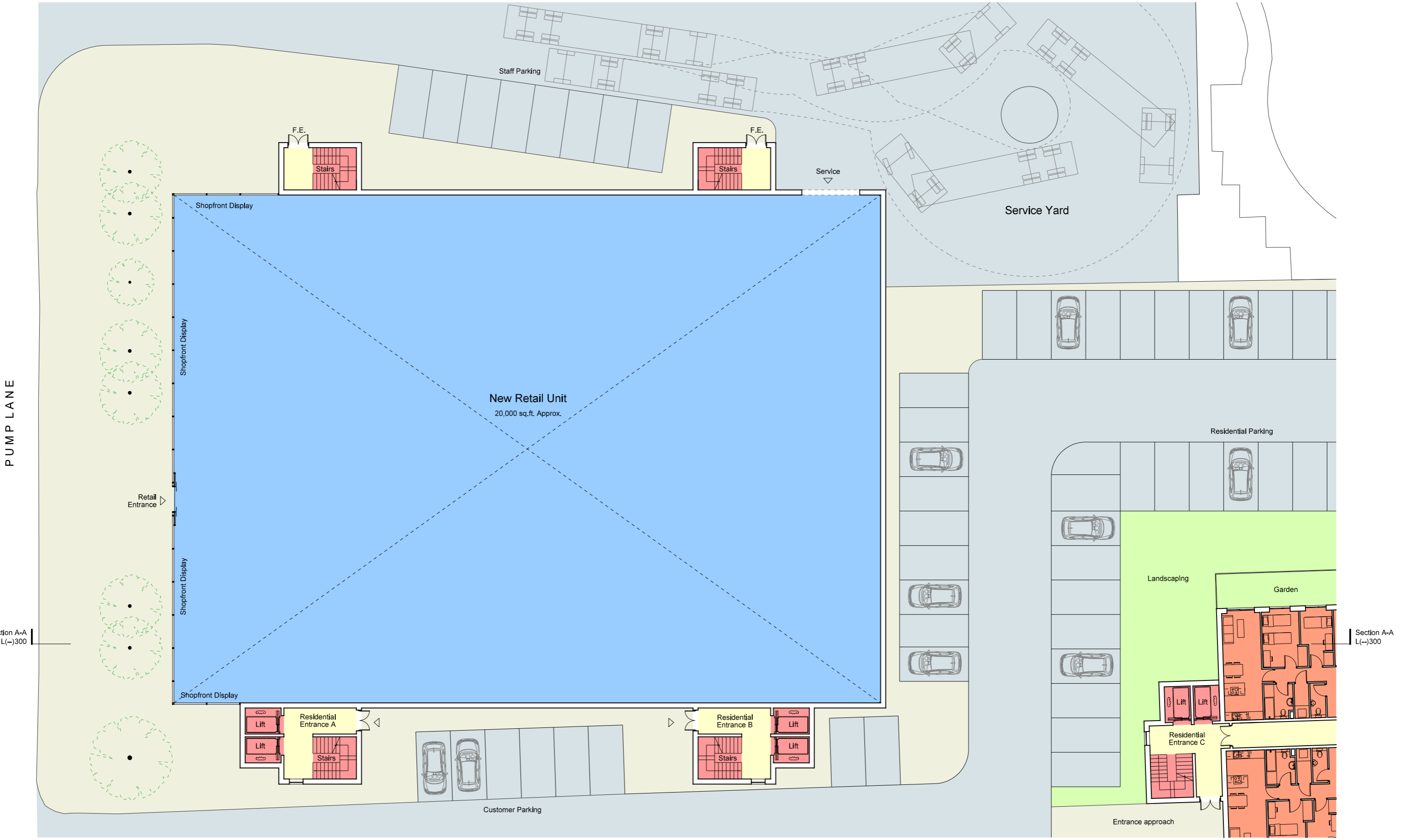
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Title  
Proposed  
Ground Floor Plan

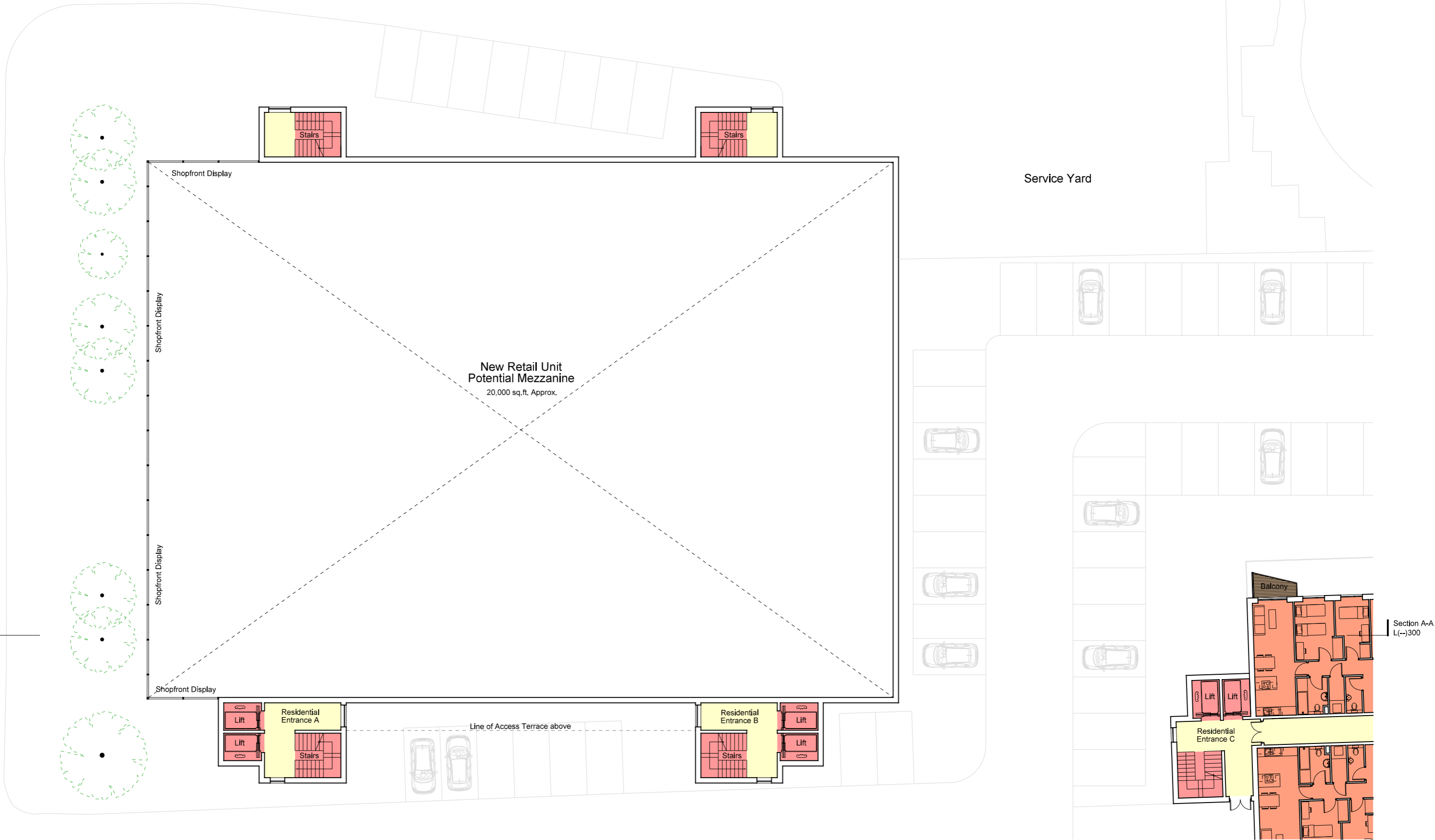
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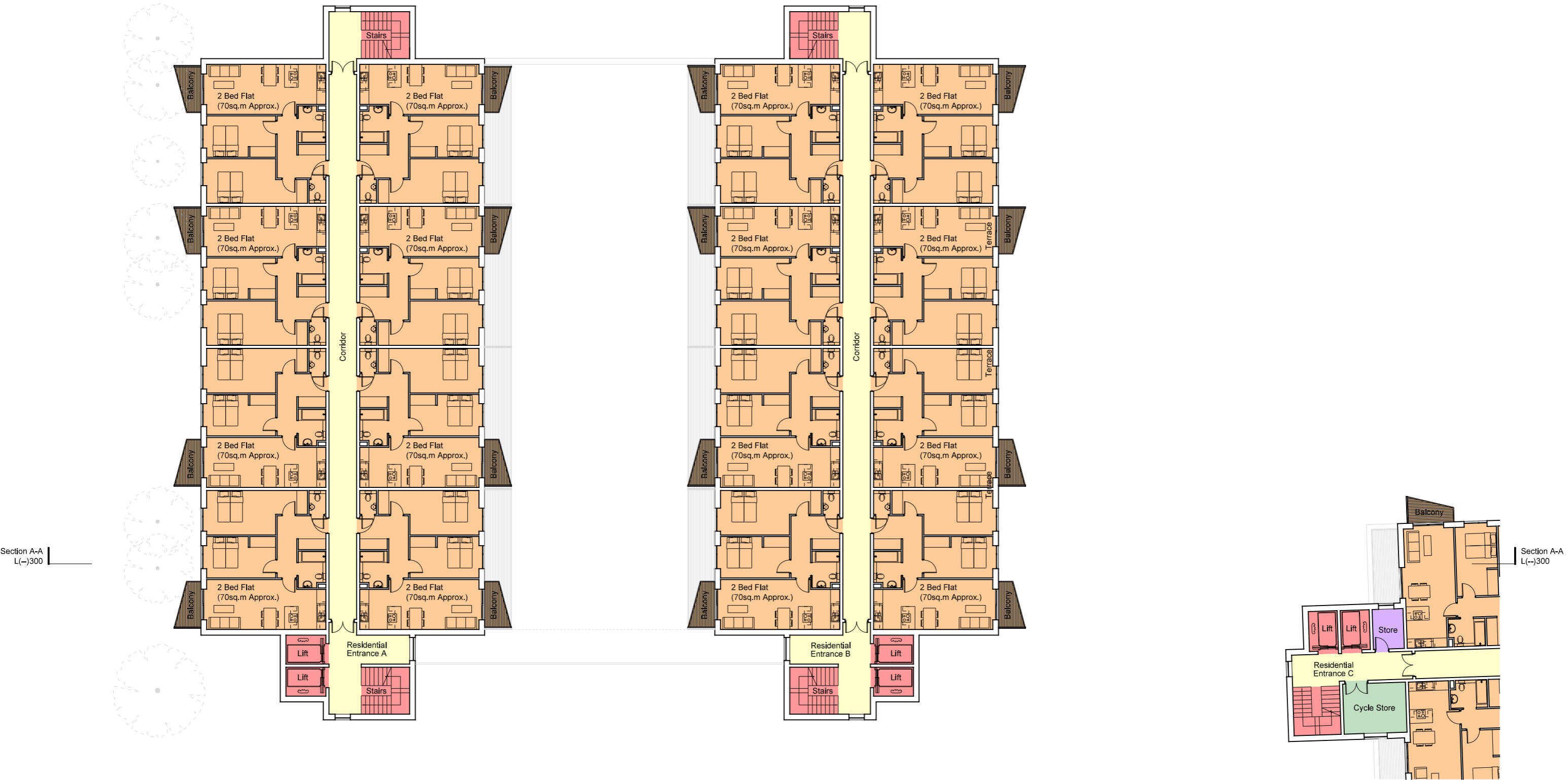


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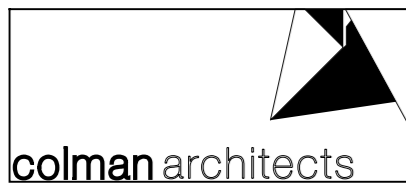
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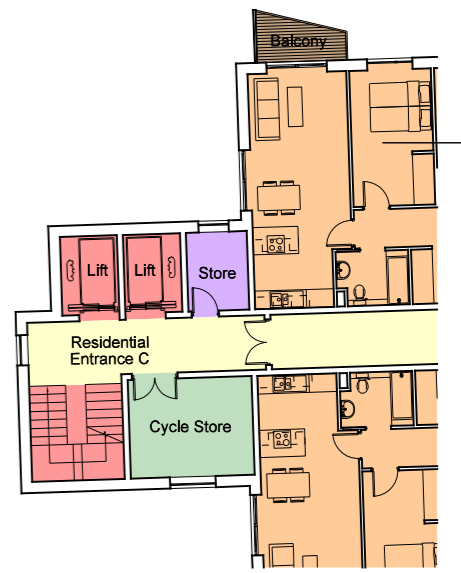
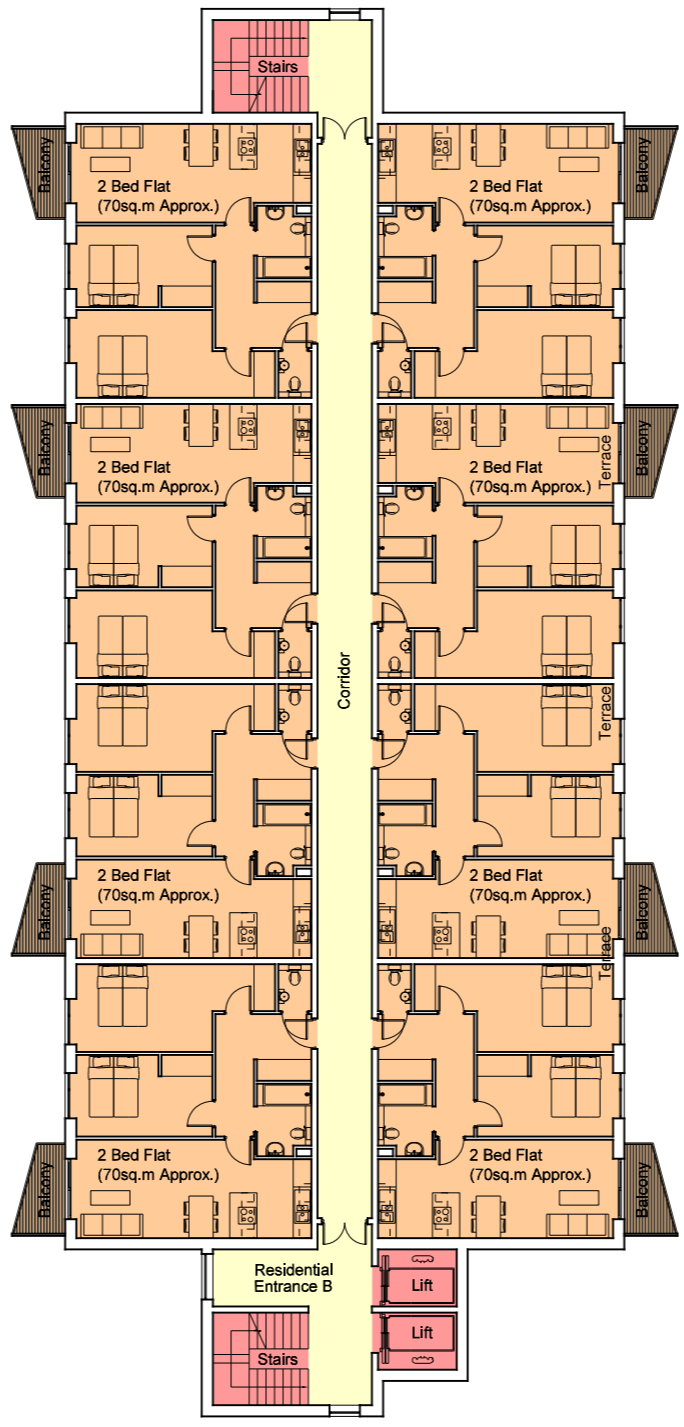
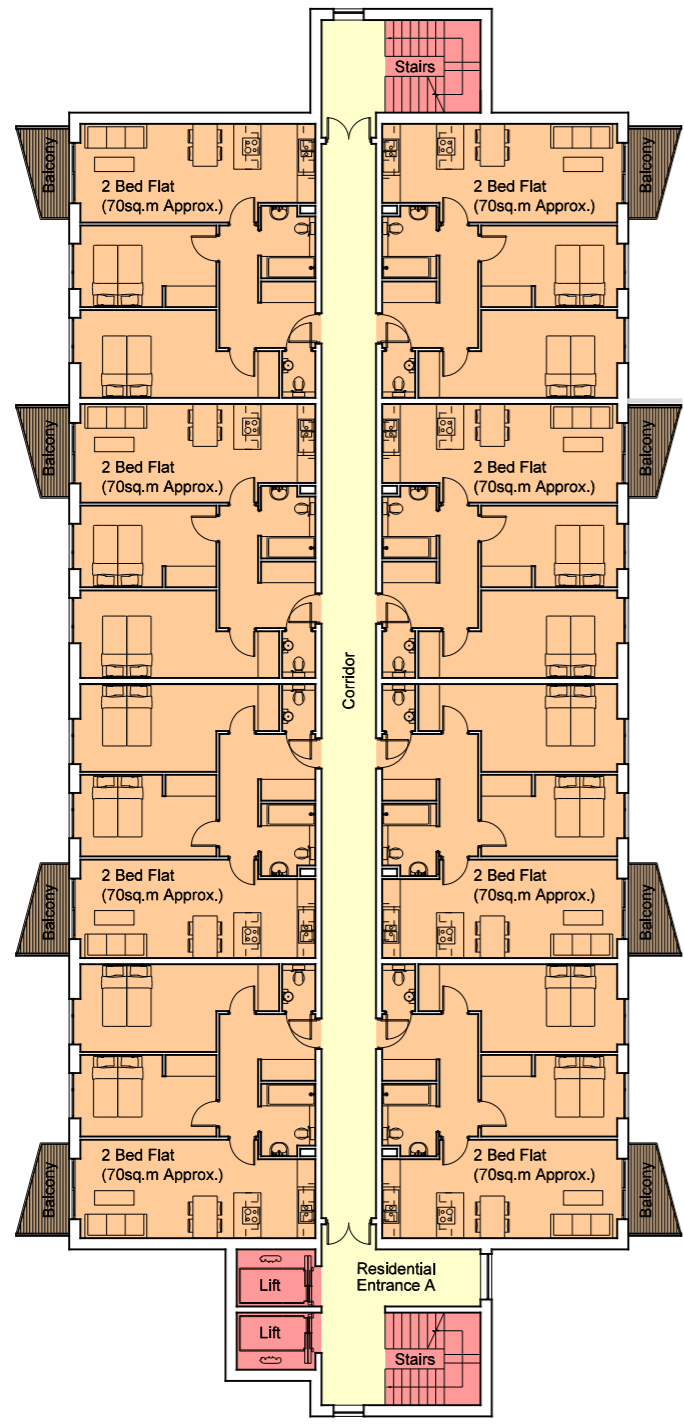


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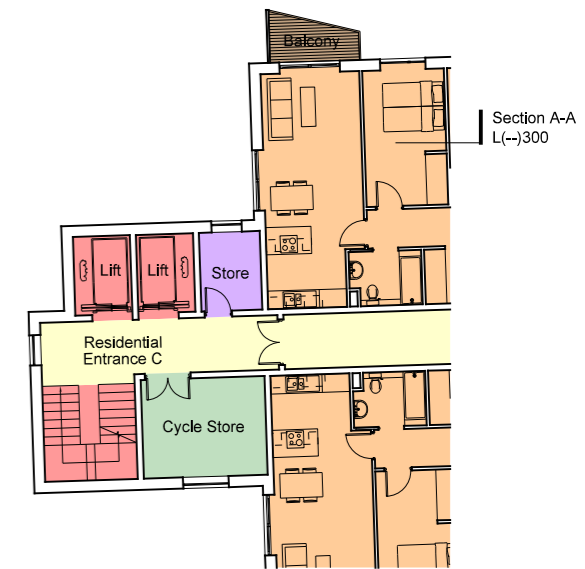
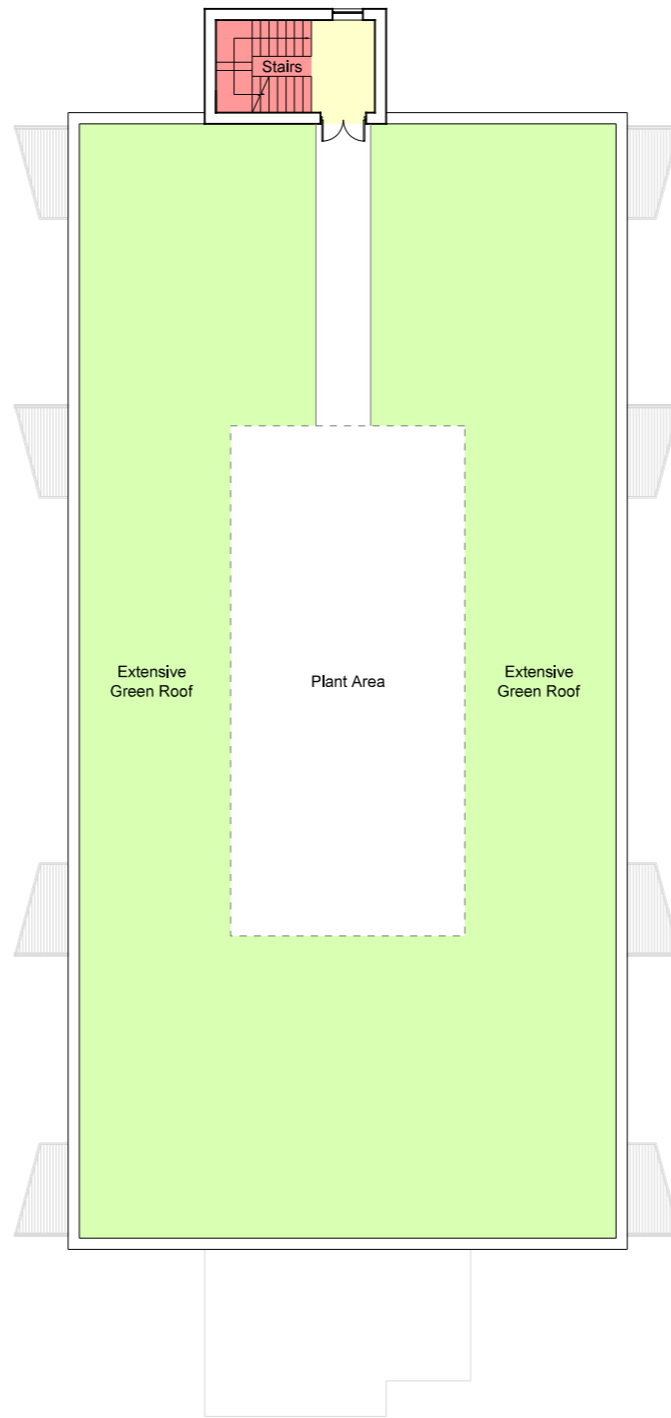
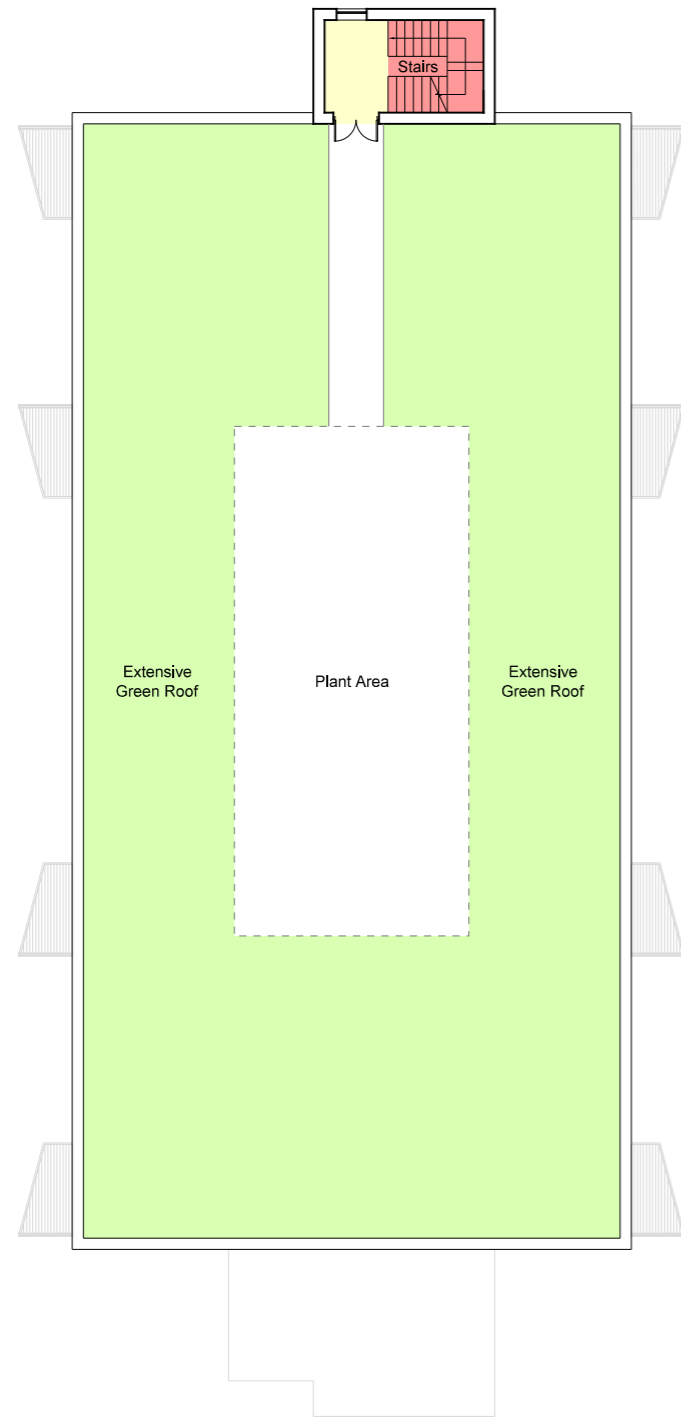


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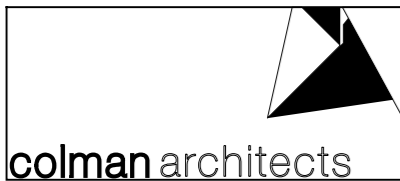
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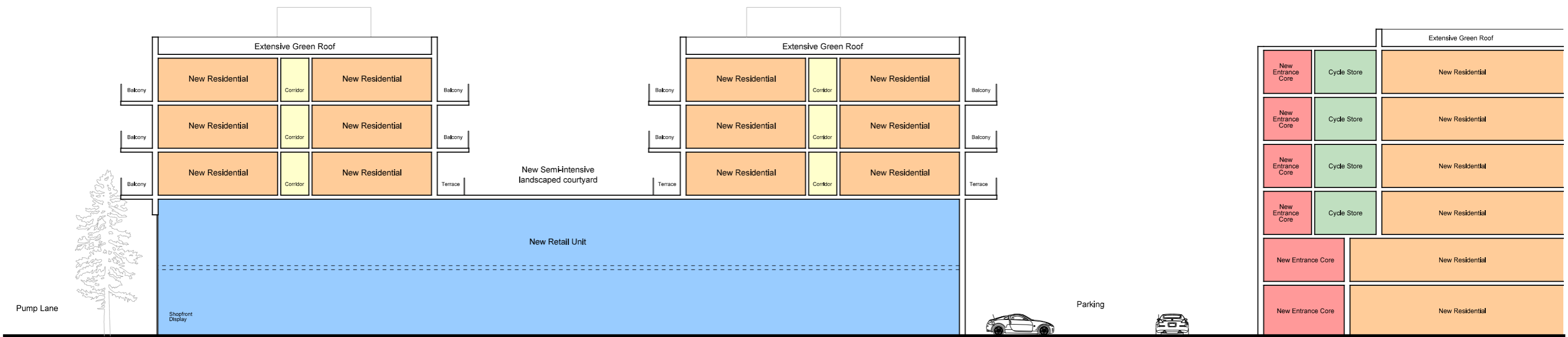


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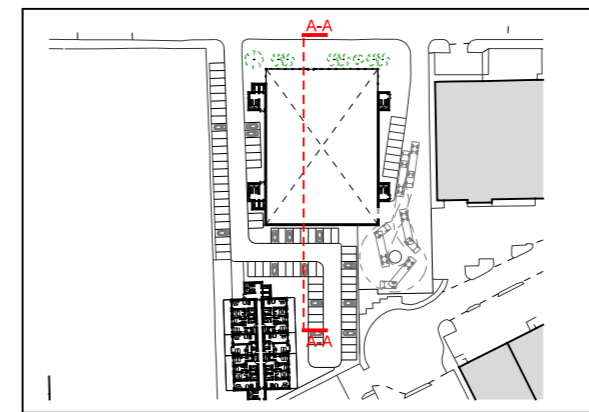
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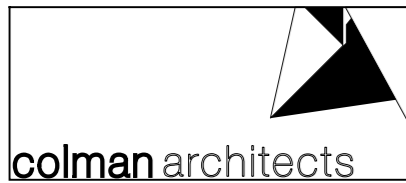
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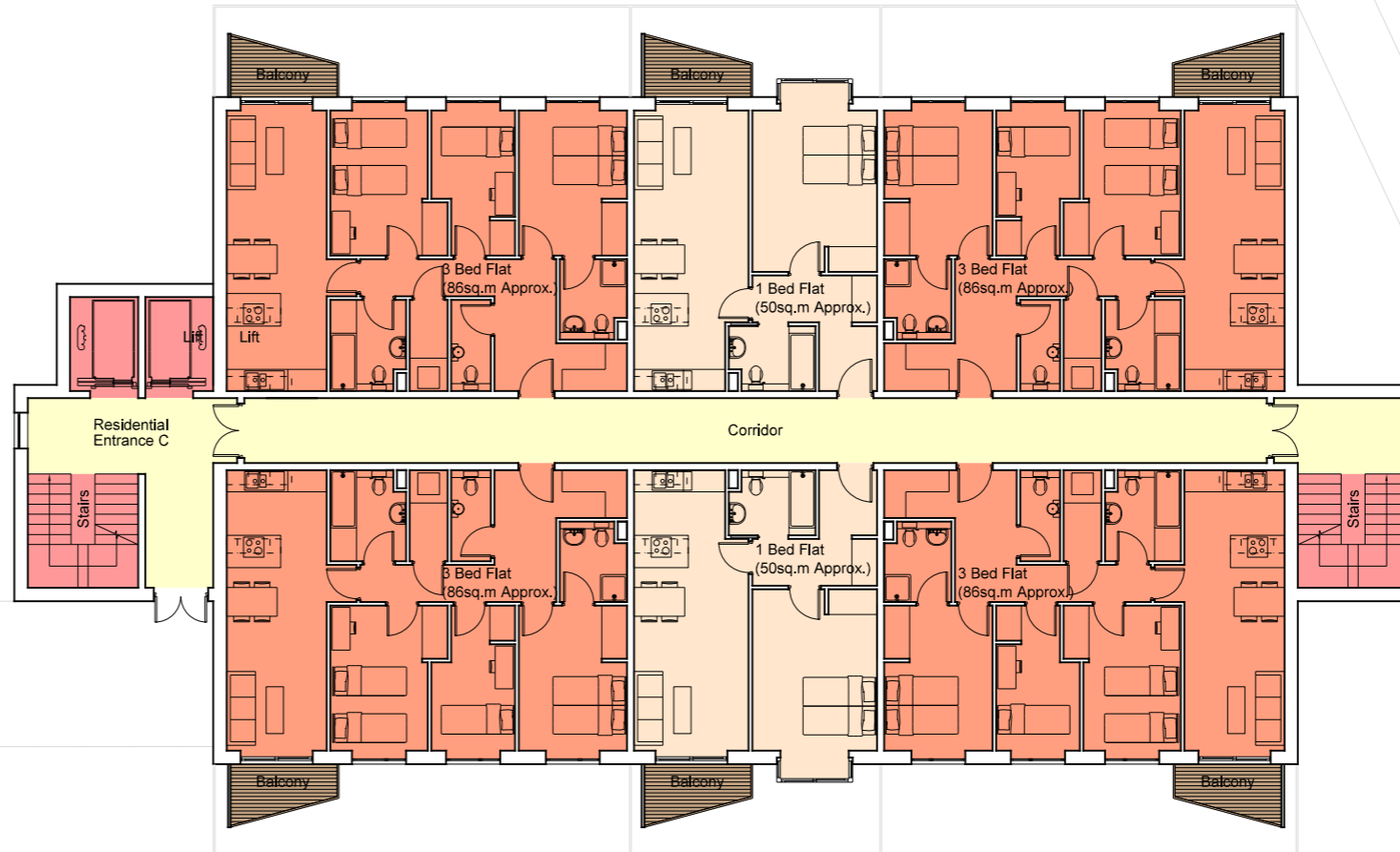
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New Retail Unit

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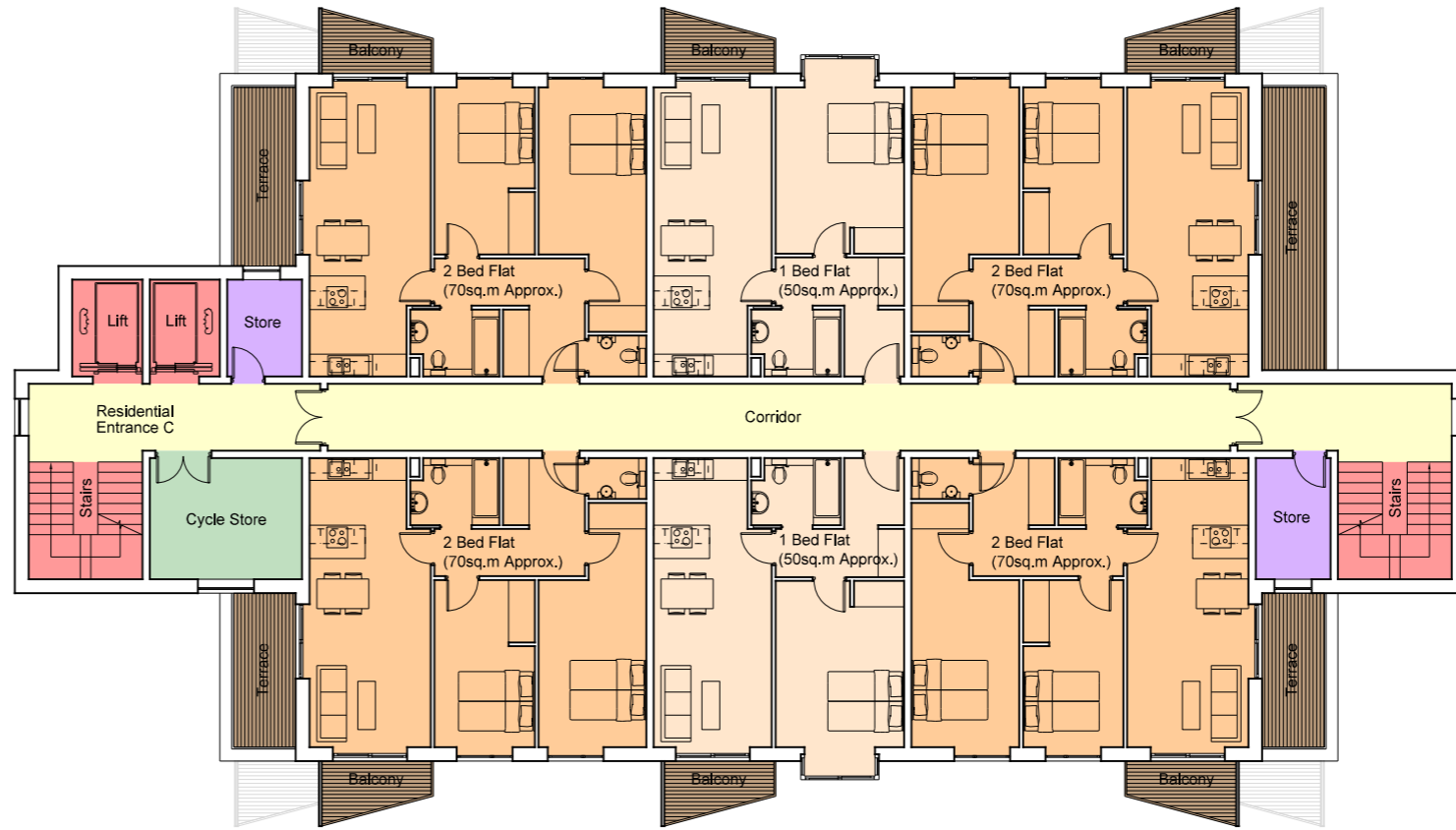
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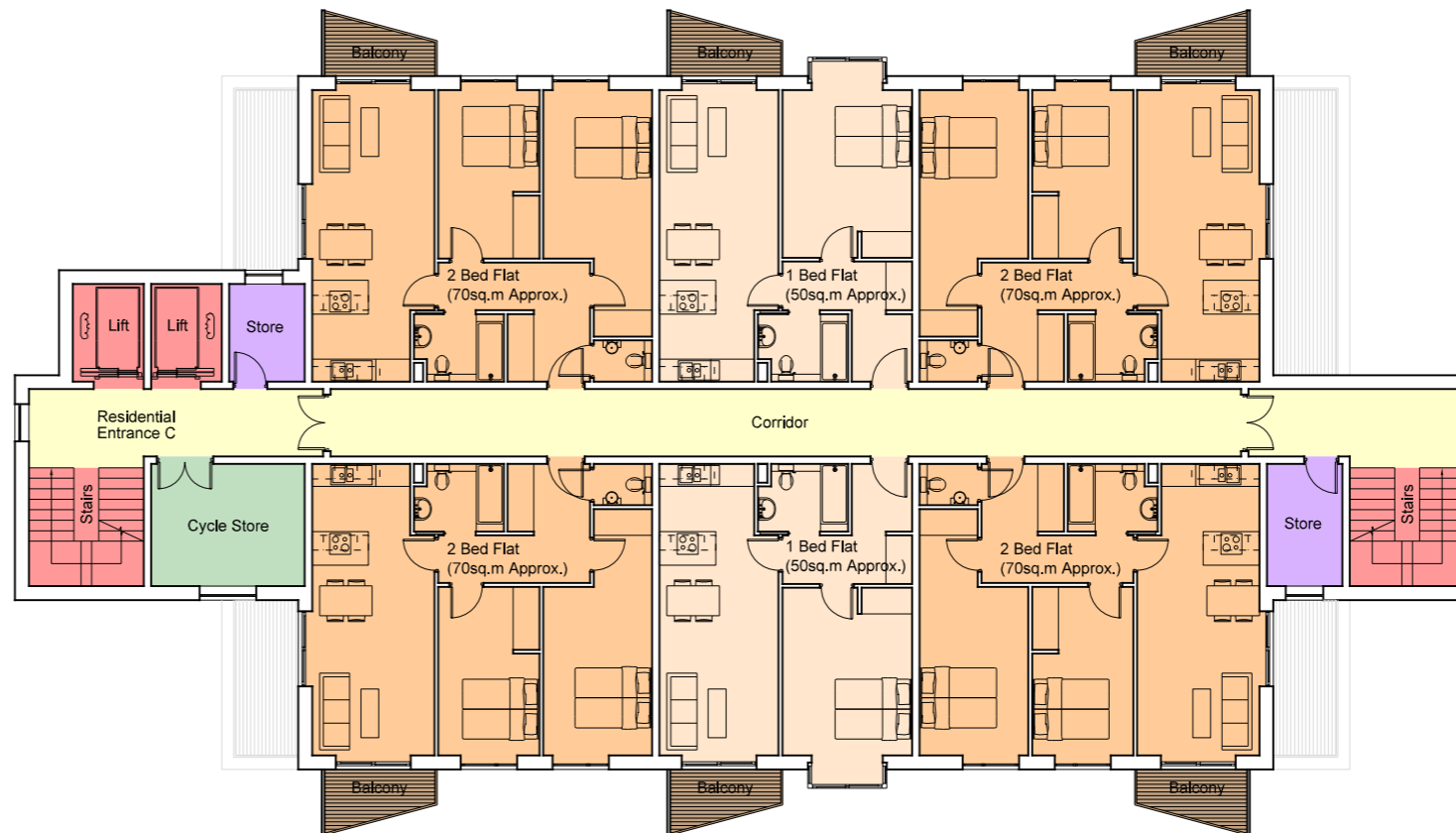
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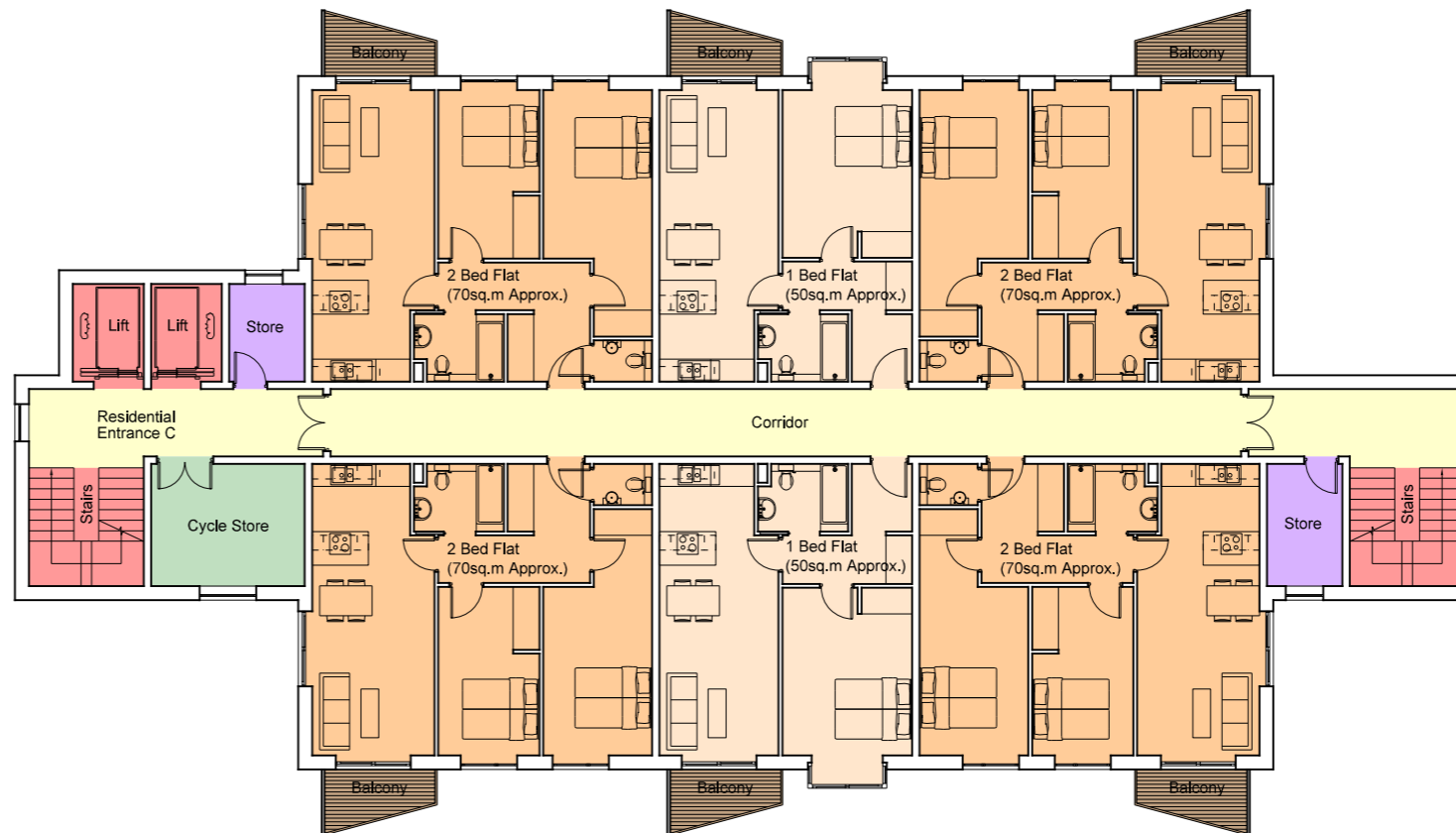
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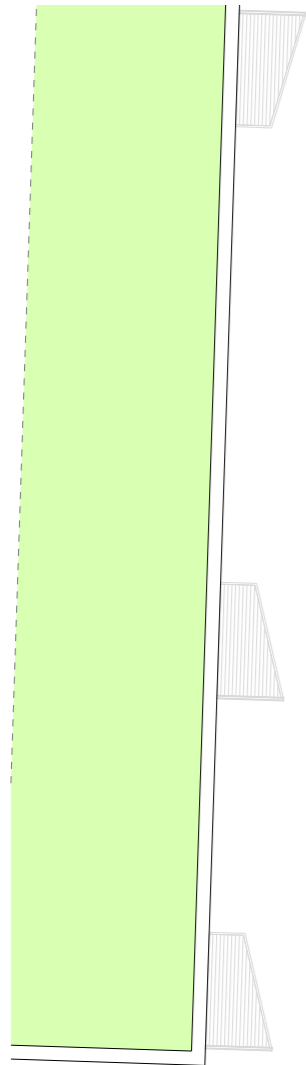


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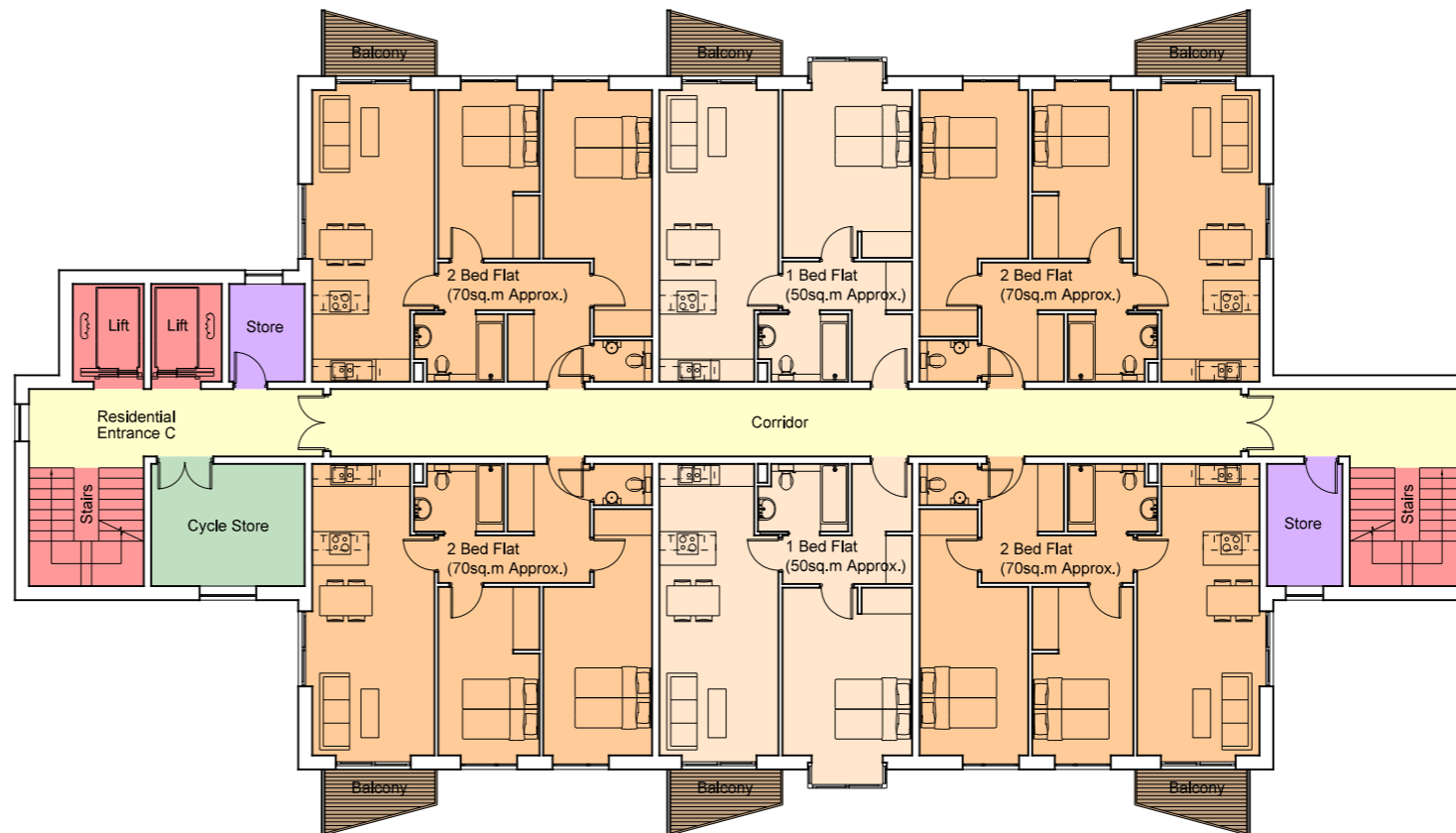
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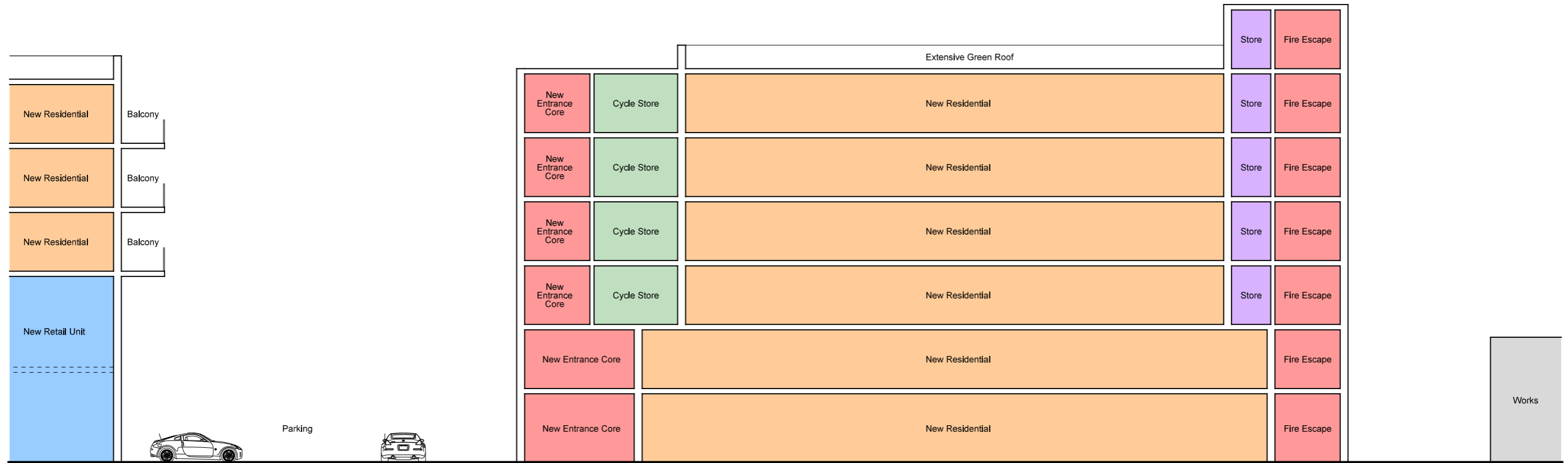
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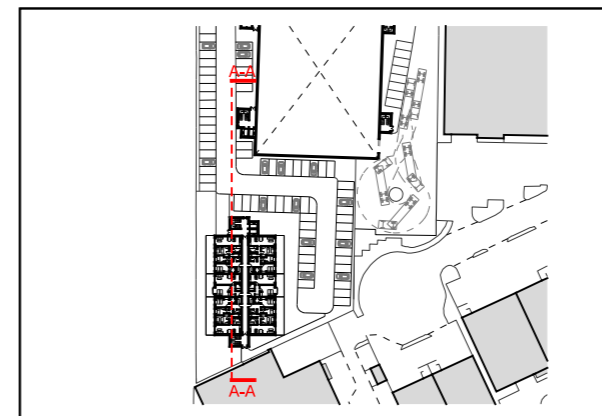
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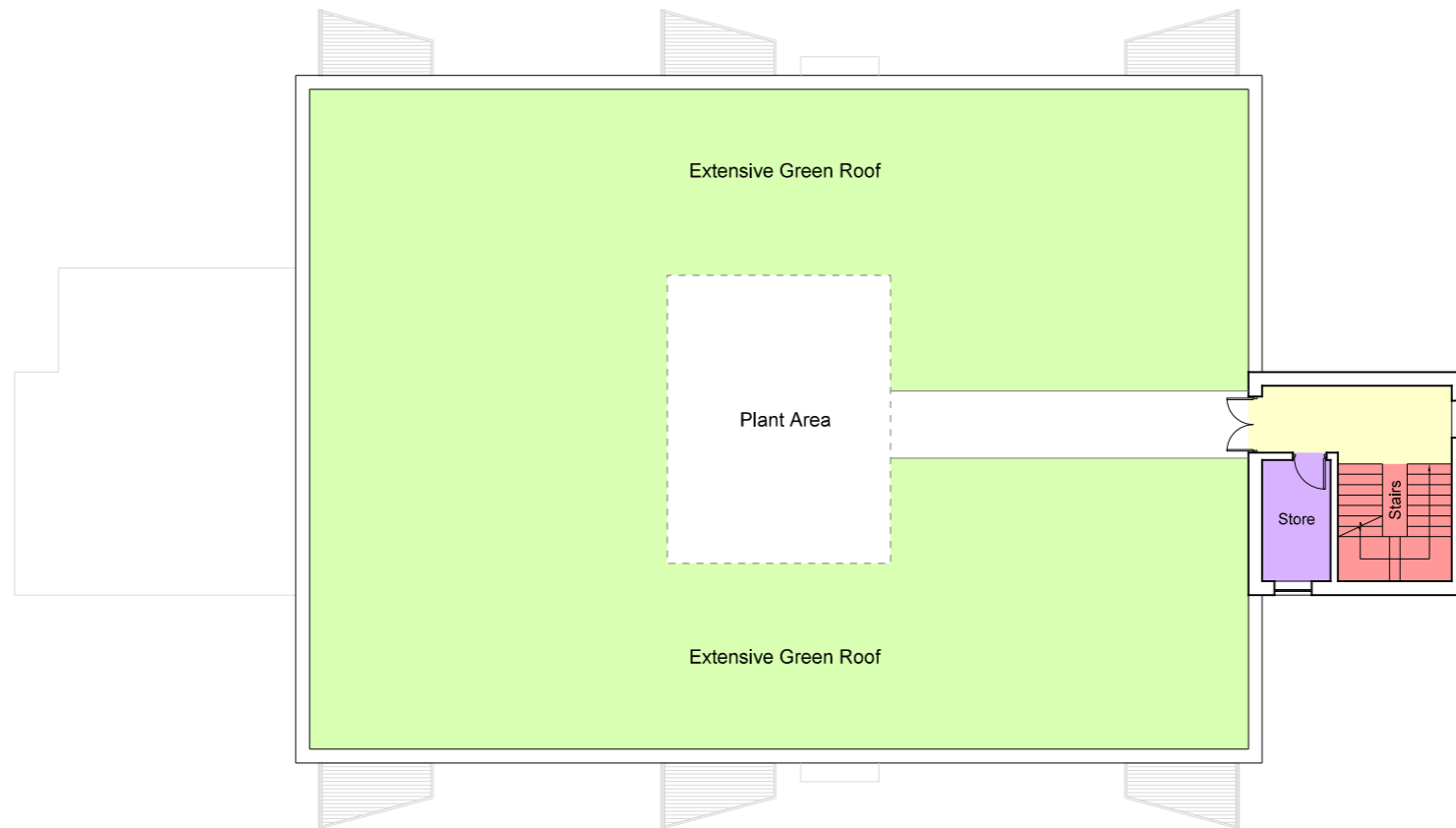
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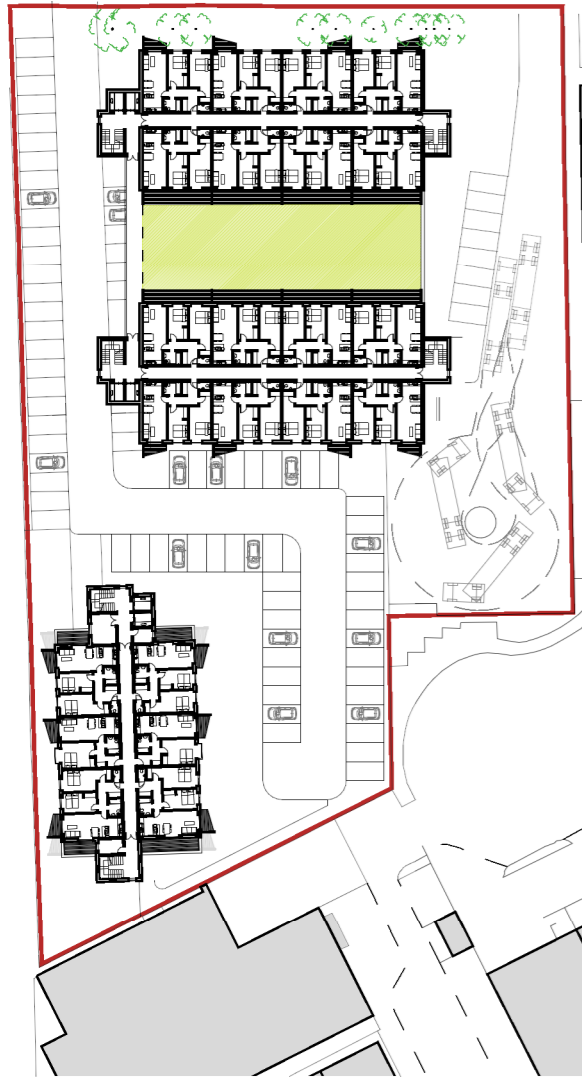




# Semi-intensive Landscape Courtyard

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## Site Plan



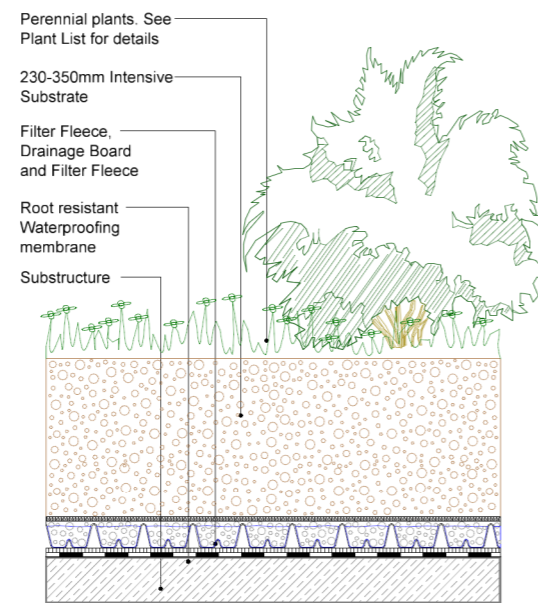
## Brief Description

Use of roof landscape as an additional living space for residents by using perennial beds, recreational lawns, shrubbery and seating areas.

This garden roof increase the aesthetic value from upper floor windows with a high ecological value.

Exclusively for the residents

## Typical Built-up



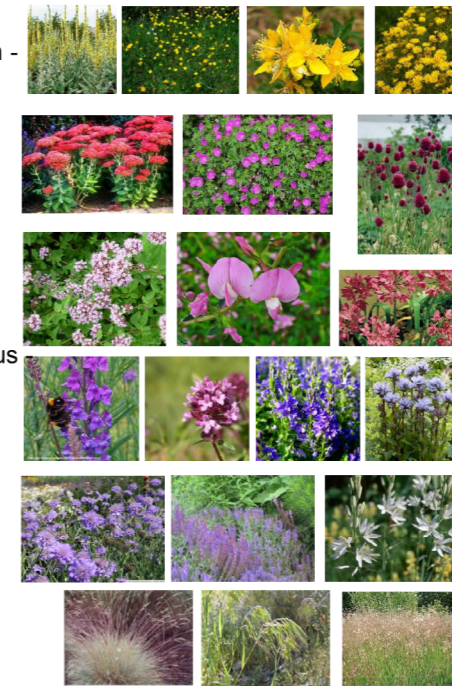
## Technical Data

- Solution: 0-5<sup>th</sup> Semi-intensive Garden Roof at 2nd Floor
- 260-470mm (h) Multi-layered built-up with drainage board
- 70-95% water retention
- Intensive roof greening
- Additional living space possible by using the roof landscape
- Perennial beds, recreational lawns, shrubberies and seating areas
- Provide automatic irrigation

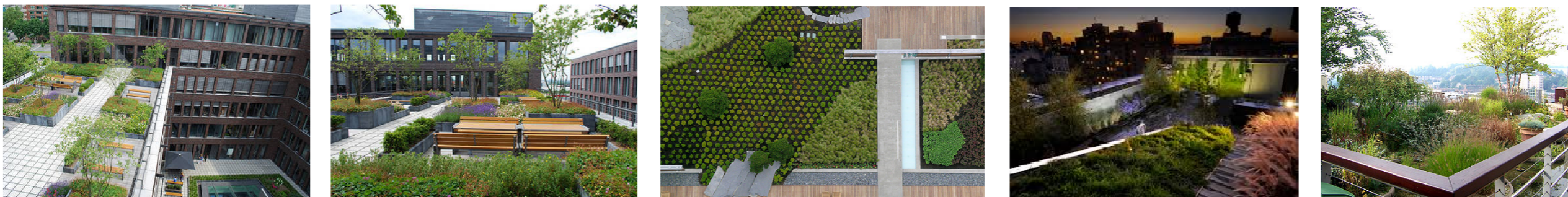


## Plant List Extensive Green Roof

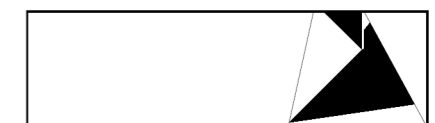
- Allium moly - Bupthalmum salicifolium - Hypericum perforatum - Ranunculus bulbosus - Verbascum bombyciferum - Vernascum nigrum
- Allium sphaerocephalon - Geranium sanguineum - Sedum telephium
- Allium ostrowskianum - Ononis spinosa - Origanum vulgare - Thymus montanus
- Linaria vulgaris- Thymus montanus
- Campanula glomerata - Centaurea scabiosa - Cichorium intybus - Salvia pratensis - Scabiosa columbaria - Veronica teucricum
- Anthericum liliago - Galium verum - Iris germanica
- Grasses:  
 Briza media - Bromus tectorum - Festuca amethystina - Melica ciliata - Stipa pennata



## References



INFORMATION ONLY



colman architects

Project  
 Pump Lane, Hayes, UB3 3NB

Title  
 Landscape Strategy  
 Semi-intensive Landscape  
 Courtyard Roof  
 Second Floor

|                               |                        |                    |
|-------------------------------|------------------------|--------------------|
| Scale<br>1:1000@ A3           | 1:500@ A1              | Date<br>04/12/2015 |
| Drawn by<br>NR                | Checked by Proj. Arch. | Checked By Manager |
| Drawing No.<br>1531/L(90.4)01 | Revision<br>-          |                    |

The Colman Partnership Limited Telephone: 020 7535 2040  
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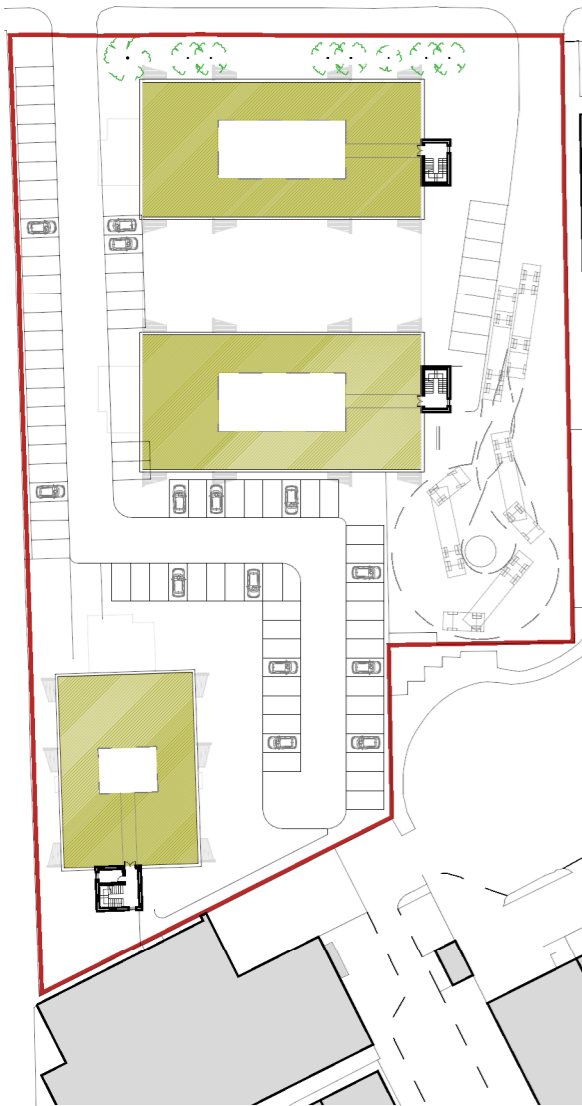
CAD Filename: R:\TCP\_Jobs\1531 - Pump Lane\_Hayes\2\_SHTSL\90.4\L(90.4)01.dgn  
 07/12/2015



# Extensive Green Roof

Dimensions are not to be scaled from this drawing.  
 This drawing is based on current available information and should not be relied on as accurate measurements of usable space.  
 This drawing is the property of the Colman Partnership Ltd. and Copyright is reserved by them. The drawing is issued on condition that it is not copied or disclosed by or to any unauthorised persons without the prior consent in writing of the Colman Partnership Ltd.

## Site Plan



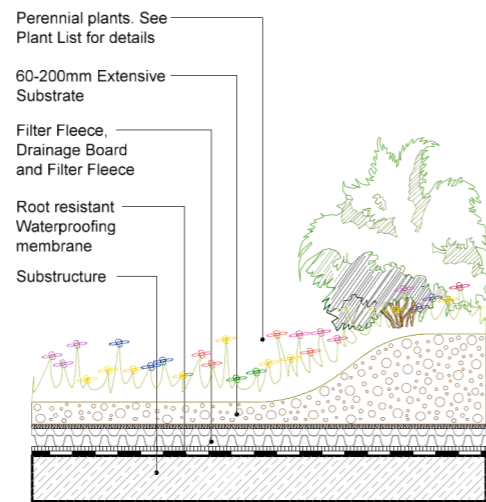
## Brief Description

Roof greening with high ecological value, high biodiversity of flora and fauna and use of recycled plastic materials

The nature roof solution increase the aesthetic value from upper floor windows with a high level of biodiversity and high ecological value. It is a perfect habitat for butterflies and other insects. It allows the storm water attenuation and improves drainage.

Non accesible to the public

## Typical Built-up



## Technical Data

- Solution: 0-5<sup>^</sup> Extensive Green Roof at 5th & 6th Floor.
- 100-250mm (h) Multi-layered system
- 60-70% water retention
- High level of biodiversity
- High ecological value
- Long flowering window annually
- Use of recycled plastic materials



## Plant List Extensive Green Roof

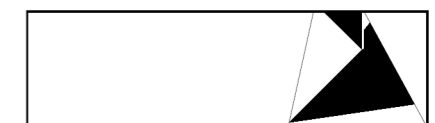
- Achillea tomentosa - Anthemis tinctoria - Hieracium pilosella - Potentilla verna - Sedum reflexum - Sedum sexangulare
- Hieracium x rubrum
- Dianthus carthusianorum - Sanguisorba minor - Saponaria ocymoides - Sedum spurium
- Allium schoenoprasum - Centaurea scabiosa
- Thymus montanus - Thymus serpyllum
- Verbascum phoeniceum - Veronica teucrium
- Achillea millefolium - Antennaria dioica - Chrysanthemum leucanthemum - Petrorhagia saxifraga - Sedum album -
- Grasses: Carex flacca - Carex humilis - Festuca amethystina - Festuca ovina - Poa compressa



## References



INFORMATION ONLY



colman architects

Project  
 Pump Lane, Hayes, UB3 3NB

Title  
 Landscape Strategy  
 Extensive Green Roof  
 Fifth & Sixth Floor

|                               |                        |                    |
|-------------------------------|------------------------|--------------------|
| Scale<br>1:1000@ A3           | 1:500@ A1              | Date<br>04/12/2015 |
| Drawn by<br>NR                | Checked by Proj. Arch. | Checked By Manager |
| Drawing No.<br>1531/L(90.4)02 | Revision<br>-          |                    |

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CAD Filename: R:\TCP\_Jobs\1531 - Pump Lane\_Hayes\2\_SHTSL\90.4\L(90.4)04.dgn  
 07/12/2015



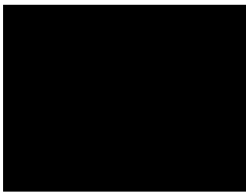
December 2015

# **London Borough of Hillingdon Local Plan Part 2 Revised Proposed Submission Consultation**

## **Development Management Policies (October 2015)**

### **Planning Representations in Response to Representation Form**

Prepared by Savills UK on Behalf of London Diocese Fund (LDF)





# 1. Introduction

---

- 1.1 These planning representations in respect of the Development Management Policies Document (September 2015) have been prepared by Savills on behalf of The London Diocesan Fund (LDF). The document underwent consultation from 26 October – 8 December 2015.
- 1.2 These representations provide a formal response to, and should be read in conjunction with, the Local Plan Part 2 Representation Form and the questions that have been put forward by London Borough of Hillingdon (LBH) and also the separate representation document which responds to the Site Allocations Document.
- 1.3 The LDF recently acquired the freehold of the site in October 2015. The property comprises a 40,450 sq ft single storey retail warehouse occupying a 1.89 acre site on Pump Lane in Hayes, which is well-located for access to Hayes town centre and Hayes & Harlington rail station. The property is let to Matalan Retail Ltd under a current lease expiring in May 2026 (10.4 years unexpired).
- 1.4 The tenant currently operates the site for the sale of discount clothing, shoes and homeware in accordance with the consent granted by a planning permission in 2000 (referenced 34731/APP/2000/1740) which extended the permitted use to "clothing, household goods and textiles, shoes, china, glassware and pottery, seasonal goods and ancillary items in addition to the range of goods previously granted in 1996,". An earlier planning permission granted in October 1996 (referenced 34371X/96/916), which sought to vary the original permission (referenced 262AD/83/1141), approved a widening of the sales of non-bulky goods to "non-food retail development limited to the sale of DIY articles, garden materials and goods, building and decorating equipment and related goods, furniture and furnishings, self-assembly furniture, carpets, floor coverings, white goods and other electrical goods and accessories, computers, office stationery and equipment, pets and pet products".
- 1.5 A red line plan illustrating the extent of landownership is found at **Appendix 1** of these planning representations. The land shown on the red line plan indicates the land that these representations consider suitable for residential and retail uses and as a result should be re-instated for such purposes as part of a Further Modification to the Revised Proposed Submission Site Allocations (SA) DPD.
- 1.6 The LDF consider that the land offers an ideal medium or more likely longer term solution to meeting primarily the pressing housing needs and demands of the borough and local area whilst also meeting employment needs. From initial discussions with Matalan, there could be an opportunity to consider an alternative retail format for their continued retail occupation and therefore on that basis, the site offers a post-2021 opportunity (third LDF cycle) with the possibility of an earlier release for redevelopment (i.e. post-2016).
- 1.7 On the above basis, formal representations and proposed changes are made to the following draft policies, in relation to the Revised Proposed Submission Development Management Policies Document, which specifically concern the LDF site as follows:

***a. Development Management Policy DMH 2: Housing Mix***

***b. Development Management Policy DMH 7: Provision of Affordable Housing***

1.8 Each of these policies will be discussed in turn in the following sections of this representation.

## 2. Development Management Policy DMH 2: Housing Mix

---

### Introduction

- 6.1 It is suggested that as part of this representation, Development Management policy DMH 2: Housing Mix is revised in order to make reference to housing mix being subject to housing requirements. Table 4.1 sets out the LBH housing requirement by size and type. This table provides a very rigid requirement for the percentage of private and affordable units to be provided at different sizes in the borough. These figures were subject to the Council's latest information at the time at which the policy was drafted, however that does not mean that these requirements will reflect an up to date representation of market requirements throughout the plan period.
- 6.2 Including the phrase 'subject to market requirements' in the policy text will seek to ensure that housing mix reflects the market requirements at the time of any individual planning application to ensure that LBH is meeting the actual demands of the Borough. This is particularly important for longer terms sites such as the Matalan site which in the medium to long term when they come forward the market is likely to have changed from the current position.

### Planning Commentary

- 6.3 Paragraph 159 of the NPPF states that local authorities should have a clear understanding of housing needs in their area and:

*"...should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:*

- Meets household and population projections, taking account of migration and demographic change;*
- Addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)."*

- 6.4 Housing should be provided at a design and mix that responds to demonstrable local demand and need, and also subject to development viability. This should be based on objective figures taking into account all sections of the population at the time of an application in order to provide an up to date reflection of the current need. In this way, policy DMH 2: Housing Mix would then be consistent with National policy in line with the NPPF test of soundness.



## Recommended Revision to Policy DMH 2: Housing Mix

6.5 The recommended revision to policy DMH 2 is set out below:

### Policy DMH 2: Housing Mix

The Council will require the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need and **will be subject to market requirements.**

## 3. Development Management Policy DMH 7: Provision of Affordable Housing

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### Introduction

- 3.1 Support is given for the general tone of Development Management policy DMH 7: Provision of Affordable Housing, due to the fact that the policy refers to viability testing as follows:

*'A) In accordance with national policy H1 of the Local Plan Part 1 :*

*i) developments with a capacity to provide 10 or more units will be required to maximise the delivery of on-site affordable housing;*

*ii) subject to viability and if appropriate in all circumstances, a minimum of 35% of all new homes on sites of 10 or more units should be delivered as affordable housing, with the tenure split (70% Social/Affordable Rent and 30% Intermediate) as set out in Policy H2: Affordable Housing of the Local Plan Part 1.' [author's emphasis].*

### Planning Commentary

- 3.2 Paragraph 159 of the NPPF requires local authorities to address the need for all types of housing, including affordable housing, with paragraph 50 stating that *"where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified."*
- 3.3 Paragraph 173 states that *"pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking" and goes on to state that "to ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing landowner and willing developer to enable the development to be deliverable."*
- 3.4 As the NPPF makes clear, it is important that sufficient affordable housing is provided to meet local needs, however, it is also important, that the viability of development is taken into account, as set out in part ii) of policy H1 of the Development Management Policies document.

### Recommended Policy Changes

- 3.5 None



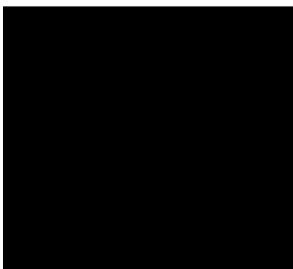
October 2014

## **Local Plan: Part 2**

# **Site Allocations and Designations**

**(September 2014)**

Prepared by Savills UK on behalf of the London Diocesan Fund



# Introduction

---

1. These representations have been prepared and submitted by Savills on behalf of the London Diocesan Fund (LDF) in response to the Local Plan: Part 2 Site Allocations and Designations published September 2014.
2. The LDF is the administrative wing of the Diocese of London which covers 277 square miles of Greater London including the Cities of London and Westminster and 17 other local authorities. The LDF has a portfolio of freehold and leasehold property interests including office, residential and ecclesiastical properties. The LDF strategically considers development and change of use potential of suitable properties within its portfolio in order to generate receipts or revenue for reinvestment back into the operation of the Church.
3. In response to this consultation document, this submission seeks to include the following site in the Site Allocations and Designations document:
  - Ladygate Lane, Ruislip
4. This submission also seeks a Green Belt deletion for another site under LDF ownership for a land use swap with Ladygate Lane:
  - Glovers Grove
5. In summary, this submission seeks inclusion of the LDF's site at Ladygate Lane, Ruislip within the Site Allocations and Designations document as a residential development opportunity and deletion of the green belt site at Glovers Grove.

# Planning Considerations

---

## a) Site at Ladygate Lane

### Development Plan Certainty

1. Part (3) (5) (a) of the Town and Country Planning (Local Planning) (England) Regulations 2012 indicates that Local Development Documents should 1) include the development and use of land which the local planning authority wish to encourage during the specified period and 2) include the allocation of sites for a particular type of development or use – with the purpose of site allocations in a plan to guide the determination of applications for planning permission.
2. NPPF (157) indicates that plans should plan positively for development in the area to meet the objectives, principles and policies of the Framework. It states that sites should be allocated to promote development bringing forward new land where necessary and providing detail on form, scale, access and quantum of development where appropriate.
3. The Presumption in Favour of Sustainable Development (PFSD) is the “*golden thread*” which runs through a plan. The approach to a plan, its vision and proposals should be expressed in policies which are justified and effective in accordance with the NPPF. The plan needs to be positively prepared.
4. The NPPF sets out the Government’s current and future requirements for boosting significantly the supply of housing (in the drive for economic growth) - including the identification of a supply of specific, developable sites sufficient to provide five years worth of housing against local housing requirements.
5. NPPF (7) indicates priority towards “*providing the supply of housing required to meet the needs of present and future generations*” and “*widening the choice of high quality homes*” (NPPF (9)). There are various references to housing needs throughout the document. Importantly, though, NPPF (159) indicates that SHMAs should cater for housing demand, as well as need.
6. It is clear from national statute and planning guidelines that plans should allocate even the smaller sites to create certainty on their 5 year land supply. It is understood from our discussions with officers that the Authority will consider representations below the 0.25 hectare threshold and take a view on whether the site is suitable for allocation based on the issues and site specifics which we address below.

7. The Fund are considering options at the moment for a carefully designed housing scheme at the Ruislip site and linked to this proposal, relocation of the existing scout hut to a more suitable location at Glovers Grove. This facility is also intended to be used during the day as a nursery and the Fund are currently in discussion with an interested operator. As a result, this linked proposal would not result in any net loss of a community facility. The housing development at the Ruislip site would enable development of the new, better located facility at Glovers Grove. The Fund is in the process of preparing pre application documentation for discussion with Officers during the coming weeks with the intention to submit two linked applications on the above basis.

### **Overall Housing Position**

8. As cited in the Site Allocations and Designations document, *'the borough's current target is to provide an additional 4,250 dwellings, annualised as 425 dwellings per year, for the ten year period between 2011 and 2021'*. The Draft Further Alterations to the London Plan (FALP) however, proposes an increased annualised target of 559 for the borough.
9. An assessment of the annual monitoring report shows that the majority of the residential dwellings are coming from strategic sites which, by their very nature, go beyond the 5 year period. Furthermore, as noted on page 15 of the Site Allocations Document, *'a key component of the Hillingdon's London Plan housing monitoring target is an allowance for small sites under 0.25 hectares.'* According to the detailed housing trajectory outlined in the Annual Monitoring Report, between 2013 and 2018 the number of small scale unidentified windfalls with planning permission or under construction ranges from 68 to 70. This number will have to increase to accommodate the increased FALP target. The site put forward in this submission therefore, whilst small in scale, would make an important contribution to the borough's housing target and assist in addressing the shortfall.

### **Site Specific considerations**

#### **Land Use**

10. The area around the site is predominantly residential in nature. The proposed site allocation is therefore considered appropriate in this context. Through pre-application consultation with the council, the LDF is looking into a land use swap for the existing community use, to re-provide the Scout Hut at a nearby site at Glovers Grove, which is also under LDF ownership. The principle of this land swap would therefore provide the opportunity to create a new and enhanced scout hut facility in place of the existing facility which is supported by the Scout organisation. This arrangement would lead to no net loss of the existing community facility on

the site. This space would also be shared with a nursery in use during the daytime with an interested operator already identified.

### **Density**

11. Based on the PTAL rating of 1B, the density range for a residential development on the site is between 150-250 habitable rooms per hectare (hr/ha). The proposed scheme for 5 to 8, family-sized residential dwellings on the site is in accordance with this density range.

### **Housing Mix**

12. An analysis of the area immediately surrounding the site demonstrates that this location is considered a mixed character area, with semi-detached houses on the site's western elevation, and flats on the site's eastern elevation. The prospective design for a residential scheme for the site, subject to planning consent, would be for up to 8 family sized residential dwellings, thus making an important contribution to family housing provision in the borough and importantly meeting market demand within this locality.

### **Design Approach**

13. The site is brownfield land and benefits from an existing access onto Ladygate Lane and services. The prospective design for a residential development on the site has been developed to create high quality family dwellings, with outdoor amenity space and off street parking provision, in accordance with London Plan design standards. The configuration of the development has been orientated to ensure sufficient distances with the adjacent properties, to ensure privacy and outlook is maintained. Design options will be explored in detail with Officers at the time of the pre-application consultation.

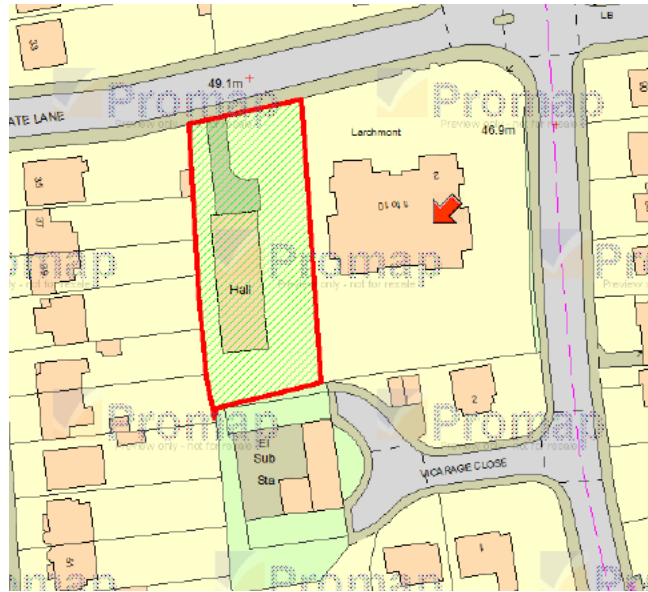
### **Conclusions**

14. Based on the above considerations, we would propose insertion of the following matrix to the Site Allocations and Designations document:

### **Ladygate Lane, Ruislip, HA4 7QR**

The site has an area of 0.12 hectares and is located on the south side of Ladygate Lane. It is a plot with vehicular access from Ladygate Lane. The existing Scout Hut comprises a single storey building located in the south west corner of the site. The rear of the site abuts Vicarage Close.





### Ladygate Lane, Ruislip, HA4 7QR

The Council supports the development of the site for residential use. This will meet the following criteria:

- The existing protected trees on the site will be retained;
- Through discussion with the council, the landowner is prepared to consider a land swap with a site adjacent to Glovers Grove under the same ownership to relocate the existing Scout Hut, thus ensuring that there will be no net loss to the community facility;
- A residential development on the site will make a contribution of family sized dwellings with off street parking and private amenity space and assist in meeting the housing targets for this local area of the borough.

#### Site Information

|               |                          |
|---------------|--------------------------|
| Site name     | Ladygate Lane            |
| Location      | Ruislip                  |
| Area (ha/sqm) | 0.12 hectares/ 1,228 sqm |

|   |  |
|---|--|
| PTAL Ratings                            | 1B   |
| Proposed Development                    | Residential  |
| Designations                            | Site is located within an Archaeological Priority Area   |
| Existing Use                            | Premises used by the Scouts organisation   |
| Relevant Planning History (Most Recent) | Planning permission 702A/73/259 dated 07/05/73 was granted for the erection of a Scout Headquarters. |
| Proposed Number of Units                | 5-8 family sized dwellings.  |
| Existing Units                          | 0  |
| Net Completions                         | 0  |
| Infrastructure Considerations           | No specific considerations   |
| Indicative Phasing                      | Short term.  |
| Other Information                       | None   |

#### b) Site at Glovers Grove

15. This submission seeks to delete the green belt designation of another LDF site at Glovers Grove, Ruislip. Deletion is justified on the grounds that the site would offer a land swap opportunity to re-provide the existing scout facility currently located at a site known as Ladygate Lane (proposed as a housing allocation) to enable sustainable residential development at this location. This is in accordance with the Inspector's report on Part 1 of the Local Plan which notes that *'very minor adjustments and compensatory additions could take place at this stage, perhaps to make viability and achievable a sustainable development.'*
16. When assessed against paragraph 80 of the NPPF, the site is not considered to strategically contribute towards the purposes of the Green Belt, as outlined below:
- Check the unrestricted sprawl of large built-up areas;
- The site is a small part of a much larger green belt site, and thus would not check the unrestricted sprawl of large built-up areas.*
- Prevent neighbouring towns merging into one another;

*The site's location on the edge of the existing settlement will not prevent neighbouring towns merging into one another.*

- Assist in safeguarding the countryside from encroachment; or

*The site's small size and proximity to the existing settlement means that it does little to assist in safeguarding the countryside from encroachment.*

- Preserve the setting and special character of an historic town.

*This is not considered applicable to this site.*

17. Further, a single storey development in the form of a replacement scout facility is considered justified in principle based on the very special circumstances of need and likely minimal impact on the openness of the GB at this location.

18. We would therefore propose insertion of the following Green Belt deletion into the Site Allocations and Designations document:



#### **4) Grovers Grove, Ruislip**

##### **Recommendation:**

Delete from the Green Belt

**Reason for Recommendation:** The site does not merit its current Green Belt designation and should be deleted from the policies map as Green Belt. It is adjacent to the existing settlement boundary, and the proposed development for a single storey community facility on the site in connection with a land swap opportunity at Ladygate Lane, would have limited impact on the openness of the Green Belt. The site is bounded by properties on two sides and due to its limited size is considered not to positively contribute towards the NPPF's tests to include land in the Green Belt , namely:

- Check the unrestricted sprawl of large built-up areas;
- Prevent neighbouring towns merging into one another;
- Assist in safeguarding the countryside from encroachment.



# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |                      |              |  |
|----------------------------|----------------------|--------------|--|
| Title                      | MR                   |              |  |
| First name                 | WILL                 |              |  |
| Last Name                  | HAGGER               |              |  |
| Organisation (if relevant) | LONDON DIOCESAN FUND |              |  |
| Unit                       |                      | House number |  |
| House name                 |                      |              |  |
| Address 1                  | c/o AGENT            |              |  |
| Address 2                  |                      |              |  |
| Town                       |                      |              |  |
| County                     |                      |              |  |
| Postcode                   |                      |              |  |
| Telephone                  |                      |              |  |
| Email                      |                      |              |  |

| 2. Agent's Name and Address (if applicable) |                  |              |  |
|---|------------------|--------------|--|
| Title                                       | MS               |              |  |
| First name                                  | JANE             |              |  |
| Last name                                   | BARNETT          |              |  |
| Company                                     | SAVILLS (UK) Ltd |              |  |
| Unit  |                  | House number |  |
| House name                                  |                  |              |  |
| Address 1                                   |                  |              |  |
| Address 2                                   |                  |              |  |
| Town  |                  |              |  |
| County                                      |                  |              |  |
| Postcode                                    |                  |              |  |
| Telephone                                   |                  |              |  |
| Email                                       |                  |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on proposed changes to: *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

Q2. Please indicate the Proposed Change on which you wish to comment:

|                               |  |
|-------------------------------|--|
| Policy number;                | NOT APPLICABLE AS RELATES TO SITE ALLOCATIONS                    |
| Paragraph number;             | PLEASE REFER TO ATTACHED COVERING LETTER FOR FURTHER INFORMATION |
| Table or figure number; or    |  |
| Map number (Atlas of Changes) |  |

Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/>            | It is not effective                       |
| <input type="checkbox"/>            | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

**PLEASE REFER TO ATTACHED LETTER**





**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

**PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** [localplan@hillingdon.gov.uk](mailto:localplan@hillingdon.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillingdon.gov.uk](mailto:localplan@hillingdon.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

### 1) What is your gender?

Male                       Female

### 2) To which age group do you belong?

under 15                                       25 – 44                                       65 – 85  
 15 - 24                                       45 - 64                                       85+

### 3) Do you consider yourself to be a disabled person?

No                                       Yes

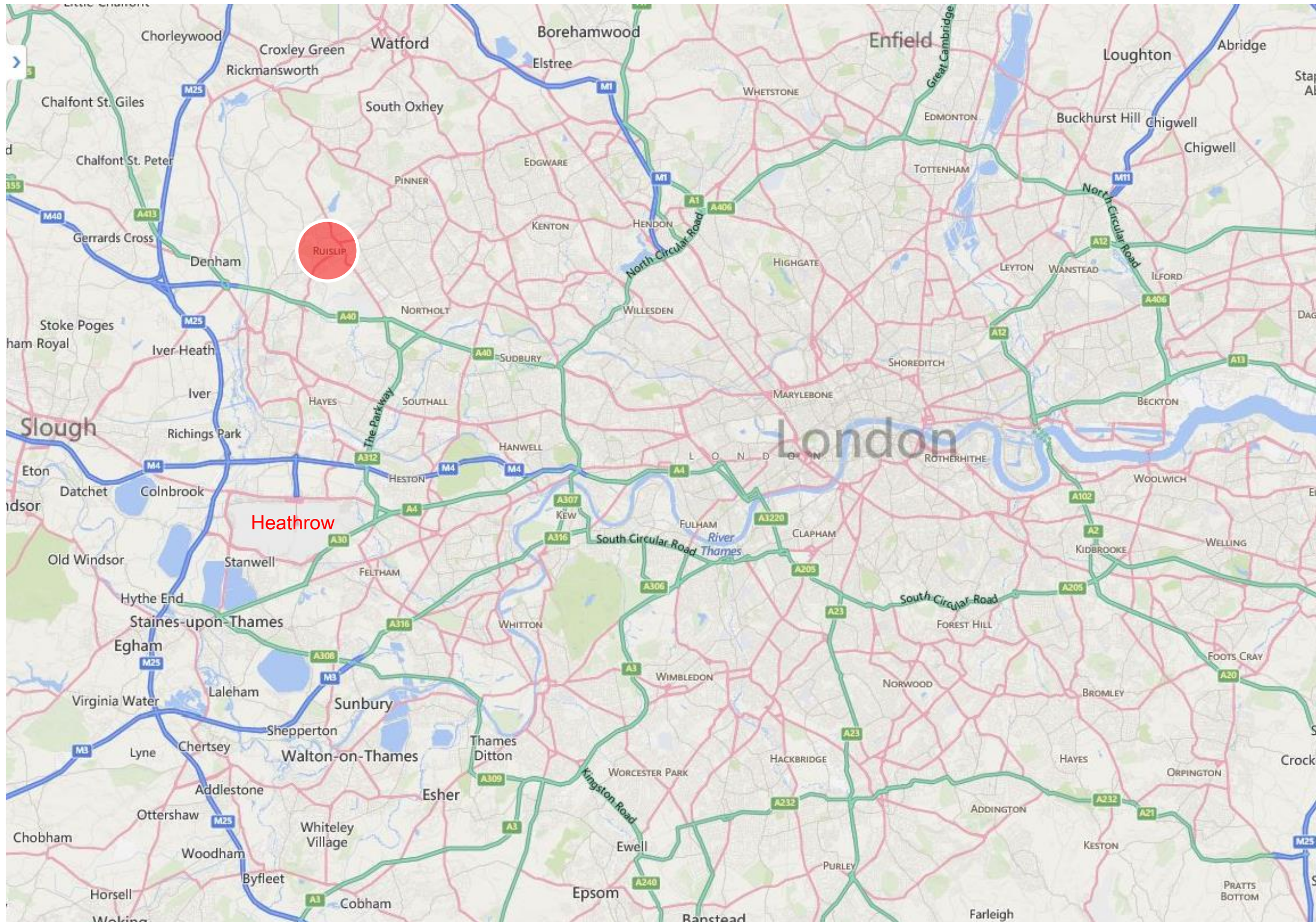
### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |

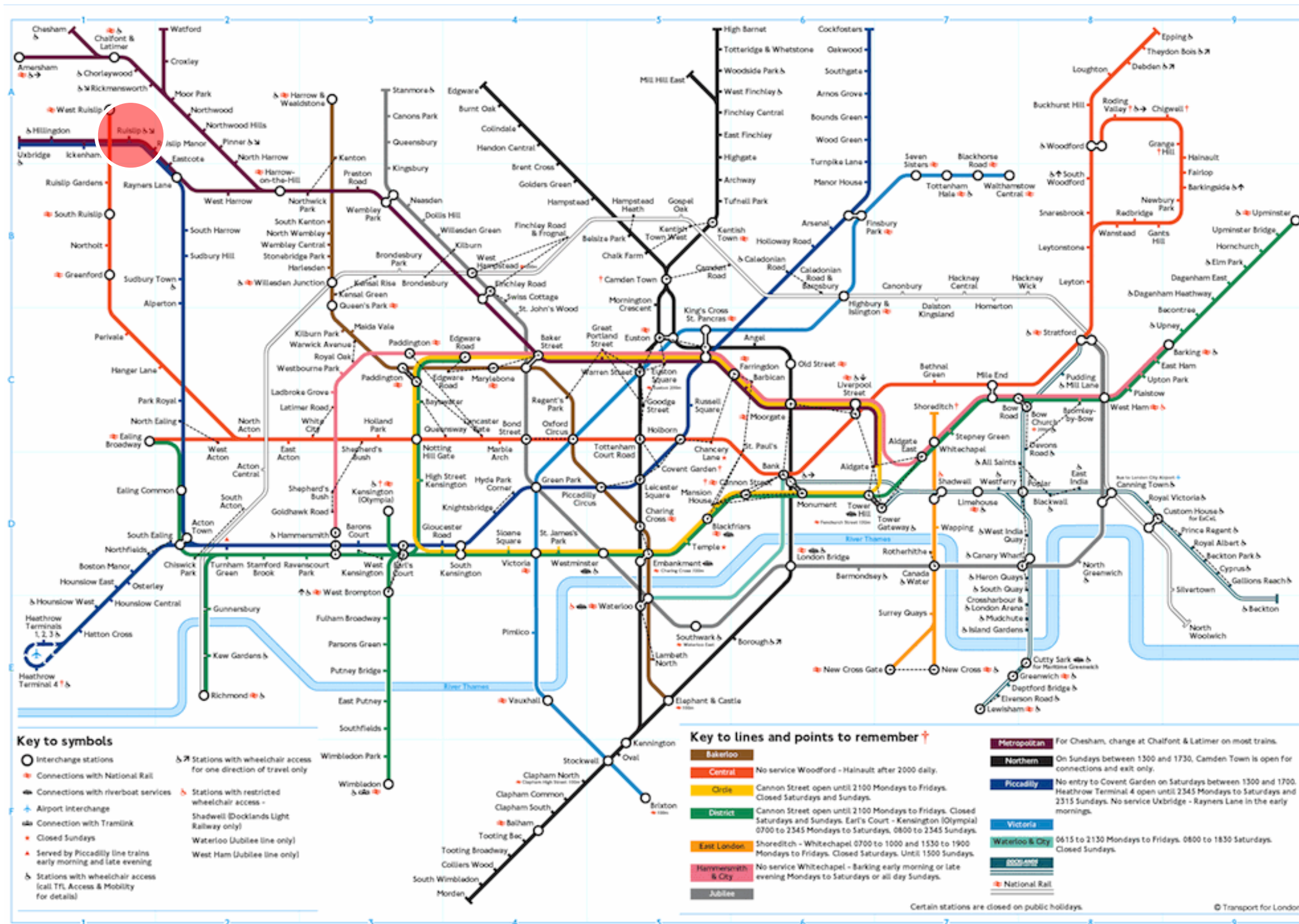


Ladygate Lane  
Ruislip  
by  
**colman architects**









## Ruislip

Within the M25  
Close to Heathrow  
Metropolitan & Piccadilly lines

## Other Stations

West Ruislip  
(Central line and Rail to Marylebone (25min) plus Ruislip Manor Ruislip Gardens South Ruislip)

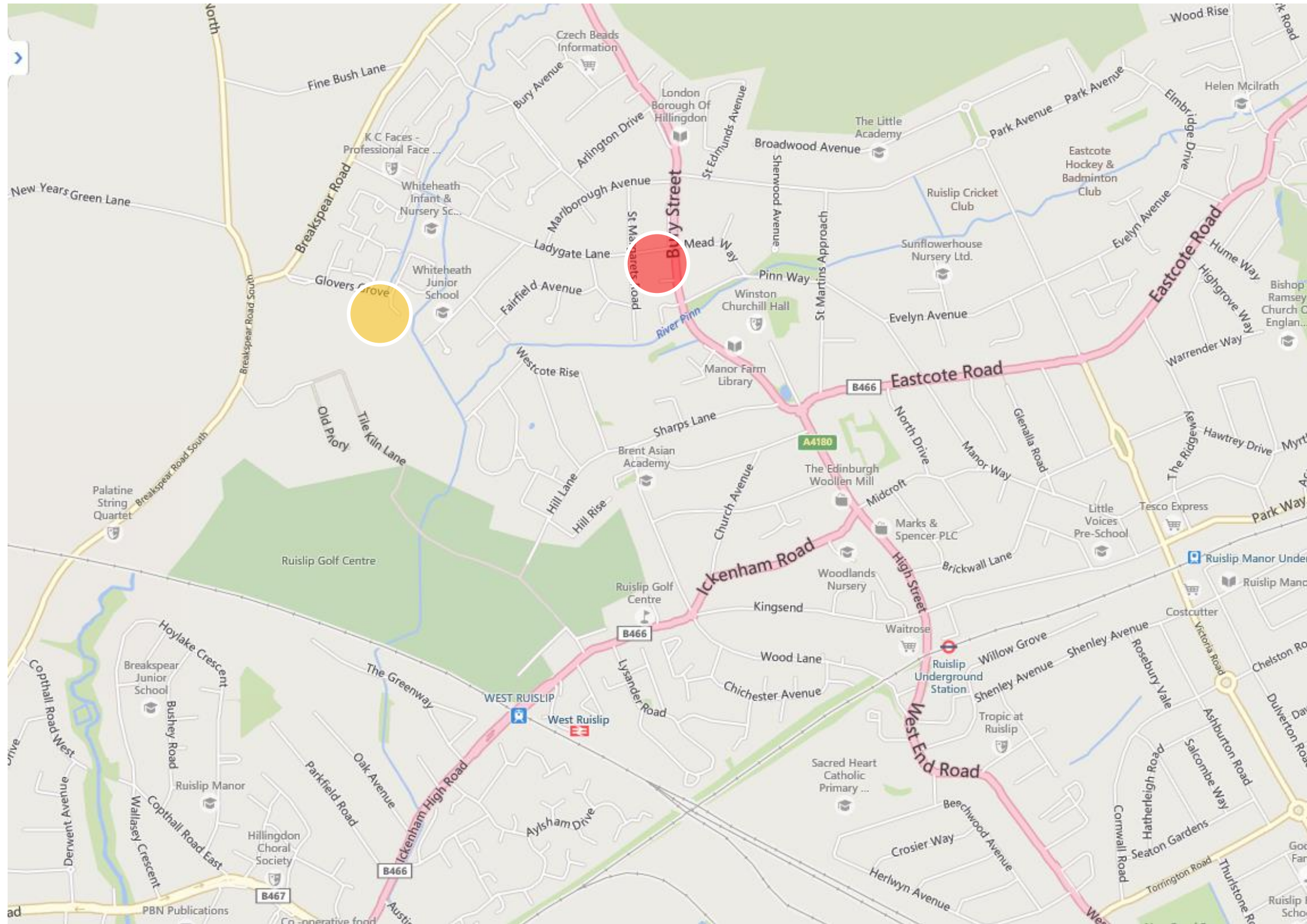
## MP's

Nick Hurd (Con.)  
Ruislip, Northwood & Pinner

South Ruislip & Uxbridge







-  Ladygate Lane
-  Glovers Grove

## Ladygate Lane, Ruislip

Location - Sites  
- December 2015 -





**Ruislip Village**

Waitrose

Specialized Concept Store

M&S Simply Food

Ruislip Lido

Manor Farm

Cafe Rouge

Baskin Robbins

Bang & Olufsen



**Ladygate Lane, Ruislip**

Location - Ruislip Village

- December 2015 -



colman architects





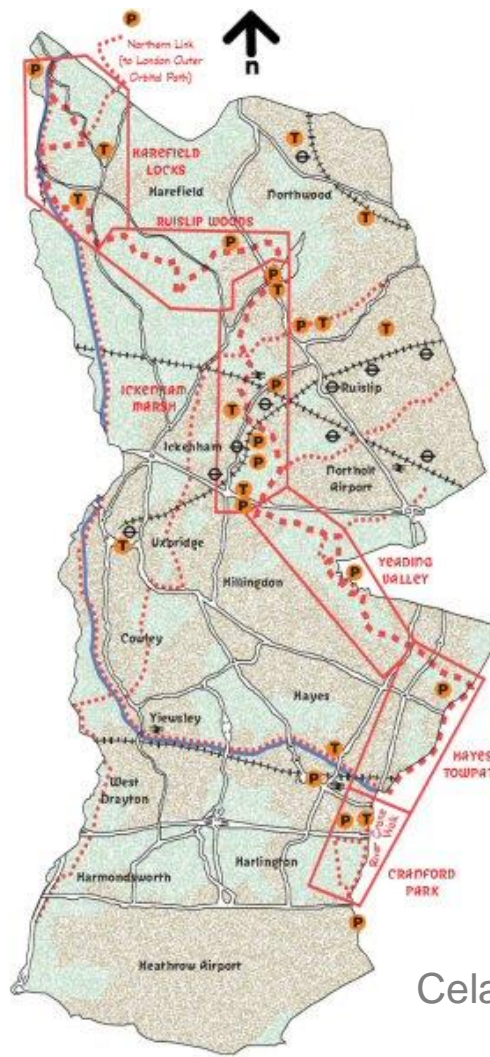
331 Bus Route



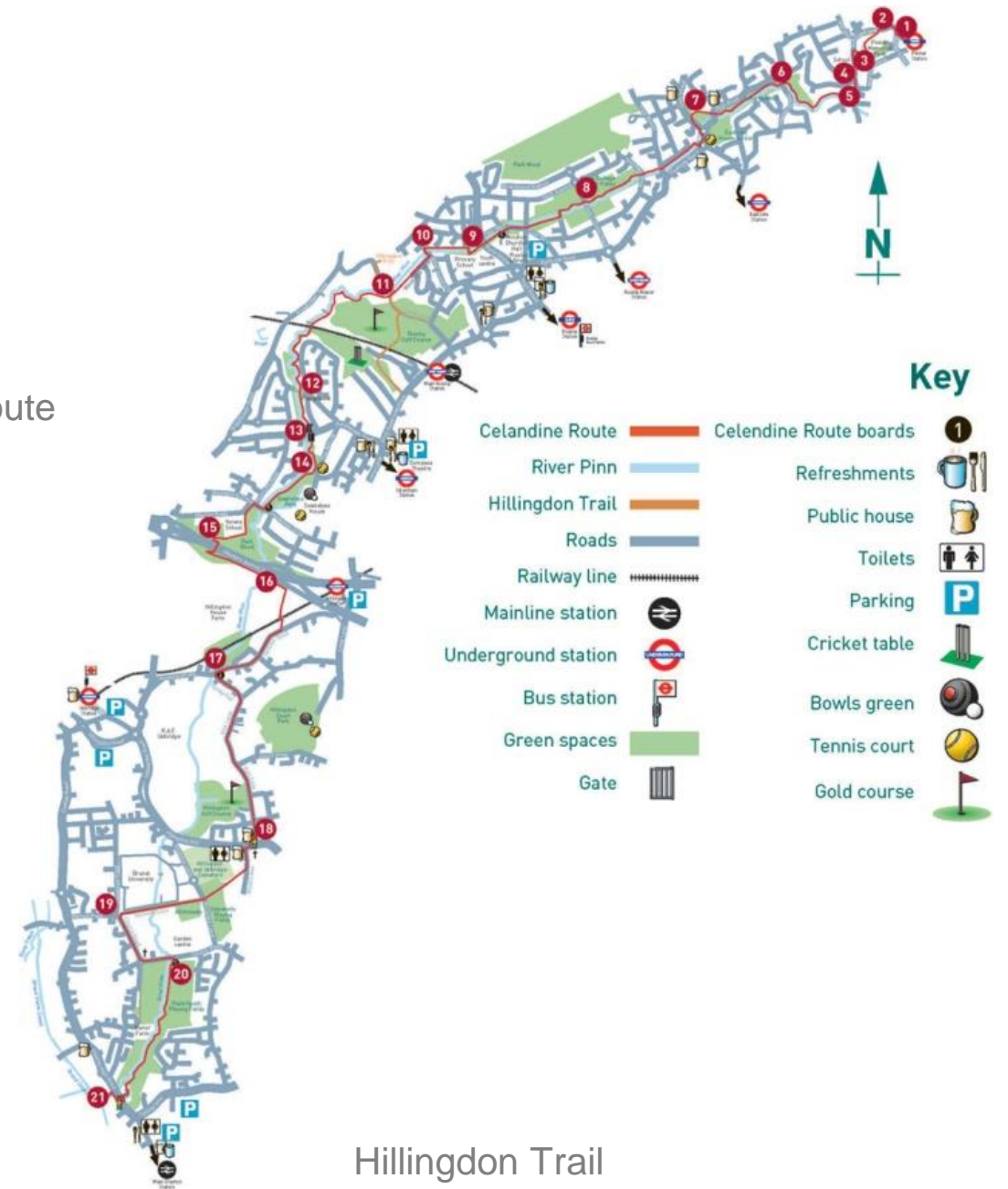
Whiteheath Infant & Nursery School



The Duck House



Celandine Route



Hillingdon Trail

Ladygate Lane, Ruislip

Location - Ladygate Lane

- December 2015 -







From East



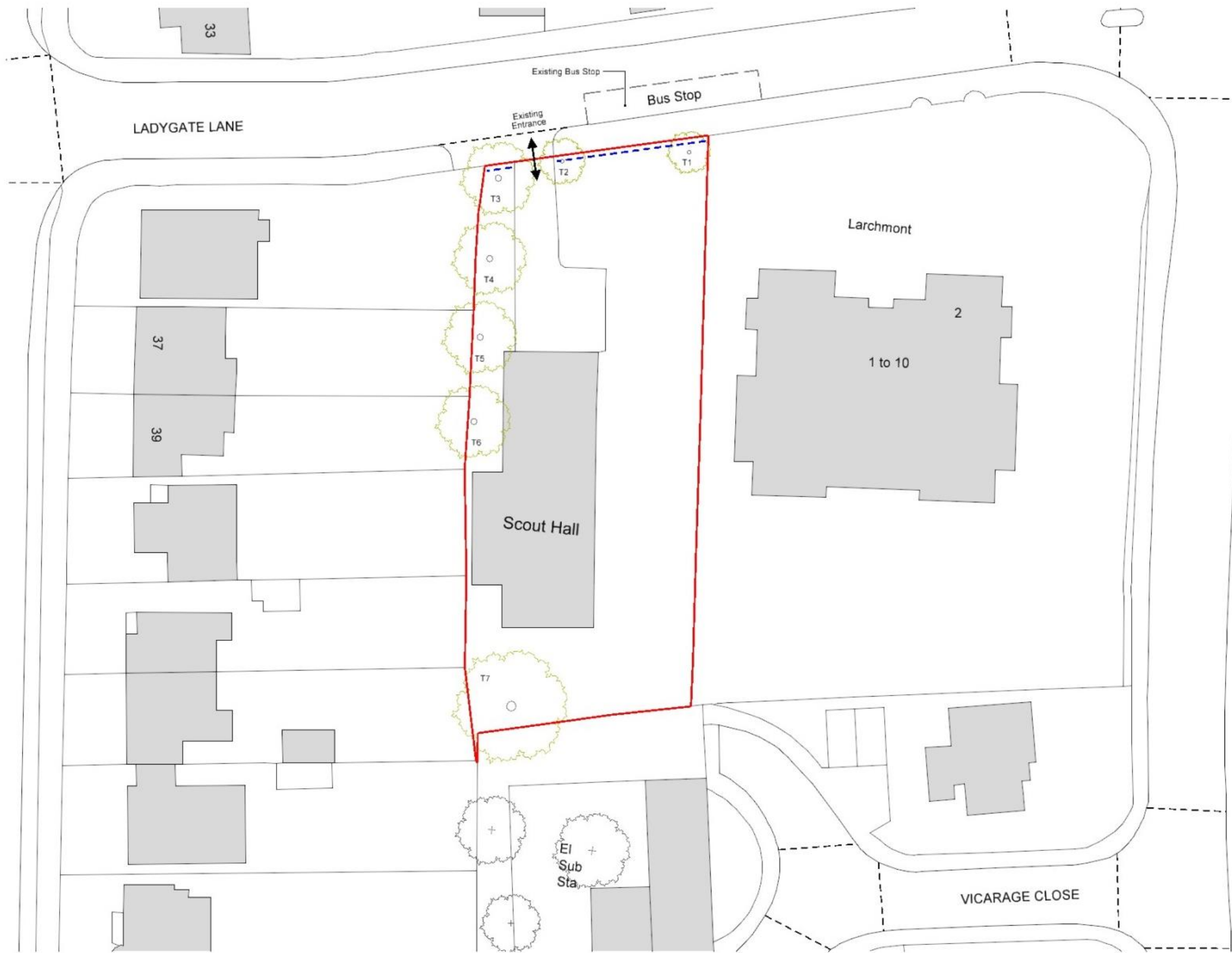
From West

## Ladygate Lane, Ruislip

Location - Existing Site Photos

- December 2015 -





**Note:**

7 TPO's

— Site Boundary

- - - Existing restrictions determine access location

T1 - Existing Lime Trees (TPO 608)







St Margaret's Road / Lady Gate Lane. No.32



No.35



St Margaret's Road. No.56



St Margaret's Road / Glenfield Crescent



## Ladygate Lane, Ruislip

Location - Adjacent House Types

- December 2015 -



Bury Street





From East



Eastern Boundary



Access

## Ladygate Lane, Ruislip

Location - Relationship To Larchmont

- December 2015 -





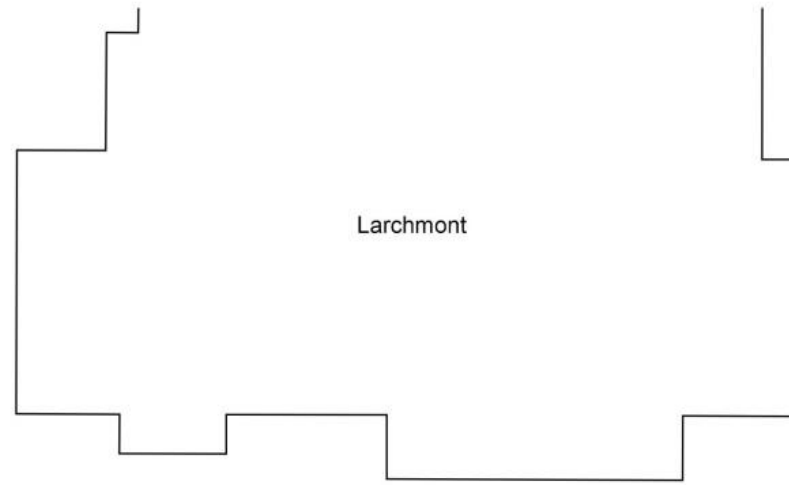


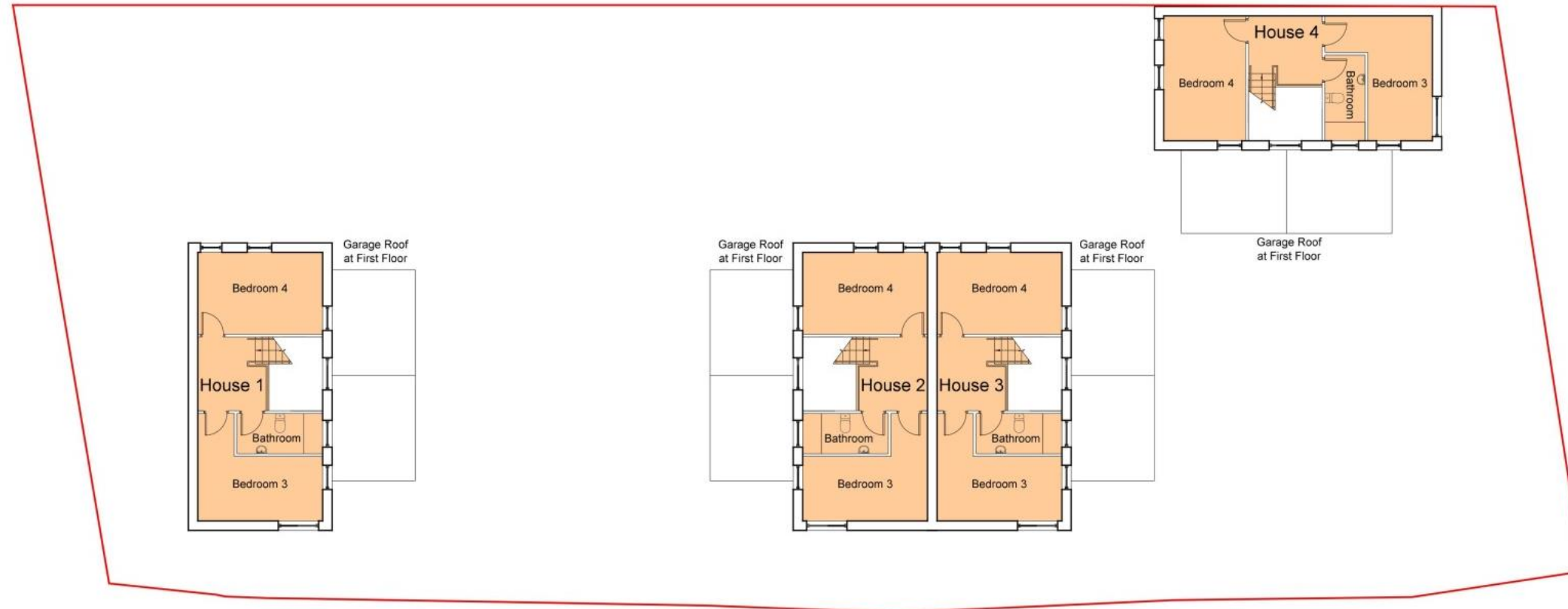
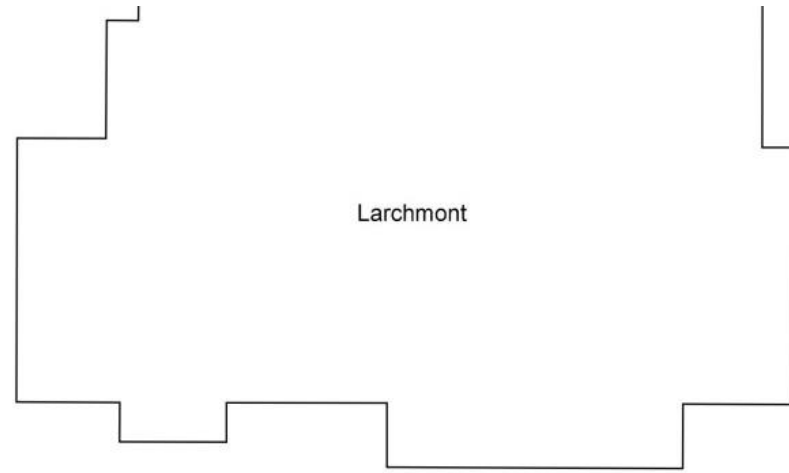
# Ladygate Lane, Ruislip

Presentation - Proposed Ground Floor Plan

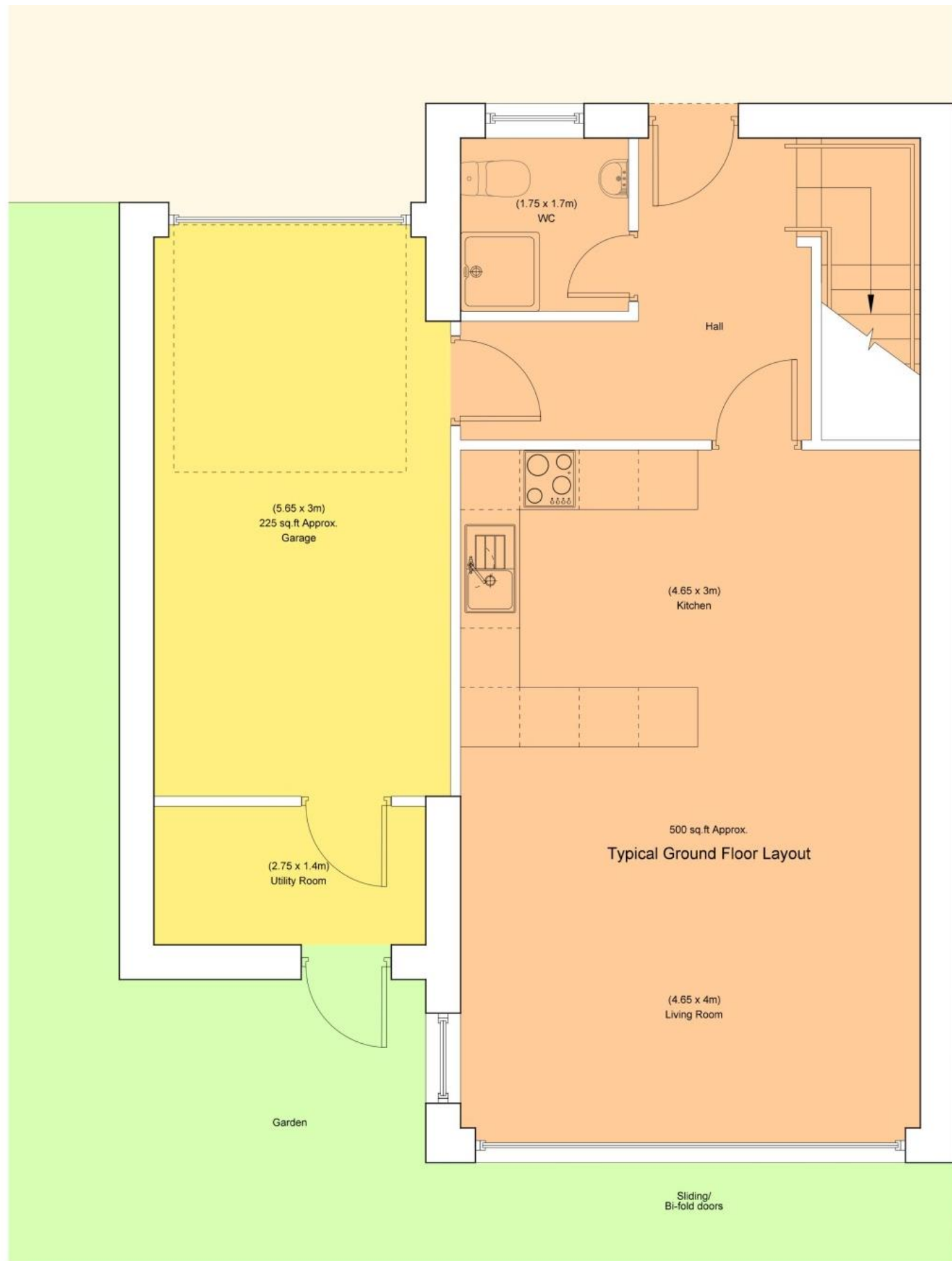
-- December 2015 -







— Site Boundary



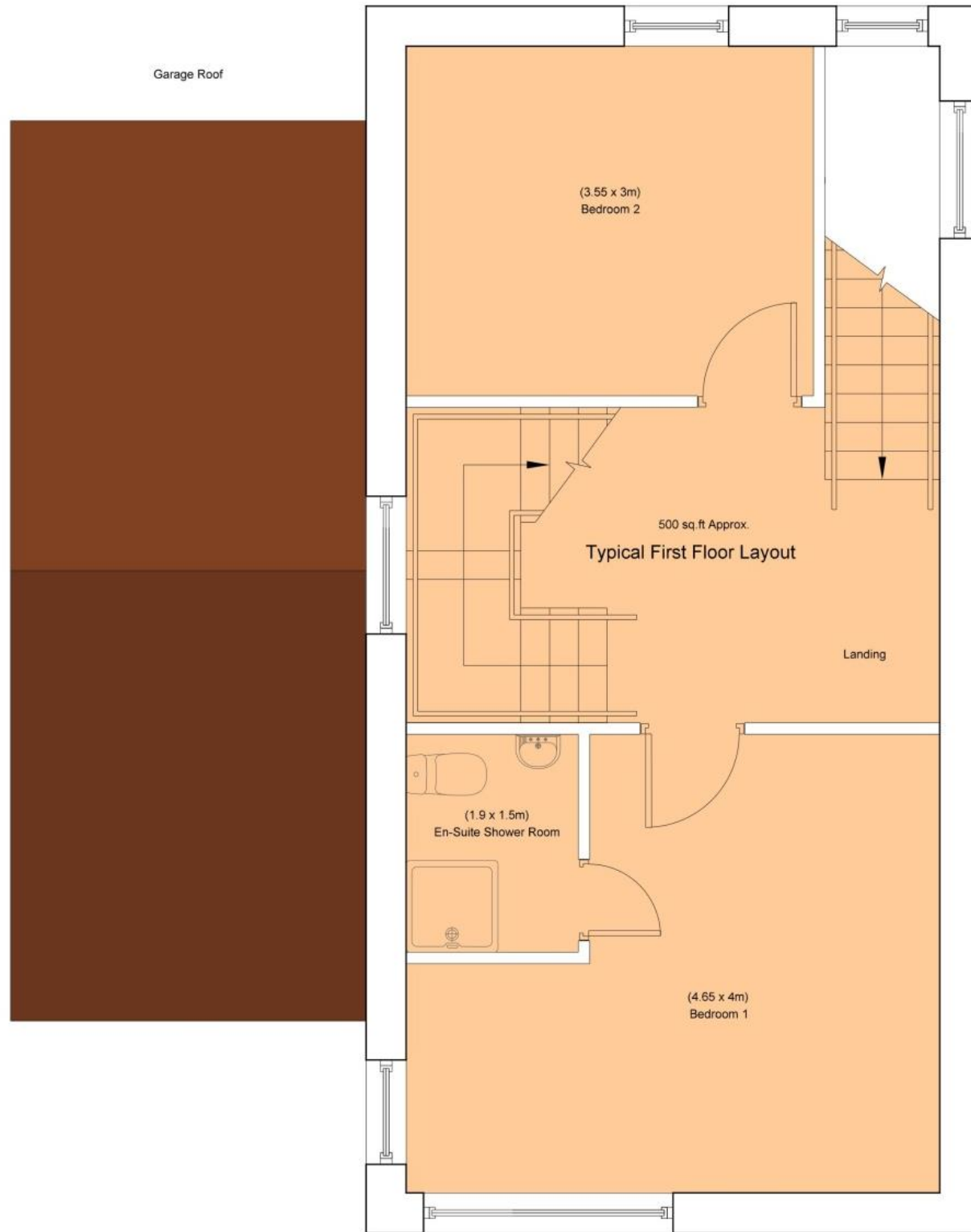
Ground Floor Proposed House Plan

Gross External Areas

| Floor        | Floor Area           | Garage/Utility     |
|--------------|----------------------|--------------------|
| Ground       | 600 sq. ft.          | 255 sq. ft.        |
| First        | 615 sq. ft.          | -                  |
| Second       | 615 sq. ft.          | -                  |
| <b>TOTAL</b> | <b>1,830 sq. ft.</b> | <b>255 sq. ft.</b> |

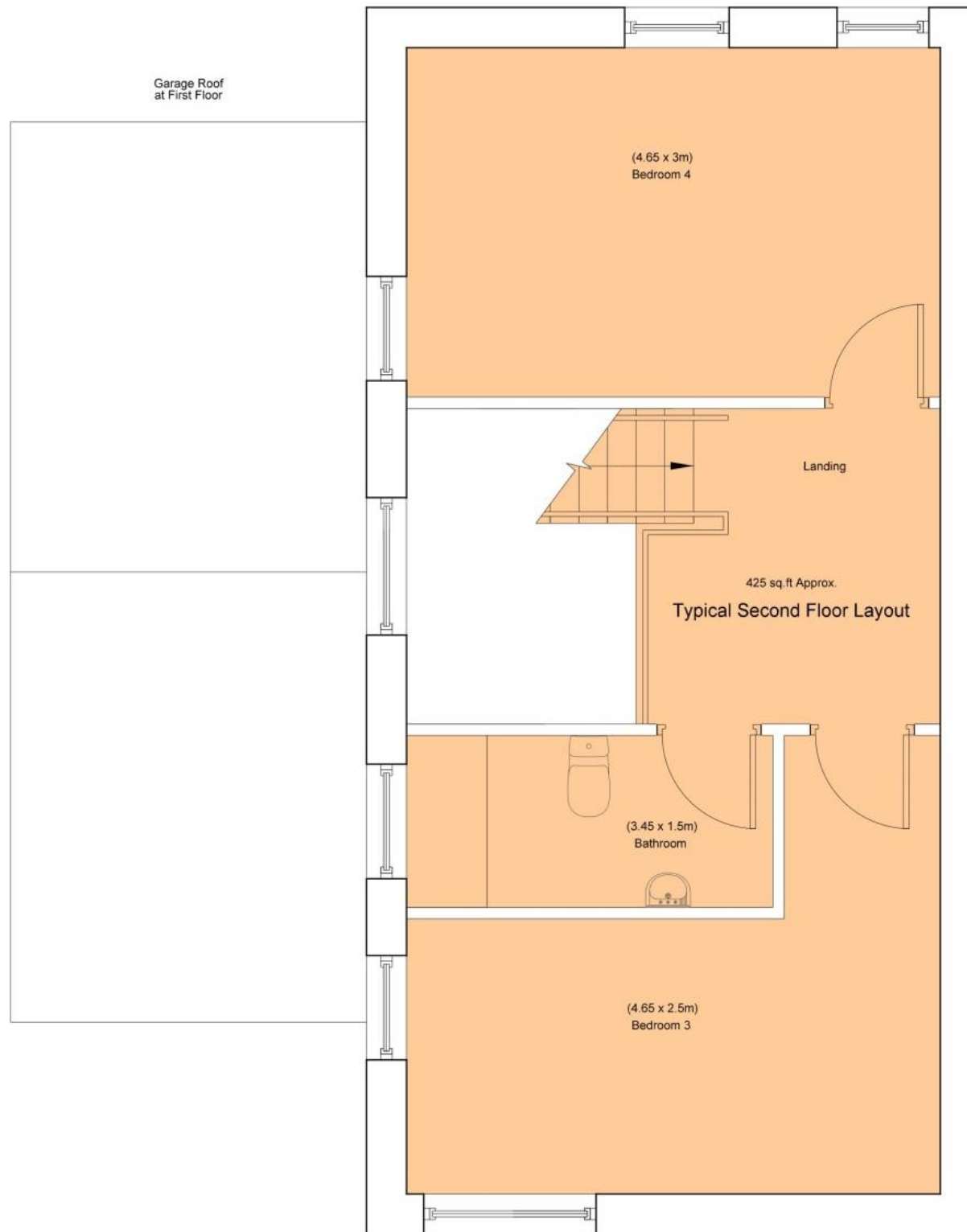
Gross Internal Areas

| Floor        | Floor Area           | Garage/Utility     |
|--------------|----------------------|--------------------|
| Ground       | 500 sq. ft.          | 225 sq. ft.        |
| First        | 500 sq. ft.          | -                  |
| Second       | 425 sq. ft.          | -                  |
| <b>TOTAL</b> | <b>1,425 sq. ft.</b> | <b>225 sq. ft.</b> |



First Floor Proposed House Plan





Second Floor Proposed House Plan



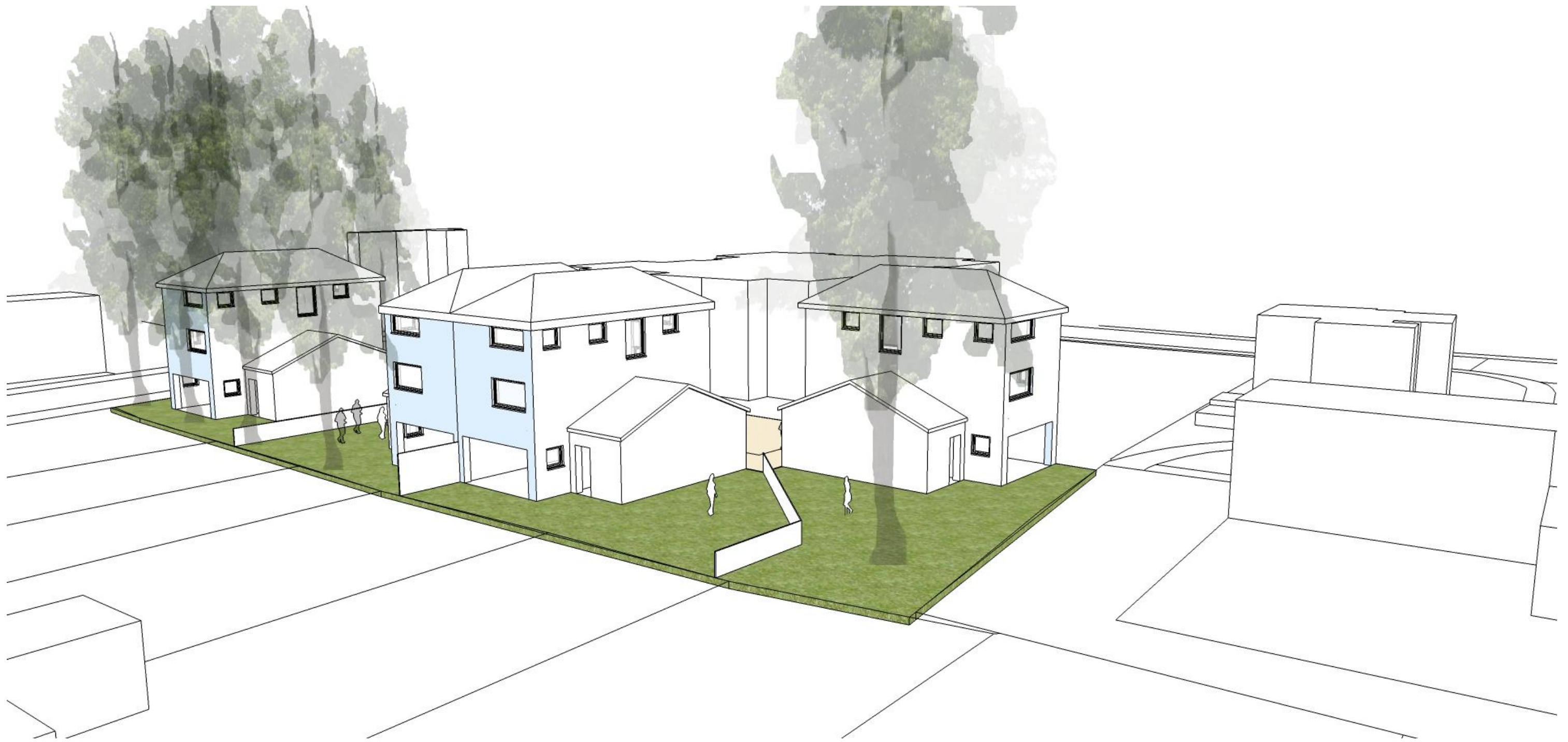














3<sup>rd</sup> December 2015

Planning Department,  
Civic Centre,  
High Street,  
Uxbridge, Middlesex  
UB8 1UW

Jane Barnett

**BY EMAIL:** [planning@hillingdon.gov.uk](mailto:planning@hillingdon.gov.uk)

Dear Sirs,

**Updated Representations to the Hillingdon Local Plan: Part 2 Site Allocations and Designations Revised Proposed Submission Version**

This updated representation has been prepared by Savills on behalf of the London Diocesan Fund (LDF), further to previous representations made, in response to the Local Plan Part 2 Site Allocations and Designations Revised Proposed Submission Version, October 2015. This letter should therefore be read in conjunction with the previous representations made to the previous version of the Local Plan Part 2 Site Allocations and Designations.

**Planning Policy Considerations**

a) National Level

Since the last representations, the Government has promoted the Housing and Planning Bill 2015. This Bill contains a number of measures that are primarily focussed on increasing the supply of new housing. This therefore places additional pressure on Local Planning Authorities (LPAs) to release additional housing land to meet local housing needs and demands.

In addition, consideration should be made to the National Population Projections (NPP) which was published by the Office of National Statistics (ONS) on 29<sup>th</sup> October 2015 and makes demographic assumptions about future fertility, mortality and migration. The NPP underpins the Sub-National Population Projections (SNPP) and in turn the CLG Household Projections (currently 2012 based), which according to Planning Practice Guidance should be used to provide the starting point estimate of housing need. This projection is therefore likely to place added pressure on LPAs to deliver more homes and on smaller sites in London boroughs to include Hillingdon.

b) Regional Level

Since the submission of the previous set of representations, the GLA has adopted the Further Alterations to the London Plan (FALP) March 2015, confirming the new annualised housing target of 559 for the London Borough of Hillingdon which results in an 32% increase from its previous 2011 housing target. Its emphasis is on urban sites which are both large and small to be identified to meet housing pressures at a local level.

### c) Local Level

As noted on page 15 of the Site Allocations Document, *'a key component of the Hillingdon's Local Plan housing monitoring target is an allowance for small sites under 0.25 hectares.'* This recognises the importance of small sites in meeting the Borough's housing need. Notwithstanding our earlier argument that small sites (below the 0.25 threshold) should be identified where suitable within the Local Plan, when taken together the Ladygate Lane site and the re-provision site are likely to meet the GLA's 0.25 hectare size threshold. By the nature of the land use swap therefore, these will be linked sites and the Ladygate Lane site should therefore be considered on this site specific basis.

### Site Specific Considerations

Further to the previous submission to the first round of consultation of the Site Allocations and Designations Document, this representation represents an updated position regarding the prospective re-provision of the existing community facility. Previously, it was stated that the re-provision of the existing Scout Hut facility would be achieved through the development of a new Scout Hut facility on a Green Belt site under London Diocesan Fund ownership at Glovers Grove. This site is no longer proposed for the re-provided facility. An alternative site has however been identified which would allow for two Scout Hut facilities to be amalgamated into a larger enhanced facility. This site is not located in the Green Belt. The Fund have an in principle agreement with the Scout Organisation and negotiation is ongoing regarding the specific location and nature of this new facility. Since the previous representation was made, detailed design pre-application consultation has already been undertaken with the Council for a proposed residential development on the site. An independent transport consultant's assessment has been incorporated into the proposed site layout to ensure that the access to Ladygate Lane is appropriate for a development of this density level. This site is therefore deliverable and could come forward in the first 5 years of the plan period.

In summary, the site at Ladygate Lane is available for a housing allocation in accordance with both the National Planning Policy Framework (NPPF) and the National Planning Policy Guidance (NPPG), and will assist the borough in meeting its increased housing target.

Included in these representations is the latest pre-application brochure with plans and visuals, which reflects discussions with officers during the pre-application process in order to agree a final scheme. This scheme is subject to further discussion with the Council, however demonstrates the design development that has already taken place to date and that by allocating the site for residential purposes will allow for a workable scheme to come forward.

We have submitted these representations by email, and we would be grateful if you could confirm receipt of these documents. We would also appreciate if you could notify us in future of any future consultations or publications.

In the meantime, should you require any additional information or have any further queries, please do not hesitate to contact my colleague Pearce Gunne-Jones [REDACTED] or myself.

Yours sincerely,



**Jane Barnett**  
**Director**  
**Savills Planning and Regeneration**

cc. Will Hagger, London Diocesan Fund

Attachments:  
Pre-application Brochure  
Latest site layout plan  
Latest set of visuals  
Original representations



22<sup>nd</sup> June 2016



Planning Department  
Hillingdon Council  
Civic Centre  
High Street  
High Street  
Uxbridge, Middlesex  
UB8 1UW

Jane Barnett



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

**FAO: James Gleave**

Dear Sir / Madam

**HILLINGDON LOCAL PLAN: PART 2  
REVISED PROPOSED SUBMISSION CONSULTATION OCTOBER 2015  
WEST RUISLIP GOLF COURSE AND OLD PRIORY MEADOWS – PROPOSED SINC EXTENSION  
REFERENCED SINC 11**

These representations are submitted on behalf of the London Diocesan Fund (LDF) and form an objection to the Authority's identification of the "West Ruislip Golf Course and Old Priory Meadows" site referenced "SINC Ext 11" of the Revised Proposed Submission version of the Site Allocations DPD (October 2015), as a Borough Grade II Site of Importance for Nature Conservation (SINC).

This site is one of 37 new and extended SINC's which have been reviewed in the borough by virtue of their initial identification by the GLA back in 2005 by the London Ecological Unit (LEU) under the previous Mayor's wider Biodiversity Strategy at the time. London Borough of Hillingdon (LBH) has recommended removal of 11 sites as part of their own site selection process. This site has been identified as having potential of a borough Grade II importance (below sites of metropolitan importance and borough Grade I importance).

The LDF own the freehold of land at St Martin's Brakespear Road and part of the site is implicated by this draft designation. For reference, a red line plan is enclosed with this letter illustrates the extent of the LDF's ownership in relation to these landholdings.

**Planning Policy Context**

The site's proposed SINC designation has been drawn from a study undertaken by LUC entitled "London Borough of Hillingdon: Review of Proposed New and Extended SINC's" on behalf of LBH, published in October 2015 which suggested a number of new and extended SINC's, to include this site; this single study in turn supported the LBH's latest iteration of their Site Allocations DPD when published during the same month in October 2015.

At a strategic level, the site is allocated Green Belt. There are other strategic sites, however, that are allocated Green Belt, Metropolitan Open Land (MOL) and/ or Green Chain and also subject to proposed new and extended SINC designations as part of the LUC 2015 study. MOL and Green Chain designations identify for these sites, at a strategic level, their national or regional biodiversity and ecological value.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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Registered office: 33 Margaret Street, London, W1G 0JD



These sites therefore are considered to warrant biodiversity protection and if the LDF's site was considered of strategic biodiversity and ecological value it would have been identified as either MOL and/ or Green Chain to support the proposed SINC extension.

### **The Site's Biodiversity Value**

The LUC 2015 study recommends the site is subject to a grade II borough importance SINC designation on the following grounds:

*"The habitats appeared to be of a similar condition to that recorded in 2005. The site provides a diverse habitat mosaic comprising the river and associated wetland habitats (similar species present as 2005), relatively species-rich semi-improved neutral grassland, with mature trees and dense and scattered scrub. The site is also important in terms of providing habitat connectivity along the River Pinn. There is also good public access to the north of the site via a footpath along the river, providing access to nature and a countryside feel." (author's emphasis).*

The emphasis of the proposed SINC designation is therefore towards wetland habitat and species and its connectivity along the River Pinn.

An independent assessment undertaken by CSA Environmental (June 2016) which is submitted as part of these planning representations involves a survey of the site and comments on the LUC study, in particular. This assessment concludes that there is a case for the removal of the habitats within the LDF site from the SINC extension, particularly as the primary goal of the proposed SINC extension appears to be to preserve good habitat connectivity for wildlife along the River Pinn corridor in line with the proposed and existing SINC's to the east and west (as illustrated at Appendix C of CSA's enclosed report). As stated above, this connectivity of these valuable wetland habitats (the thrust of the proposed SINC designation for this site) would be achieved without the inclusion of the grassland habitats within the LDF's site. Notwithstanding this, the habitats within the LDF site are not uncommon in the local area with specific reference in particular to LWSB guidelines on this matter.

It is also worthy to note that within the study itself, it was indicated that "*partial access was made available*" to the site. The level of accuracy of the survey data obtained across the extent of the proposed designation is therefore questionable. It is important to note that the study cites that those sites not benefitting from access have been proposed for removal from the SINC.

### **Conclusion**

It is acknowledged that important sites should be protected and consider that the relevant authorities should concentrate their resources into protecting the most important and valuable SINC's (to include those identified for enhanced biodiversity provisions at a strategic and regional level); rather than the less valuable sites which are considered to include "*West Ruislip Golf Course and Old Priory Meadows*".

The extent of the SINC designation itself (to include the grassland and meadow areas) does not appear to relate to the main reason for the "*SINC Ext 11*" designation which relates to preserving wetland habitat. Nor does it positively contribute towards the Council's wider objective in preserving the wetland habitat along the River Pinn which is the main objective of the proposed new and existing SINC designations to the east and west of the site (with reference in particular to proposed SINC 16 and proposed SINC 4 and the existing SINC designation east and south of the LDF site as illustrated at Appendix C of CSA's report). The LDF is therefore of the view that the land should be removed from such a designation as it does not serve a purpose.

It is the view that this is an unsound policy change not in accordance with the NPPF tests of soundness in either being justified or effective local policy. It is therefore recommended that proposed SINC extension referenced SINC 11 is removed as a new designation but that the proposed SINC 16 (Grade II SINC) and the

proposed SINC 4 (Grade II SINC) both connecting with the existing SINC designation along the River Pinn to the south and immediate east of the LDF site are retained to achieve the objective for preserving wetland habitat along this river corridor within the local area.

We have submitted these representations by both post and email (with an accompanying CSA report) and we would be grateful if you could confirm receipt of these documents. We would also appreciate if you could notify us of any future consultations or publications.

In the meantime, should you require any additional information or have any further queries, please do not hesitate to contact my colleague Charlotte Scotney at [REDACTED] (DD: [REDACTED]) or myself on the details set out at the head of this letter.

Yours sincerely

A large, irregular black redaction mark covering the signature area.

**Jane Barnett**  
**Director**  
**Savills Planning**

**Cc:** Will Hagger, London Diocesan Fund

**Encl:** Ecological report prepared by CSA Environmental (June 2016)



## **BRAKESPEAR ROAD, RUISLIP**

### **Habitat Survey and Critique of SINC Designation**

June 2016

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#### **1.0 INTRODUCTION**

- 1.1 CSA Environmental was appointed by Savills to undertake an extended Phase 1 Habitat survey at the above Site, which is owned by the London Diocese Fund (LDF), in order to evaluate the quality of the habitats present.
- 1.2 The survey was commissioned in light of the recent designation of the southern portion of the LDF Site as part of an extension of Borough Grade II Importance to an existing Site of Importance for Nature Conservation (SINC).
- 1.3 The purpose of this document is to set out the findings of the extended Phase 1 Habitat survey undertaken by CSA Environmental and, in light of the survey findings, to objectively critique the inclusion of habitats within the LDF Site as part of the SINC extension.
- 1.4 This critique is based on a review of the following documents:
  - *Local Plan: Part 2 - Site Allocations and Designations (Revised Proposed Submission Version, October 2015)* – Available online.
  - *London Borough of Hillingdon: Review of Proposed New and Extended SINCs* - prepared by LUC and dated October 2015. Available online.
  - *An Ecological Data Search for Brakespear Road, Ruislip* - commissioned from Greenspace Information for Greater London (GiGL) by CSA Environmental in June 2016, in order to provide records of notable/protected species, non-statutory sites and habitats within a 2km radius of the centre of the Site.
  - *ADVICE NOTE: Process for selecting and confirming Sites of Importance for Nature Conservation (SINCs) in Greater London* – Available online.

## 2.0 BACKGROUND INFORMATION

### Original SINC Description

- 2.1 The 2015 LUC report states that the original Borough Grade 1 SINC is described in the 1988 Greater London Council (GLC) document *Nature Conservation in Hillingdon*, as follows:

*“The golf course and surrounding habitat comprises a diverse mosaic of herb-rich semi-improved neutral grassland, hedge, broad-leaved secondary woodland, scattered trees, scrub, standing water, swamp, running water, tall herbs, ditches and amenity grassland...The railway embankment is species-rich with a range of tall herbs and scattered shrubs and trees.”*

- 2.2 The boundary of the original SINC is unknown, but based on the above description it would appear that the purpose of the original designation was to protect the golf course and its surrounding habitat (excluding the LDF Site), which already incorporates areas of *“herb-rich semi-improved neutral grassland”* (i.e. similar habitat to that found on the LDF Site).

### GiGL Information

- 2.3 The 2016 GiGL Data Search report states that the SINC was first notified in 1994.

### Greater London Authorities London Ecology Unit SINC Review

- 2.4 A review of nature conservation sites was carried out in 2005 by the Greater London Authorities' (GLA) London Ecology Unit (LEU), in liaison with the Borough, which involved an extensive review of sites based on field work and updated citations on the flora and fauna supported at existing sites.

- 2.5 The outcome of this review was a series of boundary changes, some additions, and deletions where sites were lost as a result of development.

- 2.6 These included a proposed extension to the SINC described in the 1988 GLC document, to include:

- The southern portion of the LDF Site (the meadow and two narrow fields adjacent to the west).
- Old Priory Meadow (off-site).
- An area of wetland habitat between the golf course and the River Pinn (off-site).

- 2.7 These areas are clearly labelled in Appendix A.

2.8 The proposed extension was described in 2005 as follows:

*"The area to the west of the River Pinn comprises an old meadow with a rich plant diversity and two narrow fields [i.e. the LDF Site]. To the east of these fields is the River Pinn. The section of river to the north has been dredged in the past and is relatively species-poor but has occasional water chickweed Myosoton aquaticum, which is a locally scarce species. The southern section of the river, beside the golf course, is a rich wetland habitat [not part of the LDF Site – see Appendix A], enhanced by adjacent wet grassland and a drainage ditch. The river supports water-starwort, brooklime, and foals water-cress, with meadowsweet, common fleabane and hemlock occurring along the banks. The wet grassland is dominated by meadowsweet, tufted hair-grass, gipsywort, red clover, stinging nettle and common knapweed. The ditch supports abundant floating sweet-grass and water-starwort, along with water plantain, fleabane and marsh woundwort."*

2.9 The 2005 review document identifies the extension land to be of Grade II Borough Importance. From the level of botanical detail provided, this assessment appears to be based heavily on the ecological value of those habitats not present within the LDF Site (see underlined sections above), namely the *"rich wetland habitat...wet grassland [and] drainage ditch"* to the south-west of the LDF Site, as well as the off-site River Pinn and its banks.

#### GiGL Information

2.10 The 2016 GiGL Data Search states that the SINC citation and boundary were both edited in 2005.

2.11 It would appear that both these changes were undertaken to incorporate the suggestions of the 2005 GLA review described above, and led to the SINC boundary being changed to appear as it does in Annexe A (i.e. to incorporate the extension area and both green 'Existing SINC' areas to the west and east).

#### **Review of Proposed New and Extended SINC**s

2.12 The sites identified by the 2005 GLA review had been included in the London Borough of Hillingdon (LBH) emerging *Local Plan Part 2: Site Allocations and Designations* documents which were issued for consultation in September 2014. A number of representations were received relating to these proposed new/extended SINC's and therefore LBH undertook a review of the 2005 recommendations, with updated surveys undertaken to confirm the value of the sites and whether designation was warranted. This review work was undertaken by LUC in 2015.

- 2.13 The study was not required to review existing SINCs, only proposed new SINC and SINC extensions.

LUC Survey Method

- 2.14 All proposed new/extended SINC identified in the 2005 GLA review were surveyed by LUC, subject to access, in accordance with the Greater London Authority's *Open Space and Habitat Survey Methodology*; developed to enable the assessment of sites in London as potential SINC<sup>1</sup>.

- 2.15 Following these site surveys, the proposed new/extended SINC were assessed in line with *Process for selecting and confirming Sites of Importance for Nature Conservation (SINC) in Greater London*<sup>2</sup>, a method and set of criteria developed by the London Wildlife Sites Board (LWSB).

- 2.16 The LWSB guidance states the following (among other things) with respect to Sites of Borough Importance:

*"These are sites which are important on a borough perspective in the same way as the Metropolitan sites are important to the whole of London. Although sites of similar quality may be found elsewhere in London, damage to these sites would mean a significant loss to the borough. As with Metropolitan sites, while protection is important, management of borough sites should usually allow and encourage their enjoyment by people and their use for education.*

...

*Since essentially a comparison within a given borough is made when choosing Sites of Borough Importance, there is considerable variation in quality between those for different boroughs; for example, those designated in Barnet will frequently be of higher intrinsic quality than those in Hammersmith and Fulham, a borough comparatively deficient in wildlife habitat. Only those sites that provide a significant contribution to the ecology of an area are identified."*

- 2.17 The guidance also includes the following in relation to criteria for choosing sites:

*"The best examples of each major habitat type are selected. These include typical urban habitats such as abandoned land colonised by nature ('brownfield'). Where a habitat is not extensive in the search*

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<sup>1</sup> Available online:

[http://downloads.gigl.org.uk/website/OpenSpaceHabitatSurveyGreaterLondon\\_Revisedspecification.pdf](http://downloads.gigl.org.uk/website/OpenSpaceHabitatSurveyGreaterLondon_Revisedspecification.pdf)

<sup>2</sup> Available online (2013 update):

[https://www.london.gov.uk/sites/default/files/sinc\\_selection\\_process\\_-\\_update\\_march\\_2013.pdf](https://www.london.gov.uk/sites/default/files/sinc_selection_process_-_update_march_2013.pdf)

*area it will be appropriate to conserve all or most of it, whereas where it is more extensive a smaller percentage will be conserved."*

2.18 The criteria themselves are not prescriptive and are instead "used to act as a guide for professional judgement", as stated in the LWSB guidance.

2.19 Indeed, the 2015 LUC document states that:

*"Given the nature of these criteria, and also the rapid nature of the survey method, assessments were subjective and based on the professional judgement of experienced ecologists. Following the surveys a workshop was held between the surveyors and the Project Manager to ensure consistency during the assessment."*

2.20 Where access was not available to a site, and it was not possible to view enough of the site to reach a robust conclusion regarding its value, the proposed new/extended SINC were recommended for removal.

#### Limitations to the LUC study

2.21 In terms of limitations, the LUC report states the following:

*"There was limited information available regarding the 2005 recommendations. In some cases it was not possible to match up the GIS shapefiles with the 2005 citations provided, as site identifications (GIS IDs or names) did not correspond between the two datasets. In addition, there was no additional background information to support the citations (such as previous survey data or rationale for recommendation), and in some cases the citations did not make clear the reason for the change (for example if extension was recorded). However, all new/extended sites identified in the GIS datasets were surveyed, subject to access, and therefore surveyors were able to undertake an independent assessment.*

*Access was not available to a relatively large proportion of the proposed new/extended SINC or parcels. As above, where access was not available and views in to the site were restricted, these sites were recommended for removal as a robust assessment could not be reached to determine whether the conditions recorded in 2005 remained."*

#### Site-specific Limitations

2.22 In the *London Borough of Hillingdon: Review of Proposed New and Extended SINC* it clearly states "Partial access available" in the description of the survey findings of the West Ruislip Gold Course and Old Priory Meadows SINC review. The recording sheet for the SINC indicates that the site was viewed from footpaths.

- 2.23 Although landowner permission was not requested prior to undertaking the LUC assessment of the proposed SINC extension, the Hillingdon Trail runs through the westernmost field in the southern portion of the Site and then bisects the Site at the north-west boundary of the southern meadow. As such, the trail provides relatively good views of the habitats in the southern portion of the Site.
- 2.24 It is clear, however, that full access to all parts of the Brakespear Road Site that were included in the proposed SINC extension was not possible at the time of survey.

#### 2015 LUC Assessment

- 2.25 The 2015 LUC assessment of the SINC, with reference to the previous site description produced by LEU in 2005, is as follows:

*“Partial access available. The habitats appeared to be of a similar condition to that recorded in 2005. The site provides a diverse habitat mosaic comprising the river and associated wetland habitats [not on the LDF Site – see Appendix A] (similar species present as 2005), relatively species-rich semi-improved neutral grassland, with mature trees and dense and scattered scrub. The site is also important in terms of providing habitat connectivity along the River Pinn. There is also good public access to the north of the site via a footpath along the river, providing access to nature and a countryside feel.*

*Recommend include as extension, Borough Grade 2.” (author’s emphasis underlined).*

#### GiGL Information

- 2.26 The 2016 GiGL Data Search report Non-statutory Designations Map shows the SINC boundary to include the area occupied by the existing SINC as well as the proposed SINC extension.
- 2.27 It is not clear whether this reflects the recommendations of the GLA 2005 study, or the 2015 LUC study.

### **3.0 UPDATE SITE SURVEY**

- 3.1 The Brakespear Road Site was subject to an extended Phase 1 Habitat survey, undertaken in fine and dry weather suitable for ecological survey by Dr Martin Brammah MCIEEM on 7 June 2016.

#### Method

- 3.2 The survey involved walking over the Site (in particular the southern section forming part of the SINC extension as described by LUC in 2015), recording the habitat types present and compiling species-lists for those habitats, in order to allow for a comparison between the habitats currently on-site and those described by LEU and LUC in 2005 and 2015 respectively.

#### Results

- 3.3 The southern portion of the Site comprises a semi-improved neutral grassland (meadow), with two narrow grassland fields that are adjacent to the west of the meadow and are separated from it by a tree-lined wet ditch.
- 3.4 The meadow is bounded to the north and east by native species-poor hedgerow, and to the south by dense scrub.
- 3.5 The two narrow fields are separated from one another by a defunct hedgerow with trees and bordered to the north and east by (off-site) woodland, with scrub and scattered trees along the southern boundary.
- 3.6 Species recorded in each field are described in the table in Appendix B.

## 4.0 EVALUATION OF SINC EXTENSION ALLOCATION

4.1 Despite having only partial access to the relevant areas of the LDF Site, the LUC assessment of the habitats present is considered accurate, in light of the findings of the survey undertaken in June 2016 by CSA Environmental. As such the assessed value of the habitats on the LDF Site is not disputed, however the inclusion of these habitats as part of the proposed SINC extension warrants further investigation.

### Habitat connectivity

4.2 It appears that the proposed SINC extension was intended to provide habitat connectivity between the two halves of the existing SINC along the river corridor. This is evidenced by the linear nature of new SINC's proposed in the LUC SINC Review document (2015) and their descriptions (see Appendix C):

- *River Pinn Corridor near Kings College Playing Fields and Manor Farm* (the river corridor leading the east from the LDF site)
- *River Pinn Corridor at Swakeleys Park and Riverside Walk* (the river corridor leading south of the existing SINC)

4.3 All of the LUC surveyor opinions for the above proposed new SINC's highlight their function as a wildlife corridor that is likely to be of importance in the wider landscape (see Appendix C).

4.4 Note that in the 2016 GiGL report, the above proposed new SINC's are described as:

- King's College Playing Fields Borough Grade II SINC
- River Pinn between St Martin's Approach & Woodville Gardens Local SINC
- Mad Field Covert, Railway Mead and the River Pinn Borough Grade II SINC

4.5 It is clear from the LUC surveyor notes that protection of the wildlife corridor along the River Pinn was the main driving force for suggesting these new SINC's. Note, however, that the area covered by the proposed SINC extension (including part of the LDF Site) is significantly beyond the area that would be required to achieve habitat connectivity along the river.

4.6 With reference to the proposed extension map, it would appear that the river corridor could be protected without the need to include either the meadow or narrow grassland fields on the LDF Site (bearing in mind that the woodland at the eastern end of the LDF Site is already designated as part of the existing SINC). The most important area of habitat required to protect the river corridor is the area of off-site rich



wetland habitat between the golf course and the River Pinn already included as part of the proposed SINC extension (shown in light blue in Appendix A).

#### Habitat importance

- 4.7 The question therefore remains as to why the grassland habitats on the LDF site were recommended by LUC in 2015 for inclusion as part of the SINC extension, particularly as these habitats could only be viewed by the surveyor from public footpaths.
- 4.8 As presented above, the LUC report itself states that *“there was no additional background information to support the [LEU] citations (such as previous survey data or rationale for recommendation), and in some cases the citations did not make clear the reason for the change (for example if extension was recorded)”*. It is possible therefore that LUC were also unaware as to why the grassland habitats on the LDF Site were included in the SINC extension proposed by LEU in 2005. LUC may have decided to include these habitats based purely on the fact that the decision had already been made by LEU previously. It is worth reiterating that the LUC description of the proposed SINC extension makes particular mention of its importance *“in terms of providing habitat connectivity along the River Pinn”*, which arguably is less applicable to the grassland on the LDF Site.
- 4.9 The GiGL Data Search report describes the on-site habitats found in the southern portion of the LDF Site (described as ‘Old Clack Farm Area, Fields’ and ‘Old Clack Farm Area, Field to S of Old Clack Farm’) as:
- Improved or re-seeded agricultural grassland (i.e. the meadow)
  - Native hedge
  - Neutral grassland (semi-improved) (i.e. the narrow grassland fields)
  - Wet marginal vegetation
  - Ditches (water filled)
- 4.10 According to GiGL, these habitat type assessments are based on the findings of GLA habitat surveys undertaken between the mid-1980s and 2009.
- 4.11 Looking solely at the 147 sites for which habitat data exists within the GiGL Data Search area (a 2km radius around the LDF Site’s central grid reference), it could be argued that these habitats are not uncommon on sites locally (see Table 2).

Table 2:

| Habitat type                                 | Number of surveyed sites within the 2km radius Data Search Area with the same habitat type (147 sites in total) |
|--|---|
| Improved or re-seeded agricultural grassland | 20  |
| Native hedge                                 | 55  |
| Neutral grassland (semi-improved)            | 37  |
| Wet marginal vegetation                      | 12  |
| Ditches (water filled)                       | 10  |

- 4.12 The findings of the CSA Environmental survey suggest that the meadow probably falls into the category of 'Neutral grassland (herb-rich)' in the GLA habitat type definitions. This habitat type is actually more common than 'Improved or re-seeded grassland' within the Data Search area, appearing a total of 28 times.
- 4.13 The LWSB SINC selection guidelines also state that *"Where a habitat is not extensive in the search area it will be appropriate to conserve all or most of it, whereas where it is more extensive a smaller percentage will be conserved."* This further suggests that there may not be a requirement to include the grassland habitats of the LDF Site in the SINC extension, as the fact that these habitats are relatively widespread locally reduces the need to conserve them.








#### Conclusion

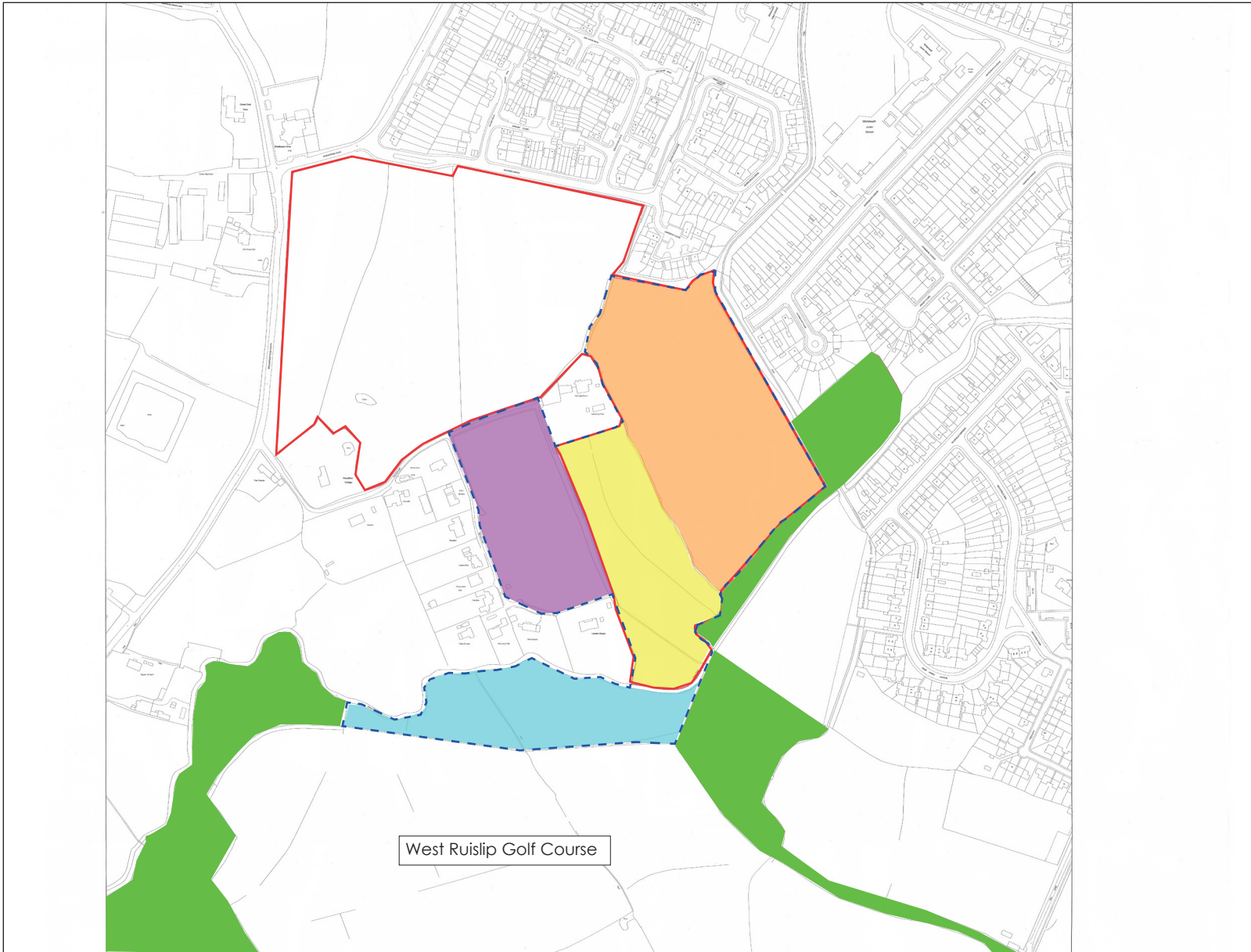
- 4.14 In light of the above arguments, there is something of a case for removal of the habitats within the LDF Site from the SINC extension, particularly as the primary goal of the proposed SINC extension appears to be to preserve good habitat connectivity for wildlife along the River Pinn corridor, in line with the proposed new SINC's to the east and west. As stated above, this connectivity for wildlife could be achieved without the inclusion of the grassland habitats on the LDF Site.

**Appendix A**  
SINC Areas Plan



**Key**

-  London Diocese Fund (LDF) Site boundary
-  Meadow
-  Narrow grassland fields
-  Existing SINC
-  Proposed SINC Extension boundary (2015)
-  Old Priory Meadow (not on LDF Site)
-  Rich wetland area (not on LDF Site)



West Ruislip Golf Course



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**Project** Brakespear Road, Ruislip

**Drawing Title** SINC Areas Plan

**Client** Savills

**Date** June 2016

**Scale @ A4** NTS

**Drawn** MB

**Drawing No.** CSA/2998/100

**Rev** -

**Checked** AM

**Appendix B**  
Species List from LDF Site

| Common Name  | Scientific Name                |
|--|--------------------------------|
| <b>Meadow</b>  |                                |
| Meadow foxtail   | <i>Alopecurus pratensis</i>    |
| Cock's-foot  | <i>Dactylis glomerata</i>      |
| Yorkshire fog  | <i>Holcus lanatus</i>          |
| False oat-grass  | <i>Arrhenatherum elatius</i>   |
| Red fescue   | <i>Festuca rubra</i>           |
| Red clover   | <i>Trifolium pratense</i>      |
| White clover   | <i>Trifolium repens</i>        |
| Sheep's sorrel   | <i>Rumex acetosa</i>           |
| Meadow buttercup   | <i>Ranunculus acris</i>        |
| Meadow vetchling   | <i>Lathyrus pratensis</i>      |
| Ribwort plantain   | <i>Plantago lanceolata</i>     |
| Perennial rye-grass  | <i>Lolium perenne</i>          |
| Sweet vernal grass   | <i>Anthoxanthum odoratum</i>   |
| Crested dog's-tail   | <i>Cynosaurus cristatus</i>    |
| Common mouse-ear   | <i>Cerastium fontanum</i>      |
| Bird's-foot trefoil  | <i>Lotus corniculatus</i>      |
| Ox-eye daisy   | <i>Leucanthemum vulgare</i>    |
| Meadowsweet  | <i>Filipendula ulmaria</i>     |
| Oval sedge   | <i>Carex ovalis</i>            |
| Greater stitchwort   | <i>Stellaria holostea</i>      |
| <b>Meadow boundaries</b>   |                                |
| Hawthorn   | <i>Crataegus monogyna</i>      |
| Bramble  | <i>Rubus fruticosus</i> agg.   |
| Elder  | <i>Sambucus nigra</i>          |
| Blackthorn   | <i>Prunus spinosa</i>          |
| <b>Wet ditch corridor between meadow and narrow grassland fields</b> |                                |
| Willow   | <i>Salix</i> sp.               |
| Pedunculate oak  | <i>Quercus robur</i>           |
| Field maple  | <i>Acer campestre</i>          |
| Elder  | <i>Sambucus nigra</i>          |
| Hogweed  | <i>Heracleum sphondylium</i>   |
| Cleavers   | <i>Galium aparine</i>          |
| Ivy  | <i>Hedera helix</i>            |
| Nettle   | <i>Urtica dioica</i>           |
| False-brome  | <i>Brachypodium sylvaticum</i> |
| Garlic mustard   | <i>Alliaria petiolata</i>      |
| Himalayan balsam   | <i>Impatiens glandulifera</i>  |

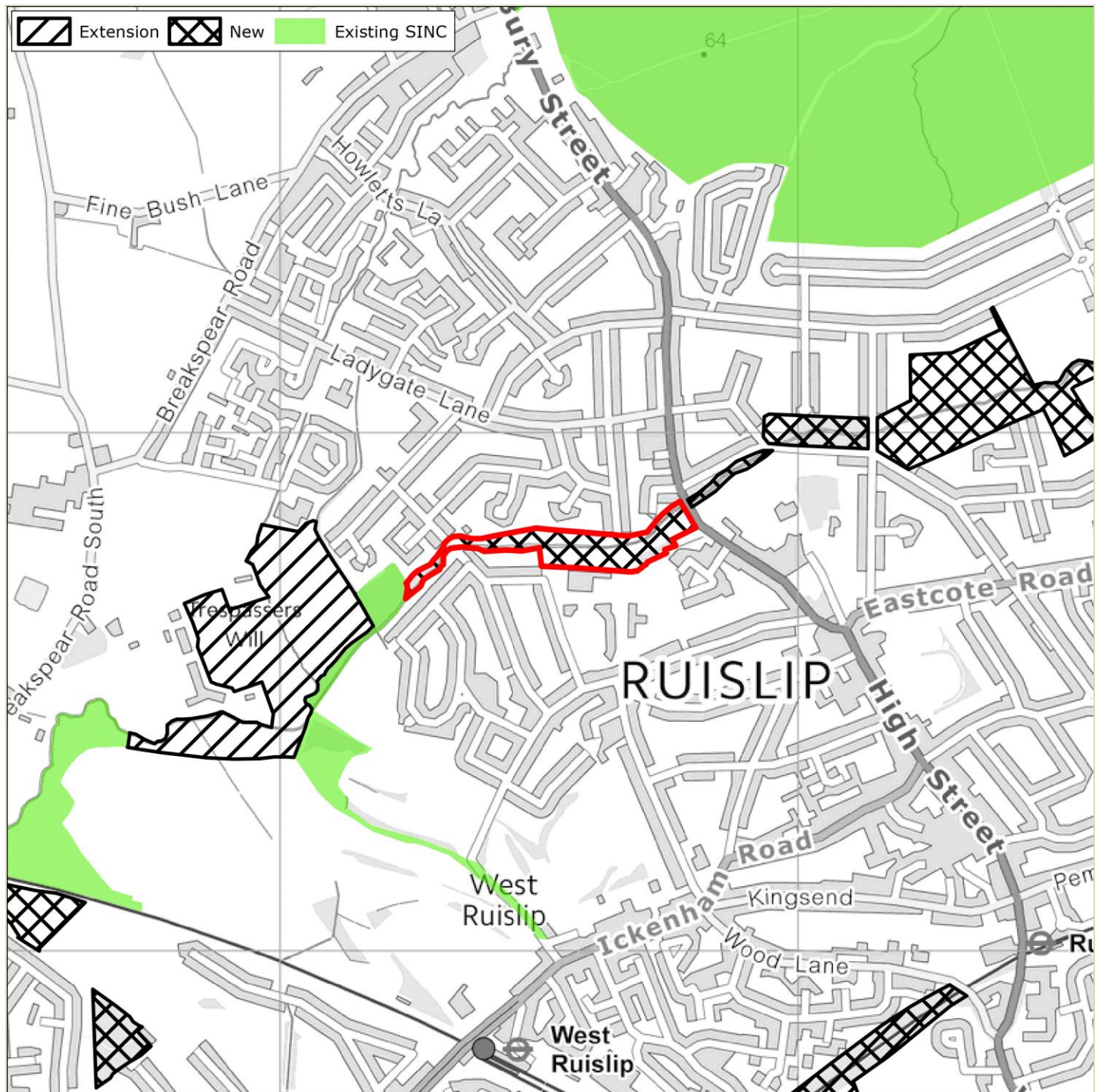
| <b>Narrow grassland fields</b>                  |                              |
|---|------------------------------|
| Meadow foxtail                                  | <i>Alopecurus pratensis</i>  |
| Cock's-foot                                     | <i>Dactylis glomerata</i>    |
| Yorkshire fog                                   | <i>Holcus lanatus</i>        |
| False oat-grass                                 | <i>Arrhenatherum elatius</i> |
| Perennial rye-grass                             | <i>Lolium perenne</i>        |
| Sweet vernal grass                              | <i>Anthoxanthum odoratum</i> |
| Meadowsweet                                     | <i>Filipendula ulmaria</i>   |
| Hogweed   | <i>Heracleum sphondylium</i> |
| Common vetch                                    | <i>Vicia sativa</i>          |
| Broadleaved dock                                | <i>Rumex obtusifolius</i>    |
| Greater plantain                                | <i>Plantago major</i>        |
| Great burdock                                   | <i>Arctium lappa</i>         |
| <b>Hedgerow between narrow grassland fields</b> |                              |
| Elm   | <i>Ulmus</i> sp.             |
| Hawthorn  | <i>Crataegus monogyna</i>    |
| Blackthorn                                      | <i>Prunus spinosa</i>        |
| Pedunculate oak                                 | <i>Quercus robur</i>         |
| Ash   | <i>Fraxinus excelsior</i>    |

**Appendix C**  
Proposed New SINC Data Sheets



SiteID: SINC 4      Grade: Grade 2      ID on Maps: 9a      SINC No: SINC 4

Site name: River Pinn Corridor near Kings College Playing Fields and Manor Farm      Status: New



### Site and parcel details

|   |                      |              |                      |
|---|----------------------|--------------|----------------------|
| Location:                                     | <input type="text"/> | Surveyor:    | S Puntney            |
| Owner:  | <input type="text"/> | Survey date: | 29/07/2015           |
| Manager:                                      | <input type="text"/> | Time spent:  | <input type="text"/> |
| Access/View from:                             | <input type="text"/> | Weather:     | Sunny with cloud     |
| Permission to enter from:                     | <input type="text"/> | Access:      | All                  |
| Recommendation:                               | Borough Grade 1      | Area (ha):   | 2.71                 |
| Local Plan Part 2 Changes: Designation Grade: | Grade 1              |              |                      |

SiteID: SINC 4 Grade: Grade 2 ID on Maps: 9a SINC No: SINC 4

Site name: River Pinn Corridor near Kings College Playing Fields and Manor Farm Status: New

### Open space typology

PPG17 ID: [ ]  
PPG17 Typology: [ ]  
Specify other: [ ]

### Planning status Other information

SSSI  MOL Ownership: [ ]  
 LNR  Green chain Public access: Restricted  
 SINC or equivalent  Green corridor Public access restrictions: No access to western area of site  
 Green Belt  No open space designation  
 Other  Conservation Area Entry points: Open access-whole/part of site  
Specify other: [ ] Maintenance and management: Poor  
Predominant recreational use: Active  
Level of use: Frequent use

### Accessibility (score 0-2)

Pedestrian: 2 Private car: 1 Cycle: 1 Wheelchair: 1 Public transport: 0

### Facilities

Tennis courts (specify number): 0 Playing pitches Mini: 0 Junior: 0 Full: 0  
 Cricket pitch  All weather  All weather  All weather  
 Athletics track  Natural  Natural  Natural  
 Bowling green  Floodlit  Floodlit  Floodlit  
 Golf course  
 Pitch putt/crazy golf  Play for under 7s  Refreshments  Waymarked walking  
 Driving range  Play for 7-13  Litter bins  Cycle paths  
 Changing rooms  Play for over 13s  Recycling facilities  Historic features  
 Motor cross  BMX track  Dog litter bins/area  Art gallery  
 Outdoor swimming pool  Skateboard area  Nature trail  Sculptures/monumnets  
 Outdoor paddling pool  Seats  Animal/bird enclosure  Public art  
 Fishing  Operational toilet  Open air performance area  Facilities other  
 Watersports  Disabled facilities  Car parking  
 Basketball hoops  Information  Horse riding  
Specify other: [ ]

### Threats and disturbances (give details of severity etc)

Himalayan Balsam

SiteID: SINC 4      Grade: Grade 2      ID on Maps: 9a      SINC No: SINC 4

Site name: River Pinn Corridor near Kings College Playing Fields and Manor Farm      Status: New

|                 |                                     |                                    |
|-----------------|-------------------------------------|------------------------------------|
| Vandalism       | <input type="checkbox"/>            |                                    |
| Litter          | <input checked="" type="checkbox"/> | Bins overflowing, scattered litter |
| Dogfouling      | <input type="checkbox"/>            |                                    |
| Fly Tipping     | <input type="checkbox"/>            |                                    |
| Pollution       | <input type="checkbox"/>            |                                    |
| Aircraft noise  | <input type="checkbox"/>            |                                    |
| Rail/road noise | <input type="checkbox"/>            |                                    |
| Other           | <input type="checkbox"/>            |                                    |

### Interest/potential for enhancement

|                  |                                      |
|------------------|--------------------------------------|
| Recreation:      |                                      |
| Structural:      |                                      |
| Amenity:         | Increase management to reduce litter |
| Ecology:         | Manage himalayan balsaam             |
| Education:       |                                      |
| Social cultural: |                                      |
| Heritage:        |                                      |
| Health:          |                                      |
| Accessibility:   |                                      |
| Other:           |                                      |
| Comments         |                                      |

### Changes since last survey

Changes: No apparent change since last survey

Comments:

SiteID: SINC 4 Grade: Grade 2 ID on Maps: 9a SINC No: SINC 4

Site name: River Pinn Corridor near Kings College Playing Fields and Manor Farm Status: New

### Habitats %

|  |   |   |
|--|---|---|
| <input type="checkbox"/> 01: Native broadleaved woodland     | <input type="checkbox"/> 08: Acid grassland                       | <input type="checkbox"/> 28: Arable                             |
| <input type="checkbox"/> 02: Non-native broadleaved woodland | <input type="checkbox"/> 30 09: Neutral grassland (semi-improved) | <input type="checkbox"/> 16: Bog                                |
| <input type="checkbox"/> 03: Coniferous woodland             | <input type="checkbox"/> 35: Neutral grassland (herb rich)        | <input type="checkbox"/> 17: Reedswamp                          |
| <input type="checkbox"/> 20 37: Scattered trees:             | <input type="checkbox"/> 10: Basic grassland                      | <input type="checkbox"/> 40: Typha etc. swamp                   |
| <input type="checkbox"/> 05: Recently felled woodland:       | <input type="checkbox"/> 20 11: Improved/reseeded agric grassland | <input type="checkbox"/> 18: Wet marginal vegetation            |
| <input type="checkbox"/> 10 06: Scrub                        | <input type="checkbox"/> 07: Amenity grassland                    | <input type="checkbox"/> 19; Fen carr (woodland/scrub over fen) |
| <input type="checkbox"/> 38: Planted shrubbery               | <input type="checkbox"/> 12: Ruderal or ephemeral                 | <input type="checkbox"/> 20: Standing water (includes canals)   |
| <input type="checkbox"/> 25: Native hedge                    | <input type="checkbox"/> 33: Roughland (intimate mix of 9, 14 6)  | <input type="checkbox"/> 21: Ditches (water filled)             |
| <input type="checkbox"/> 34: Non-native hedge                | <input type="checkbox"/> 13: Bracken                              | <input type="checkbox"/> 23: Intertidal mud, sand, shingle etc  |
| <input type="checkbox"/> 31: Orchard                         | <input type="checkbox"/> 14: Tall herbs                           | <input type="checkbox"/> 24: Saltmarsh                          |
| <input type="checkbox"/> 36: Vegetated walls, tombstones etc | <input type="checkbox"/> 15: Heathland                            | <input type="checkbox"/> 30: Habitat information not available  |
| <input type="checkbox"/> 26: Bare soil and rock              | <input type="checkbox"/> 39: Allotments (active)                  |   |
| <input type="checkbox"/> 27: Bare artificial habitat         |   |   |
| <input type="checkbox"/> 29: Other                           | 29: Other description: Running water 10%, Emergent vegetation 10% |   |

### Habitat qualifiers

|  |   |  |
|--|---|--|
| Treeline without hedge: <input type="checkbox"/> | Grazed: <input type="checkbox"/>              | Floating vegetation: <input type="checkbox"/>        |
| Even-aged plantation: <input type="checkbox"/>   | Infrequently mown: <input type="checkbox"/>   | Submerged vegetation: <input type="checkbox"/>       |
| Coppice: <input type="checkbox"/>                | Frequently mown: <input type="checkbox"/>     | Emergent vegetation: Yes <input type="checkbox"/>    |
| Flush: <input type="checkbox"/>                  | Cuttings removed: <input type="checkbox"/>    | Saline: <input type="checkbox"/>                     |
| Dead wood: <input type="checkbox"/>              | Unmanaged grassland: <input type="checkbox"/> | Tidal: <input type="checkbox"/>                      |
| Wet: <input type="checkbox"/>                    | Ridge and furrow: <input type="checkbox"/>    | Naturally formed riverbank: <input type="checkbox"/> |
| Hedge with treeline: <input type="checkbox"/>    | Flush: <input type="checkbox"/>               | <input type="checkbox"/> Eutrophic                   |
| Ancient woodland: <input type="checkbox"/>       | Wet: <input type="checkbox"/>                 | <input type="checkbox"/> Mesotrophic                 |
| Pollarded: <input type="checkbox"/>              | Sand/clay bank: <input type="checkbox"/>      | <input type="checkbox"/> Oliotrophic                 |
| Wood shrub layer: <input type="checkbox"/>       |   | <input type="checkbox"/> Dystrophic                  |

### Interest

- Invertebrate
- Fish
- Amphibian
- Reptile
- Mammal
- Bird
- Higher Plant
- Bryophyte
- Lichen
- Fungi
- Geology
- other

Additional comments:

### Species Richness

Species richness: Poor/Average

SiteID: SINC 4      Grade: Grade 2      ID on Maps: 9a      SINC No: SINC 4

Site name: River Pinn Corridor near Kings College Playing Fields and Manor Farm      Status: New

## Nature conservation value

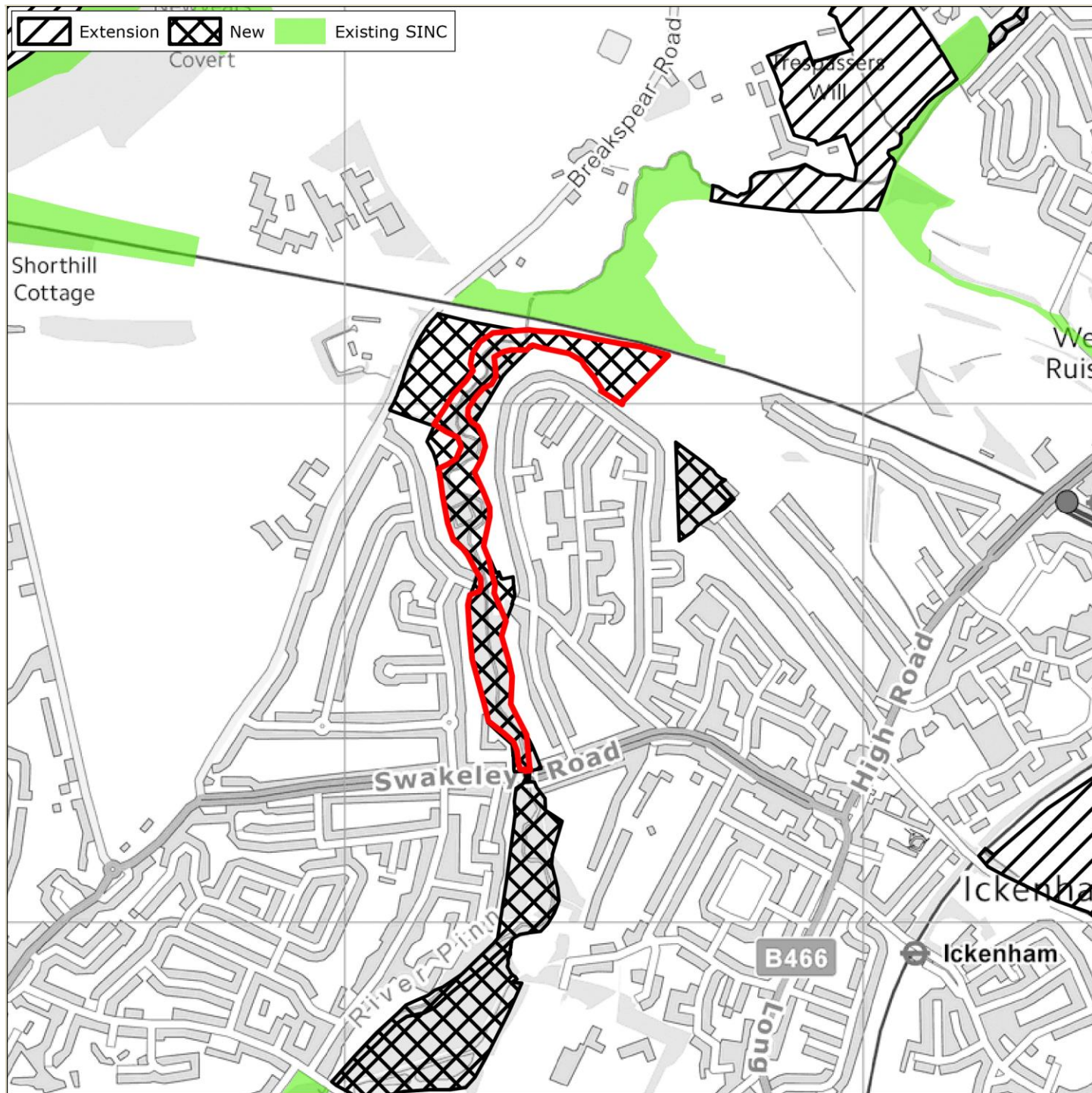
Nature conservation value (surveyor's personal opinion):

Dense scrub and trees near watercourse are important for providing shelter for local wildlife. Forms an wildlife corridor that is likely to be of importance in the wider landscape.



SiteID: SINC 16      Grade: Grade 2      ID on Maps: 32c      SINC No: SINC 16

Site name: River Pinn Corridor at Swakeleys Park and Riverside Walk      Status: New



### Site and parcel details

|   |                      |              |                      |
|---|----------------------|--------------|----------------------|
| Location:                                     | <input type="text"/> | Surveyor:    | S Puntney            |
| Owner:  | <input type="text"/> | Survey date: | 30/07/2015           |
| Manager:                                      | <input type="text"/> | Time spent:  | <input type="text"/> |
| Access/View from:                             | <input type="text"/> | Weather:     | Sunny with cloud     |
| Permission to enter from:                     | <input type="text"/> | Access:      | All                  |
| Recommendation:                               | Borough Grade 1      | Area (ha):   | 6.35                 |
| Local Plan Part 2 Changes: Designation Grade: | Grade 1              |              |                      |

SiteID: SINC 16 Grade: Grade 2 ID on Maps: 32c SINC No: SINC 16

Site name: River Pinn Corridor at Swakeleys Park and Riverside Walk Status: New

### Open space typology

PPG17 ID:   
PPG17 Typology: Green corridors: Railway cutting  
Specify other:

### Planning status Other information

|  |  |                               |                                |
|--|--|-------------------------------|--------------------------------|
| <input type="checkbox"/> SSSI                          | <input type="checkbox"/> MOL                       | Ownership:                    | <input type="text"/>           |
| <input type="checkbox"/> LNR                           | <input type="checkbox"/> Green chain               | Public access:                | Free                           |
| <input checked="" type="checkbox"/> SINC or equivalent | <input type="checkbox"/> Green corridor            | Public access restrictions:   | <input type="text"/>           |
| <input type="checkbox"/> Green Belt                    | <input type="checkbox"/> No open space designation | Entry points:                 | Open access-whole/part of site |
| <input type="checkbox"/> Other                         | <input type="checkbox"/> Conservation Area         | Maintenance and management:   | <input type="text"/>           |
| Specify other: <input type="text"/>                    |  | Predominant recreational use: | Active                         |
|  |  | Level of use:                 | Moderate numbers               |

### Accessibility (score 0-2)

Pedestrian:  Private car:  Cycle:  Wheelchair:  Public transport:

### Facilities

Tennis courts (specify number):  Playing pitches: Mini:  Junior:  Full:

|  |                                      |                                      |                                      |
|--|--------------------------------------|--------------------------------------|--------------------------------------|
| <input type="checkbox"/> Cricket pitch   | <input type="checkbox"/> All weather | <input type="checkbox"/> All weather | <input type="checkbox"/> All weather |
| <input type="checkbox"/> Athletics track | <input type="checkbox"/> Natural     | <input type="checkbox"/> Natural     | <input type="checkbox"/> Natural     |
| <input type="checkbox"/> Bowling green   | <input type="checkbox"/> Floodlit    | <input type="checkbox"/> Floodlit    | <input type="checkbox"/> Floodlit    |
| <input type="checkbox"/> Golf course     |                                      |                                      |                                      |

|  |  |  |   |
|--|--|--|---|
| <input type="checkbox"/> Pitch putt/crazy golf | <input type="checkbox"/> Play for under 7s   | <input type="checkbox"/> Refreshments              | <input type="checkbox"/> Waymarked walking    |
| <input type="checkbox"/> Driving range         | <input type="checkbox"/> Play for 7-13       | <input type="checkbox"/> Litter bins               | <input type="checkbox"/> Cycle paths          |
| <input type="checkbox"/> Changing rooms        | <input type="checkbox"/> Play for over 13s   | <input type="checkbox"/> Recycling facilities      | <input type="checkbox"/> Historic features    |
| <input type="checkbox"/> Motor cross           | <input type="checkbox"/> BMX track           | <input type="checkbox"/> Dog litter bins/area      | <input type="checkbox"/> Art gallery          |
| <input type="checkbox"/> Outdoor swimming pool | <input type="checkbox"/> Skateboard area     | <input type="checkbox"/> Nature trail              | <input type="checkbox"/> Sculptures/monumnets |
| <input type="checkbox"/> Outdoor paddling pool | <input type="checkbox"/> Seats               | <input type="checkbox"/> Animal/bird enclosure     | <input type="checkbox"/> Public art           |
| <input type="checkbox"/> Fishing               | <input type="checkbox"/> Operational toilet  | <input type="checkbox"/> Open air performance area | <input type="checkbox"/> Facilities other     |
| <input type="checkbox"/> Watersports           | <input type="checkbox"/> Disabled facilities | <input type="checkbox"/> Car parking               | Specify other: <input type="text"/>           |
| <input type="checkbox"/> Basketball hoops      | <input type="checkbox"/> Information         | <input type="checkbox"/> Horse riding              | <input type="text"/>                          |

### Threats and disturbances (give details of severity etc)

|                       |                                     |                  |
|-----------------------|-------------------------------------|------------------|
| Invading plants       | <input checked="" type="checkbox"/> | Himalayan balsam |
| Erosion               | <input type="checkbox"/>            |                  |
| Motorcycle scrambling | <input type="checkbox"/>            |                  |
| Intrusive buildings   | <input type="checkbox"/>            |                  |
| Boundary treatment    | <input type="checkbox"/>            |                  |
| Redevelopment         | <input type="checkbox"/>            |                  |
| Safety security       | <input type="checkbox"/>            |                  |

|            |  |        |         |             |     |          |         |
|------------|--|--------|---------|-------------|-----|----------|---------|
| SiteID:    | SINC 16  | Grade: | Grade 2 | ID on Maps: | 32c | SINC No: | SINC 16 |
| Site name: | River Pinn Corridor at Swakeleys Park and Riverside Walk |        |         |             |     | Status:  | New     |

|                 |                          |  |
|-----------------|--------------------------|--|
| Vandalism       | <input type="checkbox"/> |  |
| Litter          | <input type="checkbox"/> |  |
| Dogfouling      | <input type="checkbox"/> |  |
| Fly Tipping     | <input type="checkbox"/> |  |
| Pollution       | <input type="checkbox"/> |  |
| Aircraft noise  | <input type="checkbox"/> |  |
| Rail/road noise | <input type="checkbox"/> |  |
| Other           | <input type="checkbox"/> |  |

### Interest/potential for enhancement

|                  |  |
|------------------|--|
| Recreation:      |  |
| Structural:      |  |
| Amenity:         |  |
| Ecology:         | Young oak regeneration in amenity grassland. Manage himalayn balsam. |
| Education:       |  |
| Social cultural: |  |
| Heritage:        |  |
| Health:          |  |
| Accessibility:   |  |
| Other:           |  |
| Comments         |  |

### Changes since last survey

|           |                                      |
|-----------|--------------------------------------|
| Changes:  | No apparent change since last survey |
| Comments: |                                      |



SiteID: SINC 16 Grade: Grade 2 ID on Maps: 32c SINC No: SINC 16

Site name: River Pinn Corridor at Swakeleys Park and Riverside Walk Status: New

### Habitats %

|  |   |   |
|--|---|---|
| <input type="checkbox"/> 01: Native broadleaved woodland     | <input type="checkbox"/> 08: Acid grassland                         | <input type="checkbox"/> 28: Arable                             |
| <input type="checkbox"/> 02: Non-native broadleaved woodland | <input type="checkbox"/> 10 09: Neutral grassland (semi-improved)   | <input type="checkbox"/> 16: Bog                                |
| <input type="checkbox"/> 03: Coniferous woodland             | <input type="checkbox"/> 35: Neutral grassland (herb rich)          | <input type="checkbox"/> 17: Reedswamp                          |
| <input type="checkbox"/> 15 37: Scattered trees:             | <input type="checkbox"/> 10: Basic grassland                        | <input type="checkbox"/> 40: Typha etc. swamp                   |
| <input type="checkbox"/> 05: Recently felled woodland:       | <input type="checkbox"/> 11: Improved/reseeded agric grassland      | <input type="checkbox"/> 18: Wet marginal vegetation            |
| <input type="checkbox"/> 10 06: Scrub                        | <input type="checkbox"/> 10 07: Amenity grassland                   | <input type="checkbox"/> 19; Fen carr (woodland/scrub over fen) |
| <input type="checkbox"/> 38: Planted shrubbery               | <input type="checkbox"/> 12: Ruderal or ephemeral                   | <input type="checkbox"/> 20: Standing water (includes canals)   |
| <input type="checkbox"/> 25: Native hedge                    | <input type="checkbox"/> 10 33: Roughland (intimate mix of 9, 14 6) | <input type="checkbox"/> 21: Ditches (water filled)             |
| <input type="checkbox"/> 34: Non-native hedge                | <input type="checkbox"/> 13: Bracken                                | <input type="checkbox"/> 23: Intertidal mud, sand, shingle etc  |
| <input type="checkbox"/> 31: Orchard                         | <input type="checkbox"/> 14: Tall herbs                             | <input type="checkbox"/> 24: Saltmarsh                          |
| <input type="checkbox"/> 36: Vegetated walls, tombstones etc | <input type="checkbox"/> 15: Heathland                              | <input type="checkbox"/> 30: Habitat information not available  |
| <input type="checkbox"/> 26: Bare soil and rock              | <input type="checkbox"/> 39: Allotments (active)                    |   |
| <input type="checkbox"/> 27: Bare artificial habitat         |   |   |
| <input type="checkbox"/> 29: Other                           | 29: Other description: Running water 45%                            |   |

### Habitat qualifiers

|  |   |  |
|--|---|--|
| Treeline without hedge: <input type="checkbox"/> | Grazed: <input type="checkbox"/>              | Floating vegetation: <input type="checkbox"/>        |
| Even-aged plantation: <input type="checkbox"/>   | Infrequently mown: <input type="checkbox"/>   | Submerged vegetation: <input type="checkbox"/>       |
| Coppice: <input type="checkbox"/>                | Frequently mown: <input type="checkbox"/>     | Emergent vegetation: <input type="checkbox"/>        |
| Flush: <input type="checkbox"/>                  | Cuttings removed: <input type="checkbox"/>    | Saline: <input type="checkbox"/>                     |
| Dead wood: <input type="checkbox"/>              | Unmanaged grassland: <input type="checkbox"/> | Tidal: <input type="checkbox"/>                      |
| Wet: <input type="checkbox"/>                    | Ridge and furrow: <input type="checkbox"/>    | Naturally formed riverbank: <input type="checkbox"/> |
| Hedge with treeline: <input type="checkbox"/>    | Flush: <input type="checkbox"/>               | <input type="checkbox"/> Eutrophic                   |
| Ancient woodland: <input type="checkbox"/>       | Wet: <input type="checkbox"/>                 | <input type="checkbox"/> Mesotrophic                 |
| Pollarded: <input type="checkbox"/>              | Sand/clay bank: <input type="checkbox"/>      | <input type="checkbox"/> Oliotrophic                 |
| Wood shrub layer: <input type="checkbox"/>       |   | <input type="checkbox"/> Dystrophic                  |

### Interest

- Invertebrate
- Fish
- Amphibian
- Reptile
- Mammal
- Bird
- Higher Plant
- Bryophyte
- Lichen
- Fungi
- Geology
- other

Additional comments:

### Species Richness

Species richness: Average

SiteID: SINC 16      Grade: Grade 2      ID on Maps: 32c      SINC No: SINC 16

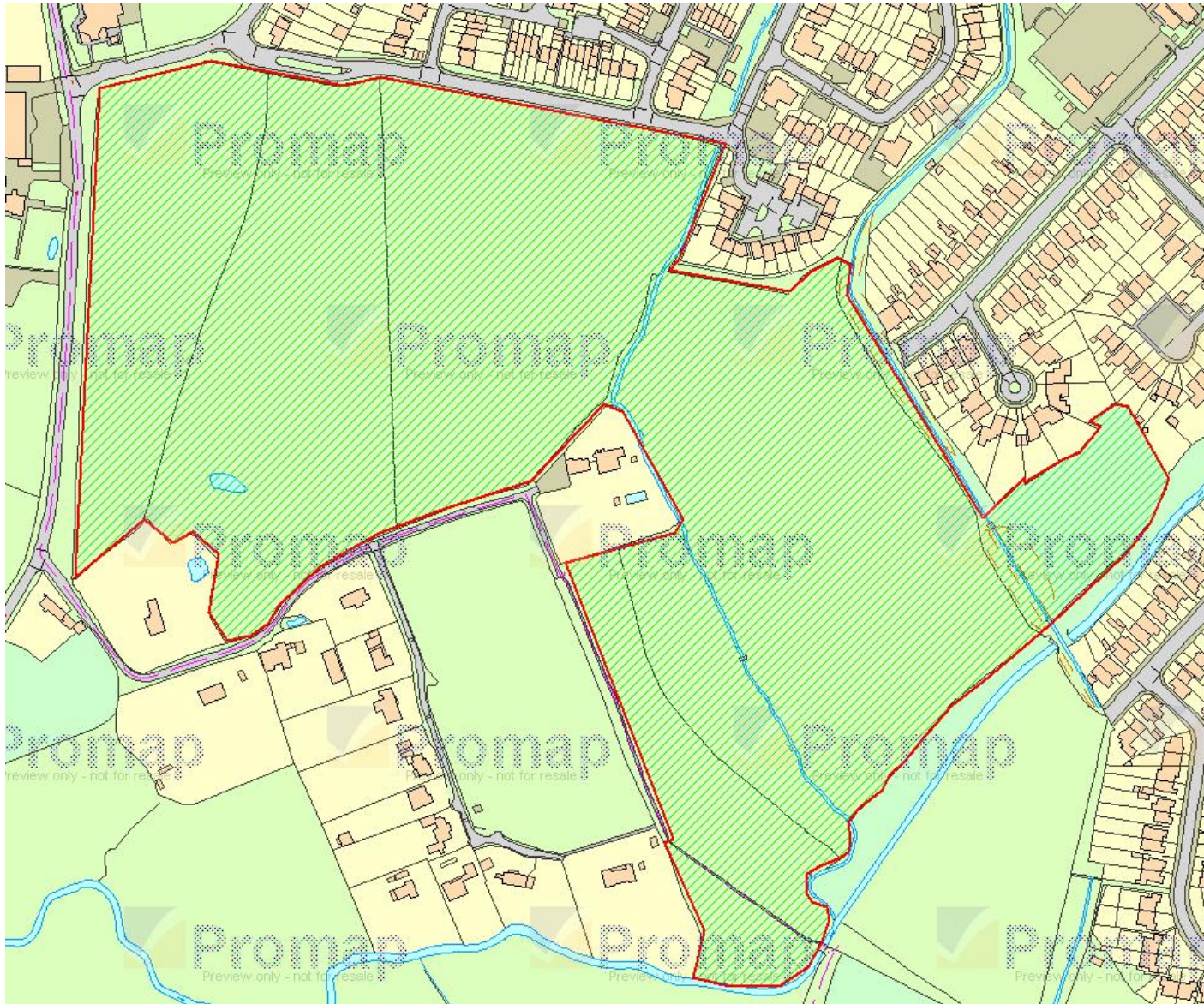
Site name: River Pinn Corridor at Swakeleys Park and Riverside Walk      Status: New

## Nature conservation value

Nature conservation value (surveyor's personal opinion):

Provides a valuable resource for local wildlife. This is particularly important due to the close proximity to a trainline. Series of parcels supporting a diverse range of habitats along the River Pinn, including public open spaces. Potentially valuable ecological corridor in combination with other designated sections.

**Land at St Martins, Breakspear Road, Ruislip, UB9 6LT**





# Development, Enterprise and Environment

James Gleave  
Planning Policy Manager  
London Borough of Hillingdon  
3N/02  
Civic Centre  
High Street  
Uxbridge UB8 1UW

**Our ref:** D&P/LDF14/LDD18/CG

**Your ref:**

**Date:** 07 December 2015

Dear Mr Gleave

## **Hillingdon Council The Local Plan Part 2: Revised Proposed Submission Version**

- **Development Management Policies**
- **Site Allocations and Designations**
- **Policies Map**

## **Statement of general conformity with the London Plan (Planning and Compulsory Act 2004, Section 24 (4) a)**

Thank you for your letter of 23 October 2015 consulting the Mayor on the above documents and requesting an opinion on general conformity. The Mayor has delegated authority to me to respond. As you will be 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.

It is the Mayor's opinion that the Proposed Revised Submission version of the Local Plan Part 2 is in general conformity with the London Plan. However, some strategic issues remain and these are set out below with other representations to clarify or improve policy.

## **Development Management Policies**

- **Reducing Carbon Emissions**

The reference to the London Plan carbon dioxide targets in proposed policy DME1 1 is welcome. However, it should be noted that the recalibrated energy targets proposed as part of the Mayor's Minor Alterations to the London Plan to reflect the 2013 Building Regulations have not progressed following the Government's announcements not to proceed with changes to the Building Regulations in 2016. Despite this, the Mayor has recently announced that London Plan policy 5.2 continues to apply and he will issue further guidance on how the policy should be applied after 2016 following the Government announcements.

Notwithstanding the above, the Council's proposed target of a 35% improvement beyond Part L 2013 Building Regulations is broadly equivalent to the existing London Plan 40% target which is based on Part L 2010. This is set out in the Mayor's Guidance on Energy Assessments for Developers <https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0>

As stated in my previous correspondence, the following change is suggested to Policy DMEI2 to ensure the emphasis is on developments that genuinely cannot meet the targets onsite in accordance with London Plan Policy 5.2, as opposed to the Council approving the development for other policy reasons and discounting the carbon targets (new text in *red italics* deleted text struck through).

Proposals that fail to take reasonable steps to achieve the required savings will be resisted. However, *where it is clearly demonstrated that the targets for carbon emissions cannot be met onsite, the Council may approve the application and* ~~if the Council is minded to approve the application despite not meeting the carbon reduction targets, then it will seek an offsite contribution to make up for the shortfall.~~

The inclusion of footnote 8 on page 103 of the draft document provides welcome clarity on the borough's proposed off-setting cost. However, now that the Government is no longer proceeding with its definition of 'zero carbon' which included an 'Allowable Solution', the borough should not use the term 'Allowable Solution' in its policy and instead refer to carbon off-setting as set out in London Plan policy 5.2.

Policy DMEI 3: *Decentralised Energy* seeks to ensure developments connect to existing district heat networks or networks planned in the short term (i.e. operational within 3 years of planning consent). However, as stated in my previous correspondence, developments located in areas of decentralised energy potential (as identified by the borough) should be future proofed for connection to potential future heat networks, as outlined in the London Heat Network Manual.

- **Water efficiency**

Part H of Policy DMEI 10 *Water Management, Efficiency and Quality* should refer to the national housing standards and the supporting text should note that this standard will be conditioned to ensure its application and enforcement through the Building Regulations (Part G).

- **Geological Conservation**

As stated in my previous correspondence, Hillingdon has a Regionally Important Geological Site, identified on Map 7.4 of the London Plan as - GLA 29 The Gravel Pits Northwood. Further information on this site is set out in London's Foundations – Protecting Geodiversity of the Capital Supplementary Planning Guidance (SPG) (2012). There should be a Local Plan policy for the management and protection of this site in accordance with London Plan Policy 7.20 and the site should be identified on the Polices Map.

- **Air quality**

The retention of the requirement to be at least 'Air Quality Neutral' in the draft document is welcome. However, to facilitate the implementation of this policy, reference to the Mayor's Sustainable Design and Construction SPG should be included.

## **Site Allocations and Designations**

- **Housing**

The Mayor welcomes the reference to the borough's new higher minimum housing target of 5,593 for the period 2015-2025 with an annual monitoring target of 559 dwellings as set out in the

Further Alterations to the London Plan (FALP), as well as the identification of development sites for new housing and mixed use development with sufficient capacity to exceed this housing target. However, he does not agree with the methodology applied by Hillingdon to calculate a revised delivery figure of 414 units per annum. The likely level of delivery of units between 2011/12 and 2013/14 was taken into account in the development of Hillingdon's housing numbers for the FALP. In addition, in line with London Plan Policy 3.3, the London Plan housing target for the borough is a minimum figure and the borough will need to continue to bring forward additional housing development capacity to supplement its housing target to meet local and strategic need. Annex 2 of the draft Interim Housing SPG suggests Hillingdon has an annual need of 1,644 units per annum and delivers an average of 931 units per annual. The document should therefore identify how it seeks to meet the 559 units a year target and seek to exceed it to bridge the gap between need and supply in line with Policy 3.3 of the London Plan and Part one of the Draft Interim Housing SPG 2015.

- **Rebalancing Employment Land**

As stated in my previous correspondence, Policy SEA1 Strategic Industrial Locations and the defined boundaries for the SILs are supported in line with London Plan policy 2.17. The continued consolidation and designation of SIL and LSIL is supported. With regards to the sites to be released (SIL + LSIS + non-designated sites), it would be useful to compare the total area with the release benchmark set out in the Land for Industry and Transport SPG. In addition, the borough should outline how it is prioritising the release of surplus industrial land close to public transport/town centres to maximise opportunities for higher density housing in line with London Plan policies 3.3 and 4.4.

As stated in my previous letter the wording in paragraph 4.14 refers to mixed use sites along the canal frontage (which comprise about half of this designated area). This wording creates ambiguity in the status of this location as SIL. The Local Plan should be clear whether the location is being designated as SIL (where mixed use residential development is not appropriate) or not.

The Mayor welcomes the designations to support hotel and / or office growth in the borough. The London Office Policy Review 2012 notes that Stockley Park and Uxbridge all have critical mass and vibrant, established office markets but they have both suffered recessionary pressures on rental values. It also recognises Heathrow Perimeter is also recognised as a core office location in Hillingdon.

If you would like to discuss any of my representations in more detail, please contact Celeste Giusti [REDACTED] who will be happy to discuss and arrange further meetings.

Yours sincerely

[REDACTED]  
**Stewart Murray**

Assistant Director – Planning

cc Dr Onkar Sahota, London Assembly Constituency Member  
Nicky Gavron, Chair of London Assembly Planning Committee  
National Planning Casework Unit, DCLG  
Alex Williams, TfL





# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |                                    |              |   |
|----------------------------|------------------------------------|--------------|---|
| Title                      | Mrs                                |              |   |
| First name                 | Eileen                             |              |   |
| Last Name                  | Bowlt                              |              |   |
| Organisation (if relevant) | Ruislip Village Conservation Panel |              |   |
| Unit                       |                                    | House number | 7 |
| House name                 |                                    |              |   |
| Address 1                  |                                    |              |   |
| Address 2                  |                                    |              |   |
| Town                       |                                    |              |   |
| County                     |                                    |              |   |
| Postcode                   |                                    |              |   |
| Telephone                  |                                    |              |   |
| Email                      |                                    |              |   |

| 2. Agent's Name and Address (if applicable) |  |              |  |
|---|--|--------------|--|
| Title                                       |  |              |  |
| First name                                  |  |              |  |
| Last name                                   |  |              |  |
| Company                                     |  |              |  |
| Unit  |  | House number |  |
| House name                                  |  |              |  |
| Address 1                                   |  |              |  |
| Address 2                                   |  |              |  |
| Town  |  |              |  |
| County                                      |  |              |  |
| Postcode                                    |  |              |  |
| Telephone                                   |  |              |  |
| Email                                       |  |              |  |



## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2        |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|--------------------------|-----------------------------------|--|---|
| <input type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/> | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |           |
|-------------------------------|-----------|
| Policy number;                | DMHB1,2,3 |
| Paragraph number;             |           |
| Table or figure number; or    |           |
| Map number (Atlas of Changes) |           |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                       |
|---|--------------------------|--------------------------|
| Sound?  | <input type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

**5.3 The original paragraph (in red and struck through) is more informative. Please reinstate it.**

**5.5 The reference to NPPF is important. Please reinstate it.**

**5.8 The reference to Historic England should be retained.**

**5.11 Please reinstate the sentence 'The Council will also have regard to the protection of the setting when considering proposals on neighbouring sites.'**

**Policy DMHB Listed Buildings**

**A Please reinstate 'do not detract from its special architectural or historic interest'.**

**C Please reinstate /as a condition of demolition'.**

**5. 21 This important statement should be retained.**

**Policy DMHB 5 Locally listed buildings.**

**A Please reinstate the important first paragraph.**

**Conservation Areas**

**Generally excellent, but why have 5.22-26 been struck out? They are informative paragraphs.**

**Scheduled Ancient Monuments**

**Why have paragraphs 5.9-10 been struck out ?**





**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                          |  |
|--------------------------|--|
| <input type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

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- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

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## Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

### 1) What is your gender?

Male  Female

### 2) To which age group do you belong?

under 15  25 – 44  65 – 85  
 15 - 24  45 - 64  85+

### 3) Do you consider yourself to be a disabled person?

No  Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |





# HILLINGDON

LONDON

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| 1. Name and Address        |   |
|----------------------------|---|
| Title                      | MRS   |
| First name                 | SUSAN   |
| Last Name                  | TOMS  |
| Organisation (if relevant) | RUISLIP,NORTHWOOD& EASTCOTE LOCAL HISTORY SOCIETY |
| Unit                       |   |
| House name                 |   |
| Address 1                  |   |
| Address 2                  |   |
| Town                       |   |
| County                     |   |
| Postcode                   |   |
| Telephone                  |   |
| Email                      |   |

| 2. Agent's Name and Address (if applicable) |              |  |
|---|--------------|--|
| Title                                       |              |  |
| First name                                  |              |  |
| Last name                                   |              |  |
| Company                                     |              |  |
| Unit  | House number |  |
| House name                                  |              |  |
| Address 1                                   |              |  |
| Address 2                                   |              |  |
| Town  |              |  |
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| Email                                       |              |  |

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| Local Plan Part 2                   |                                   |
|-------------------------------------|-----------------------------------|
| <input checked="" type="checkbox"/> | Development Management Policies   |
| <input type="checkbox"/>            | Site Allocations and Designations |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|--|---|
| <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |  |
|-------------------------------|--|
| Policy number;                |  |
| Paragraph number;             |  |
| Table or figure number; or    |  |
| Map number (Atlas of Changes) |  |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                       |
|---|--------------------------|--------------------------|
| Sound?  | <input type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |
|--------------------------|-------------------------------------|
| <input type="checkbox"/> | It has not been positively prepared |
| <input type="checkbox"/> | It is not justified                 |

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

Historic and Built Environment section

5.3 Original paragraph should be reinstated.

5.5 First sentence of original paragraph to be retained.

5.8 Original paragraph on English Heritage to be reinstated.

5.11 Reinstated 'The Council will also have regard to the protection of its setting when considering proposals on neighbouring sites'.

Policy DMHB 4.2 listed buildings

A reinstated 'do not detract from its special architectural or historic interest'.

C reinstated 'as a condition of demolition'.

5.21 Original paragraph should be reinstated.

Policy DMHB3 locally listed buildings

A reinstated first paragraph.


5.22-26 Conservation Areas Reinstated all these paragraphs.

Scheduled ancient monuments

5.9-10 reinstated these paragraphs and Policy DMHB2.7

5.22 Should add the cursus and Gruben houses at Harmondsworth which are very significant.





**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

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|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input type="checkbox"/>            | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
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Male  Female

### 2) To which age group do you belong?

under 15  25 – 44  65 – 85  
 15 - 24  45 - 64  85+

### 3) Do you consider yourself to be a disabled person?

No  Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |

# Representation to Local Plan Part 2

## The Douay Martyrs Academy & Land at Glebe Farm

8 December 2015  
LB Hillingdon

### Section

- 1 Overview
- 2 Background, Site Description and Surroundings
- 3 Green Belt Assessment
- 4 Development Management Plan Policy Overview + Planning Obligations
- 5 Academy status and evidence
- 6 Conclusion

### Appendices

- i Primary academy trends
- ii Planning History and Existing Uses
- iii Alternative sites
- iv Existing Site plan

Current usage: split site, low civic amenity



Proposed: new single site academy, high green belt amenity



# Douay Martyrs Academy & Land at Glebe Farm

## 1 Overview

This representation has been prepared on behalf of the Governors of Douay Martyrs Academy (DMA), the Roman Catholic Diocese of Westminster and the Trustees controlling Guys Investment Limited. This representation concerns the creation of a revitalised, single-site Douay Martyrs Academy, complimentary community facilities and the required enabling development. All achieved while respecting the amenity of the Green Belt designated land.

This representation aims to facilitate a single solution for the educational and amenity needs faced by the Hillingdon community, while respecting the amenity they currently enjoy. In the representation to the Hillingdon Local Plan Part 1, much effort was made to demonstrate how a new, possibly expanded, facility could be delivered at zero cost to the public purse, a 21<sup>st</sup> century fit-for-purpose learning environment, delivered in the optimal, most safety conscious manner. It created a legacy of facilities that would have lasted 60 years+, been established with the highest sustainability credentials, set in an environment that inspired all that learn and worked there. The three parties listed above consulted with wider community stakeholders on this basis. While the proposals struck a chord in terms of stakeholders' understanding of the challenges faced by DMA in regenerating its facilities and addressing the split site issue, the simple issue of the Green Belt designation prevented any real accord from being reached. The parties resolved to respond to this honest feedback and address it as follows:

- Rather than introduce a class of development onto Green Belt designated land that raises consternation, it has been resolved to simplify matters;
- The plan indicated over shows the simplification of how the land use can be resolved to attain an appropriate balance of community use and enhanced amenity;

We trust that our representation is the start of a dialogue with LB Hillingdon and the community on the challenges we need to collaboratively face and address. Simply, from Hillingdon's perspective, stating that policy does not allow debate around the subject, is a failure of duty under the The National Planning Policy Framework (NPPF) as it explicitly states:

*It, (the NPPF), provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.*

*Paragraph 1, National Planning Policy Framework, DCLG, March 2012*

It further clarifies:

*The Government attaches great importance to ensuring that a sufficient choice of academy places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:*

- *give great weight to the need to create, expand or alter schools; and*
- *work with schools promoters to identify and resolve key planning issues before applications are submitted.*

*Paragraph 72, National Planning Policy Framework, DCLG, March 2012*

The parties promoting this representation would truly welcome the local planning authority in fulfilling its duty and meeting with the academy promoters to discuss the challenges the academy faces and collaboratively determine if a masterplan for the sites can reflect the need and priorities of the wider community not just a select, vocal few.

While not wishing to forecall what needs and priorities may materialise, we believe the following achieves an equitable blend of sustainable education facilities, a significantly enhanced amenity of green space partially achieved through appropriate enabling development.



The currently designated Green Belt land is split into two elements;

1. The southern portion of this land (that has positive Green Belt characteristics) is retained as Green Belt, protected in perpetuity for Ickenham as a community resource and enhanced in amenity (visual and recreation) significantly;

2. The northern part (that is undeniably lacking in Green Belt characteristics) becomes the site for a new 21<sup>st</sup> century academy campus. A sustainably developed facility that will showcase how a collaboratively evolved masterplan can respect its setting, respect its neighbours yet deliver a campus that inspires outstanding learning;

3. The two current academy sites are then developed (with due regard to density and the context of their neighbourhood settings) as enabling development, assisting in defraying the cost of the academy build;

It is clear from an analysis of the Glebe Farm site that portions of it serve little or no function in Green Belt terms and indeed may well have been planned for further residential expansion when the new Glebe Avenue community was developed to the east of the Piccadilly/Metropolitan line. Green Belt boundaries should not include land that it is unnecessary to keep permanently open. Paragraph 2.9 of the former PPG2 guidance noted that wherever practical a Green Belt boundary should be several miles wide, so as to ensure an appreciable open zone all around the built up area concerned. We would argue that this is not the case in respect of the subject land and indeed its functional form is simply one of greenfield rather than Green Belt. It should therefore be removed from the Green Belt

We would stress that the portion of the land that strengthens the 'tests' for Green Belt will be retained and enhanced. The portion that currently lacks those key characteristics of openness, visual amenity etc will be sensitively developed. This sensitivity involves:

- locating any building mass as far from existing dwellings as the site permits;
- landscaping said buildings to minimise visual impact; this may also exist in shielding existing dwellings from the current noise of the Piccadilly Line railway;
- minimising building footprint and hard standing areas;
- producing a landscape that reflects & respects its location next to the key Ickenham Marshes nature conservation area.

However, the relative merits of Green Belt designated land are a thorny issue and while we understand the intent of its original designation, its merit as a valued, open amenity is questionable. What is unquestionable is the significantly enhanced value that community bodies like DMA, the Ickenham Residents Association and the wider Ickenham community could put this space to.

The strength of our case is the education needs that alone were a strong enough argument for Lake Farm School to prove a *very special circumstances* case. Douay Martyrs Academy is an outstanding\* academy but it:

- has the worst condition campus of any secondary school in Hillingdon;
- operates on a split site with the attendant inefficiencies in curriculum and resourcing;
- inflicts hazardous road crossings on students and staff every day;
- has learning spaces deemed unsuitable by OfSTED and by DfE standards;
- is at full roll on current intake with a primary age and catholic ratio bulge forecast. Please note that current first preference for DMA is up 27% on 2014 applications. (see section 5 & appendix i);

\* Ofsted Section 5 Good, Section 48 Outstanding. A factor holding DMA back from Outstanding has been identified as the site, particularly from a Safeguarding perspective and the split site concerns are referenced in OfSTED Reports back to 1993 in the Teaching and Learning time lost in addition to the safeguarding concerns of site movement each lesson.

On this last point, this representation will table evidence in terms of the demographic challenge faced across Hillingdon at Primary and Secondary level plus the pressure on pupil spaces (Catholic and non-Catholic) in West London. This representation will also indicate the lack of alternative sites suitable for education purposes acknowledged by Hillingdon through its own assessment and Local Plan endeavours. Ultimately, this representation will justify that Hillingdon deserves education facilities that are sized accordingly, fit-for-purpose, safe and most importantly acknowledged as an outstanding education environment. Hillingdon demands community amenity that is accessible to all with facilities that promote enhanced usage with all the attendant benefits this generates.

We wish to also stress that through the purely cursory 'desktop' consultation exercises undertaken to date by LB Hillingdon it has failed to address inaccuracies in assessments, an approach that does not breed confidence that all factors have been weighed and considered in determining an outcome. Hence, it appears LB Hillingdon are basing its ten-year policy on less than ideal information and hence not performing the analysis its citizens deserve, for example:

- The lack of certain elements of assessment in the Local Plan Part 1 was criticised by the Planning Inspector (Planning Inspectorate Report to LB Hillingdon 26th July 2012);
- In itself, this does not suggest that any determination of individual sites may be questionable, but without a quantifiable assessment on what increased housing will be forthcoming, how can a local authority set appropriate education capacity numbers across the borough or in targeted areas. The Inspectorates Report commented on this fact:
  - The last housing assessment indicates the majority of housing will be in the Hayes and Harlington areas, the area that is the core student population of DMA; It shows that approximately 75% of the new homes will be built south of the A40 with Uxbridge, the Hayes/West Drayton Corridor and other parts of the Heathrow Opportunity Area being the strategic locations for development, in accordance with the spatial strategy.
- LB Hillingdon has failed to full consult on pupil place planning with academy promoters and/or provide assurances that sufficient capacity exists or is planned to be provided. The report quotes:
  - 'More detail is emerging, for example in relation to the need for additional academy places in the Borough. The next stage of the Local Plan will need to contain a firmer assessment of such need in order to allocate sites for any new buildings that may be required. From the information in the SIP, the Council is able to confirm that there are no projects that are crucial but so uncertain that the Plan's soundness in this respect is called into question.'
  - The simple fact is that Hillingdon have not completed this 'firmer assessment' effectively, so the Planning Inspectorates comments still hold.
- We would also wish to highlight the consistent errors and/or discrepancies in relation to designation of the sites. In the previous Local Plans and their accompanying open land/green belt assessment, the Glebe Farm site assessment has had two different outcomes indicated. This inconsistency is further compounded by the erroneous inclusion of the Douay

Martyrs Arrowsmith campus under the Green Belt assessment in the Local Plan Part 1 report to cabinet. At best, this is a simple mistake caused by this inconsistency of assessment, but one might argue it is misleading and has enabled Councillors to make a decision based on incomplete and inaccurate information;

- The LB Hillingdon Cabinet Report on Local Plan Part 1 from October 2013, erroneously pushes together the Glebe Farm site with the much larger 24 Ha Green Belt stretch from Long Lane in the West, stretching along the northside of the A40 to RAF Northolt in the East. We fully support the ideal that this large swathe of land is consistent with the best intentions of a Green Belt designation and indeed under the Ickenham Marshes designation has enhanced protection. This is why we propose that the higher amenity parts of the Glebe Farm site (that are adjacent and contiguous with this swathe) are retained as Green Belt and protected for community use. It is purely the less open, lower amenity parts of the Glebe Farm land (that add little value to this area) that are suggested for re-designation;
- Our proposals for Glebe Farm are to establish public infrastructure, a much needed, expanded successful community academy. It is not for private sector profit that we request the re-designation unlike the owners of the adjoining land; furthermore, it is the intention that DMA and the Ickenham community will ensure that interpretation and understanding of this environment will be increased through curriculum related interaction as well as ensuring community access is increased.

The LB Hillingdon Cabinet report on Local Plan Part 2 from March 2015 acknowledged their own shortcomings by stating the following:

- That the need for additional academy places over the Plan period has not been addressed; and that
- The section of the DMP covering education and community uses will be updated to include the latest information on school place provision. Sites for additional new schools will be identified in the Site Allocations and Designations document.
- Our representations will pre-date sight of any update as the crux of this point is that Hillingdon have not provided any update. The education sites promoted in the Local Plan Part 2 are retrospective decisions on primary schools only. Nominal expansion of some Secondary schools is noted but there is a complete absence of any forward planning to address their own acknowledged forthcoming issue. In this total absence it is difficult to comprehend the basis or merit of their analysis and as far as we aware discussions with education colleagues has shed little light on how, or by whom, this assessment is being or will be conducted;

While Hillingdon's own strategic planning policies acknowledge the need to plan more succinctly for education provision, and they wish to perform the role of the intelligent commissioning client, yet the burden of proof is placed on individual schools to prove *very special circumstances*, something that schools have scant resources or ability to pursue:

*The Council recognises that the capacity of existing school sites is becoming increasingly limited and that these exceptional very special circumstances may necessitate the release of greenfield sites or Green Belt sites, through the production of the Site Allocations DPD. Such sites will only be identified where the need for additional forms of entry cannot feasibly be met through the expansion of existing schools or new development on suitable brownfield land.*

#### *Para 9.45 Hillingdon Local Plan: Part 1 - Strategic Policies*

One crucial point here is that Hillingdon made formal representations to the landowner of Glebe Farm about purchasing the site with the express purpose of establishing an education facility. This not only establishes the view that LB Hillingdon concedes that it is site of lower amenity or value to the Green Belt when other factors (educational need) are considered in the round as the NPPF demands.

Irrespective of current inaction or intransigence, we have seen within the borough of Hillingdon, the inclination and imagination to establish a sustainable community academy and resources on not only Green Belt but also publicly owned, designated Country Park land. Running against vociferous local objection, Lake Farm School was established in response to demographic challenges in the immediate and wider wards. A search yielded little alternative sites, so the borough requested

approval from the GLA to site a school of over 600 pupils on publically owned land of a higher amenity class than the privately owned, lesser amenity land we are proposing. This shows that Hillingdon has the ability and inclination to take bold, imaginative if somewhat controversial approaches for the betterment of the needs and resources for its community or at the very least promote proposals for the community to debate.

We have researched numerous examples of new and/or expanded education establishments on Green Belt designated land and would happily share this with colleagues in LB Hillingdon's planning department. While appreciating that every case must be weighed on its individual merits, it helps establish an approach that may be beneficial to all.



## Douay Martyrs Academy & Land at Glebe Farm 2 Background, Site Description and Surroundings

### Background

The application sites are sited on or near Long Lane in Ickenham. The Douay Martyrs Academy (DMA) campus consists of two sites - Arrowsmith Campus (main academy site) and Cardinal Hume Campus – split by Long Lane, this provides a historical, current and future safety issue as well as providing an insurmountable challenge to the provision of an outstanding education for students – as acknowledged by Ofsted. While the Governors of DMA are responsible for the delivery of education, the freehold remains with the Archdiocese of Westminster. The academy has been situated here since the 1930's with minimal investment since the major rebuild in the 1960's.

The land referred to as Glebe Farm in previous representations (item 62 in the LB Hillingdon Local Plan Part 1) is owned by Guys Investment Trust, a family Trust historically associated with Ickenham. This site is within the designated Green Belt. *Acknowledging the current greenbelt designation of the land, the scheme seeks to retain the element of the land that contributes most to the green belt, increasing the amenity for the local community. It will be respectful of the adjacent scheduled ancient monument and enhance community access to the local asset. It enables the creation of a new single-site Douay Martyrs Academy plus potential expansion to help the borough-wide pressure on pupil places. An element of enabling development is required to fund this venture but the degree of this is not determined yet as community consultation is vital to ensure a balanced approach.*

### Site Surroundings

The site is bounded to the west by the London Underground line running from Uxbridge to central London with the secure fence line being maintained by LTU along with the trees forming this boundary line. To the north the development of Glebe Farm circa 1950's was made into the existing Clovelly Avenue and Clovelly Close cul de sac off Glebe Avenue. To the east the site is bounded by Burnham Avenue developed in the 1940's, and further bounded by the western edge of the moat of Ickenham Manor farmhouse, and to the south the field is bounded by the unmade track that services both Long Lane Farm and the house of Manor Farm.

The local moat of Ickenham Manor – one of the drain's purposes was to drain the land upon which the house and outbuildings stand - surrounds both the farmhouse and the 'playing fields' of the Douay Martyrs Academy. The closer moat was probably dug at the time of the farm construction, and the outer moat was perhaps a cattle enclosure, drained by that outer moat to render it suitable for grazing. The wet Ickenham Marsh lies close by to the eastern edge of the farm buildings illustrating what the land would have been like if left undrained.

The Ickenham Manor moats have English Heritage notice boards explaining their history and significance but the moats themselves are not currently accessible to the public, and there is no 'through link' from this track/path to the nature trail to the east that runs by Ickenham Marsh up along the Austin's Lane Trail.

### Current owners

The current freehold owner's of the field is Guys Investments Limited, which is within a family Trust based and governed in Guernsey. The Trustees fully support the donation of the land to the Diocese of Westminster in order to benefit the Academy and local community so that an exceptional educational case can be submitted to the LBH 2012 local plan for inclusion at this time.



## Land Registry documentation

The Official number of the registered title is MX 77304 and was updated on 21.08.2013 to reflect the correct boundaries of the freehold land first entered in the register on 18.01.1938, and in addition specifying the new address of the proprietor.

In addition, the land has specific rights allocated to the transmission of electricity distribution – in that there are a wayleave for a proposed electricity sub station to the eastern boundary foot path entrance, and an underground power cable running to the field from under the railway line at the bridge crossover location.

The stiles for the right of way have been renewed in the past 2 years and the rights of the landowner have been established with regard to the private and restrictive access to the site under the current legislation. These have been registered with Hillingdon.

The following maps and plans are attached in Appendix iv: Copy of drawing showing the Right of Way and fence lines

## Current site uses and designations



## Douay Martyrs Academy & Land at Glebe Farm

### 3 Green Belt Assessment

To remove a preferred site from the Green Belt, there are two routes (1) the Local Planning Authority can identify Education allocations in their Local Plan or (2) in the absence of an allocation in the Local Plan a “very special circumstances” planning application needs to be made. We strongly urge LB Hillingdon to consider the former, taking the opportunity, like at Lake Farm Academy to be pro-active in finding a solution for much needed community facilities. We believe there is a strong case, with a very special rationale, and a potentially exceptional outcome for students, for doing so and we outline below the points that merit debate about the Green Belt designation.

Clearly the modern purposes of the Green Belt, as set out in the NPPF, bear very little relation to the original vision of the Green Belt as the green lungs of the city where town dwellers could find tranquillity and recreational space. They do, however, still closely reflect the justification given by Duncan Sandys when he implemented the Green Belt in 1955. Nonetheless, the NPPF does recognise that Green Belt boundaries can, and should, be reviewed over time to ensure that, amongst other things, the boundaries take account of the need for sustainable development (including economic sustainability).

The underlying purpose for making changes is to ensure the Green Belt is protected throughout and beyond the time frame of the Local Plan, or put another way, **the right land is protected in the right way.**

Preserving publically accessible open space of high environmental and amenity value around cities provides a treasured public good and can be justified in terms of the benefits produced for the general population. It is, however, much more difficult to construe how the current official purposes of the Green Belt confer significant public benefit to the population who live in a large city like London. Research demonstrates that there are substantial benefits from local parks, school playing fields (formalised recreation) and back gardens (informal recreation). The same applies to publically accessible areas of real beauty such as London-wide recognised areas such as the Royal Parks, Hampstead Heath or Epping Forest. At a local level, Ickenham Marshes performs such a role, but the Glebe Farm northern portion is at best a transition area to this space that has a greater amenity. But research shows such benefits are relatively localised. They decrease with distance and seem to disappear at about one kilometre (outstanding spaces such as Hampstead Heath or Epping Forest may have a longer reach). The value of privately owned Green Belt land does not extend beyond the residents who actually live within it, according to the most up to date research. Certainly there is no value for residents of Hayes in protected farmland several kilometres away in Ickenham.

Hillingdon, like all London's boroughs, has been encouraged to review their Green Belt and consider how the land within it can be most effectively used and what the options are for re-designating a small fraction for new sustainable development. This review would be in line with existing planning policy and echoes a recent recommendation by the Communities and Local Government Committee report looking at the NPPF, which stated:

“We encourage all councils, as part of the local planning process, to review the size and boundaries of their green belts. They should then make any necessary adjustments in their local plan. We argue that the starting point for any Green Belt review in London should be to only consider areas that are close to existing or future transport nodes, that are of poor environmental or civic value and could better serve London's needs”

While the principles of the Green Belt policy have changed very little, it is inevitable that the scale and use of large-scale developments will have changed and will continue to do so. The purpose of any review of Green Belt is therefore to identify:

- whether the existing Key Green Belt Sites (KGBS) (formerly known as Major Developed Sites/MDS) meet the objectives of the NPPF;
- what the long term likely scenarios for the development of these are;
- whether there are any other sites within the Borough that should be included as a KGBS; and
- whether, in the context of the future planning of particular sites or locations, there should be any minor change to the Green Belt boundary.

Schools in the Green Belt are required to demonstrate very special circumstances in support of development. For some schools that have limited budgets, this can be a difficult task that may hamper their ability to achieve their education development goals. The NPPF places 'great importance' on the provision of new schools and the extension of existing schools, and expects councils to take a proactive, positive and collaborative approach to meeting this requirement'. When a planning application is made, full weight should be given to Green Belt considerations, balanced with the NPPF's requirement to provide for schools.

The National Planning Policy Framework (NPPF) explicitly states:

*It, (the NPPF), provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.*

*Paragraph 1, National Planning Policy Framework, DCLG, March 2012*

It further clarifies:

*The Government attaches great importance to ensuring that a sufficient choice of academy places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:*

- *give great weight to the need to create, expand or alter schools; and*
- *work with schools promoters to identify and resolve key planning issues before applications are submitted.*

*Paragraph 72, National Planning Policy Framework, DCLG, March 2012*

This policy approach is further stressed through the DCLG policy statement on planning for schools development, guidance designed to facilitate the delivery and expansion of state-funded schools. It states:

*The Government is firmly committed to ensuring there is sufficient provision to meet growing demand for state-funded academy places, increasing choice and opportunity in state-funded education and raising educational standards. State-funded schools - which include Academies and free schools, as well as local authority maintained schools (community, foundation and voluntary aided and controlled schools) - educate the vast majority of children in England. The Government wants to enable new schools to open, good schools to expand and all schools to adapt and improve their facilities. This will allow for more provision and greater diversity in the state-funded academy sector to meet both demographic needs and the drive for increased choice and higher standards....It is the Government's view that the creation and development of state-funded schools is strongly in the national interest and that planning decision-makers can and should support that objective, in a manner consistent with their statutory obligations. We expect all parties to work together proactively from an early stage to help plan for state-academy development and to shape strong planning applications. This collaborative working would help to ensure that the answer to proposals for the development of state-funded schools should be, wherever possible, "yes."*

*National Policy Guidance - Policy Statement on Planning for Schools Development, DCLG, August 2011*

The statement clearly emphasises that there should be a presumption in favour of the development of schools and that "Local Planning Authorities should make full use of their planning powers to support state-funded schools applications."

## Regional Policy Guidance

*Development proposals, which enhance education and skills provision, will be supported, including new build, expansion of existing facilities or change of use to educational purposes. Those which address the current projected shortage of academy places will be particularly encouraged.*

*Policy 3.18 The London Plan, GLA, July 2011*

Local policy – one that seeks to encourage the provision of enhanced educational facilities across the borough from nearly ten years ago, stating:

*The Local Planning Authority will regard proposals for new meeting halls, buildings for education, social, community and health nurseries, including libraries, nursery, primary and secondary academy buildings, as acceptable in principle subject to the other policies of this plan.*

*Policy R10, Hillingdon Unitary Development Plan Saved Policies, September 2007*

Updated through the Local Development Framework, specifically Policy CI1 of the Local Development Framework supports the need to ensure appropriate academy provision is provided across the borough stating that the Council will ensure that community and social infrastructure is provided in Hillingdon to cater for the needs of the existing community and future populations by" amongst other things "supporting extensions to existing schools and the development of new schools and youth facilities"

If these three levels stress the need for provision of education capacity to be of the utmost priority, the parties to this representation would welcome the opportunity to treat this discuss with LB Hillingdon and the wider community its strategy or tactics for such provision given the following:

- A lack of a suitable pupil place planning strategy, tactics or individual academy build plans that acknowledges certain fundamental criteria:
  - Full comprehension of the identified pupil place deficit materialising across the primary sector that will affect secondary provision;
  - How the Hillingdon voluntary aided schools have high non-denominational ratios of students, DMA has close to 50% non-catholics; these students will not attain places at VA schools as the bulge materialises as catholic primary academy children will get priority;
  - Increased housing provision due to developments in DMA's most populous student areas (Hayes and Harlington) will increases demand for places;
- DMA is ranked first in LB Hillingdon for the poor condition of its estate i.e. acknowledged to be in the worst state.
- Even if funding materialises to address the condition, it does not address the suitability of spaces, the capacity issues highlighted above or most fundamentally the key issue of the split sites;
- The split site influences so many poor characteristics it is tribute to DMA as a whole that they attain an 'Outstanding' OfSTED rating, given:
  - Loss of curriculum time;
  - Loss of pastoral care time;
  - Inefficient staff resourcing;
  - Inefficient deployment of resources;
  - Replication of facilities;

While accepting that the National Planning Policy Framework (NPPF) is clear in what constitutes inappropriate development, and that, by definition, it being harmful to the Green Belt, it will normally be refused, we strongly feel there is a case for VSC to have weight. We acknowledge that any proposal(s) will only be permitted where these VSC exist, to the extent that these other circumstances outweigh any potential harm to the Green Belt by reason of appropriateness and any other harm. The VSC is justified in this case through every level of planning policy, national, regional and local:

*Within this section, we assess the component parts of the proposed development alongside Green Belt (GB) policy contained within local, regional and national planning policy.*

#### ***Local policy - The Hillingdon Unitary Development Plan Saved Policies (September 2007) (UPD)***

*UDP policy OL1 defines the types of development considered acceptable within the Green Belt. These are predominantly open land uses including agriculture, horticulture, forestry, nature conservation, open-air recreational activities and cemeteries. It states that planning permission will not be granted for new buildings or changes of use of existing land or buildings that do not fall within these uses.*

*Policy OL2 states that, where development proposals are acceptable within the Green Belt, in accordance with Policy OL1, the Local Planning Authority will seek comprehensive landscaping improvements to enhance the visual amenity of the Green Belt.*

#### ***Local Development Framework***

*The London Borough of Hillingdon is currently in the process of preparing its Local Development Framework. The Core Strategy was submitted to the Secretary of State in October 2011 and an Examination in Public commenced in March 2012. Accordingly significant weight can now be attached to this document, given its advanced stage in the planning process.*

*Policy EM2 confirms that any proposals for development within the Green Belt will be assessed against national and London Plan policies, including the very special circumstances test.*

*Notwithstanding this, paragraph 8.27 states that "in very exceptional circumstances the Council will consider the release of Greenfield sites for schools."*

#### ***Regional Policy Guidance - The London Plan (July 2011)***

*London Plan policy 7.16 reaffirms that the "strongest protection" should be given to London's Green Belt, in accordance with national guidance, and emphasises that inappropriate development should be refused, except in very special circumstances.*

#### ***National Policy Guidance - National Planning Policy Framework (NPPF)***

*The NPPF makes it clear that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. It states that:*

*"When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations."*

*In the GB there is a presumption against inappropriate development. Paragraph 3.4 of PPG2 clarifies that the construction of new buildings in the GB is inappropriate unless it is for certain purposes defined by that paragraph. Based upon this, the buildings that are associated with certain uses are considered an appropriate form of development, whilst any residential*

*buildings are inappropriate. Consequentially these two distinct uses raise different Green Belt policy issues.*

*Before considering the acceptability in Green Belt terms of the proposed development we firstly consider the value of including land within it.*

### **Assessment of how the existing site contributes to the purposes of including land in the Green Belt**

NPPF identifies that there are five purposes of including land in Green Belts, these being to:

- i. check the unrestricted sprawl of large built-up areas;
- ii. prevent neighbouring towns from merging into one another;
- iii. assist in safeguarding the countryside from encroachment;
- iv. preserve the setting and special character of historic towns; and
- v. assist in urban regeneration, by encouraging the recycling or derelict and other **urban land.**

The purposes of including land in Green Belts are of paramount importance to their continued protection, and should take precedence over any land use objectives. We assess below how the site currently contributes to achieving these purposes and how this will be affected by the proposed development.

#### **i. check the unrestricted sprawl of large built-up areas**

There are two distinct parts of the site. The northern part is bordered to the north and east by a residential neighbourhood. To the west is the Piccadilly/Metropolitan line. To the south is a boundary hedgerow to the southern part of the site. Hence, on three principal boundaries it has an already established urban character. The southern part of the site is bordered to the east by the current Douay Martyrs Academy playing fields. To the south and west it is bordered by open space that is predominantly being used for agricultural purposes, broken only by the odd farm building and boundary hedgerows.

The northern part of the site is accessed from the end of Clovelly Avenue, a boundary that will not become any less defensible as a result of any potential development. Indeed, by splitting the site into the northern and southern sections will create an enhanced, southern defensible boundary.

As described above any variation on a masterplan layout will result in development being located solely in the northern part of the site that already has an urban (or suburban) character and appearance, with green belt complimentary uses on the southern part only. On balance, there is a positive impact. In addition, as the southern part of the site will not be removed from the Green Belt were this development to be implemented, the local planning authority would maintain planning powers to resist future inappropriate development both on this site and adjoining Green Belt land in the future.

#### **ii. prevent neighbouring towns from merging into one another**

The site does not sit between neighbouring towns as clarified by the assessment in the LB Hillingdon Local Plan Part 1 and the previous LB Hillingdon Local Plan review 2006.

#### **iii. assist in safeguarding the countryside from encroachment**

In terms of encroachment there are two main issues. Firstly, in terms of its visual impact on the wider open countryside and the impacts of the proposals on this. Secondly, the impact of the proposals upon the openness of the site.

As indicated previously, this proposal seeks to safeguard that part of the site (southern portion) that enhances the overall open countryside character in this area, extending the public access to 'around the moats' of the Ickenham Manor, and seeking linkage to the Austin's Lane Trail thence through to the River Pinn public access areas.

Openness – in terms of policy, openness is governed by:

Local policy - The Hillingdon Unitary Development Plan Saved Policies (September 2007) (UPD) Policy R4 seeks the protection of open space stating:

"The Local Planning Authority will not normally grant planning permission for proposals which involve the loss of land used (or where the last authorised use was) for recreational open space (including publicly accessible open space and playing fields, private or academy playing fields, private or public allotments), particularly if there is (or would be) a local deficiency in accessible open space."

Local Development Framework Policy EM4 of the Core Strategy states that the Council will "safeguard, enhance and extend the network of open spaces" and that "there will be a presumption against any net loss of open space in the Borough." Development proposals should address local deficiencies.

Regional Policy Guidance - The London Plan (July 2011) London Plan policy 7.16 reaffirms that inappropriate development within London's Metropolitan Open Spaces should be refused except in very special circumstances:

"The strongest protection should be given to London's Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green Belt. Essential ancillary facilities for appropriate uses will only be acceptable in they maintain the openness of MOL."

Policy 7.18 reiterates that the loss of open spaces must be resisted. Where the loss of open space is proposed it should be replaced by equivalent or better quality space within the locality and that the replacement of one type of open space with another will not normally be considered acceptable.

National Planning Policy Framework (NPPF) Paragraph 74 of the NPPF reaffirms that the strongest protection should be given to preserving open space:

"Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

As indicated, this representation seeks to establish debate around what the community wants for this space. It is currently only accessible at the benevolence of the landowner and tenant. The loss resulting from the proposed development would be replaced by:

- equivalent or better provision in terms of quantity and quality in a suitable location;
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

Openness is a distinctly separate test to visual impact in that it relates to the amount of built form as opposed to whether you can see it. To assist in further assessment an analysis of the site and its surrounding landscape context will be undertaken and a number of visualisations prepared from locations agreed with the local planning authority.

#### Effect on Landscape Character More Generally

Mindful of all the above, it is necessary to consider how 'character' in the landscape context is understood and the effects of the development upon it. Character is about more than what can be seen: it is a function of land use and the consequent effects of those uses, for example lighting, traffic, landscaping and noise. Thus it is the product of a general awareness and understanding of how an area is structured.

Visualisations can be prepared to allow an impression of the scheme to be appreciated from a representative sample of publically accessible viewpoints. These are aids to the visualisation process but it is accepted that the wider landscape effects cannot be encapsulated by a single visual image, because viewers are not 'parachuted' into a viewing position. Thus

most people who move across an area have in their mind an understanding of the broader pattern of uses even when they do not see them directly. This sense comes from memory, from the experience of an area.

In this broader understanding of landscape character and effect it is our view that the proposed development would have a substantial beneficial effect. As well as this quantitative benefit there are significant qualitative benefits in the form of the delivery of attractive landscaping (hard and soft), enhanced ecological/biodiversity potential, greater visual and physical links through the site (thereby improving permeability) and the delivery of innovative and high quality architecture. These are a demonstrable and substantial improvement upon the existing situation that actively detracts from the character of the Green Belt and visual amenity of the area. The application proposals will therefore integrate in a more appropriate, and in our view successful, manner with the surrounding landscape context.

iv. preserve the setting and special character of historic towns

There are no historic towns in the immediate vicinity of the application site and as such this purpose is not relevant to this application, as clarified in the LB Hillingdon Local Plan Part 1 and previous LB Hillingdon Local Plan review 2006.

v. assist in urban regeneration, by encouraging the recycling or derelict and other **urban land**

The site was not assessed as assisting in urban regeneration by the LB Hillingdon Local Plan Part 1 and previous LB Hillingdon Local Plan review 2006.

### **Green Belt summary**

Nevertheless, as demonstrated above, when assessed against the purpose of including land within the Green Belt this site serves very limited 'purpose'. Consequently the proposed development would not compromise the purposes of including land in the Green Belt in this location. Instead we consider that the site will, as a result of this development, contribute more positively to the purposes of including land within the Green Belt. In addition to delivering a wide range of other benefits. Furthermore, the proposed redevelopment of this site will not necessitate the sites deletion or change of status from the Green Belt ensuring ongoing policy protection over any future development proposals.

The adopted Hillingdon Local Plan Part 1 recognises as a matter of principle the expansion of education facilities within the Green Belt, and is a consideration that may be required to meet the Borough's sustainable objectives. Glebe Farm, Clovelly Avenue, Ickenham was specifically reviewed at Page 51 of Hillingdon's Green Belt and Major Development Site in the Green Belt Assessment January 2006. Whilst in 2006 the consideration for designation was simply whether land met one of the five tests, the consideration now is whether the land meets these tests "and" other components of the NPPF that would warrant allocation. We do not consider that this land meets any of the five tests identified within the NPPF. The sustainable development needs to the Borough also need to be considered.

It is clear from an analysis of the site that it serves no function in Green Belt terms and indeed may well have been planned for further residential expansion when the new Glebe Avenue community was developed to the east of the Metropolitan line. Green Belt boundaries should not include land that it is unnecessary to keep permanently open. Paragraph 2.9 of the former PPG2 guidance noted that wherever practical a Green Belt boundary should be several miles wide, so as to ensure an appreciable open zone all around the built up area concerned. We would argue that this is not the case in respect of the subject land and indeed its functional form is simply one of greenfield rather than Green Belt. It should therefore be removed from the Green Belt. The content of the Proposed Development Management Policies has been identified in outline by Hillingdon Council. At this stage clearly there is limited detail in respect of the policies but nevertheless we do consider that at this stage there should be a policy to promote education facilities with Hillingdon recognising the need for enabling development to fund such provision.





# Douay Martyrs Academy & Land at Glebe Farm

## 4 Development Management Plan Policy and Planning Obligations

### Educational facilities:

The following policies, which encourage the provision of new and/or enhanced educational facilities, are also of relevance:

Local policy - The Hillingdon Unitary Development Plan Saved Policies (September 2007 (UDP) Policy R10 seeks to encourage the provision of enhanced educational facilities across the borough, stating:

"The Local Planning Authority will regard proposals for new meeting halls, buildings for education, social, community and health nurseries, including libraries, nursery, primary and secondary academy buildings, as acceptable in principle subject to the other policies of this plan."

Local Development Framework Policy CI1 of the Local Development Framework supports the need to ensure appropriate academy provision is provided across the borough stating that the Council will ensure that community and social infrastructure is provided in Hillingdon to cater for the needs of the existing community and future populations by "amongst other things "supporting extensions to existing schools and the development of new schools and youth facilities"

Regional Policy Guidance - The London Plan (July 2011) London Plan policy 3.18 states:

"Development proposals which enhance education and skills provision will be supported, including new build, expansion of existing facilities or change of use to educational purposes. Those which address the current projected shortage of primary academy places will be particularly encouraged."

National Policy Guidance - DCLG Policy Statement on Planning for Schools Development (published 15/08/11)

The DCLG policy statement on planning for schools development is designed to facilitate the delivery and expansion of state-funded schools. It states:

"The Government is firmly committed to ensuring there is sufficient provision to meet growing demand for state-funded academy places, increasing choice and opportunity in state-funded education and raising educational standards. State-funded schools - which include Academies and free schools, as well as local authority maintained schools (community, foundation and voluntary aided and controlled schools) - education the vast majority of children in England. The Government wants to enable new schools to open, good schools to expand and all schools to adapt and improve their facilities. This will allow for more provision and greater diversity in the state-funded academy sector to meet both demographic needs and the drive for increased choice and higher standards."

It goes on to say that:

"It is the Government's view that the creation and development of state-funded schools is strongly in the national interest and that planning decision-makers can and should support that objective, in a manner consistent with their statutory obligations. We expect all parties to work together proactively from an early stage to help plan for state-academy development and to shape strong planning applications. This collaborative working would help to ensure that the answer to proposals for the development of state-funded schools should be, wherever possible, "yes."

The statement clearly emphasises that there should be a presumption in favour of the development of schools and that "Local Planning Authorities should make full use of their planning powers to support state-funded schools applications."

### National Planning Policy Framework (NPPF)

Paragraph 72 of the NPPF reiterates the objectives set out in the DCLG Policy Statement on Planning for Schools Development. It clearly confirms that the Government attaches great importance to ensuring that a sufficient choice of schools places is available.

### Next stage considerations

With any complex, multi-use scheme, there are a multitude of planning policy requirements and obligations that need to be addressed at the appropriate stage. The stakeholders in this scheme are seeking to promote debate about the merits of the principles of their proposals. The stakeholders fully acknowledge that community consultation is vital on such a scheme to ensure that a balanced solution is arrived at, one that balances the needs of Hillingdon as a whole.

It is appreciated that the proposals, set a challenge to one of the most cherished elements of the environs, the amenity of Green Belt. To ensure that the perceived loss of a portion of this amenity, the stakeholders are keen to promote sensible, balanced debate about what can be established to address the preconceptions. It is acknowledged that local authority or GLA policy in terms of the following will need to be established through this process:

- Traffic enhancements – permanent and during construction
- Section 106 agreements
- Community Infrastructure Levy (CIL) contributions
- Affordable / Key worker Housing provision
- Sustainability levels of all permanent construction – buildings, infrastructure and landscaping
- Employment assessment – permanent and during construction
- Permanent creation of leisure amenities – academy priority (during academy hours) and community priority
- Environmental and Ecological improvements
- Public access to previously restricted amenities

The aim of the stakeholders is not to hide behind the process but utilise the process to help determine the scheme that Hillingdon aspires to and then delivers. The prime driver from the stakeholders has always been the realisation of an outstanding education environment for the 2,000 plus families in the Hillingdon community that this academy serves and ensuring it provides wider range of services for the its immediate community.

# Douay Martyrs Academy & Land at Glebe Farm

## 5 Academy Status and Evidence

This section of the representation is seeking to address the well-known challenge across London in terms of Pupil Place Planning.

### Demographic Influences

The 2014 secondary academy admissions cohort commenced compulsory schooling in September 2007. Since that date there have been two significant developments effecting access to education:

- The rapid expansion in the primary sector that has been required in order to supply sufficient academy places for primary academy aged children
- Changes within the European Union that have resulted in a significant increase in number of Catholic Families choosing to settle in the United Kingdom

During the last 5 years, the number of places in Catholic primary Schools in Hillingdon has remained unchanged at 330. However, within in the authorities listed above, more than 300 places per year (10 forms of entry) have been supplied in areas that are close to the borders of Hillingdon. This will result in greater demand for places at those named schools. With most governing bodies using distance as the determining factor for managing oversubscription, the net results is that the catchment area for each secondary academy will reduce. The impact for Hillingdon and Hillingdon Catholics in particular will be significant.

Douay Martyrs is the only maintained Catholic Secondary academy/academy operating within the London Borough of Hillingdon. Situated in just north of the A40 in Edinburgh Drive, Ickenham, it attracts most of its pupils from within the Borough. On the map to the left, Douay Martyrs is represented by the maroon building symbol situated to the north-west of RAF Northholt. The six green building symbols represent the 6 Catholic Primary Schools in Hillingdon. The red triangles represent Catholic pupils and the blue triangles, non-Catholic pupils.

It is clear from the evidence depicted, that the vast majority of successful applicants to Douay Martyrs come from within the Borough of Hillingdon.

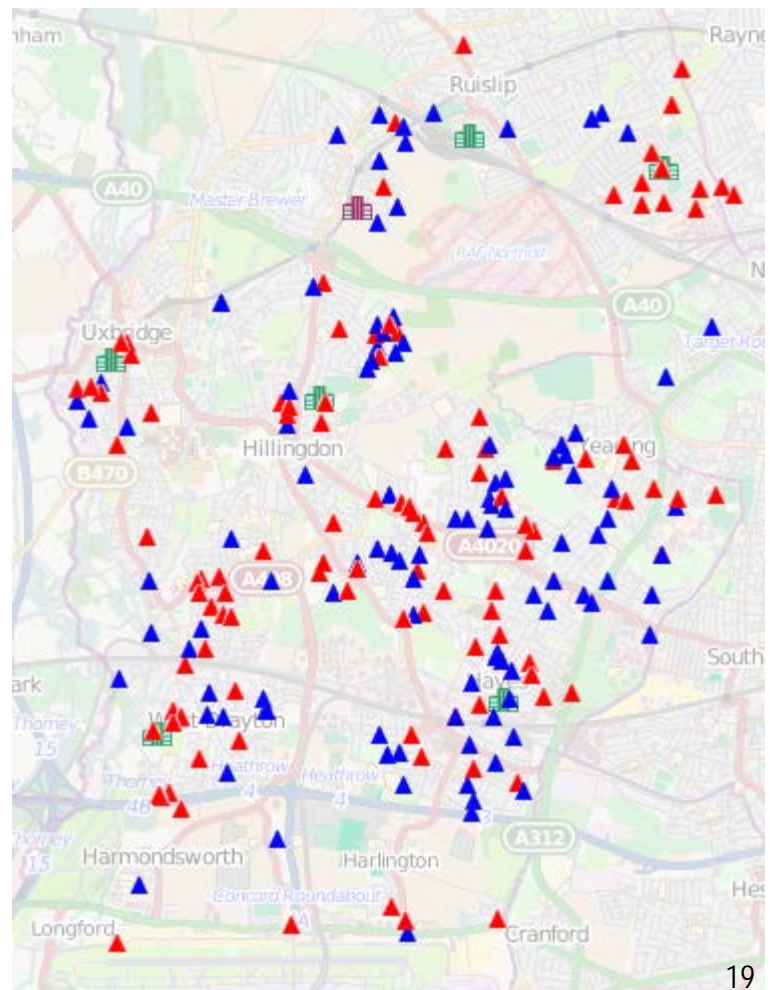
In September 2014, Douay Martyrs admitted: the following student profile:

Catholic Pupils: 126

Non-Catholic Pupils: 114

Total: 240

The planned admission number for Douay Martyrs is 240, therefore the academy is full.



In selecting a secondary academy for their child, some parents chose to send their children to Catholic Secondary Schools in neighbouring local authorities. In September 2014 children resident in Hillingdon were enrolled at the following out of borough schools:

- Hertfordshire
  - St Joan of Arc, Rickmansworth
  - Loreto, St Albans (Girls)
  - St Michael, Watford
- Harrow
  - Salvatorian (Boys)
  - Sacred Heart Language (Girls)
- Ealing
  - Cardinal Wiseman
- Hounslow
  - St Mark
  - Gumley House Convent (Girls)
  - Gunnersbury (Boys)
- Kensington and Chelsea
  - Cardinal Vaughan Memorial Academy (Boys)
- Hammersmith and Fulham
  - London Oratory (Boys)
  - Sacred Heart (Girls)

For some parents, the choice was based on Gender (8 of the 12 schools listed above cater for single sex cohorts). For others, location and proximity may have been influencing factors.

### **Forecast for Douay Martyrs**

In September 2021, the cohort that has just started primary academy will be attending secondary academy. Unless there are significant changes in the demographic trends in the borough, almost 400 Catholic children within Hillingdon, will be starting secondary academy. Unfortunately, if Douay Martyrs remains unchanged, only 240 of these children will secure places at the academy. The remaining 150+ children (5 forms of entry) will accept places in other secondary schools within the borough and potentially displacing other residents for whom those schools would have been their preferred option.

This situation will be further exasperated by the displacement of those Non-Catholic children who are currently able to secure places at the academy. This number currently stands at 114 pupils (4 forms of entry). They too will be seeking placements in the Hillingdon Community Secondary Schools.

Therefore, in total, the Local Authority will need to provide a Community Secondary Academy with the capacity to admit 270 pupils per year (9 forms of entry) just to cope with the projected displacement caused by one Catholic Secondary Academy.

Our scheme to relocate DMA and potentially increase pupil places as part of this educational capacity will alleviate part of this borough shortfall and in addition could /will reduce 'displacement' of pupils. It would also greatly assist reducing travel journeys and family disruption within the borough as a whole'.



# Douay Martyrs Academy & Land at Glebe Farm

## 6 Conclusion

Ultimately, this representation validates that Hillingdon deserves education facilities that are sized accordingly, fit-for-purpose, safe and most importantly acknowledged as an outstanding education environment. Hillingdon demands community amenity that is accessible to all with facilities that promote enhanced usage with all the attendant benefits this generates.

The potential benefits for Hillingdon are significant:

- A redeveloped new academy facility, on a single site sized for a 10FE intake delivering an outstanding education to Hillingdon citizens – Catholic and non-Catholic;
- A safe site, not skewered by Long Lane. Further measures will be taken to address the traffic issues caused during drop-off and pick-up by the current arrangements;
- An enhanced Green Belt portion with significantly enhanced visual and leisure amenity;
- Affordable and Key Worker Housing delivered at policy levels;
- Capital and revenue contributions to LB Hillingdon through the development;
- Delivered at potentially zero cost to the Public Purse

This representation aims to promote debate around the challenges faced by the Hillingdon community in providing the optimum facilities for its citizens. The full representation to the Local Plan (Part 2) will table evidence in terms of:

- the demographic challenge faced across Hillingdon at Primary and Secondary level;
- the pressure on pupil spaces (Catholic and non-Catholic) in West London;
- the lack of alternative sites suitable for education purposes - acknowledged by LB Hillingdon through its own assessment and Local Plan endeavours;
- the challenge faced by The Douay Martyrs Academy on a day by day basis let alone providing a viable future for the outstanding education of Hillingdon Catholics and non-Catholics; and
- justification for provision of this facility on Green Belt

### **Education justification – Demographics; Educational attainment; Safety; basic conditions**

Demographics - The need for the redevelopment and expansion of The Douay Martyrs Academy has been thoroughly investigated. Taking into consideration current pupil statistics it has been demonstrated without an element of doubt that there is a burgeoning need to make provision for school places across the borough, to serve Catholic and Non-Catholics. For example, in September 2021, the cohort that has just started primary school will be attending secondary school and unless there are significant changes in the demographic trends in the Borough, almost 400 Catholic residents of the Borough will be making that transition. Unfortunately, if DMA remains unchanged, only 240 of these children will secure places at the academy. The remaining 150+ children (5 forms of entry) will accept places in other secondary schools within the borough and potentially displace other residents for whom those schools would have been their preferred option. This situation will be further exasperated by the displacement of those Non-Catholic children who are currently able to secure places at the academy. This number currently stands at 114 pupils (4 forms of entry). They too will be seeking placements in the Hillingdon Community Secondary Schools. Therefore, in total, the Local Authority will need to provide a Community Secondary school with the capacity to admit 270 pupils per year (9 forms of entry) just to cope with the projected displacement caused by one Catholic Secondary Academy.

Educational Attainment – Ofsted have repeatedly indicated that the ability of DMA to deliver an outstanding education is significantly compromised by their current facilities, principally the impact of being a split site. Ofsted quoted 'The academy's

buildings are on two sites separated by a busy main road; this affects punctuality to lessons as well as presenting difficulties for the academy and the students.'

**Safety** – There have been long publicised and debated issues due to the split site nature of the academy on either side of Long Lane – there has been one fatality through the current arrangements despite additional crossing controls. This scheme aims to address this by creating one single site. Furthermore, we will need facilitate a proper academy drop-off + pick up facility easing congestion along Long Lane during peak periods.

**Basic Conditions** – DMA current accommodation only has an assessed agreed capacity for 216 pupils per year; they currently accept 240 pupils on an interim basis. As policy now dictates an increased staying on rate post-16, this creates greater pressure. Combine this with the DfE policy to not capital fund split site schools and the academy is left in very difficult situation - note: this scheme aims to create a one site academy that is then eligible for DfE capital funds. This scenario is further exacerbated over the next 5 years as major fabric and services condition items (heating, roofing) become critical and potentially elements that may lead to academy closure(s) should they fail to be instigated in due time.

### **Alternative sites – redevelopment/expansion; relocation in and out of the borough**

**Redevelopment and expansion on the existing site:** This is not a realistic option. The twin sites of the existing academy are already over developed. Whilst an expansion of the academy on its existing sites is theoretically possible, LB Hillingdon would have to:

- i. Consent to buildings of significant height (5 to 8 stories) in an area that comprises of mainly residential housing;
- ii. fund the demolition and rebuild of the whole academy; and
- iii. arrange for the academy to be accommodated in temporary facilities for the 24 – 30 months required to complete the work

**Relocation to a site outside of Hillingdon:** This is not a realistic option. Whilst it might be possible to find a potential site for the academy outside of the Borough, if relocated, it could not continue to serve its current communities and feeder primary schools. In reality, the academy would fill with Catholic children but these children would be from the area immediately surrounding the new site. The supply of places for Catholic residents of Hillingdon would be significantly reduced, severely limiting the options of a significant portion of the electorate.

**Relocation within LB Hillingdon:** Based in Ickenham, Douay Martyrs is reasonably accessible to Catholic residents throughout the Borough. The original siting of Catholic Secondary Schools, by the Diocese of Westminster, was planned to ensure that every academy had a strong catchment area whilst offering parents a certain amount of choice. If the academy is to be relocated within the Borough, it is necessary to identify and secure a suitable site within 1 mile of the current academy. Furthermore, public transportation must be equal to or better than those servicing the existing site. On this principal basis, a detailed analysis has been undertaken in order to identify the most appropriate site for such an academy, taking into consideration key criteria including size, location, accessibility, UDP designations and availability. All possible alternatives (all identified Sites in the Local Plan -Part1), and particularly those in more appropriately designated locations, have been carefully scrutinised in making the site choice. The one alternative location of any merit was the Hillingdon Circus site, however LB Hillingdon recently gave consent for this site for retail and residential uses. Hence, all alternatives were not deemed suitable for a range of reasons and were thus rejected.

### **Green Belt considerations**

There are numerous local and national policies that apply to Green Belt land. Our representation to the Local Plan covers each in detail. In this briefing note we would only seek to highlight a few factors. PPG2 identifies that there are five purposes of including land in Green Belts, these being to i) check the unrestricted sprawl of large built-up areas; ii) prevent neighbouring towns from merging into one another; iii) assist in safeguarding the countryside from encroachment; iv) preserve the setting and special character of historic towns; and v) assist in urban regeneration, by encouraging the recycling or derelict and other urban land. In its 2006 Local Plan, LB Hillingdon acknowledged that purposes ii) to v) were of limited

impact on this site.

In relation to factor i) to check the unrestricted sprawl of large built-up areas - we would stress the following: There are two distinct parts of the site. The northern part is bordered to the north and east by a residential neighbourhood. To the west is the Piccadilly/Metropolitan line. To the south is a boundary hedgerow to the southern part of the site. Hence, on three principal boundaries it has an already established urban character. The southern part of the site is bordered to the east by the current Douay Martyrs Academy playing fields. To the south and west it is bordered by open space that is pre-dominantly being used for agricultural purposes, broken only by the odd farm building and boundary hedgerows. The proposal seeks to protect and enhance the visual and leisure amenity of the portion of the Green Belt that has the 'classic Green Belt characteristics'. Overall the scheme seeks to provide much needed community infrastructure at zero cost to the public purse through sustainable enabling development respectful of the character of the neighbourhood.

This vital community infrastructure is best characterised by National Policy Guidance - DCLG Policy Statement on Planning for Schools Development (published 15/08/11). The DCLG policy statement on planning for schools development is designed to facilitate the delivery and expansion of state-funded schools. It states:

"The Government is firmly committed to ensuring there is sufficient provision to meet growing demand for state-funded academy places, increasing choice and opportunity in state-funded education and raising educational standards. State-funded schools - which include Academies and free schools, as well as local authority maintained schools (community, foundation and voluntary aided and controlled schools) - education the vast majority of children in England. The Government wants to enable new schools to open, good schools to expand and all schools to adapt and improve their facilities. This will allow for more provision and greater diversity in the state-funded academy sector to meet both demographic needs and the drive for increased choice and higher standards."

It goes on to say that: "It is the Government's view that the creation and development of state-funded schools is strongly in the national interest and that planning decision-makers can and should support that objective, in a manner consistent with their statutory obligations. We expect all parties to work together proactively from an early stage to help plan for state-academy development and to shape strong planning applications. This collaborative working would help to ensure that the answer to proposals for the development of state-funded schools should be, wherever possible, "yes."

The statement clearly emphasises that there should be a presumption in favour of the development of schools and that "Local Planning Authorities should make full use of their planning powers to support state-funded schools applications."

## Summary

Taking into consideration the site's Green Belt location a scheme has initially been and will continue to be carefully developed which seeks to not only meet relevant Department for Education requirements and best practice guidance regarding educational delivery, but to also minimise its impact on the openness of the surrounding area and to enhance the visual and leisure amenities of the locality where possible. Naturally any elements of the scheme's design will blend appropriately into its wider setting and will not detract unnecessarily from the visual amenities of the surrounding area. Design elements such as high levels of sustainable building measures will be a necessity not a nicety.

It is considered that the educational need and the lack of more appropriate alternative site options for the provision of the academy, combined with the proposed low impact design, high quality landscaping scheme and incorporation of high levels of sustainable build measures, amounts to a case of very special circumstances sufficient to justify the loss of some open space and the provision of the academy in this Green Belt location.

We respectfully request LB Hillingdon's support for the principles of the project outlined in this document and agree to the proposal for a new academy to be built on the land specified either on an area of de-restricted green belt or to be built on the land as an exceptional case whilst retaining the green belt status. This would then allow The Douay Martyrs Academy, the



Diocese of Westminster and Trustees controlling Guys Investment Limited to engage with all stakeholders to develop a community solution meeting the needs and aspirations of all.

We submit our representation in a summary format by listing the reasons as to why the Hillingdon ought to accept the case for 'change of status' for the betterment of the community both in the short term and the longer term to provide a 21<sup>st</sup> Century educational facility and to make private land available to community to enhance the conservation area of the Ickenham for the wider community':

1. Authority is already granted to the local community to resolve and implement local plans to resolve local issues for the betterment of the community - we contend that our plan provides betterment to the community educational and recreational facilities with no worsening of those areas of land to be utilised;
2. There is a need to meet educational requirements for pupils and to provide the community with enhanced modern educational facilities at little cost to the community - this proposal provides the land to facilitate these needs and with scope to accommodate the to be identified amenity requirements of the community;
3. The project would provide an academy for the 21<sup>st</sup> Century and replace the condition-wise worst ranked school in the borough; a failing facility in need of re-instatement at a cost to the community and owners that could be more effectively delivered within a new build concept. The landowner facilitated the land availability reduces the overall project costs and makes the project potentially financially viable at no additional cost to the public or community. This is a once in a lifetime opportunity;
4. The costs to the public purse would be minimal and this assists government both national and local to direct funds where they are most urgently needed;
5. This opportunity creates a legacy. Master-planned, designed and built in the right manner, it creates public facilities the community can be proud of and enjoy for generations. Setting sustainability levels to the highest envisaged will ensure it has minimal impact on the environment, natural resources etc;
6. It establishes a solution to some short-term issues. The threat of school closure due to failing infrastructure is ever present given the condition of facilities at DMA and the changing climatic environment;
7. The community benefits from new educational facilities and also from new access to an equal 5 acres site adjacent to an existing conservation area that could be used by the community for new facilities - such as most formal recreation. The landowners are minded to gift the land to the community or under Trust for the community to Hillingdon - as past family members donated Milton Court to the Ickenham Community years ago;
8. The plan resolves years of planning issues along Long Lane and assists in traffic control or reduction of high risk to school pupils especially during rush hours;
9. The plan provides long term certainty for parents with regard to education in the local community and also caters for the pupil bulge already identified and reduces the misplacement of pupils outside local area;
10. The new academy replaces a very old out of date and overcrowded fully developed site that cannot be extended without severe disruption and additional costs which would have to borne;

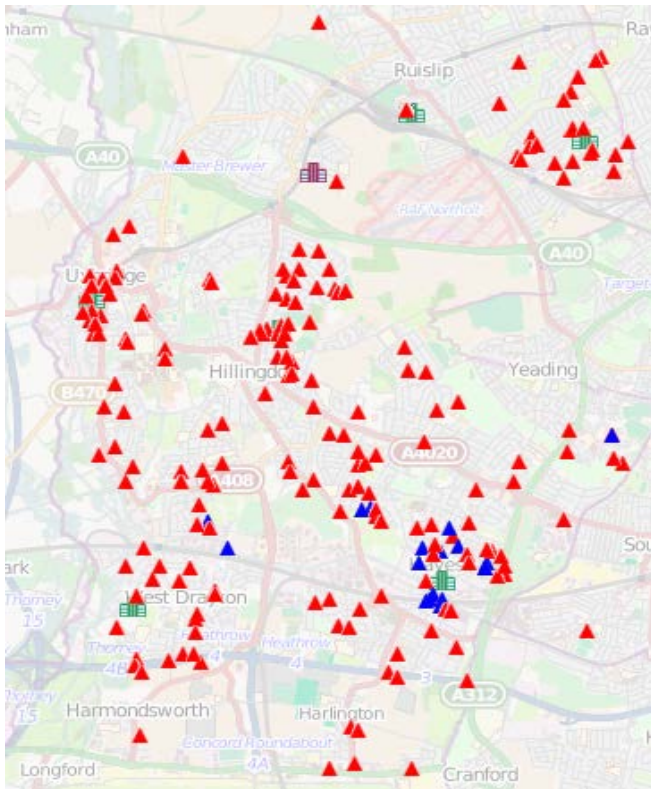
## Appendix i

### Primary Academy Trends

Hillingdon is served by 6 Catholic Primary schools. Together they offer 330 places per year as indicated on the table below. In recent years, the percentage of Catholic Children has been increasing year on year. In 2014, the percentage of Catholic Children starting academy in reception exceeded 91% of the total intake.

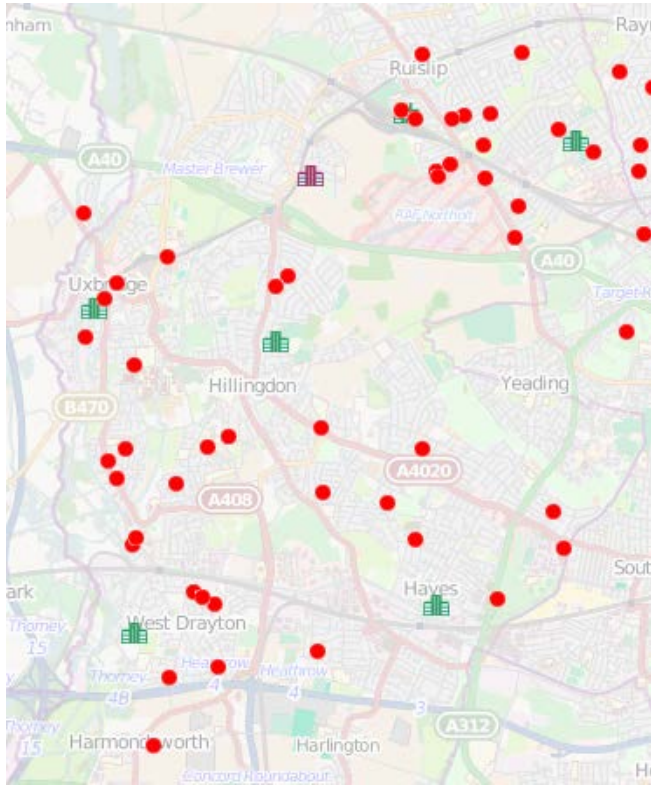
With Catholic admissions being the top priority, this then affects the probability of Non-Catholic children being offered a place. In 2014 more than 450 Non-Catholic children expresses an interest in a place in one of the 6 Hillingdon Catholic Primary Schools. Only 29 applications were successful and the majority of these were for the younger siblings of Non-Catholic children already attending a Catholic Academy. The success rate for Non-Catholic applicants is less than 7%.

|                  | Region of Hillingdon | Number of Pupils Admitted to Reception Each Year |
|------------------|----------------------|--|
| Botwell House    | Hayes                | 90   |
| St Bernadette    | Hillingdon           | 60   |
| Sacred Heart     | Ruislip              | 90   |
| St Catherine     | West Drayton         | 30   |
| St Mary          | Uxbridge             | 30   |
| St Swithun Wells | South Ruislip        | 30   |
| Total            |                      | 330  |



Map 2: Admissions to Hillingdon Catholic Primary Schools – September 2014

The key to the information contained in this map is the same as for map 1 above. Once again it is clear that the vast majority of children live in close proximity to their primary schools and within the administrative area of the London Borough of Hillingdon. Before considering the projected longer-term impact on secondary academy



Map 3: Unsuccessful Catholic Primary Academy Applicants – September 2014

This map only refers to Catholic Applicants. In September 2014, 93 children, confirmed as Catholics, failed to secure a place in a Catholic Primary Academy. As stated above, Hillingdon has not expanded provision in local Catholic Primary Schools. Instead, the council has pursued a policy that focuses on the expansion of Community schools. The net result is that more than 90 Catholic Children are currently taking up places in Community Schools.

## Appendix ii Planning history and existing uses

### Site and Planning History

The two fields are some 15 acres remaining of the 1382 acre Swakeleys Estate that was auctioned off in July 1922 and represent the last part of the five lots, mainly awkward pieces of fields which were cut off by the newly built railway line, that were advertised at that time as building land.

The estates nine farms were mainly sold off in their entirety including Long Lane Farm bought by Mr Edward Dalton, and Ivy House Farm, Milton Farm, Church Farm and Glebe Farm which were purchased by West Middlesex Development Company, who had entered an agreement with Uxbridge Urban District Council in 1927, to develop the Ivy House Farm estate in accordance with the principals of a Town Planning Scheme then being prepared by the Council. Both Milton Farm and Glebe Farm continued as farms for some years, though with depleted amounts of land. By 1937 the Reverend Guy had acquired them and in 1939 the Ickenham Garden City in conjunction with the District Council was begun. The City development was halted during the war years and then completed soon thereafter on a reduced scale although the existing Milton Court and surrounding housing and roads illustrate the innovative and modern style of housing development then completed in conjunction with the Uxbridge District Council. In addition, it is noteworthy that the 'existing large green open space' of Milton Court was donated by his brother Mr Waldo Guy to the Ickenham residents as a 'free open community space' for the relaxation and enjoyment of the residences.

The farm land that was not used due to the 'austerity measures of the 2nd World War' for the Ickenham Garden City were then placed into Trust and the remaining parcels of all that land are these fields owned by Guys Investments Limited under Trust ownership for the surviving family beneficiaries of the late Reverend Guy and his brother.

In the late 1940's plans were drawn up for a major housing estate in Ickenham to the east of the railway line replete with houses, schools, cinema and shops. Both Burnham Avenue and the Glebe Primary Academy were built at this time and some of the land became part of the Middlesex Green Belt. In the 1950's houses were still being built in Clovelly Close and Clovelly Avenue, which was the site of Glebe Farm. Indeed Clovelly Avenue terminates abruptly at the site boundary. The public highway, associated footpaths and utilities and services are all terminated in anticipation of further residential development southwards into the Glebe Farm fields. The Glebe Farm 'home' grazing fields are the fields associated with this Representation on behalf of the three parties.

At the time of the Borough of Hillingdon's Unitary Development Plan – draft 1993 representation was made by the Trustees to permit a relaxation of the Green Belt status to accommodate a re-development of the Douay Martyrs Academy in order that the academy could expand and cater for the rising number of children within the academy's catchment area. The Trust in conjunction with the Academy head – Lady Stubbs - presented to the Inquiry and whilst the Inspector both commended and supported the re-development scheme he was unable to 'rule' on the submission as it fell outside the specific remit of the inquiry.

### Previous plans for fields

During the period of the Unitary Plan's development the academy applied for temporary classrooms which was deferred, and the Trust itself received an offer to purchase the 'Fields' for use as an educational expansion and re-siting of the Douay Martyrs Academy on a single site by the Hillingdon Council itself. In the years following we also received another request from the Diocese of Westminster to use some of the land to develop and expand the academy due to cater for the intake of pupils, and to resolve 'wasted educational time by making the scheme more efficient.

Following the Unitary Plan presentation and in the later 1990's further reviews of the fields and how they could be used under 'exceptional circumstances' were investigated both by the Trust and the academy. In addition the academy undertook 'land'

searches within the local area to find an alternative site and the last of these 'joint approaches' failed to become viable in 2012 to the developer on the Hillingdon Circus site.

During the whole of this period – 1991 through to 2010 – the Trust has taken a supportive role to the academy – now an Academy – to both donate and provide adequate land within the field site for the development of a single site new academy/academy for the benefit of the community. The Academy Governors have continued to search for or join a developer on another site but these attempts have failed due to the 'cost to the Diocese' of the land required and the associated costs of re-building. A number of temporary alternatives have been implemented during the period including a second site on the opposite side of the road, an expansion of classrooms on the main site, and a re-allocation of playing fields and space for the pupils around the Ickenham Manor. However, all this changes have not resolved the main issue in that the academy cannot 'expand' pupil numbers or 'grow' the educational benefits to pupils on the existing sites due to site constraints, an inability to make the two site location more efficient, and is unable to achieve standards of educational excellence for pupils with the restrictive loss of teaching time and 'educational wasted time' due to pupils transferring themselves from one site to another.

Since 2010 the Trustees have become more pro-active in renewing their attempts to assist the Academy and the Diocese to re-solve all the issues in providing 'educational' land at no cost, financial support to unlock the potential of the existing academy sites, and to achieve a resolution of this community issue that has remained unresolved for over 30 years.

#### Existing Uses

The 15 acres are designated as a registered agricultural holding and the land is currently being used for grazing purposes and is currently leased on an annual basis to the Dalton Family Trust of Long Lane Farm. It should be noted that while there is relatively unfettered public access to the site, this at the benevolence of the landlord.

This representation has sought to demonstrate the extensive works undertaken in looking at a viable solution for Douay Martyrs Academy, works that through various policy and government funding cycles has been ongoing for over 20 years. The stakeholders instructed an analysis of the available options:

1. Expansion on the existing site
2. Relocation to a site outside of LB Hillingdon but within Diocese acceptable parameters
3. Sites available within LB Hillingdon

#### 1. Expansion on the existing site:

The twin sites of the existing academy are already over developed and under capacity (on current intake at Governors interim agreement – notwithstanding current policy on staying on levels post 16). Whilst an expansion of the academy on its existing sites is technically possible, LB Hillingdon would have to:

- iv. Consent to buildings of significant height and density ratios that transgress policy in an area that comprises of mainly residential housing;
- v. fund the demolition and rebuild of the whole academy;
- vi. address how the academy's buildings (that are on two sites separated by a busy main road) become viable in the future – all facilities cannot be accommodated on one site; As Ofsted have frequently commented this factor 'affects punctuality to lessons as well as presenting difficulties for the academy and the students'.
- vii. arrange for the academy to be accommodated in temporary facilities for the 24 – 30 months required to complete the work

**Outcome: This is not a realistic option as its impact on educational standards is unacceptable.**

#### 2. Relocation to a site outside of Hillingdon:

Whilst it might be possible to find a potential site for the academy outside of the Borough, if relocated, it could not continue to serve its current communities and feeder primary schools. In reality, the academy would fill with Catholic children but these children would be from the area immediately surrounding the new site. The supply of places for Catholic residents of Hillingdon would be significantly reduced, severely limiting the options of a significant portion of the electorate.

**Outcome: This is not a realistic option as the Diocese and academy are committed to serving the community of Hillingdon and supporting all LB Hillingdon efforts in addressing the demographic pressures faced.**

#### 3. Relocation within LB Hillingdon:

Based in Ickenham, Douay Martyrs is reasonably accessible to Catholic residents throughout the Borough. The original siting of Catholic Secondary Schools, by the Diocese of Westminster, was planned to ensure that every academy had a strong catchment area whilst offering parents a certain amount of choice. As determined by those who established the academy in the first place, if the academy is to be relocated within the Borough, it will be necessary to identify and secure a suitable site within 1 mile of the current academy. Furthermore, public transportation must be equal to or better than those servicing the existing site. Cycling options must also be viable.

#### The Site Selection Process

In view of the above, a sequential assessment has been carried out that identifies sites within and close to the area of greatest need, of sufficient size to accommodate the new academy and reasonably available to the Council (as the body with responsibility to purchase land for educational purposes).

The site search sought to identify suitable sites in planning terms, but also taking into consideration educational requirements, for the provision of a new ten-form of entry secondary academy within the Hillingdon area. Essentially, the primary criteria in selecting sites suitable for the new academy were to identify: sites of a sufficient size; sites which would allow the greatest numbers of staff and students to walk, cycle or use public transport to get to the academy, rather than car; sites which were reasonably available within the time and budgets available to the Council; and sites which were most appropriate from a planning perspective.

Taking into consideration the geographical area within which the new academy is required, and following a review of the adopted and emerging Local Plans, discussions with Council Officers, a desk based assessment and an 'on the ground' analysis of potential locations, only two sites have been identified, where there could be potential to provide a academy.

Once identified these sites was assessed against a basic set of criteria, including the following (in no particular order of importance):

- i. Location
  - ii. Size and physical constraints
  - iii. Accessibility
  - iv. UPD designations
  - v. Availability
- i. Location

The location of the academy site is an important factor to not only ensure that it appropriately serves the area of greatest need but to also ensure the long-term success of the academy. In determining the location, sustainability has been an important consideration. Schools are major generators of traffic and, as such, it is vital that that they are located so as to maximise their accessibility by walking, cycling and public transport. This has been a significant factor in determining the appropriateness of sites. Notwithstanding the above, there are a number of factors that can influence the location of the site and it is important that a balance is struck between all relevant criteria.

ii. Size

The size of the site is a critical factor in determining its suitability for a secondary academy. The Education (Academy Premises) Regulations 1999 - enshrined in Guidance BB98 and updated in BB103 (secondary) - sets out specific requirements for academy premises. An academy to accommodate circa 2,000 pupils (ten form of entry plus 100% staying on rate in sixth form) would require the following allowances – demonstrated against the current arrangements:

| Building                  | Current | BB98   | BB103 (S) |
|---------------------------|---------|--------|-----------|
| pupil numbers             | 1,680   | 2,100  | 2,100     |
| Total net building area   | 9,040   | 11,170 | 10,473    |
| Total gross building area | 11,752  | 15,920 | 15,230    |
| efficiency - footprint    | tbc     | 6,368  | 6,092     |

| Site area                 | Current | BB98    | BB103 (S) |
|---------------------------|---------|---------|-----------|
| Net site area             | 54,340  | 111,700 | 56,800    |
| Confined net site area    | n/a     | 11,200  | tbc       |
| usable site area external | -       | -       | -         |

By the latest academy regulations, BB103 (secondary) circa 15,000 m2 of floorspace plus circa 50,000 m2 for external areas (inclusive of playing pitches, (grass) informal play areas, hard surfaces for games courts, hard surfaces for play areas, etc.) - based on a 50% efficiency in building footprint (by using flexible site design)

averaging 2.5 stories across the development) and the need to provide appropriate access, parking and landscaping, a minimum site area of approximately 5 hectares is required.

### iii. Accessibility

The selected site should have good accessibility for pedestrians, cyclists and those using public transport in order to reduce dependency on private car use and minimise the impact of the development on the surrounding highway network and local air quality. The academy will have a Green Travel Plan which will encourage use of sustainable modes of transport, walking and cycling to academy, car sharing schemes, etc, and, as such, it is important that the academy is located within a convenient walking and cycling distance from the greatest number of pupils possible. Furthermore, the Council is required to make transport arrangements for pupils who cannot be offered places within reasonable travel distance of their home address (and, as such, financially, it is not viable to locate the academy too far away from the majority of pupils likely to attend it.

### iv. UDP designations

In reviewing the appropriateness of any site due regard must be given to relevant policies and designations as set out in the Hillingdon Unitary Development Plan Saved Policies (September 2007).

In this case, the site selection, based on UDP policies, would have the following order of preference:

Existing academy sites

Brownfield land

Land designated for other uses (i.e., housing, industrial, etc)

Green Belt

In addition to the specific site designations, constraints such as flood zone, the location of high quality trees, proximity to and potential impact on listed buildings, etc, also heavily influence the site selection.

### v. Availability

The proposed academy must be delivered to a programme driven by the demographic challenge and other condition driven factors and within budget and, as such, the availability of sites to the Council is also an important consideration in determining their feasibility for a site for the academy.

Where a privately owned site was considered it was vital that this could be made available within a timely manner and at a reasonable cost. There is concern that, given the timescale in which the new academy must be delivered, the current very dynamic residential market, competition and timescale of land transactions could significantly complicate and delay the delivery of the academy.

The two sites that emerged were:

1) former Master Brewer - Hillingdon Circus site

This site emerged as a credible alternative for a academy when assessed against criteria i. through to iii., albeit LB Hillingdon acknowledges in its own assessment of this site that a significant objection was the impact a current application would both have on traffic and pollution. The area is an Air Quality Management Area, which means with even current traffic levels it's already exceeding the pollution quotas for the European Union. Further concerns were raised about: " The longer it takes people to cross a road the more likely they are to ignore the traffic light system and cross when they see a chance, not when the light turns green. That could be very dangerous - especially for young children."

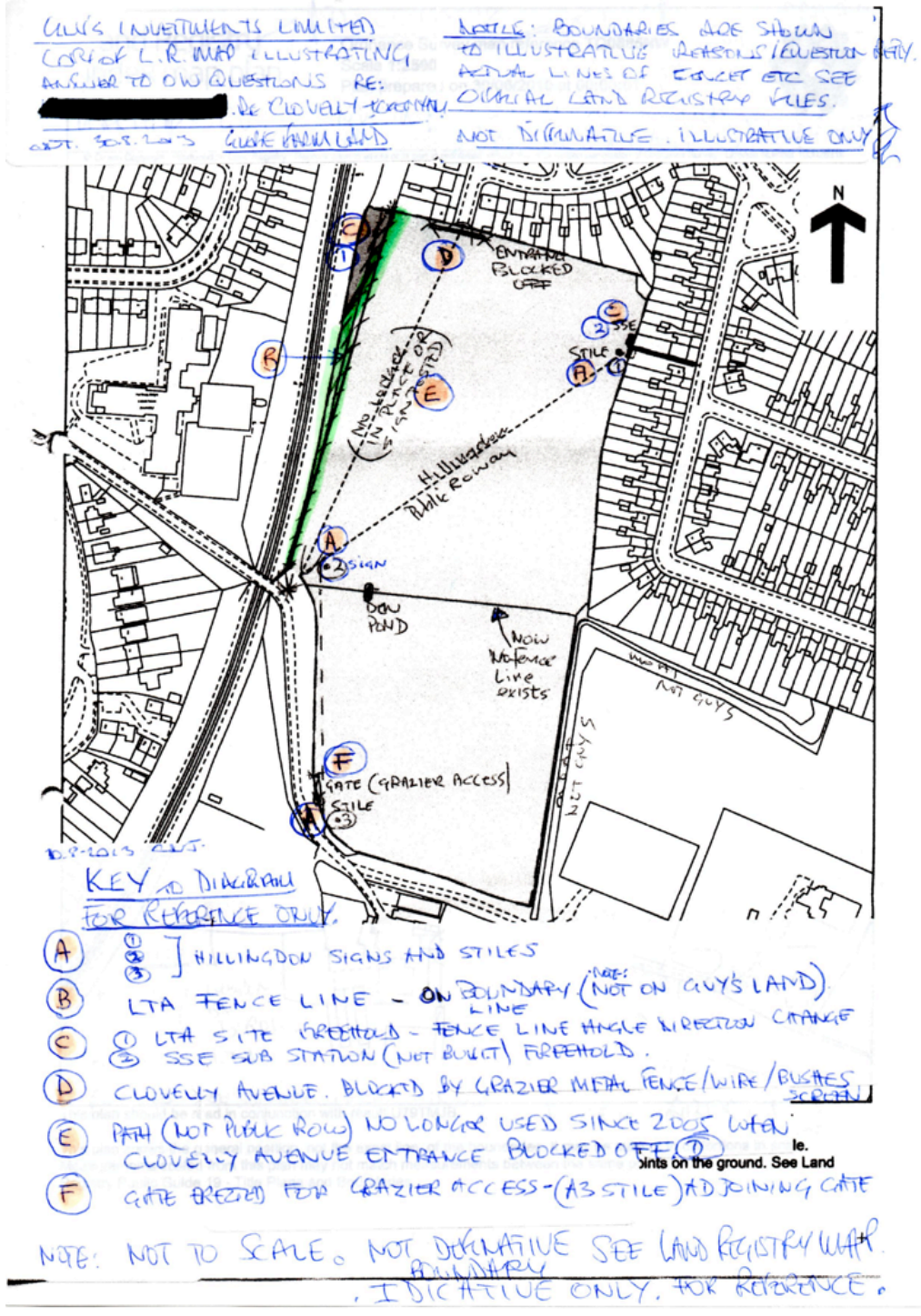


In terms of criteria iv., its designation is 'Land designated for other use' and unfortunately LB Hillingdon has recently resolved to grant permission for a mixed use - Retail, Hotel and Residential development. This recent approval hence negates criteria v. from being an influencing factor as the owner (even acknowledging the transfer from Tesco to a new owner) is developing out to this permission.

## 2) The Douay Martyrs Academy own site in conjunction with adjoining land at Glebe Farm

This site emerges as the most credible alternative and only real viable option as it scored very favourably on criteria i. through to iii. On criteria v., it also scored heavily as the landowner has positively been supporting any academy development scheme for the past 20 years and is happy to implement immediately, post the appropriate statutory approvals being in place. Notwithstanding this statutory obstacle, the benefits of creating a single site Douay Martyrs campus including their playing fields have outstanding education possibilities.

The stakeholders resolved to endorse the Douay Martyrs Academy own site in conjunction with adjoining land at Glebe Farm option as their favoured solution and approach LB Hillingdon and the community as appropriate. It was further determined that elements of enabling development should be considered in order to provide a potentially 'zero cost to the public purse' solution.





# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |  |              |  | 2. Agent's Name and Address (if applicable) |             |
|----------------------------|--|--------------|--|---|-------------|
| Title                      |  |              |  | Title                                       | Mr          |
| First name                 |  |              |  | First name                                  | Christopher |
| Last Name                  |  |              |  | Last name                                   | Spiceley    |
| Organisation (if relevant) | Douay Martyrs Academy, RC Diocese of Westminster & Guys Investment Trust Ltd |              |  | Company                                     | f451        |
| Unit                       |  | House number |  | Unit  | [REDACTED]  |
| House name                 |  |              |  | House name                                  |             |
| Address 1                  |  |              |  | Address 1                                   |             |
| Address 2                  |  |              |  | Address 2                                   |             |
| Town                       |  |              |  | Town  |             |
| County                     |  |              |  | County                                      |             |
| Postcode                   |  |              |  | Postcode                                    |             |
| Telephone                  |  |              |  | Telephone                                   |             |
| Email                      |  |              |  | Email                                       |             |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2        |                                   | Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|--------------------------|-----------------------------------|--|---|
| <input type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/> | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |   |
|-------------------------------|---|
| Policy number;                | Policies referred to in 1.10 of Local Plan Part 2 |
| Paragraph number;             | 1.10 of Local Plan Part 2                         |
| Table or figure number; or    |   |
| Map number (Atlas of Changes) |   |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                       |
|---|--------------------------|--------------------------|
| Sound?  | <input type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

Paragraphs 1.11 through 1.16

All six of these paragraphs come to the same conclusion. A conclusion that states that Hillingdon has assessed and determined that they have sufficiently accommodated for the forecast education capacity for 4 years only, when the Local plan should make allowances for a forward plan for ten years of additional provision. Even if said allocations of potential development are not ultimately required, creating capacity now is prudent forward planning, as demanded by the NPPF.

Please see attached sheet for full details.

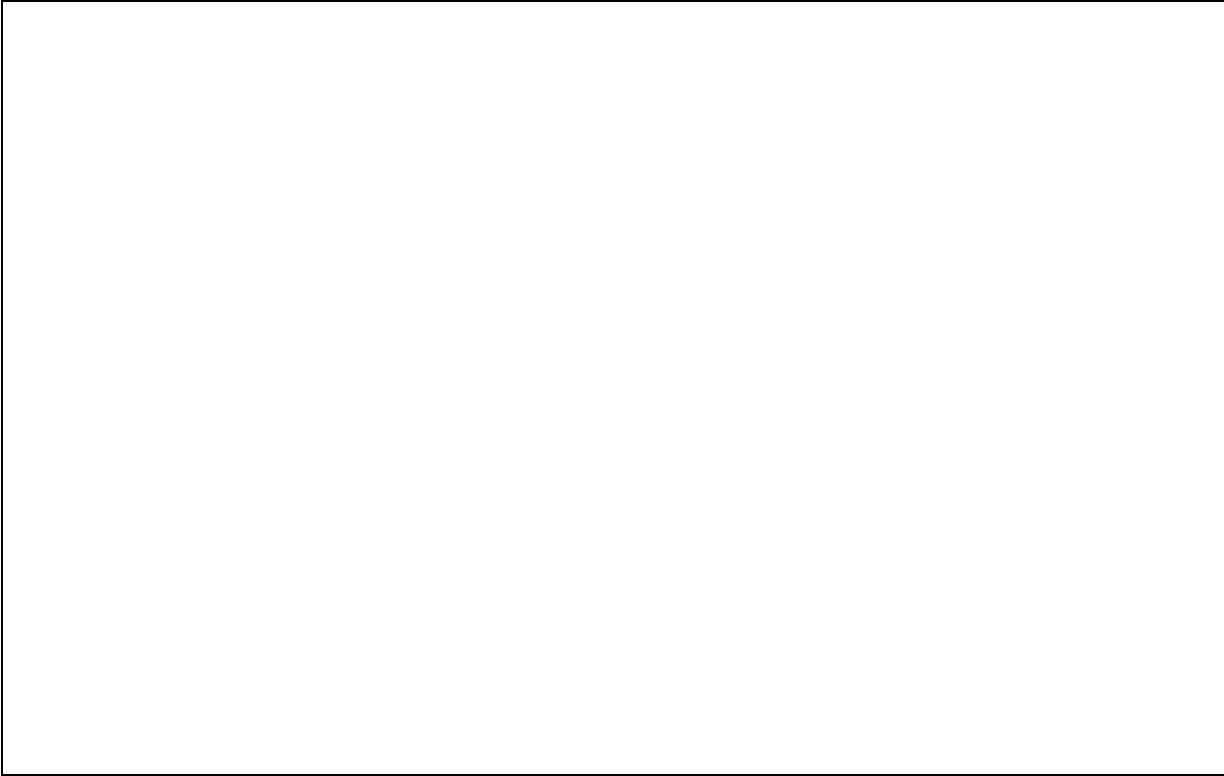
Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | <b>No, I do not want to participate in the oral examination</b> |
| <input type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

We wish to establish the case for a very special circumstances development on the Green Belt land identified. We would like the opportunity to put forward our points about the education need and how we will enhance the green belt amenity on this portion of land. The wider Hillingdon community must be given the chance to have its say.



**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## PART B - Your responses

Please complete Part B **for each representation** you wish to make. You do not need to complete Part A and C again.

**Q1.** I am commenting on proposed changes to: *(please tick relevant box)*

| Local Plan Part 2                   |                                   |
|-------------------------------------|-----------------------------------|
| <input type="checkbox"/>            | Development Management Policies   |
| <input checked="" type="checkbox"/> | Site Allocations and Designations |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|--|---|
| <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |



**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                                      |  |
|--------------------------------------|--|
| <b>Policy number;</b>                | Policies referred to in 5.7 of Local Plan Part 2 |
| <b>Paragraph number;</b>             | 5.7 of Local Plan Part 2                         |
| <b>Table or figure number; or</b>    |  |
| <b>Map number (Atlas of Changes)</b> |  |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is (please tick)**

|  | <b>Yes</b>               | <b>No</b>                |
|--|--------------------------|--------------------------|
| <b>Sound?</b>  | <input type="checkbox"/> | <input type="checkbox"/> |
| <b>Prepared in accordance with the duty to cooperate, legal and procedural requirements?</b> | <input type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below (Tick relevant box/es)**

|                          |  |                          |  |
|--------------------------|--|--------------------------|--|
| <input type="checkbox"/> | <b>It has not been positively prepared</b> | <input type="checkbox"/> | <b>It is not effective</b>                       |
| <input type="checkbox"/> | <b>It is not justified</b>                 | <input type="checkbox"/> | <b>It is not consistent with national policy</b> |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

5.7 Paragraph 8.24 of the Hillingdon Local Plan: Part 1 - Strategic Policies notes that

'The Council does not consider that major adjustments to Green Belt boundaries are necessary to accommodate growth over the period covered by the Plan. However, minor adjustments to the boundary will be undertaken in the Hillingdon Local Plan: Part 2 - Site Specific Allocations Local Development Document (LDD).'

5.8 The Council has undertaken a review of the Green Belt to underpin this Plan and identify:

Areas that no longer meet the purposes of including land in the Green Belt and should be removed

New areas of Green Belt that should be designated in accordance with paragraph 82 of the NPPF.

5.9

The outcome of the review undertaken is set out in the Hillingdon Green Belt Assessment Update 2013.

All three of these paragraphs come to the same conclusion. Hillingdon has consulted, as far it seems fit on the merits of proposals for Green Belt addition or deletions. This is incorrect as no such local level consultations on the merits or harm have been conducted or published. Paragraphs 5.7, 5.8 and 5.9 are incomplete as a key site has been omitted from the Local Plan Part 2 and hence the community have been omitted the opportunity to comment on the merits of a proposal that would increase amenity and protection to a green belt asset.

Most critically, New areas of Green Belt should be designated in accordance with the NPPF in full, not isolated paragraphs. Hence sites should equally be assessed against paragraphs 1 and 72 and the overall harm/benefit assessment made.

Please see attached sheet for full details.

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

**No, I do not want to participate in the oral examination**



**Yes, I would like to participate in the oral examination**

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

We wish to establish the case for a very special circumstances development on the Green Belt land identified. We would like the opportunity to put forward our points about the education need and how we will enhance the green belt amenity on this portion of land. The wider Hillingdon community must be given the chance to have its say.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and,**

**Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

**PART B - Your responses**

Please complete Part B **for each representation** you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| <b>Local Plan Part 2</b> |  |
|--------------------------|--|
| <input type="checkbox"/> | <b>Development Management Policies</b>   |
| <input type="checkbox"/> | <b>Site Allocations and Designations</b> |

| <b>Technical Reports (answer Q1 &amp; Q9 only)</b> |   |
|--|---|
| <input type="checkbox"/>                           | <b>Addendum to Sustainability Appraisal</b> |
| <input type="checkbox"/>                           | <b>Consultation Statement</b>               |

|                          |                                    |
|--------------------------|------------------------------------|
| <input type="checkbox"/> | Policies Map<br>(Atlas of Changes) |
|--------------------------|------------------------------------|

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | Addendum to the Strategic Flood Risk Assessment |
|--------------------------|---|

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                           |
|-------------------------------|---------------------------|
| Policy number;                | EM2                       |
| Paragraph number;             | 5.10 of Local Plan Part 2 |
| Table or figure number; or    |                           |
| Map number (Atlas of Changes) |                           |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is (please tick)**

|   | Yes                      | No                       |
|---|--------------------------|--------------------------|
| Sound?  | <input type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below (Tick relevant box/es)**

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

5.10 Policy EM2 seeks to protect areas of Metropolitan Open Land from development and also notes that Green Chains will be reviewed for designation as Metropolitan Open Land in accordance with London Plan policies. The Council has undertaken a review of its Metropolitan Open Land and designated Green Chains, which is set out in and the outcome of this work is also detailed in the Hillingdon Metropolitan Land and Green Chains Assessment April 2004. It is considered that the conclusions set out in the assessment continue to remain valid in underpinning this Plan.

Policy 5.10 is incomplete as a key site has been omitted from the Local Plan Part 2 and hence the community have been omitted the opportunity to comment on the merits of a proposal that would increase amenity and protection to a green belt asset.

Please see attached sheet for full details.

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                          |  |
|--------------------------|--|
| <input type="checkbox"/> | No, I do not want to participate in the oral examination |
| <input type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

We wish to establish the case for a very special circumstances development on the Green Belt land identified. We would like the opportunity to put forward our points about the education need and how we will enhance the green belt amenity on this portion of land. The wider Hillingdon community must be given the chance to have its say.



A large, empty rectangular box with a thin black border, intended for providing comments on the technical reports mentioned in the question below.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

A large, empty rectangular box with a thin black border, intended for providing comments on the technical reports mentioned in the question above.

Please continue on a separate sheet if necessary

## PART B - Your responses

Please complete Part B **for each representation** you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2        |                                   |
|--------------------------|-----------------------------------|
| <input type="checkbox"/> | Development Management Policies   |
| <input type="checkbox"/> | Site Allocations and Designations |
| <input type="checkbox"/> | Policies Map (Atlas of Changes)   |

| Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|--|---|
| <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                   |   |
|-------------------|---|
| Policy number;    | Policies referred to in 5.11 of Local Plan Part 2 |
| Paragraph number; | 5.11 of Local Plan Part 2                         |

|                               |  |
|-------------------------------|--|
| Table or figure number; or    |  |
| Map number (Atlas of Changes) |  |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is (please tick)**

|   | Yes                      | No                       |
|---|--------------------------|--------------------------|
| Sound?  | <input type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below (Tick relevant box/es)**

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

**5.11 On the basis of this evidence this chapter of the Plan which includes proposals for:**

- Metropolitan Open Land sites to be upgraded to Green Belt
- Areas forming links in Green Chains to be included in Green Belt
- Areas Forming Links in Green Chains to be included

## in Metropolitan Open Land

- New Areas Forming Links in Green Chains

Policy 5.11 is incomplete as a key site has been omitted from the Local Plan Part 2 and hence the community have been omitted the opportunity to comment on the merits of a proposal that would increase amenity and protection to a green belt asset.

Please see attached sheet for full details.

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | <b>No, I do not want to participate in the oral examination</b> |
| <input type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

We wish to establish the case for a very special circumstances development on the Green Belt land identified. We would like the opportunity to put forward our points about the education need and how we will enhance the green belt amenity on this portion of land. The wider Hillingdon community must be given the chance to have its say.

A large, empty rectangular box with a thin black border, intended for providing comments on the technical reports mentioned in the question below.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

A very large, empty rectangular box with a thin black border, occupying most of the lower half of the page, intended for providing detailed comments on the technical reports.

Please continue on a separate sheet if necessary

## PART B - Your responses

Please complete Part B **for each representation** you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2        |                                   |
|--------------------------|-----------------------------------|
| <input type="checkbox"/> | Development Management Policies   |
| <input type="checkbox"/> | Site Allocations and Designations |
| <input type="checkbox"/> | Policies Map (Atlas of Changes)   |

| Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|--|---|
| <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                   |   |
|-------------------|---|
| Policy number;    | Policies referred to in 5.12 of Local Plan Part 2 |
| Paragraph number; | 5.12 of Local Plan Part 2                         |

|                               |  |
|-------------------------------|--|
| Table or figure number; or    |  |
| Map number (Atlas of Changes) |  |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is (please tick)**

|   | Yes                      | No                       |
|---|--------------------------|--------------------------|
| Sound?  | <input type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below (Tick relevant box/es)**

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

**5.12 The review of existing Green Belt, Metropolitan Open Land and Green Chain designations have informed this chapter and the changes proposed in this Plan.**

Policy 5.12 is incomplete as a key site has been omitted from the Local Plan Part 2 and hence the community have been omitted the opportunity to comment on the merits of a proposal that would increase amenity and protection to a green belt asset.

Please see attached sheet for full details.



Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | <b>No, I do not want to participate in the oral examination</b> |
| <input type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

---

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

We wish to establish the case for a very special circumstances development on the Green Belt land identified. We would like the opportunity to put forward our points about the education need and how we will enhance the green belt amenity on this portion of land. The wider Hillingdon community must be given the chance to have its say.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART B - Your responses**

Please complete Part B **for each representation** you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| <b>Local Plan Part 2</b>            |                                   |
|-------------------------------------|-----------------------------------|
| <input type="checkbox"/>            | Development Management Policies   |
| <input checked="" type="checkbox"/> | Site Allocations and Designations |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| <b>Technical Reports (answer Q1 &amp; Q9 only)</b> |   |
|--|---|
| <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                                      |  |
|--------------------------------------|--|
| <b>Policy number;</b>                | Policies referred to in 7.9 of Local Plan Part 2 |
| <b>Paragraph number;</b>             | 7.9 of Local Plan Part 2                         |
| <b>Table or figure number; or</b>    |  |
| <b>Map number (Atlas of Changes)</b> |  |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|  | Yes                      | No                       |
|--|--------------------------|--------------------------|
| <b>Sound?</b>  | <input type="checkbox"/> | <input type="checkbox"/> |
| <b>Prepared in accordance with the duty to cooperate, legal and procedural requirements?</b> | <input type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

**7.9 The updated forecast shows a longer-term sustained pressure for additional secondary school places, rising to 27 additional forms of entry over the next 8 years, with pressure for places commencing from 2016/17 onwards. In particular, the forecast need for additional secondary school places is higher in the north / central parts of the Borough, where there tends to be higher numbers of pupils living outside the Borough travelling to**

a Hillingdon school.

It is unclear from policy 7.9 how this assessment has been arrived at. The parties to our representation are unaware any consultation that addresses this fundamental piece of education policy making. We have grave reservations that Hillingdon's 'assessment' has missed key influences on pupil place planning, for example:

Catholic migration due to success of catholic secondary schools in neighbouring boroughs

Increased housing in Hayes and Harlington (further exacerbated by policies in this Local Plan Part 2) that are Douay Martyrs core catchment area

Note: Douay Martyrs currently has close to 50% non-Catholic students, by their admission criteria these non-Catholic 'spaces' will dwindle as more Catholics request spaces at Hillingdon secondary schools (on presumption that they indicate DMA – an outstanding school - as preference). These non-Catholics will need to be accommodated in the community state schools.

Please see attached sheet for full details.

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                          |  |
|--------------------------|--|
| <input type="checkbox"/> | No, I do not want to participate in the oral examination |
| <input type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

We wish to establish the case for a very special circumstances development on the Green Belt land identified. We would like the opportunity to put forward our points about the education need and how we will enhance the green belt amenity on this portion of land. The wider Hillingdon community must be given the chance to have its say.

A large, empty rectangular box with a thin black border, intended for providing comments on the technical reports mentioned in the question below.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## PART B - Your responses

Please complete Part B **for each representation** you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   |
|-------------------------------------|-----------------------------------|
| <input type="checkbox"/>            | Development Management Policies   |
| <input checked="" type="checkbox"/> | Site Allocations and Designations |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|--|---|
| <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |



**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                                      |   |
|--------------------------------------|---|
| <b>Policy number;</b>                | Policies referred to in 7.10 of Local Plan Part 2 |
| <b>Paragraph number;</b>             | 7.10 of Local Plan Part 2                         |
| <b>Table or figure number; or</b>    |   |
| <b>Map number (Atlas of Changes)</b> |   |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is (please tick)**

|  | <b>Yes</b>               | <b>No</b>                |
|--|--------------------------|--------------------------|
| <b>Sound?</b>  | <input type="checkbox"/> | <input type="checkbox"/> |
| <b>Prepared in accordance with the duty to cooperate, legal and procedural requirements?</b> | <input type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below (Tick relevant box/es)**

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

7.10 An initial appraisal of secondary school sites across the Borough to consider the potential for expansion has been completed. In addition, expansion projects are already underway at Abbotsfield, Swakeleys and Northwood Secondary Schools. The Council is of the view that the need for secondary places over the next 4 years can be met from the expansion of existing schools.

It is unclear from policy 7.10 how this assessment has been arrived at. The parties to our representation are unaware any consultation that addresses this fundamental piece of education policy making. We have grave reservations that Hillingdon's 'assessment' has missed key influences on pupil place planning, for example:

Catholic migration due to success of catholic secondary schools in neighbouring boroughs

Increased housing in Hayes and Harlington (further exacerbated by policies in this Local Plan Part 2) that are Douay Martyrs core catchment area

Note: Douay Martyrs currently has close to 50% non-Catholic students, by their admission criteria these non-Catholic 'spaces' will dwindle as more Catholics request spaces at Hillingdon secondary schools (on presumption that they indicate DMA – an outstanding school - as preference). These non-Catholics will need to be accommodated in the community state schools.

7.10 An initial appraisal of secondary school sites across the Borough to consider the potential for expansion has been completed. In addition, expansion projects are already underway at Abbotsfield, Swakeleys and Northwood Secondary Schools. The Council is initially of the view that the need for secondary places over the next 4 years can be met from the expansion of existing schools but in order to plan properly for a potential

increase beyond early projections, we feel it prudent to consult with the community on an expansion at Douay Martyrs.

Please see attached sheet for full details.

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                          |  |
|--------------------------|--|
| <input type="checkbox"/> |  |
|--------------------------|--|

|                          |   |
|--------------------------|---|
|                          | <b>No, I do not want to participate in the oral examination</b> |
| <input type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

We wish to establish the case for a very special circumstances development on the Green Belt land identified. We would like the opportunity to put forward our points about the education need and how we will enhance the green belt amenity on this portion of land. The wider Hillingdon community must be given the chance to have its say.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART B - Your responses**

Please complete Part B **for each representation** you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| <b>Local Plan Part 2</b> |  |
|--------------------------|--|
| <input type="checkbox"/> | <b>Development Management Policies</b> |

| <b>Technical Reports (<i>answer Q1 &amp; Q9 only</i>)</b> |   |
|---|---|
| <input type="checkbox"/>                                  | <b>Addendum to Sustainability Appraisal</b> |

|                          |                                   |
|--------------------------|-----------------------------------|
| <input type="checkbox"/> | Site Allocations and Designations |
| <input type="checkbox"/> | Policies Map (Atlas of Changes)   |

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | Consultation Statement                          |
| <input type="checkbox"/> | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |   |
|-------------------------------|---|
| Policy number;                | Policies referred to in 7.11 of Local Plan Part 2 |
| Paragraph number;             | 7.11 of Local Plan Part 2                         |
| Table or figure number; or    |   |
| Map number (Atlas of Changes) |   |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is (please tick)**

|   | Yes                      | No                       |
|---|--------------------------|--------------------------|
| Sound?  | <input type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below (Tick relevant box/es)**

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

Currently policy 7.11 is insufficient in that it does not go far enough in planning for future provision. Hillingdon has not investigated far enough or even deemed to consult with the Hillingdon community about the possibility of the outlined proposals we submit.

7.11 For the period beyond that to ensure capacity is available for every Hillingdon student, current existing successful schools should be considered for expansion. All potential opportunities will be consulted on to ascertain if the potential benefit outweighs perceived harm.

Please see attached sheet for full details.

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | <b>No, I do not want to participate in the oral examination</b> |
| <input type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

We wish to establish the case for a very special circumstances development on the Green Belt land identified. We would like the opportunity to put forward our points about the education need and how we will enhance the green belt amenity on this portion of land. The wider Hillingdon community must be given the chance to have its say.



A large, empty rectangular box with a thin black border, intended for providing comments on the technical reports.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

A large, empty rectangular box with a thin black border, intended for providing detailed comments on the technical reports.

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | When the Local Plan Part 2 Plan has been submitted for independent examination.   |
| <input type="checkbox"/> | The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2. |
| <input type="checkbox"/> | The adoption of the Local Plan Part 2.  |

## Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

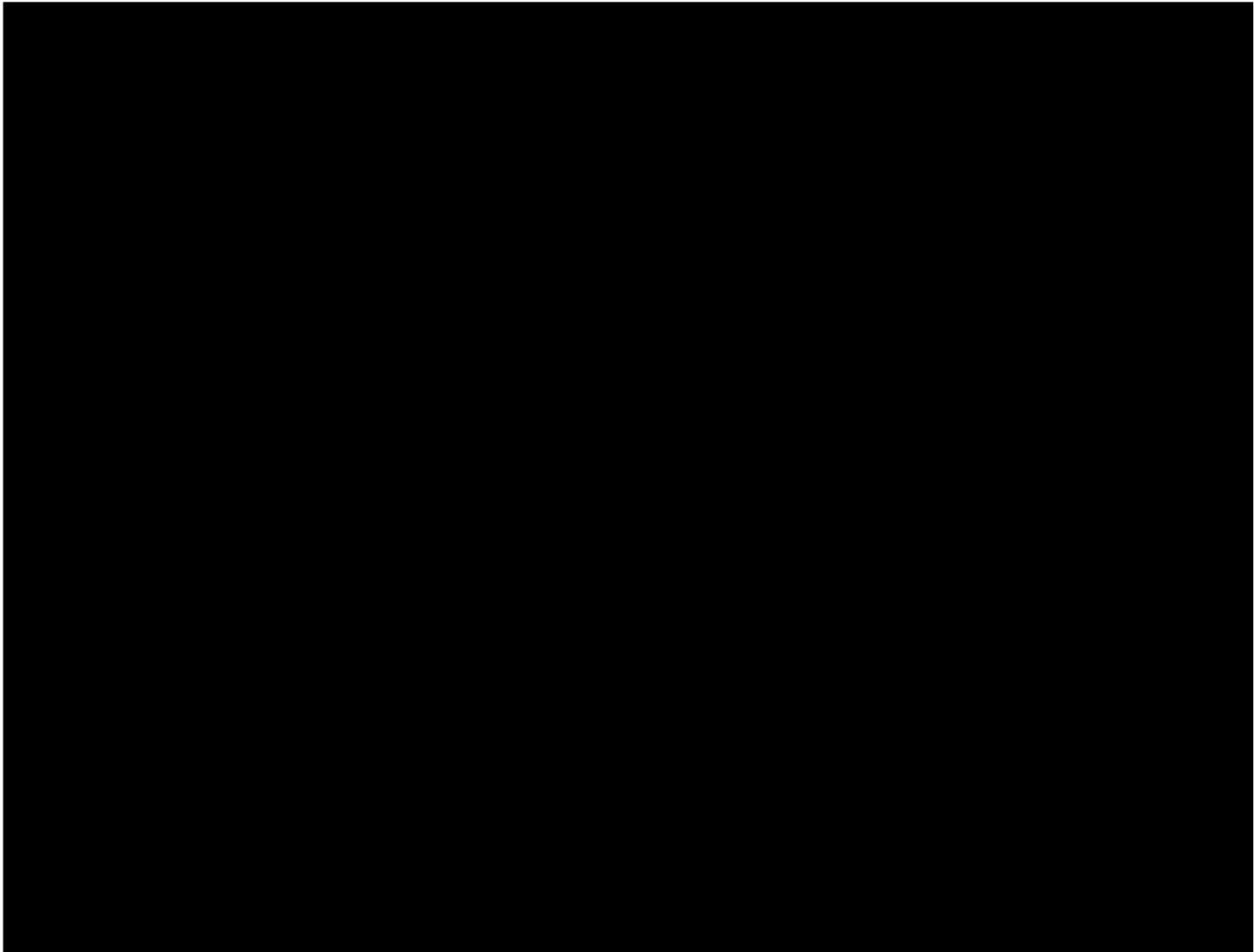
- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## **Monitoring Questions**

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.





# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |                     |              |  |
|----------------------------|---------------------|--------------|--|
| Title                      | Mrs                 |              |  |
| First name                 | Claire              |              |  |
| Last Name                  | McLean              |              |  |
| Organisation (if relevant) | Canal & River Trust |              |  |
| Unit                       |                     | House number |  |
| House name                 |                     |              |  |
| Address 1                  |                     |              |  |
| Address 2                  |                     |              |  |
| Town                       |                     |              |  |
| County                     |                     |              |  |
| Postcode                   |                     |              |  |
| Telephone                  |                     |              |  |
| Email                      |                     |              |  |

| 2. Agent's Name and Address (if applicable) |  |              |  |
|---|--|--------------|--|
| Title                                       |  |              |  |
| First name                                  |  |              |  |
| Last name                                   |  |              |  |
| Company                                     |  |              |  |
| Unit  |  | House number |  |
| House name                                  |  |              |  |
| Address 1                                   |  |              |  |
| Address 2                                   |  |              |  |
| Town  |  |              |  |
| County                                      |  |              |  |
| Postcode                                    |  |              |  |
| Telephone                                   |  |              |  |
| Email                                       |  |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input checked="" type="checkbox"/>                  | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                  |
|-------------------------------|------------------|
| Policy number;                | DMHB 20          |
| Paragraph number;             | I,ii,iii,iv,v,vi |
| Table or figure number; or    |                  |
| Map number (Atlas of Changes) |                  |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/>            | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input type="checkbox"/>            | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

We disagree with criterion i) of this policy. There is no reason why moorings cannot be located on rural stretches – this happens all across our network and is entirely **in keeping** with the use of the inland waterway network. We assume that the policy intends to state that *residential* moorings should generally be located on urban stretches, but still disagree that these could be deemed incongruous or out of keeping, when they are part of the fabric of the canals and their heritage. The mooring of boats on the waterway is part of their character, whether rural or urban, and there can often be very little visual difference between a long term leisure or visitor mooring (which do not require planning permission) to a permanent residential mooring. We therefore do not consider this part of the policy to be justified, and request it be deleted. We would instead accept the following wording:

“i) Locations near town centres and in close proximity to public transport will be prioritised, particularly in light of the need to animate water space through town centres to reduce anti-social behaviour through passive surveillance, and to take advantage of Crossrail improvements.”

With regard to criterion ii), we consider that boating is an entirely appropriate use of the Blue Ribbon Network so it is not appropriate to say that *“moorings should be located so that they do not interfere with other uses of the canal, or use of the bank or towpath”*. Moorings are integral to the canal and require use of the towpath. This is emphasised in our national towpath policy, which states in Principle 5: “.. in general priority should be given to the slowest and those using the waterway”, the latter referring to boaters operating locks and using the navigation for its primary purpose. We request that this be re-worded to state:

“ii) the establishment of permanent moorings should be carefully considered amongst the mix of other leisure and recreational activities on and next to the canal so that one use does not unduly cause detriment to other uses (e.g. walking, cycling, fishing, etc.). If possible, off-line locations such as within a marina or layby, will be preferred.”

We would query if criterion iii) is effective as it is not clear what a ‘barrier’ could be interpreted

as. We would suggest the following wording:

“iii) the number and density of boats moored at any point should be appropriate to the number and density of boats moored at any point should be appropriate to the location and include ample breaks to ensure views of the open water space is not unduly limited from the towpath.”

Criterion v) is not effective as the type of moorings or services are not clarified. Boats are generally fairly self-sufficient, and can exist with services provided around the network. There are a variety of different residential mooring sites on canals, some with all services (telephone, foul, water, electric, but others with no facilities whatsoever. We would suggest the following wording:

“v) adequate service facilities for receiving post and deliveries, for waste collection and where appropriate utility connections, should be provided.”

Criterion vi) should read:

“vi) development must take account of the Canal & River Trust’s emerging London Mooring Strategy and "Hillingdon Towpaths, June 2015".

The London Mooring Strategy is only currently being scoped out, but the AINA’s advisory document ‘Residential Use of Inland Waterways’ would be useful for reference within the text.



Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

To ensure that our representations are clearly understood, particularly as we have not had any feedback on our original comments from the 2014 consultation, and these do not appear to have been taken into account.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

The Canal & River Trust's comments submitted in November 2014 do not appear in the Consultation Statement, and therefore do not appear to have been taken into account.

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | When the Local Plan Part 2 Plan has been submitted for independent examination.   |
| <input type="checkbox"/> | The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2. |
| <input type="checkbox"/> | The adoption of the Local Plan Part 2.  |

## Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

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**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

### 1) What is your gender?

Male  Female

### 2) To which age group do you belong?

under 15  25 – 44  65 – 85  
 15 - 24  45 - 64  85+

### 3) Do you consider yourself to be a disabled person?

No  Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                               |
|-------------------------------|-------------------------------|
| Policy number;                | DMEI 8: Waterside Development |
| Paragraph number;             |                               |
| Table or figure number; or    |                               |
| Map number (Atlas of Changes) |                               |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                                     |   |
|--------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/>            | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

With regard to criterion A) ii) there may be occasions where developments rising sheer out of the canal on the non-towpath side will be appropriate. This occurred historically with industrial buildings being built right up to the canal edge to take advantage of the canal transportation system. We do not consider it necessary to apply a blanket approach to waterside development, when every site proposal should be assessed on its merits, and to insist that a 5 metre space be left could create unsightly 'dead' space, susceptible to anti-social behaviour or fly tipping next to the canal.

We support criterion F and the requirement for development to contribute to biodiversity improvements. We would suggest that these should not be restricted to biodiversity improvements as development can put increased pressure on the canal network in a variety of other ways, such as wear of the towpaths, and request that this policy be widened to read "...will be expected to contribute to improvements to the canal, and to biodiversity."

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

To ensure that our representations are clearly understood, particularly as we have not had any feedback on our original comments from the 2014 consultation, and these do not appear to have been taken into account.



**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

The Canal & River Trust's comments submitted in November 2014 do not appear in the Consultation Statement, and therefore do not appear to have been taken into account.

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | When the Local Plan Part 2 Plan has been submitted for independent examination.   |
| <input type="checkbox"/> | The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2. |
| <input type="checkbox"/> | The adoption of the Local Plan Part 2.  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |             |
|-------------------------------|-------------|
| Policy number;                |             |
| Paragraph number;             | 6.39 Canals |
| Table or figure number; or    |             |
| Map number (Atlas of Changes) |             |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                                     |   |
|--------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/>            | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

The wording in this paragraph is not consistent with national policy, as paragraph 89 of the NPPF states that new buildings are inappropriate within the Green Belt, with the exception of the “provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it”. Most waterside facilities will support outdoor recreation.

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

To ensure that our representations are clearly understood, particularly as we have not had any feedback on our original comments from the 2014 consultation, and these do not appear to have been taken into account.

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Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

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|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | When the Local Plan Part 2 Plan has been submitted for independent examination.   |
| <input type="checkbox"/> | The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2. |
| <input type="checkbox"/> | The adoption of the Local Plan Part 2.  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |  |
|-------------------------------|--|
| Policy number;                |  |
| Paragraph number;             |  |
| Table or figure number; or    |  |
| Map number (Atlas of Changes) |  |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |



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*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

SA4: Fairview Business Centre

We support the release of this site for residential led, mixed use development, and would request some additional wording to ensure that the ground floor canalside uses maximise the potential of the canal. The Canal & River Trust and the Hillingdon Canal Partnership have been working on a scheme of residential moorings along the adjoining canal bank, under application reference 67297/APP/2010/2202, to provide some activity and surveillance on this stretch. The canal is in a cutting here, so is not overlooked and users can feel isolated. Any proposed development should therefore animate this edge, and potentially provide an additional access to the canalside moorings.

SA5: Land to the South of the Railway, including Nestle.

This site has a canalside frontage and care should be taken to ensure that the benefits of this frontage are maximised; this should include active uses such as restaurants, cafes, community facilities on the ground floor. The Trust considers that the site could be an appropriate location for a community water sports club, which would activate that canal front edge and provide recreation activities for young people in the area.

The Trust also considers that there is an opportunity for the site to accommodate permanent residential moorings along this stretch of the canal and this should be incorporated into the designation.

The Trust would support better linkages from the site to Hayes Town Centre. The Trust would not be opposed in principle to a suitably located and designed footbridge across the canal to link the site up with the towpath and also to improve connectivity between the towpath and the Town Centre. The existing vehicular bridge at North Hyde Gardens should also be improved for pedestrians and cyclists with the possibility for steps from the road down to the towpath.

SA7 Union House

As with SA4, above, we would support access through this site to the approved moorings, on the canalside.

### SA23 Silverdale Road/Western View

This site has a canalside frontage and care should be taken to ensure that the benefits of the frontage are maximised. The existing dock here is privately owned and is not owned by the Canal & River Trust. Any development of this site should retain the dock as it should become a feature of the development and should not be filled in. The retention of the dock should be highlighted within policy SA19. Given that the site is located on the towpath side any canalside improvements should be agreed with the Canal & River Trust.

### SA29 Cape Boards

We support the proposal to make this land available for a residential-led mixed use development. Canalside improvements should be agreed in consultation with the Canal and River Trust and the development should make a contribution to towpath and environmental enhancements.

### SA36 Hayes Bridge

We support the redevelopment of this site residential led, mixed use development. Given its non-towpath location the site would be suitable for residential moorings and this should be a feature of the redevelopment of the site.

### Crown Trading Centre

This site is not within the Site Allocations document, but we would support its release for residential led, mixed use redevelopment, as this would be a better neighbour to the canal, and help enhance this valuable local asset. We understand that the site owners are also keen for this to happen. We would request that any redevelopment maximises the potential of the canal frontage, and that contributions are sought towards the enhancement of the canal.

### Rebalancing Employment Land

There is a significant amount of industrial land located along the Grand Union Canal through LB Hillingdon, due largely to its industrial heritage. We note that several sites have been highlighted for retention as industrial land, but the Trust would support release of waterside sites where this can help to enhance the canalside, and maximise its potential for

#### 4.29 Summerhouse Lane

We support the release of this canalside land for residential redevelopment, which would help enhance the waterway setting.


Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

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## **PART C - Progress of the Local Plan Part 2**

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| <input type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |



Canal &  
River Trust

Keeping people, nature & history connected

8<sup>th</sup> December 2015

London Borough of Hillingdon  
3N/02  
Civic Centre  
High Street  
Uxbridge  
UB8 1UW

Dear Planning Policy Team,

**Re: Public Consultation for draft Hillingdon Local Plan Part 2**

Thank you for your consultation in respect of the above. Please note that although the Canal & River Trust forms a part of the Hillingdon Canal Partnership please consider this letter to be the Trust's formal response to your consultation.

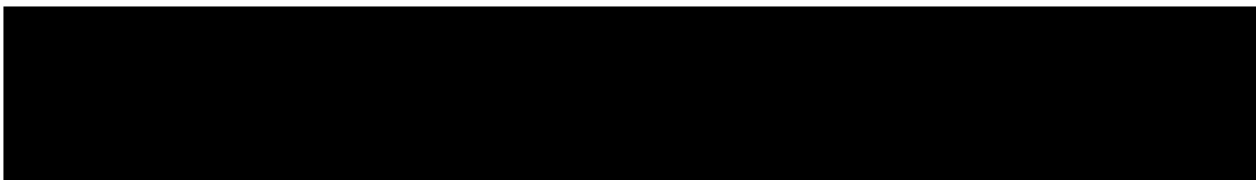
The Canal & River Trust is a statutory consultee under the Town and Country Planning (Development Management Procedure) (England) Order 2015. The Trust is a company limited by guarantee and registered as a charity. It is separate from government but still the recipient of a significant amount of government funding.

The Trust has a range of charitable objectives including:

- To hold in trust or own and to operate and manage inland waterways for public benefit, use and enjoyment;
- To protect and conserve objects and buildings of heritage interest;
- To further the conservation, protection and improvement of the natural environment of inland waterways; and
- To promote sustainable development in the vicinity of any inland waterways for the benefit of the public.

With regard to the current consultation, we are very concerned that our previous comments, dated 4 November 2014, do not appear to have been taken into account, and are not referred to in the Consultation Statement, October 2015. I have attached our previous comments to my email.

We therefore have several further comments to make, but would be keen to meet to discuss them. I have also put them into the representation forms.



## Draft Development Management Policies October 2015

As a general comment, we are known as the Canal & River Trust (note '&' not 'and').

In order to be sound this policy needs some amendments to address the following points;

- The scope of moorings to which this policy applies; and
- There are issues of effectiveness relating to the criteria.

### 5.81 Moorings

Using a description in the local plan simply entitled 'moorings' does not usefully encapsulate all the different types of mooring use, whether they are permanent moorings or temporary moorings unless there is some further explanation or description, as below.

### 5.82

The wording of this policy is not effective because it does not acknowledge different types of moorings. We would request that this be amended to read the following:

*"There are range of different moorings available for boaters on the Grand Union Canal, including visitor moorings, long term leisure moorings, commercial moorings and residential moorings. Permanent residential and commercial moorings require planning permission and are therefore regulated through the planning system. Other moorings providing other land uses are not controlled by the planning system. Any physical works to create a residential mooring (installation of pontoon or landing stage) is considered development and will require planning permission. The Council is required to formally consult the Canal and River Trust on any planning application for development likely to affect any inland waterway or reservoir owned or managed by the Canal and River Trust."*

### Policy DMHB 20: Moorings

We disagree with criterion i) of this policy. There is an assumption that moorings in rural areas are incongruous and out of keeping. There is no reason why moorings *per se* cannot be located on rural stretches – this happens all across our network and is entirely **in keeping** with the use of the inland waterway network. We assume that the policy intends to state that *residential* moorings should generally be located on urban stretches, but still disagree that these could be deemed incongruous or out of keeping, when they are part of the fabric of the canals and their heritage.

The mooring of boats on the waterway is part of their character, whether rural or urban, and there can often be very little visual difference between a long term leisure or visitor mooring (which do not require planning permission) to a permanent residential mooring. We therefore do not consider this part of the policy to be justified, and request it be deleted. We would instead accept the following wording:

“i) Locations near town centres and in close proximity to public transport will be encouraged, particularly in light of the need to animate water space through town centres to reduce anti-social behaviour through passive surveillance, and to take advantage of Crossrail improvements.”

With regard to criterion ii), we consider that boating is an entirely appropriate use of the Blue Ribbon Network so it is not appropriate to say that *“moorings should be located so that they do not interfere with other uses of the canal, or use of the bank or towpath”*. Moorings are integral to the canal and require use of the towpath. This is emphasised in our national towpath policy, which states in Principle 5: “.. in general priority should be given to the slowest and those using the waterway”, the latter referring to boaters operating locks and using the navigation for its primary purpose. We request that this be re-worded to state:

“ii) the establishment of permanent moorings should be carefully considered amongst the mix of other leisure and recreational activities on and next to the canal so that one use does not unduly cause detriment to other uses (e.g. walking, cycling, fishing, etc.). If possible, off-line locations such as within a marina or layby, will be preferred.”

We would query if criterion iii) is effective as it is not clear what a ‘barrier’ could be interpreted as. We would suggest the following wording:

“iii) the number and density of boats moored at any point should be appropriate to the location and include ample breaks to ensure views of the open water space is not unduly limited from the towpath.”

Criterion v) is not effective as the type of moorings or services are not clarified. Boats are generally fairly self-sufficient, and can exist with services provided around the network. There are a variety of different residential mooring sites on canals, some with all services (telephone, foul, water, electric, but others with no facilities whatsoever. We would suggest the following wording:

“v) adequate service facilities for receiving post and deliveries, for waste collection and where appropriate utility connections, should be provided.”

Criterion vi) should read:



“vi) development must take account of the Canal & River Trust’s emerging London Mooring Strategy and "Hillingdon Towpaths, June 2015".

The London Mooring Strategy is only currently being scoped out, but the AINA’s advisory document ‘Residential Use of Inland Waterways’ would be useful for reference within the text.

#### Policy DMEI 8: Waterside Development

With regard to criterion A) ii) there may be occasions where developments rising sheer out of the canal on the non-towpath side will be appropriate. This occurred historically with industrial buildings being built right up to the canal edge to take advantage of the canal transportation system. We do not consider it necessary to apply a blanket approach to waterside development, when every site proposal should be assessed on its merits, and to insist that a 5 metre space be left could create unsightly ‘dead’ space, susceptible to anti-social behaviour or fly tipping next to the canal.

We support criterion F and the requirement for development to contribute to biodiversity improvements. We would suggest that these should not be restricted to biodiversity improvements as development can put increased pressure on the canal network in a variety of other ways, such as wear of the towpaths, and request that this policy be widened to read “...will be expected to contribute to improvements to the canal, and to biodiversity.”

#### 6.39 Canals

The wording in this paragraph is not consistent with national policy, as paragraph 89 of the NPPF states that new buildings are inappropriate within the Green Belt, with the exception of the “provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it”. Most waterside facilities will support outdoor recreation.

### **Draft Site Allocations and Designations**

#### SA4: Fairview Business Centre

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#### SA5: Land to the South of the Railway, including Nestle.

This site has a canalside frontage and care should be taken to ensure that the benefits of this frontage are maximised; this should include active uses such as restaurants, cafes, community facilities on the ground floor. The Trust considers that the site could be an appropriate location for a community water sports club, which would activate that canal front edge and provide recreation activities for young people in the area.

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The Trust would support better linkages from the site to Hayes Town Centre. The Trust would not be opposed in principle to a suitably located and designed footbridge across the canal to link the site up with the towpath and also to improve connectivity between the towpath and the Town Centre. The existing vehicular bridge at North Hyde Gardens should also be improved for pedestrians and cyclists with the possibility for steps from the road down to the towpath.

#### SA7 Union House

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### **Crown Trading Centre**

This site is not within the Site Allocations document, but we would support its release for residential led, mixed use redevelopment, as this would be a better neighbour to the canal, and help enhance this valuable local asset. We understand that the site owners are also keen for this to happen. We would request that any redevelopment maximises the potential of the canal frontage, and that contributions are sought towards the enhancement of the canal.

### **Rebalancing Employment Land**

There is a significant amount of industrial land located along the Grand Union Canal through LB Hillingdon, due largely to its industrial heritage. We note that several sites have been highlighted for retention as industrial land, but the Trust would support release of waterside sites where this can help to enhance the canalside, and maximise its potential for delivering sustainable communities.

#### 4.29 Summerhouse Lane

We support the release of this canalside land for residential redevelopment, which would help enhance the waterway setting.

I hope these comments are clear. Should you have any queries please feel free to contact me. Given the nature of our comments, we would be very pleased to meet with LB Hillingdon to discuss them, prior to an Examination.

Yours sincerely,

**Claire McLean**  
**Area Planner - London**



## GUIDANCE FOR DEVELOPMENT OF NEW RESIDENTIAL MOORING SITES (ENGLAND & WALES)

1. Introduction and purpose of this document
2. General considerations
3. Site-specific considerations:
  1. Location
  2. Access
  3. Water resources
  4. Flood Risk
  5. Refuse / waste disposal
  6. Utilities infrastructure
  7. Amenity
  8. Nature Conservation
  9. Heritage
  10. Lay-out
  11. Safety, security and environmental health
  12. Boat suitability
  13. Planning conditions
  14. Consultation and communication
  15. Site maintenance and safety

### RELATED DOCUMENTS

1. British Waterways [Moorings Policies](#)
2. [British Waterways and RBOA research into customer demand and preferences](#) – Thor Research 2009
3. Association of Inland Navigation Authorities, [Advisory Document on the Residential Use of Waterways](#)

#### **British Waterways** [www.britishwaterways.co.uk](http://www.britishwaterways.co.uk)

British Waterways (BW) is a public corporation, responsible for 3,540 km of navigable inland waterways (63% of the total) and is sponsored by Defra in England & Wales and by the Scottish Government in Scotland. It is funded by revenue from its own activities (trading income from boating and associated commercial activities, together with revenue from a portfolio of endowment property) but also receives government grant in aid

BW's operational estate includes canals, navigable rivers, docks, mooring basins and reservoirs. The organisation has statutory duties to maintain the safety and structural integrity of its (largely man-made) waterway network, water supply, discharges and drainage, waterway management and maintenance operations, including maintaining water levels for navigation purposes.

BW also has statutory duties under the British Waterways Act 1995 to protect and safeguard the

natural environment, landscape character and built heritage of waterways and to encourage public access to and recreation use of the inland waterways.

BW directly<sup>1</sup> manages 4600 mooring berths at 400 sites across its network of which some 40 have residential status. Most long term mooring sites are provided by private operators.

#### **Residential Boat Owners Association**

[www.rboa.org.uk](http://www.rboa.org.uk)

BW is indebted to RBOA for its assistance in developing this guidance and the draft residential moorings policy. RBOA is a membership organisation providing information and support to residential boaters throughout the UK.

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<sup>1</sup> i.e. excluding those of the BW subsidiary, BWML

## 1. INTRODUCTION AND PURPOSE OF THIS DOCUMENT

BW has developed its Residential Mooring Policy in response to the significant demand for residential moorings and the complexities of living afloat. In addition, the Association of Inland Navigation Authorities<sup>2</sup> (AINA) published an advisory document on the residential use of waterways in 2010 (revised Feb 2011)

<http://www.aina.org.uk/docs/AINA%20Residential%20Use%20of%20Waterways%20Advisory%20Doc%20Feb%202011.pdf>. This was part funded by Defra to provide advice regarding residential boating on inland waterways and to act as a tool to help inform local planning authorities, navigation authorities, mooring providers and residential boaters on relevant matters relating to residential use on water. The AINA document contains background information on the different types of residential use on water, the regulatory framework, and Government policy as well as position statements on residential use on water from the different key navigation authorities' perspectives. It is intended to guide local planning authorities in formulating policy and in decision making and seeks to inform residential boaters and providers of moorings on the regulatory framework, consents required and the policy issues.

Readers will benefit from being familiar with these documents before using this guidance document: it complements the above publications by setting out the practical issues that need to be considered when planning the establishment of residential moorings. The guidance is aimed at:

- mooring operators who wish to set up a site on a BW waterway;
- local planning authorities when they consider planning applications for residential mooring sites; and when they prepare local development frameworks, including potential site allocations;
- residential boaters and other parties who may have an interest in residential moorings on BW waterways.

It includes useful information on:

- matters that local planning authorities may consider in determining a planning application for a new residential mooring site;
- facilities required on site to support residential mooring use of land;
- case studies of existing residential mooring sites
- research into customer preferences;
- BW's policy and useful references.

The guidance applies to waterways in England and Wales owned and managed by BW, although much of the content may also be relevant to Scotland.

Readers may also wish to refer to the Yacht Harbour Association's code of practice for construction and operation of marinas and yacht harbours:

<http://www.yachtharbourassociation.com/CodePractice.asp>

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<sup>2</sup> AINA was formed in 1996 with strong encouragement from Government (as referred to within DETR publication "Waterways for Tomorrow" (June 2000), a national policy document on waterways) and is the industry body in the UK that represents those organisations which operate and manage navigable inland waterways. AINA's key strategic objectives are to develop, share and promote good practice for waterway management and operation as well as represent the collective views of navigation authorities to Government, regulators and other policy makers and opinion formers.

## 2. GENERAL CONSIDERATIONS FOR RESIDENTIAL MOORING SITES

Research<sup>3</sup> undertaken in 2009 into the demand for residential moorings and into the preferences of prospective customers showed that different levels of on-site facilities appeal to different customers for economic and lifestyle reasons. Our aim is for boaters to have a broad choice of sites throughout our network, from simple, minimal impact sites to fully serviced moorings.

Most boats used for residential purposes have the ability to access water and sewage disposal facilities by means of a short boat cruise. It should not be assumed that all facilities must be provided at the mooring site itself.

The decision about which facilities to provide will largely depend on:

- an assessment of the preferences of prospective customers;
- the availability of suitable facilities within a reasonable distance of the site (either by cruising or by path or road), whether these are provided by BW or by arrangement with another operator e.g. marina or boatyard);
- the site's location, setting and viability.

Through its licence and mooring contract terms and conditions,<sup>4</sup> or its lease with other mooring operators, BW has the ability to control activity at, and appearance of residential mooring sites. It has limited ability to regulate the appearance of individual boats at a site.

## 4 SITE-SPECIFIC CONSIDERATIONS FOR DEVELOPING NEW RESIDENTIAL MOORING SITES

When bringing forward a proposal or determining a planning application for a new residential mooring site the following site specific matters may need to be considered. For each of these we provide a commentary including some or all of the following as relevant:

- Reference to BW's standards, policies, procedures and current operational practice
- Reference to other statutory regulations and advice
- Information about preferences among current and prospective residential boaters
- Information about existing BW residential mooring sites

### 1. Location

In planning terms, a residential mooring is considered to be *sui generis* use rather than a "dwelling house" under Class C3 of Town and Country Planning (Use Classes) Order 1987 as amended in 2005. There are significant differences between moored boats used for residential purposes and built dwelling houses. Moored boats constitute an inherent part of the waterway scene and are far less intrusive than built housing development.

There are examples<sup>5</sup> of BW owned and managed residential mooring sites which are located in open countryside or rural settings, and Green Belts. These examples illustrate that residential moorings do not necessarily adversely affect the openness of a Green Belt or the open countryside. BW acknowledges that it is important to assess each potential new residential mooring site on a case by case basis and to apply relevant "sequential" planning policies where appropriate.

In areas of highest demand and boating concentration, BW has identified that **local mooring strategies** would be an appropriate planning management tool to identify areas where there is scope for expansion (or need for reduction) in boat numbers and for different types of mooring provision which would include residential mooring sites. In these areas, BW would welcome the opportunity to prepare these local mooring strategies in conjunction with LPA to ensure that the most sustainable locations are identified.

<sup>3</sup> BW and RBOA Residential Moorings Demand and Preferences Survey January 2009, Thor Research

<sup>4</sup> See [www.britishwaterways.co.uk/licensing](http://www.britishwaterways.co.uk/licensing) (licences) [www.waterscape.com/downloads](http://www.waterscape.com/downloads) (long term moorings)

<sup>5</sup> See case studies

## 2. Access

### Road access to the site

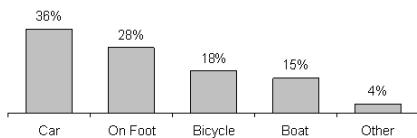
Some locations may have road access directly to the site, whilst others may be accessed by a path from the nearest road. Road access along the full length of a linear mooring site is uncommon and often impractical to achieve. The [research report](#) shows how respondents rated the importance of road access to the site and to their allocated mooring berth; their normal mode of transport is shown below.

### Parking and traffic impact

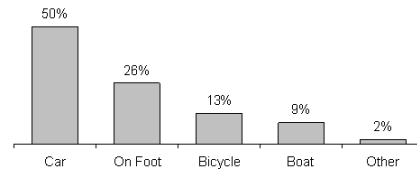
Where parking provision is considered necessary, it may be possible to make use of existing canal-side public car parks or other sites. Any new parking should ideally be located within a reasonable distance of the moorings and consideration given to security. It should be sensitively located and unobtrusive where possible. The [research report](#) ([http://www.britishwaterways.co.uk/media/documents/Residential\\_Moorings\\_Survey\\_Report\\_2009.pdf](http://www.britishwaterways.co.uk/media/documents/Residential_Moorings_Survey_Report_2009.pdf)) shows how important prospective and current residential boaters rate parking on site or the acceptable distance to it.

Parking provision is not generally a feature of BW's designated residential mooring sites, particularly in urban areas. Many residential boats can cruise to convenient locations such as canal-side shops and supermarkets or boaters often make use of the good traffic-free and sustainable cycle routes along the towpath which connect to road bridges, amenities and settlements. In research<sup>6</sup> of current and prospective residential boaters, the responses to the form of transport normally used are below.

**Total sample, over a third of whom selected more than one form of transport (645 respondents)**



**Those who mentioned just one form of transport (406 respondents)**



Cycle Parking - provision may be considered although boaters may prefer to keep their cycle on or beside their boat, particularly on long sites for reasons of security and convenience.

Initial discussions with the local highway authority should provide an early indication of any road access issues such as the impact (if any) of the residential boaters' cars on local roads.

### Access to public transport

The [research report](#) shows the preferred travel times of current and prospective residential boaters to public transport.

A significant number of BW's residential mooring sites are within 1km of public transport and 2km of amenities. The most remote sites are within 3km of local shops and facilities.

### Emergency access

Whilst it is desirable to provide some form of access for emergency vehicles, it may not always be practical to provide vehicular access directly to a site, or along its full length. The nearest access point should be identified and assessed for its suitability.

A significant number of BW residential moorings have emergency access at least to part of the site; others

<sup>6</sup> Residential Moorings [Demand and Preferences Survey](#) January 2009, Thor Research

only have access as far as the nearest road.

BW has a 24 hour contact service where local knowledgeable staff are on-call to deal or assist with a range of issues, problems and emergencies. As a navigation authority with public safety responsibilities, BW regularly liaises with the emergency services.

The research report shows how respondents rated the importance of emergency access to the site.

The frequency of emergency calls from boaters is extremely low and we have no evidence of serious difficulty in fire or ambulance services attending call outs to moored boats.

### **Pathways and access to boats**

It is desirable for any access path to be reasonably level, free of tripping hazards and of sufficient width for foot traffic. The surface should preferably be in keeping with the local environment.

The research report shows how respondents rated the importance of the path surface and access to the full length of the boat.

For its own sites, BW has minimum safety standards in relation to moorings – Customer Services Standards 2008-2009 safety standard 2c6 states that landings and moorings should have even surfaces and defined edges.

### **Access for All**

In new mooring developments, or where improvements are proposed to existing moorings, the feasibility of providing reasonable access to facilities and boats for people with disabilities should be considered. However, living on a boat may be unsuitable for people with certain disabilities, or there may be locations or environments where it is simply impractical. Where it is feasible, the desirable standards to which BW works for its own sites are:

a) Access from arrival/depart point to individual mooring along the towpath or through mooring site

Path slope      No steeper than 1 in 10

Path width        No less than one metre

Barriers          No steps or barriers

Surface            Intact compact surface with only slight irregularities, neat edges, drains immediately.

b) Access to and from the boat itself

Bank condition    see '*Pathways and access to boats*' above

Freeboard <sup>7</sup>      No more than 0.5 metres of freeboard

### **Access to open space and community facilities**

Waterways and towpaths are defined as open space in PPG 17<sup>8</sup>, acting as green infrastructure and often providing a green link to other open spaces and amenities. In turn they promote healthy and active lifestyles.

Local authorities may have their own policies or requirements relating to access to open space and amenities for residents. The research report shows the acceptable distances given by respondents to local shops and services, and reference should also be made to their normal mode of transport.

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<sup>7</sup> Freeboard is the height between the water's surface and the top of the adjacent canal/river-bank.

<sup>8</sup> Insert link



### 3. Water resources for Navigational Purposes

The potential for residential mooring developments to contain boats that will cruise on the BW network (even if only on an infrequent basis) will mean that each development should be assessed for its impact on BW's water resource position. This will be undertaken by BW's Water Management team via a two stage approach, comprising an initial screening assessment, followed if necessary by a detailed water resource study. This approach is identical to that used for considering the water resources impact of new marina proposals<sup>9</sup>.

### 4. Residential Moorings & Flood risk

The Government published PPS 25 on Development and Flood Risk (December 2006) and the "Planning Policy Statement 25: Development and Flood Risk Practice Guide, Updated December 2009" (published on 07 December 2009) which provides guidance and good practice case studies on how to implement PPS25 in England. The National Assembly for Wales published a Technical Advice Note (TAN) 15 on Development and Flood Risk in June 2005. All this planning guidance has implications for navigation authorities and mooring providers in terms of promoting and securing planning permission for marina developments and residential uses on water.

PPS 25 introduces the concept of vulnerability to flooding of different land uses and classifies land uses according to flood risk sensitivity. Certain types of land uses are only permitted within certain flood zone categories. The water-compatible uses of land are permitted in all the different flood zone categories. All water compatible development needs to be designed and constructed to remain operational and safe for users in times of flood.

Although houseboats and residential moorings are not explicitly listed in PPS25, in the preparation of the [AINA advisory document](#), AINA consulted CLG on the compatibility of residential moorings in the flood plain. Following discussion with the EA, CLG have confirmed that residential moorings should be viewed as water compatible development in respect to Table D.2 in PPS25. This would allow residential moorings to be situated in any flood zone. It is important to adopt a sequential approach to flood risk in identifying appropriate locations for residential moorings. Although some of the residential mooring sites owned and managed by BW are located within flood zone 1, many of the other residential mooring sites are located in both flood zones 2 and 3.

The key consideration for any type of residential mooring would be for the developer to demonstrate through a flood risk assessment (where required) that both the occupants and the craft were safe in the event of a flood. A site specific flood risk assessment, to be undertaken by the applicant (where required), would need to demonstrate that the boat and occupants would be safe in the event of a flood and that a dry access and egress route would be possible from each boat to an area outside the floodplain, in a 1:100 year event.

### 5. Refuse and recycling

As local residents, residential boaters should receive or have access to refuse and recycling services from the local authority and arrangements on site should be considered.

Alternatively boaters can travel (not necessarily by boat) to dispose of their refuse and recycling at a designated location or local arrangements could be made to link into the local authority's collection arrangements nearby, particularly where bin storage and/or access for collection vehicles may not be practical.

Where refuse disposal is provided on-site or nearby, it should be suitably located and ideally screened from public view. Access to the facility will probably need to be restricted to the boaters (to avoid potential misuse by others).

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<sup>9</sup> <http://www.britishwaterways.co.uk/marinadevelopment>

Refuse disposal points, which service passing boats, are located at intervals across the BW network. The nearest refuse disposal point to the proposed mooring site should be identified to establish whether it could also service the mooring site. If operated by a marina / other mooring operator then a service agreement and charge may be appropriate.

A composting facility may be considered at the site, subject to demand from site occupants. Any composting unit must be enclosed to fully contain the compost and liquid produced, so that there is no contact between the contents and the ground, which could pose a pollution risk to the water-course. BW must approve the type of container and clear advice must be given to the residents about acceptable items for compost and how best to manage and use the facility.

A significant number of BW's residential sites have refuse disposal on site, otherwise it's typically five minutes away.

The research report shows respondents' preferences for refuse disposal and recycling on site or the acceptable distance away, and how they rated the importance of composting.

## 6. Utilities infrastructure

**Sewage:** The disposal of waste water from toilets into water courses is prohibited under BW's boat licence conditions. Waste from toilets must be stored in tanks or containers onboard and periodically emptied at a sewage disposal point.

Holding tank options, dependent on the boat design, include:

- Elsan: a portable container that needs manual emptying at a disposal point.
- Pump-out: sewage is pumped-out of the boat's holding tank via a hose into a disposal unit; (some moorings offer a direct connection at the berth which can be disconnected to allow cruising).

Sewage disposal points (Elsan and pump-out) are located at intervals across the BW network that service passing boats. The nearest sewage disposal point to the proposed mooring site should be identified to establish whether it could also service the mooring site. If operated by a marina / other mooring operator then a service agreement and charge may be appropriate.

If either or both are provided on-site they should be suitably located and ideally screened from public view. An alternative option may be to provide the facility on a purpose-fitted boat, i.e. a floating service vessel that may also accommodate some other facilities.

Provision must be in accordance with current legislation, regulations and British standards.

A significant number of BW's residential sites have Elsan on site or these facilities are located within five minutes cruising distance. A significant number of BW's residential sites have pump-out on site or these facilities are located within two hours cruising distance. In some instances, both facilities are found on the same site..

The research report shows respondents' preferences for sewage disposal on site or the acceptable distance away.

**Grey Water:** Discharge from boats of grey water from sinks, washing machines and showers directly into the water course is permitted. Boaters are encouraged to minimise the amount of chemicals, food waste and other matter flushed down the sink waste and to use phosphate-free detergents.

Residential boats are generally equipped with washing facilities and some have on-board washing machines. The research report shows how respondents' rated the importance of separate showers and laundry on site (usually in a small facility building) or the acceptable distance away.

In particularly environmentally sensitive areas or where the concentration of numbers of residential boats is an issue then measures to manage grey water may be required. This may include, for example, all resident moorers signing up to an agreement to use only phosphate-free detergents. In exceptional circumstances, depending on the site, it may be necessary to restrict the discharge of grey water into the water-course and instead provide the means to discharge instead into a land-based

facility.

**Water:** Residential boats normally have holding tanks and can travel to take on potable water. Water points are located at intervals across BW's network which service passing boats. The nearest water point to the proposed mooring site should be identified to establish whether it could also service the mooring site. If operated by a marina / other mooring operator then a service agreement and charge may be appropriate. The facility will need to be accessed at evenings and weekends, not just in the daytime.

If water is provided on-site, the supply could be via shared service bollards (whereby boats temporarily move to the water point to fill up) or a direct supply to each berth provided through a service bollard. All supplies should meet the relevant water supply regulations.

A significant number of BW's residential sites have water on site, or water points are available within 10 minutes cruising time.

The research report shows how respondents' rated the importance of a water supply on site or within the acceptable cruising distance.

**Electricity:** Residential boats usually require some means of power to provide a level of comfort for the occupant's daily activities. Consideration should be given to providing connection to mains electricity through a service bollard to each berth, ideally with separate meterage. Provision must be in accordance with current legislation, regulations and British standards.

Solar or wind power devices are to be encouraged at residential mooring sites. This is particularly important to minimise dependence on running boat engines or generators at sites where mains electricity supply may not be feasible. Refer to 'Amenity' below for information about noise emissions from engines / generators and visual impact of alternative sources of power.

A significant number of BW's residential mooring sites have electricity on site.

The research report shows how respondents' rated the importance of an electricity supply to their berth.

## 7 Amenity

### Visual Impact

Moored boats are an inherent feature of the waterway. Any mooring scheme (residential, leisure or visitor) should bring life and colour to an area and positively contribute to the character and setting of the waterway. The value of residential boaters (with their frequent and regular presence on site) in adding a greater sense of security to the area is generally appreciated by local communities.

Where a residential mooring site is directly managed by BW, the appearance and environmental quality the site can be controlled through the boat licence, the terms and conditions of the mooring permit and, where necessary, supplementary rules specific to a particular mooring site. The LPA might feel in appropriate to specify particular site rules as a condition of planning permission or as a planning obligation.

Emerging alternative energy sources such as wind and solar power are to be encouraged and should be appropriately sited or screened so that they do not have an intrusive visual impact.

### Landscaping

The character of the waterway corridor and the relationship of the proposed mooring site with its wider environment must be considered. Only species of British seed source (native provenance) should be used in landscaping to match those occurring naturally in the area and should be agreed by BW's ecologists. The proposals should take account of existing valuable habitats and other issues identified in British Waterways' environmental appraisal. The exception to this is gardens (see below)

Any invasive plant species such as giant hogweed, Himalayan balsam or Japanese knotweed must be

removed prior to development and requires specialist knowledge and disposal.

Views to and from the waterway may need to be mitigated through landscape and screening work, which may also provide security to boat owners and privacy to both boaters and any neighbouring houses.

It is also advisable to determine which items may be kept by the moorers at a mooring site, by taking into consideration the site's setting and whether it is in public view. Guidance on this is provided below.

**Gardens.** There is a general presumption against garden areas for individual boats. Communal gardens with landscaping appropriate to the local character, subject to available space, are acceptable.

If boaters' gardens are considered acceptable at the site, planting should be modest, tidy and well-maintained. They should be in keeping with the character and appearance of the area (it may be helpful to make reference to neighbouring residential developments).

The [research report](#) shows how respondents' rated the importance of individual and communal gardens.

**Sheds/storage.** The provision of storage on adjacent land may be desirable for bulky items such as bags of fuel, thereby reducing the need for storing items on boat roofs. However, there is a general presumption against sheds except in exceptional cases where they can be well screened, or are out of public view.

Some of the residential mooring sites owned and managed by BW have on site storage facilities. The [research report](#) shows how respondents' rated the importance of storage on site.

**Noise.** Although engines or generators could cause some level of emission and noise disturbance, it may be possible to mitigate by (for example) regulating the type and size of generator, emission testing of generator or engine, and/or further restriction on hours of engine operation. The level of disturbance and hence necessary controls will depend on the specific location, and environment, proximity of neighbouring residents etc. British Waterways licence conditions preclude the running of generators between 8pm and 8am and indeed "anything which will cause damage or nuisance to any other person or their property". Noise and emission control will also be subject to environmental health regulations.

It should be remembered that some use of boat engines is a typical feature in the navigation environment, although more commonly it is only for relatively short periods if the boat is stationary.

Consideration should also be given to potential use of emerging alternative sources such as wind and solar power. These may have a visual impact and should be appropriately sited or screened if necessary (see above).

When considering possible new residential mooring sites adjacent to existing noise sources, reference should be made to guidance contained within PPG 24: Planning and Noise. The location will need to be acceptable for residential occupancy in relation to the proximity of noise sources. It may be necessary to stipulate that boats have suitable protection/insulation from noise sources.

**Lighting.** Light spillage over the canal should be minimised and ecologically sensitive lighting should be used wherever possible. Lighting should be considered in the context of the site's setting. It may be desirable in some locations, but is not essential and may be undesirable or inappropriate in others. There are different options such as lighting just the entrance, or the service bollards to each boat, or alternatively improving surrounding street lighting, for example. Where necessary, it may be possible to limit the impact of lighting such as using motion sensors, turning it off for late overnight periods, and requiring occupants to screen windows at night to minimise diffusion of artificial light from the boat. The assessment will consider the impact on bats, in particular areas used for roosting, foraging and commuting, and the necessity of sympathetic lighting design.

The [research report](#) shows how respondents' rated the importance of lighting.

**Neighbours / overlooking / privacy.** This will depend on the setting of each site. Waterways are

public places and boats are normally clearly visible to the public. The research report shows how respondents' rated the importance of privacy.

## 8. Nature Conservation

Both boating and wildlife are much valued and intrinsic features of the waterway network; British Waterways' policies<sup>10</sup> and waterway management seek to balance the interests of nature conservation and boating.

All proposals will be subject to an Environmental Code of Practice appraisal by BW, which will consider any potential environmental impact, the presence of statutory protected sites or species and impacts on water quality that would affect habitats, etc. The appraisal will determine that a site is either environmentally acceptable; acceptable subject to certain mandatory restrictions or mitigation to address environmental sensitivities; or unacceptable.

Sensitive environmental sites are identified through local authority planning designations. In addition to consulting BW and the Local Planning Authority, Natural England or Countryside Commission for Wales (CCW) must also be consulted from the outset if a new residential mooring site or changing the use of an existing leisure mooring site to residential are proposed in or within close proximity to a SSSI (Site of Special Scientific Interest). For moorings within SSSIs BW has a legal obligation to notify Natural England or CCW before giving permission for any change. Other public bodies must give notice to Natural England before carrying out or authorising any works that may damage the SSSI.

Where proposals will impact upon protected species present, consultation will be required with Natural England or CCW as appropriate. For European Protected Sites the competent authority (the Local Planning Authority) will be required to assess the likely significant impact of the proposal and will only be able to permit it in the absence of any unacceptable adverse affects upon the integrity of the site.

It may be possible to minimise the potential impact through the site design and to control it through planning consent conditions and site rules in the mooring contract.

The research report shows that "*the waterway environment (e.g. wildlife, boats, tranquillity)*" was the prime reason for respondents wanting to live afloat.

There are examples of residential mooring sites owned and managed by BW that are located within a SINC (Site of Importance for Nature Conservation); none are located within SSSI's.

## 9. Heritage

BW's network is rich in heritage and BW's approach to its protection and management is set out in its heritage policy. Boats and moorings are an intrinsic part of our waterway heritage and people have lived afloat in different ways since the canals were built.

The local authority planning designations and a heritage impact assessment by BW will consider the appropriateness, flag any issues or sensitivities and make recommendations about a proposed site.

Sites where sensitivities may incur include, for example, those immediately adjacent to the waterways' highest value Scheduled Monuments, Listed Buildings or within certain Conservation Areas or 'iconic views'. There may be other locations such as a World Heritage Site, Historic Battlefield, Registered Park or Garden, old canal walls or other archaeological site, which will need special consideration. Suitability will be determined by reference to the heritage impact assessment.

It should be expected that development of residential moorings in heritage sensitive places may require Scheduled Monument, Listed Building or other similar consents (all dependent on what kind of development is proposed and the precise location etc.)

For sites in less sensitive locations, much of the potential impact (if any) on waterways heritage can be

<sup>10</sup> British Waterways' Environmental policy ([http://www.britishwaterways.co.uk/media/documents/Environmental\\_Policy.pdf](http://www.britishwaterways.co.uk/media/documents/Environmental_Policy.pdf)) and Statement of Commitment to Sustainable Development? ([http://www.britishwaterways.co.uk/media/documents/BW\\_Sustainable\\_Development.pdf](http://www.britishwaterways.co.uk/media/documents/BW_Sustainable_Development.pdf))

controlled through planning consent conditions and site rules in the mooring contract.

Some residential mooring sites owned and managed by BW are located within Conservation Areas.

## 10. Site layout

Clearly the layout will depend on the water space available (e.g. a linear online mooring, an offline basin etc.) and the number and length of the boats. Reference should be made to other existing schemes.

Where possible, it may be beneficial to provide a 'service mooring' where boaters can temporarily moor their boat to use facilities such as a water point, sewage and refuse disposal (if they are provided on site). This is particularly important if facilities are provided in a building or on a purpose-fitted boat. Ideally the service mooring should also be available to passing boats on the waterway to use the facilities, but preferably without allowing them access to the rest of the residents' mooring.

The provision of visitor moorings should also be considered, since the presence of residential boats offers a welcome presence, level of security and local knowledge to the visitor.

The lay-out should also take account of a range of other factors, such as spacing between boats, length of pontoons, turning circles ('winding holes') on site or within a reasonable cruising distance if turning is restricted, prevailing wind etc. Consideration should be given to the navigational safety of boats leaving and arriving at the mooring, as well as those boats on the mainline canal, particularly for offline sites. BW will assess the navigational safety of the proposals.

The waterway bank should be assessed for its structure, stability and suitability for mooring, in consultation with BW.

Water depth alongside the bank should also be assessed along with changes in water levels in the locality, the canal bed profile and related factors to ensure there is sufficient depth for moored boats. The maximum scour occurs when boats start to move from their mooring and therefore, to reduce impact, the depth should ideally be 1.5 metres as a minimum.

Dredging may be required for the scheme to be installed, or in the future to ensure the boats have access alongside the bank and also into the main navigation channel. Depth and dredging should be discussed with BW at an early stage.

## 11. Safety, security and environmental health considerations

A risk assessment of the site should be undertaken to identify any safety issues and measures that need to be included in the design or operation of the site, with particular attention to water safety measures and to avoidance of potential hazards likely to cause slips, trips and falls.

The licence-holder of every boat on BW's waters must demonstrate that it meets BW's safety standards covering gas, electricity and fuel installations. See [www.britishwaterways.co.uk/licensing](http://www.britishwaterways.co.uk/licensing) and [www.boatsafetyscheme.com](http://www.boatsafetyscheme.com) for further information.

There are no specific standards or regulations requiring a boat to be 'fit' for residential accommodation such as sanitation, washing and cooking facilities.

Installation of land-based facilities e.g. electricity and potable water supply are subject to the relevant safety regulations.

Storage of any hazardous materials (e.g. petrol, diesel, gas cylinders, cleaning substances) are subject to health and safety regulations.

Specific legal duties may apply under the Construction Design and Management (CDM) Regulations 2007, depending on the scale and nature of the mooring scheme. The Health and Safety Executive has further information – see [www.hse.gov.uk](http://www.hse.gov.uk)

## **Security**

Security is particularly important to customers. Good design can limit the potential for crime, vandalism and enhance personal safety. It may be advisable to contact the local Crime Prevention Officer at an early stage in the design process if safety is a concern, for example in some urban areas.

## **Post**

There should ideally be arrangements for post to be delivered separately for each residential berth where possible, for example a single post-box with individual lockable portals for each berth.

## **12. Boat suitability**

Vessels at new residential moorings should possess the recognisable attributes of a boat and be capable of navigation – static structures will not be acceptable. As an exception, well-designed and constructed static structures may be suitable in large scale, urban, modern, offline settings. BW will consider the suitability on a case-by-case basis, and may request a phased salvage bond where it is reasonable to do so. Boats must also have a sewage holding facility.

Where necessary, for example in settings with important or special character, BW can stipulate more specific conditions relating to boat suitability.

## **13. Planning Obligations**

As a public corporation (a not-for-dividend organisation owned by the nation), all revenue received from mooring sites (directly-managed by BW or leased to others) is reinvested in maintaining waterway infrastructure, facilities and environment, thus reducing the cost to the public purse and supporting long term sustainability of the waterway network as a public asset.

## **14. Consultation and communications**

If a site is intended for use by an identified group of boaters, then clearly it is essential to consult them at an early stage to understand their needs and preferences for the site and facility provision.

When designing a site it is important to consult closely with local waterway interest groups, for example local angling, rowing and boating clubs, tourism operators etc. Many local groups feel a strong sense of ownership of their local patch and it is advisable to ensure that all interested groups are aware of the proposals and can contribute their views from the outset. This may identify improvements to the design or operation of the proposed residential moorings.

The same is also true for local residents and neighbouring premises, particularly those who are close to, or overlook, the proposed site. It is important that everyone understands the issues relating to living afloat and how it is intended to develop and manage the site.

It is advisable to develop a clear communications plan to identify all interested parties and to present and discuss proposals with everyone. This provides an opportunity to explain the benefits of residential moorings and help others understand that, for example, the residential boaters will usually pay Council Tax, and that conditions and rules apply to the use of the mooring etc.

A planning application for a residential mooring will, of course, be subject to normal local authority consultation procedures. Statutory consultees are likely to include the Environment Agency and possibly Natural England or CCW and/or English Heritage. It is good practice to have early discussions with these organisations, well before the planning application is submitted. BW is also a statutory consultee and will be asked by the LPA to comment on applications.

## **15. Site maintenance and safety**

### **Site maintenance**

Consideration should be given to maintaining any structures and facilities on site e.g. cleansing of pontoons, steps and slipways of algae and weed, painting etc. The maintenance of structures over water generates a range of pollutants, including metal particulates, paint, polluted water, detergents

and cement. Suitable risk assessments, method statements and pollution prevention measures must be applied. Refer to Planning Policy Guidance 23 (PPG 23) for full details at [www.communities.gov.uk](http://www.communities.gov.uk).

Use of herbicides in or near water is restricted, even on paving away from the water's edge. The only herbicides that may be used are those specifically permitted for use in or near water and must be used by suitably qualified individuals, for example those registered with the British Agrochemical Standards Inspection Scheme [www.basis-reg.com](http://www.basis-reg.com). Herbicide label requirements must be followed and where used on BW's land agreement from BW obtained prior to use.

Dredging may also be required and BW must be consulted. Submerged vegetation can pose a problem to boats, but it forms a vital component in the aquatic ecosystem and may be legally protected. Treatment of a mooring area can impact on the waterway and therefore should only be carried out after consultation with BW.

"The Green Blue" [www.thegreenblue.org.uk](http://www.thegreenblue.org.uk) is a joint initiative by the British Marine Federation and the Royal Yachting Association which promotes the sustainable operation and development of the recreational marine industry.

The British Marine Federation [www.britishmarine.co.uk](http://www.britishmarine.co.uk) has also published 'Environmental Code of Practice' which is a comprehensive guide and useful reference.

### **Safety**

The mooring operator is responsible for the safety of everyone on the site including boating customers, casual visitors, maintenance people etc. Regular risk assessments are a legal requirement - see <http://www.hse.gov.uk/contact/faqs/riskassess.htm>

## **16. Use of Land at the Mooring Site**

Conditions are generally applied through the mooring agreement. Use of the towpath for storage of any items is not permitted. At BW mooring sites on the offside of the waterway, staff guidance exists for the determination of site rules which are appropriate to the location relating to storage (boat tenders, rowing boats, fuel, sheds etc), development of gardens, use of washing lines etc.





# HILLINGDON

LONDON

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### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |               |              |  |
|----------------------------|---------------|--------------|--|
| Title                      | C/o Agent     |              |  |
| First name                 |               |              |  |
| Last Name                  |               |              |  |
| Organisation (if relevant) | Purplexed LLP |              |  |
| Unit                       |               | House number |  |
| House name                 |               |              |  |
| Address 1                  |               |              |  |
| Address 2                  |               |              |  |
| Town                       |               |              |  |
| County                     |               |              |  |
| Postcode                   |               |              |  |
| Telephone                  |               |              |  |
| Email                      |               |              |  |

| 2. Agent's Name and Address (if applicable) |                                |
|---|--------------------------------|
| Title                                       | Ms                             |
| First name                                  | Hannah                         |
| Last name                                   | Whitney                        |
| Company                                     | Nathaniel Lichfield & Partners |
| Unit  |                                |
| House name                                  |                                |
| Address 1                                   |                                |
| Address 2                                   |                                |
| Town  |                                |
| County                                      |                                |
| Postcode                                    |                                |
| Telephone                                   |                                |
| Email                                       |                                |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |         |
|-------------------------------|---------|
| Policy number;                | DMHB 17 |
| Paragraph number;             |         |
| Table or figure number; or    |         |
| Map number (Atlas of Changes) |         |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                          |   |
|-------------------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/>            | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

It is not considered that there is any justified or substantiated basis for adopting any variation from London Plan matrix guidance, which itself is adapted to reflect varying circumstances in both inner and outer London and varying PTAL ratings. No other justification for a variation based on evident analysis is presented, beyond just saying 'it is slightly different'.

It is already known that the GLA is to review the matrix approach in the forthcoming Review, after detailed criticism of the matrix approach and recognition that densities delivered routinely exceed the maxima suggested.

In particular, proximity of main transport nodes such as Uxbridge and Hayes stations (including imminent Crossrail) suggests that sustainability would be best served by new developments at higher densities as allowed for in the guidance associated with the London Plan Matrix.

Whilst the policy DMHB 17 requires developers merely the taking account of the proposed LBH matrix, practice has shown that objectors view such figures as clear maxima, not to be exceeded. Such a reaction is therefore encouraged by the inclusion of this proposed policy and the suggested local matrix 5.3.

**The density content of this policy is unjustified by any evidence base and should be deleted as being unsound.**

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)**

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

We would like to maintain the opportunity to attend the Hearing should our comments not be taken into account by the Council.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

N/A

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (tick) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

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**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup>  
December 2015.**



# HILLINGDON

LONDON

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### PART A - Your details

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| 1. Name and Address        |               |              |  |
|----------------------------|---------------|--------------|--|
| Title                      | C/o Agent     |              |  |
| First name                 |               |              |  |
| Last Name                  |               |              |  |
| Organisation (if relevant) | Purplexed LLP |              |  |
| Unit                       |               | House number |  |
| House name                 |               |              |  |
| Address 1                  |               |              |  |
| Address 2                  |               |              |  |
| Town                       |               |              |  |
| County                     |               |              |  |
| Postcode                   |               |              |  |
| Telephone                  |               |              |  |
| Email                      |               |              |  |

| 2. Agent's Name and Address (if applicable) |                                |
|---|--------------------------------|
| Title                                       | Ms                             |
| First name                                  | Hannah                         |
| Last name                                   | Whitney                        |
| Company                                     | Nathaniel Lichfield & Partners |
| Unit  |                                |
| House name                                  |                                |
| Address 1                                   |                                |
| Address 2                                   |                                |
| Town  |                                |
| County                                      |                                |
| Postcode                                    |                                |
| Telephone                                   |                                |
| Email                                       |                                |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |      |
|-------------------------------|------|
| Policy number;                | DMT6 |
| Paragraph number;             |      |
| Table or figure number; or    |      |
| Map number (Atlas of Changes) |      |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                          |   |
|-------------------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/>            | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

Clarity need to be expressed in the written justification that the car parking figures are clearly expressed as maximum standards and that no minimum standard applies other than for provision of any necessary disabled parking.

As provided for in the London Plan (parking addendum to chapter 6), it is appropriate to identify an alternative B1 parking policy standard for the borough beyond the general maximum standards set out in the London Plan. This allows local authorities through a development plan document to amend the maximum car parking standard for outer London from 1 space per 100-600 sqm to 1 space per 50-100 sqm.

Whilst it is welcomed that the wider standard has been modified to reflect the requirement for higher levels of additional B1 parking in the borough to serve Outer London business needs, Appendix C should specifically allow for additional parking in such cases (on a site-by-site basis) where it can be demonstrated that supplementary office car parking is required to allow a development to be competitive with other office facilities in the locality.

*Note that parking standards are stated in Appendix C as:*

*Offices – max 1 per 50-100 sqm*

*Flats – max 1.0-1.5 per flat for smaller units  
Max 2 per flat for larger units*

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |



**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

We would like to maintain the opportunity to attend the Hearing should our comments not be taken into account by the Council.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

N/A

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
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| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

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# HILLINGDON

LONDON

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### PART A - Your details

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| 1. Name and Address        |               |              |  |
|----------------------------|---------------|--------------|--|
| Title                      | C/o Agent     |              |  |
| First name                 |               |              |  |
| Last Name                  |               |              |  |
| Organisation (if relevant) | Purplexed LLP |              |  |
| Unit                       |               | House number |  |
| House name                 |               |              |  |
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| Address 2                  |               |              |  |
| Town                       |               |              |  |
| County                     |               |              |  |
| Postcode                   |               |              |  |
| Telephone                  |               |              |  |
| Email                      |               |              |  |

| 2. Agent's Name and Address (if applicable) |                                |              |  |
|---|--------------------------------|--------------|--|
| Title                                       | Ms                             |              |  |
| First name                                  | Hannah                         |              |  |
| Last name                                   | Whitney                        |              |  |
| Company                                     | Nathaniel Lichfield & Partners |              |  |
| Unit  | 14                             | House number |  |
| House name                                  |                                |              |  |
| Address 1                                   |                                |              |  |
| Address 2                                   |                                |              |  |
| Town  |                                |              |  |
| County                                      |                                |              |  |
| Postcode                                    |                                |              |  |
| Telephone                                   |                                |              |  |
| Email                                       |                                |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |     |
|-------------------------------|-----|
| Policy number;                | SA2 |
| Paragraph number;             |     |
| Table or figure number; or    |     |
| Map number (Atlas of Changes) |     |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/>            | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input type="checkbox"/>            | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

The proposed allocation for Old Vinyl Factory is based on a now-outdated outline planning permission, alongside the Gatefold permission.

Whilst the originally-proposed allocation indicated 642 units overall (492, 150 and 17 units in the three time periods), it is recognised that the delivery has slipped to somewhere near the 66, 501 and 75 units as now indicated for the three time periods.

The text within Policy SA2 should refer to the amended outline planning permission (ref 59872/APP/2013/3775 – approved 31 July 2014). Furthermore given that separate planning permissions have amended the outline planning permission (for an example the UTC) it is considered that the policy should identify that the Council will consider alternative uses and additional residential accommodation, where it can be demonstrated that such development will create a high quality urban realm and not have unacceptable impacts

However, practical delivery on the Old Vinyl Factory portion has been typically at around +15% unit numbers as a result of more efficient designs already approved by the LPA. In the light of the overall housing totals being target minimums (to accord with GLA London Plan), it would therefore be appropriate to increase the likely delivery from this site by +15% to 717 units overall (66, 486 and 175 units for the three time periods) to achieve a housing delivery closer to reality rather than theory. It is recognised that the implied further 75 units will need to be secured through the grant of further planning permission(s).

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

We would like to maintain the opportunity to attend the Hearing should our comments not be taken into account by the Council.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

N/A

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate *(tick)* which stage(s) you would like to be informed of:**

|                                     |   |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | When the Local Plan Part 2 Plan has been submitted for independent examination.   |
| <input checked="" type="checkbox"/> | The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2. |
| <input checked="" type="checkbox"/> | The adoption of the Local Plan Part 2.  |

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| 1. Name and Address        |   |              |  |
|----------------------------|---|--------------|--|
| Title                      | Mrs   |              |  |
| First name                 | Diane   |              |  |
| Last Name                  | Frank   |              |  |
| Organisation (if relevant) | For: Mrs Diane Frank, Catherine Bechade and Belikat PTY Ltd |              |  |
| Unit                       |   | House number |  |
| House name                 |   |              |  |
| Address 1                  | c/o Agent   |              |  |
| Address 2                  |   |              |  |
| Town                       |   |              |  |
| County                     |   |              |  |
| Postcode                   |   |              |  |
| Telephone                  |   |              |  |
| Email                      |   |              |  |

| 2. Agent's Name and Address (if applicable) |                     |              |  |
|---|---------------------|--------------|--|
| Title                                       | Mr                  |              |  |
| First name                                  | Martin              |              |  |
| Last name                                   | Friend              |              |  |
| Company                                     | Vincent and Gorbing |              |  |
| Unit  |                     | House number |  |
| House name                                  |                     |              |  |
| Address 1                                   |                     |              |  |
| Address 2                                   |                     |              |  |
| Town  |                     |              |  |
| County                                      |                     |              |  |
| Postcode                                    |                     |              |  |
| Telephone                                   |                     |              |  |
| Email                                       |                     |              |  |



## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   |
|-------------------------------------|-----------------------------------|
| <input type="checkbox"/>            | Development Management Policies   |
| <input checked="" type="checkbox"/> | Site Allocations and Designations |
| <input checked="" type="checkbox"/> | Policies Map (Atlas of Changes)   |

| Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|--|---|
| <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                      |
|-------------------------------|----------------------|
| Policy number;                |                      |
| Paragraph number;             |                      |
| Table or figure number; or    |                      |
| Map number (Atlas of Changes) | SINC Ext5 (page 190) |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |
|-------------------------------------|-------------------------------------|
| <input type="checkbox"/>            | It has not been positively prepared |
| <input checked="" type="checkbox"/> | It is not justified                 |

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

**Representations to Hillingdon Local Plan Part 2 : Site Allocations and Designations  
Revised Proposed Submission Version**

Objection to SINC Ext 5 (plan on page 190)  
Proposed extension to existing Nature Conservation Site of Metropolitan or  
Borough Grade I Importance  
Yeading Brook and Minet Country Park

This representation should be considered in the context of other representations made by the owner of land at Springfield Road to the continued designation of the site as part of the Green Belt. This representation relates to the additional new designation of the site as being of ecological value.

The Local Plan proposes extension of an existing Site of Nature Conservation Importance (SINC) adjoining the Hayes By-pass on to the remainder of the Minet Country Park together with our client's land at Springfield Road. The extension of the designation on to our client's land at Springfield Road is entirely unjustified and renders the Local Plan unsound in this regard. We attach to this representation an Ecology Statement prepared by Ecological Solutions.

There is no evidence that the Council have undertaken any assessment of its biodiversity value and, indeed, our client has allowed no access to the site by the Council or any organisation acting on their behalf.

Our client instructed well known ecologists, Ecology Solutions Limited, to independently consider whether the designation is justified. Their report is attached to these representations and demonstrates clearly that the extension of the designation to include our client's land has no evidential basis. It follows on from an habitat and botanical survey undertaken by Ecology Solutions in October 2014 and a more recent review of the Council's evidence base.

In summary, their report demonstrates clearly that the site does not meet recognised criteria for designation:-

- The Site is not of sufficient ecological value to merit designation;
- The Site does not meet relevant criteria to support the designation;
- The Site has not been subject to detailed ecological survey work to support the proposed extension; and
- The Site is not open to public access and nor will it be under the current ownership.

The evidence base for the extension is the "Review of New and Extended SINCs" (October 2015), prepared on behalf of the Council by LUC. It is clear from Section 2 of that document that in many instances only broad habitat data has been used to inform the assessment. No detailed Site based survey information is presented or referred to and thus judgements have

been made in relation to the Sites nature conservation value based upon the possible / likely species composition given the habitat/s present and the connectivity to the existing SINC.

As Ecology Solutions point out, it is evident, given that no detailed survey could have been undertaken, that in this instance a 'leap of faith' has been made in relation to the quality (in nature conservation terms), of the grassland that the site comprises. Assumptions made in relation to habitat quality is not an acceptable approach to designation.

The soft vegetation on the site was essentially destroyed between 2008 and 2010 during construction works associated with the installation of a pipeline. Since that time, reinstatement has occurred but ecological survey work has demonstrated that it does not represent habitat of any ecological value. Any historic information relied upon to support the revised boundary, as put forward during the original 2005 review, is not applicable and the non-specific, broad, habitat based approach as used by LUC in 2015 is clearly flawed.

Moreover, the site is bounded to the north and east by existing built form (including Springfield Road to the immediate east) and by a sports pitch to the south, all of which fall outside of the proposed SINC. Thus, the site would form a 'finger' of SINC extending east, bounded by habitat recognised by LUC / London Borough of Hillingdon to be of no ecological value. In these terms, the site cannot be deemed to be part of an important ecological corridor or act as a stepping stone for species during migration / colonisation.

In summary, there are currently no grounds on which the site should come forward for designation as part of a SINC. Specific surveys have shown the land to be of limited botanical / habitat diversity and its value to nature conservation in general is minimal.

The Local Plan is therefore unsound in this regard as it is not justified. It is not an appropriate strategy to designate land that has no ecological value as being protected for this value. The designation is supported by no evidence. Designation of land must be fully justified and must be based upon sufficient evidence. There can be no reasonable scientific justification for including the site within the boundaries of the proposed SINC extension.

Change to make the Local Plan sound

Remove the designation from the land at Springfield Road as shown on the attached plan.

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

To fully explain reason for change.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

### 1) What is your gender?

Male  Female

### 2) To which age group do you belong?

under 15  25 – 44  65 – 85  
 15 - 24  45 - 64  85+

### 3) Do you consider yourself to be a disabled person?

No  Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |



- SITE BOUNDARY**  
1.36ha 3.16ac
- LOCAL PLAN PROPOSED SINC EXTENSION EXT 6**
- SINC BOUNDARY AMENDMENT**
- LAND TO BE EXCLUDED FROM SINC**

**NOTE:**  
Boundary to be amended on proposals map and plan on page 139

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PROJECT TITLE  
**Land at Springfield Road,  
HILLINGDON**

DRAWING TITLE  
**London Borough of Hillingdon  
Local Plan: Part 2  
SINC boundary amendment**

|        |              |         |
|--------|--------------|---------|
| SCALE  | DATE         | CHECKED |
| 1:1250 | OCTOBER 2014 |         |
|        | DRAWN        | DATE    |
|        | HNA          |         |

|             |          |            |
|-------------|----------|------------|
| PROJECT No. | <b>N</b> | <b>004</b> |
| <b>4977</b> |          |            |

**VINCENT AND GORBING**  
**CHARTERED ARCHITECTS AND TOWN PLANNERS**  
STERLING COURT NORTON ROAD STEVENAGE HERTS  
TELEPHONE: 01438 316331 FAX:01438 722035



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MRS DIANE FRANK,  
MRS CATHERINE BECHADE AND  
BELIKAT PTY LTD

LAND OFF  
SPRINGFIELDROAD  
HAYES  
GREATER LONDON

## **Ecology Statement**



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## **CONTENTS**

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## **PLANS**

PLAN ECO1                      Image taken from Google Earth showing the Site location

## **APPENDICES**

APPENDIX 1                      Extract from "London Borough of Hillingdon: review of Proposed New and Extended SINCS" (2015) showing relevant SINC 6 information

## **1. INTRODUCTION**

### **1.1. Background & Proposals**

- 1.1.1. Ecology Solutions was originally commissioned by Mrs Diane Frank, Mrs Catherine Bechade and Belikat PTY Ltd (the owners) in October 2014 to undertake an ecological appraisal, including botanical survey of a small parcel of land off Springfield Road, Hayes, Greater London (hereinafter referred to as the Site). Ecology Solution was also instructed to assess the sites ecological value in the light of it being proposed to come forward as part of an extension to a locally designated Site of Importance for Nature Conservation (SINC). The results of that assessment were described within the report titled "Land off Springfield Road, Hayes, Greater London – Ecological Appraisal (October 2014), produced by Ecology Solutions.
- 1.1.2. Subsequent to this Ecology Solutions was instructed by the owners to review the report titled "London Borough of Hillingdon: Review of New and Extended SINCS" produced by LUC (October 2015) and provided a critique of that document insofar as it relates to the Site.
- 1.1.3. This report updates the Ecological Appraisal report (October 2014) with reference to the "Review of New and Extended SINCS" (October 2015) as appropriate.
- 1.1.4. The Site is currently being promoted by the London Borough of Hillingdon for inclusion within a proposed extension to the Yeading Brook and Minet Country Park SINC (Borough Grade I) (Ref SINC 6). The Site was previously proposed for designation at the local level as part of the "Yeading Brook, Minet Country Park and Hitherbroom Park" (SINC - Borough Grade I). Hitherbroom Park is now proposed as a separate SINC.

### **1.2. Site Characteristics**

- 1.2.1. The Site is located off Springfield Road in Hayes. It is roughly square in shape. To the immediate north is existing commercial development, to the east Springfield Road with existing commercial / industrial development beyond, to the south is a disused football ground. To the west lies an area of open land (Minet Country Park) understood to comprise grassland and scrub.
- 1.2.2. The Site itself comprises species poor grassland, which was previously grazed. The land is currently subject to regular mowing during the growing season to prevent the proliferation of scrub and notifiable agricultural weed species.

### **1.3. Assessment**

- 1.3.1. This document describes the ecological interest of the Site as documented through specific survey and assessment work undertaken by Ecology Solutions. The importance of the habitats present is evaluated with regard to current guidance published by the Institute of Ecology and Environmental Management (IEEM). It also discusses the assessment work undertaken by LUC.

#### 1.4. Habitat Survey Methodology

- 1.4.1. A habitat and botanical survey was undertaken by Ecology Solutions on the 20<sup>th</sup> October 2014. The survey focussed on identifying the main habitats and associated plant species. The survey data was used to inform conclusions in relation to the ecological value of the land contained within the boundaries of the Site.
- 1.4.2. The Site was surveyed based around extended Phase 1 survey methodology<sup>1</sup>, as recommended by Natural England, whereby the habitat types present are identified and mapped, together with an assessment of the species composition of each habitat. This technique provides an inventory of the basic habitat types present and allows identification of areas of greater potential which require further survey. Any such areas identified can then be examined in more detail.
- 1.4.3. Using the above method, the site was classified into areas of similar botanical community types, with a representative species list compiled for each habitat identified. The importance of the habitats present was evaluated with due consideration given to the current guidance published by the Institute of Ecology and Environmental Management (IEEM)<sup>2</sup>.
- 1.4.4. For clarity, by contrast the Site has not been subject to any detailed ecological survey work by LUC or any other third party on behalf of the planning authority in support of the promotion of the Site as part of the extension to SINC 6. The Site is fully enclosed by metal palisade fencing, with a padlocked access gate off Springfield Road. No access has been granted to third parties for survey purposes and access is not freely available.
- 1.4.5. Following from the above, no detailed specific ecological survey information is presented within the Review of New and Extended SINCS (October 2015) in support of the designation of the Site. The only detailed survey information which is can be considered current for assessment purposes remains that documented by Ecology Solutions.

---

<sup>1</sup> Joint Nature Conservation Committee (1993). *Handbook for Phase 1 Habitat Survey – a Technique for Environmental Audit*. England Field Unit, Nature Conservancy Council, reprinted JNCC, Peterborough

<sup>2</sup> Institute of Ecology and Environmental Management (2006) *Guidelines for Ecological Impact Assessment in the United Kingdom* (version 7 July 2006). <http://www.ieem.org.uk/ecia/index.html>

## 2. ECOLOGICAL FEATURES

2.1. The Site was subject to an ecological survey by Ecology Solutions during October 2014. The vegetation present enabled the habitats to be satisfactorily identified and an accurate assessment of the ecological interest of the habitats to be undertaken.

2.2. The following main habitat / vegetation types were identified:

- Semi-improved grassland; and
- A standard tree.

2.3. No other habitat features are present, with the Site bounded by metal palisade fencing.

2.4. Each habitat identified during the ecological survey work is described below with an account of the representative plant species present.

### 2.5. Semi-improved grassland

2.5.1. Semi-improved grassland with a ruderal compliment (most notably at the boundaries) is the dominant habitat. The grassland is understood to be regularly mown to prevent the encroachment of scrub and notifiable agricultural weeds. At the time of survey mowing had not been recently undertaken and despite some localised thatch within the sward a good compliment of species was observed.

2.5.2. Those species recorded are as follows, Perennial Rye Grass *Lolium perenne*, Cock's Foot *Dactylis glomerata*, Fescues *Festuca* spp, False Oat Grass *Arrhenatherum elatius*, Ribwort Plantain *Plantago lanceolata*, White Clover *Trifolium repens*, Common Mallow *Malva sylvestris*, Dove's-foot Cranes-bill *Geranium molle*, Creeping Buttercup *Ranunculus repens*, Dandelion agg. *Taraxacum officinale* agg, Common Ragwort *Senecio jacobaea*, Common Mouse-ear *Cerastium fontanum*, Broad Leaved Dock *Rumex obtusifolius*, Red Clover *Trifolium pratense*, Cleavers *Gallium aparine*, Bristly Ox-tongue *Helminthotheca echioides*, Yarrow *Achillea millefolium*, Smooth Sow-thistle *Sonchus oleraceus*, Spear Thistle *Cirsium vulgare*, Hairy Tare *Vicia hirsuta*, Black Medick *Medicago lupulina*, Prickly Sow-thistle *Sonchus asper*, Red Dead-nettle *Lamium purpureum*, Autumn Hawkbit *Scorzoneroides autumnalis*, Common Nettle *Urtica dioica*, Creeping Thistle *Cirsium arvense*, Common Field Speedwell *Veronica persica*, White Dead-nettle *Lamium album*, Hogweed *Heracleum sphondylium*, Small Flowered Crane's-bill *Geranium pusillum*, White Campion *Silene latifolia*, Lesser Burdock *Arctium minus*, Curled Dock *Rumex crispus*, Common Vetch *Vicia sativa* and Scentless Mayweed *Tripleurospermum inodorum*.

2.5.3. Of the above, all were infrequent within the sward which for the main part is dominated by grasses with a limited species compliment. Locally frequent and dense patches of White Dead-nettle, Hogweed and Common Nettle are present at the boundaries. Scentless Mayweed was recorded only at the compacted / disturbed ground at the entrance to the field.

- 2.5.4. It was noted that the site has clearly been subject to nutrient enrichment since some of the plants, especially the Clovers were very large.

## 2.6. **Standard Tree**

- 2.6.1. A single semi-mature Cherry *Prunus* sp. tree is present at the Site boundary in the north-western corner. This features does not offer potential roosting sites for bats. Any intrinsic value would in the main be associated with foraging / nesting opportunities for birds.

## 2.7. **Faunal use of the Site**

- 2.7.1. During the course of the survey notes were made on the use of the site by faunal species and assessments made in relation to the potential for the species present to be used by protected or notable species.
- 2.7.2. The only species observed during the course of the survey were Magpie, Kestrel, Pied Wagtails (2) and Wren. The Wren was observed off site to the west within Bramble and the other three species were all recorded in flight over the Site. No birds were recorded within the Site itself.
- 2.7.3. No evidence of use of the Site by Badgers was recorded.
- 2.7.4. Given the habitats present the Site would not be of any significant value to bats.
- 2.7.5. The potential value to common reptile species (rarer species would not be present given the habitats on site) is tempered significantly by the management regime which prevents the development of a diverse sward structure. It is also known that the Site was stripped in 2008 and re-seeded in 2010, so any colonisation would be entirely dependent on dispersing individuals from nearby populations (if present).
- 2.7.6. The site is expected to support a range of common invertebrate species, but there is no evidence to suggest that the Site would be important for any protected or notable species.
- 2.7.7. On the basis of the habitats present the Site is not expected to support any other protected or notable species.

### **3. ECOLOGICAL EVALUATION**

- 3.1. The habitats described in Section 2 of this report have been considered in the context of their ecological value at the Site level and also with regard to their importance at the local and borough wide level.
- 3.2. The Cherry tree is of negligible intrinsic ecological value. At the Site level this feature offers some foraging or nesting opportunities for birds and a seasonal foraging / shelter resource for invertebrates. In the context of the wider area, including considerations at the local and borough wide level this feature could not be considered of nature conservation value.
- 3.3. The grassland is best described as species poor pasture comprising a compliment of species which are common at the UK and local level. Its value to any faunal species is very limited. At the site, local and borough wide level this feature could not be considered of significant nature conservation value.
- 3.4. The sites value at the borough level is considered further in the following section of this report.

#### 4. CONSIDERATION OF RELEVANT MATTERS

- 4.1. The Site has been proposed for designation at the local level as part of the “Yeading Brook and Minet Country Park SINC (Borough Grade I), where an extension to an existing SINC is proposed, to include the Site.
- 4.2. A plan showing the current proposed extension together with the site survey proforma, taken from the “Review of New and Extended SINC’s” (October 2015) is included at Appendix 1 of this report.
- 4.3. Previously Ecology Solutions reviewed the proposed extension to the SINC in light of the document titled “Local Plan Part Two, Draft Proposed Site Allocations and Designations” (2002) (hereinafter referred to as the DPSAD) published by London Borough of Hillingdon. Many of the same issues arise in relation to a consideration of the “Review of New and Extended SINC’s” and all relevant matters are discussed below.
- 4.4. The following key points arise:
  - The Site is not of sufficient ecological value to merit designation;
  - The Site does not meet relevant criteria to support the designation;
  - The Site has not been subject to detailed ecological survey work to support the proposed extension; and
  - The Site is not open to public access and nor will it be under the current ownership.
- 4.5. The above points are discussed wherever relevant below.

##### Matters relating to Ecological value

- 4.6. As described in previous sections of this report, the site is of very limited ecological value comprising species poor pasture.
- 4.7. Criteria for the designation of SINC’s within London are set out within the Mayor’s Biodiversity Strategy (2002). In relation to Borough Grade I SINC’s the following is stated:

“These are sites which are important on a borough perspective in the same way as the Metropolitan sites are important to the whole of London. Although sites of similar quality may be found elsewhere in London, damage to these sites would mean a significant loss to the borough. As with Metropolitan sites, while protection is important, management of borough sites should usually allow and encourage their enjoyment by people and their use for education.

Since 1988 borough sites have been divided, on the basis of their quality, into two grades, but it must be stressed that they are all important on a borough-wide view.

In defining Sites of Borough Importance, the search is not confined rigidly to borough boundaries; these are used for convenience of defining areas substantially smaller than the whole of Greater London, and the needs of neighbouring boroughs should be taken into account. In the same way as for Sites of Metropolitan Importance, parts of some



boroughs are more heavily built-up and some borough sites are chosen there as oases providing the opportunity for enjoyment of nature in extensive built environments.

The borough is an appropriate search area in relation to Planning Policy Guidance on nature conservation (1994) which, in paragraphs 15 and 25, states that local plans should identify, and include policies for, areas of local nature conservation importance.

Since essentially a comparison within a given borough is made when choosing Sites of Borough Importance, there is considerable variation in quality between those for different boroughs; for example, those designated in Barnet will frequently be of higher intrinsic quality than those in Hammersmith and Fulham, a borough comparatively deficient in wildlife habitat. Only those sites that provide a significant contribution to the ecology of an area are identified.”

- 4.8. The main points taken from the above are discussed below.
- 4.9. Notwithstanding other sites of similar quality may be present in London, damage to these sites in particular would “mean a significant loss to the borough”. Thus it is inherent within the guidance that the site (i.e. the designated land, in this case land within the extended boundary) must have sufficient nature conservation value (to merit designation) such that losses to it would be detrimental to the borough nature conservation assets. As discussed, the Site is not of any significant ecological value and losses to it cannot be deemed detrimental to the Borough’s nature conservation assets.
- 4.10. In some instances, where a borough is more heavily built up, sites which in other instances may not be chosen for designation (i.e. more limited intrinsic ecological value) can come forward on the basis that they are “oases providing the opportunity for enjoyment of nature”. This criteria is not applicable in this instance since the Site adds nothing of consequence to the existing SINC in terms of nature conservation value, but furthermore the Site is fenced and is not open to public access.
- 4.11. Sites should only be chosen which “provide a significant contribution to the ecology of an area are identified”. Survey evidence obtained by Ecology Solutions shows that the nature conservation value of the Site is not significant for the borough.
- 4.12. No evidence to the contrary is presented within the Review of proposed New and Extended SINCS, nor was any previously presented within the DPSAD.
- 4.13. Consideration has been given to the added value the Site would bring to the SINC.
- 4.14. The Site does not contain plant species which are rare at any level, local or otherwise and the Site would not likely be important to protected or notable faunal species. Species poor grassland is not under-represented in the local area and better quality grassland is understood to be present within the existing SINC boundaries.
- 4.15. In line with relevant criteria, a site must be shown to have nature conservation value of a level worthy of protection through the planning system. It is not

acceptable to designate on the grounds of a sites potential value. Any land could have 'potential value', subject to appropriate remedial works and future management, but to designate on this basis seriously undermines the value of the network of locally designated sites.

- 4.16. Previously, in undertaking a review of the DPSAD, paragraphs 5.11 – 5.18 of the DPSAD were considered relevant where a summary of the evolution of guidance and planning policy in relation to the designation of SINCs in London was given. Of particular note is paragraph 5.16, where it is stated that the proposed revisions to the sites and boundaries of SINCs follow a review of SINCs in 2005 and that:

“The GLA in combination with the Borough carried out an extensive review of sites based on field work and updated citations on the flora and fauna supported at sites.”

- 4.17. In relation to the mechanisms and timescales for designation paragraph 5.16 states:

“The revisions and alterations could not be designated until they had been through a formal plan making process allowing the public and landowners the opportunity to comment. The intention was that the changes would be integrated into the 2007 LDF Core Strategy and Site Allocations document. The Hillingdon Local Plan Part 1 was published in 2012, with a review of site allocations to follow.”

- 4.18. It was considered by Ecology Solutions entirely feasible that the existing SINC and some of the land which was proposed under the extension of the boundary has indeed been subject to a level of “field work”. This was however not the case for the Site to which this report relates. It could not be, because the Site was, and still is securely fenced and at no stage have the owners granted access for survey purposes. In this light, any such survey would have been undertaken without permission being granted and with a surveyor being in no doubt as to the lack of general public access (i.e. trespass would have occurred).

- 4.19. Specifically regarding the “Review of New and Extended SINCs” (October 2015), it is clear from Section 2 of that document that in many instances only broad habitat data has been used to inform the assessment. It is stated at paragraph 2.4 that:

“Detailed plant species lists were only collected for particularly notable habitats as per the GLA method, such as acid grassland sites.”

- 4.20. No detailed Site based survey information is presented or referred to and thus judgements have been made in relation to the Sites nature conservation value based upon the possible / likely species composition given the habitat/s present and the connectivity to the existing SINC.

- 4.21. It is evident, given that no detailed survey could have been undertaken, that in this instance a ‘leap of faith’ has been made in relation to the quality (in nature conservation terms), of the grassland. Assumptions made in relation to habitat quality is not an acceptable approach to designation.

- 4.22. It is worth noting that the Site is known to have been grazed through the 1980's, 1990's and early 2000's. Livestock were removed in 2002 following continued instances of harming, theft and abuse. Between 2008 and 2010 the Site was subject to significant earthworks to facilitate the construction of a gas pipeline along the boundary of the site with Springfield Road. The majority of the topsoil stripped and hardstanding areas were constructed. On completion, the land was reinstated as grazing pasture over the period 2010 / 2011.
- 4.23. Given the above, any perceived nature conservation value associated with the Site at the point when the SINCs and their boundaries were originally being reviewed in 2005 was essentially destroyed between 2008 and 2010. Thus, events at the Site have superseded any (limited) information relied upon during the original 2005 review.
- 4.24. The only information which could be relied upon to support the proposed designation of the Site would need to be derived from updated and detailed survey work undertaken post reinstatement work (i.e. 2011 onwards). As discussed, Ecology Solutions survey work has demonstrated that the Site is of limited ecological value and could not be deemed significant at the Borough level.
- 4.25. A further point of note relates to the position of the Site in the context of the existing SINC and additional land subject to the proposed extension. The Site is bounded to the north and east by existing built form (including Springfield Road to the immediate east) and by a sports pitch to the south, all of which rightly and understandably fall outside of the proposed extension. Thus, the Site would form a 'finger' of SINC extending east, bounded by habitat recognised by LUC / London Borough of Hillingdon to be of no ecological value. In these terms, the Site cannot be deemed to be part of an important ecological corridor or act as a stepping stone for species during migration / colonisation.
- 4.26. In light of the above it is simply not possible that sufficiently detailed and appropriate information is available to London Borough of Hillingdon in order for it to determine that the quality of the Site (in true nature conservation terms) is such that it should proceed to include the Site within the proposed extension to SINC 6.

#### Matters relating to Accessibility

- 4.27. From a review of the LUC survey proforma, attached for ease of reference at Appendix 1, it is clear that there is a significant anomaly in relation to the availability of public access. Access is described as "free" and in relation to available entry points it is stated that the area proposed under the extension is "accessible open space". Further, recreational use is described as "active" with "frequent use".
- 4.28. The above is factually wrong and misleading. It may well be true for parts of the proposed extension, but it is certainly not the case for the Site. To re-iterate, the Site is securely fenced and does not offer any public access. It cannot be described as 'accessible open space' subject to any, let alone frequent active recreational use.

## 5. SUMMARY AND CONCLUSIONS

- 5.1. Ecology Solutions was originally commissioned by the owners in October 2014 to undertake an ecological appraisal, including botanical survey of a small parcel of land off Springfield Road, Hayes, Greater London. Ecology Solution was also instructed to assess the sites ecological value in the light of it being proposed to come forward as part of an extension to a SINC. Subsequent to this Ecology Solutions was instructed by the owners to review the report titled "London Borough of Hillingdon: Review of New and Extended SINCs" produced by LUC (October 2015) and provided a critique of that document insofar as it relates to the Site.
- 5.2. This report updates the Ecological Appraisal report (October 2014) with reference to the "Review of New and Extended SINCs" (October 2015) as appropriate.
- 5.3. The ecological survey work undertaken has shown the site to be of very limited ecological value and certainly not of value in nature conservation terms at the borough wide level.
- 5.4. No detailed survey work for the Site has been undertaken by London Borough of Hillingdon, or its representatives. The only current, detailed survey work available remains that obtained by Ecology Solutions which shows the Site to be of limited ecological value and certainly not significant in the context of the Borough.
- 5.5. The site was essentially destroyed between 2008 and 2010 during construction works associated with the installation of a pipeline. Since that time, remediation has occurred but ecological survey work has demonstrated that it does not represent habitat of sufficient botanical diversity or broader ecological value. Any historic information relied upon to support the revised boundary, as put forward during the original 2005 review is not applicable and the non-specific, broad, habitat based approach as used by LUC in 2015 is clearly flawed..
- 5.6. Inclusion of the Site within the SINC 6 extension does not fit with relevant designation criteria and habitat of no significant value in the context of the borough has been included.
- 5.7. Designation of land must be fully justified and must be based upon sufficient and appropriate evidence. Such evidence has not been provided and there can be no reasonable scientific justification for including the Site within the boundaries of the proposed SINC 6 extension.

## **PLANS & APPENDICES**

## PLANS

## **PLAN ECO1**

Image taken from Google Earth showing the Site  
location





Google earth

miles  
km





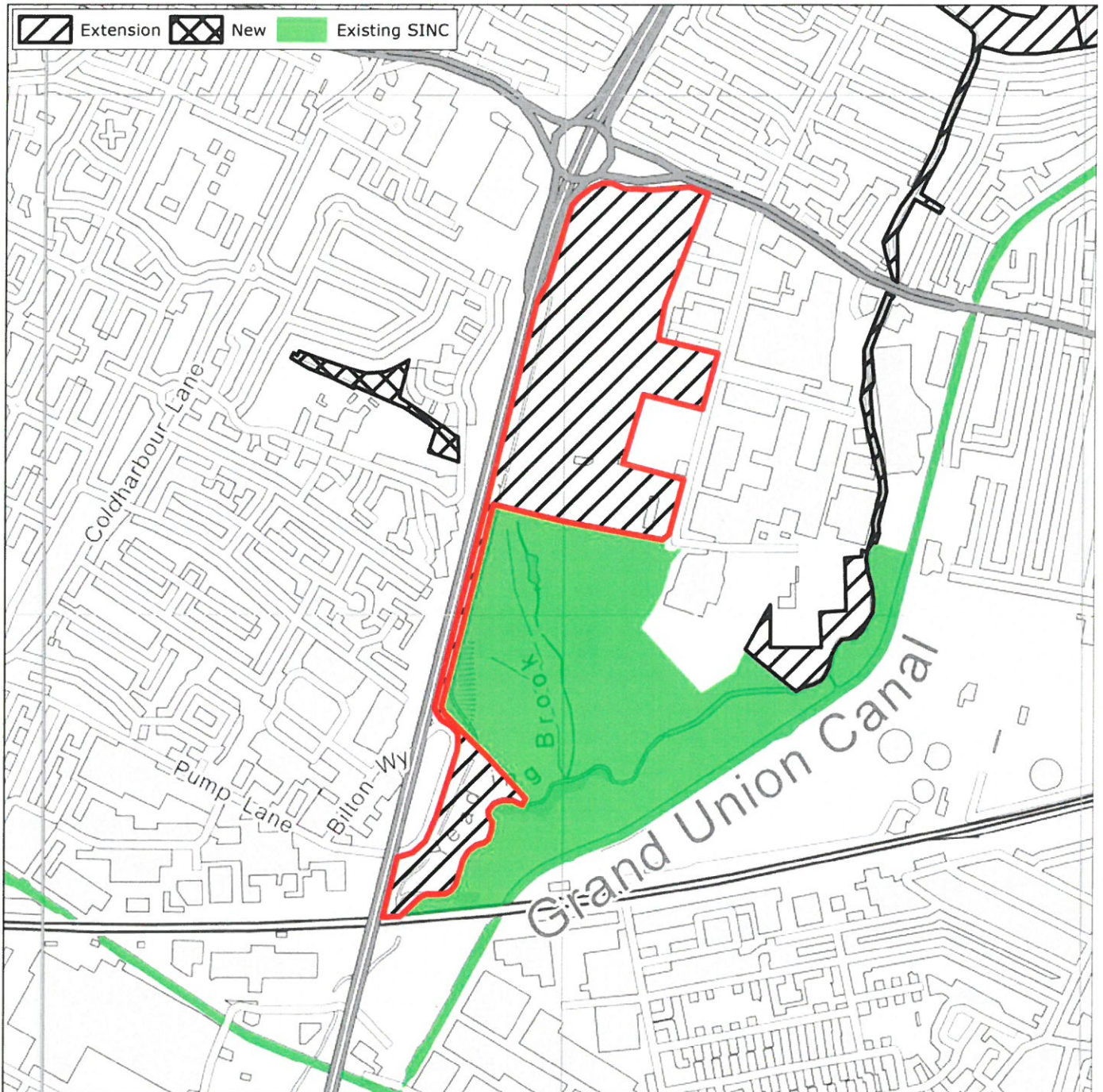
## **APPENDICES**

## **APPENDIX 1**

Extract from “London Borough of Hillingdon: review  
of Proposed New and Extended SINCS” (2015)  
showing relevant SINC 6 information

SiteID: SINC 6      Grade: Grade 1      ID on Maps: 10h      SINC No: SINC 6

Site name: Yeading Brook & Minet Country Park      Status: Extension



### Site and parcel details

|   |                 |              |                     |
|---|-----------------|--------------|---------------------|
| Location:                                     | Avondale Drive  | Surveyor:    | S Puntney           |
| Owner:  |                 | Survey date: | 28/07/2015          |
| Manager:                                      |                 | Time spent:  | 1.5                 |
| Access/View from:                             |                 | Weather:     | Full cloud coverage |
| Permission to enter from:                     |                 | Access:      | All                 |
| Recomendation:                                | Borough Grade 1 | Area (ha):   | 22.45               |
| Local Plan Part 2 Changes: Designation Grade: | Grade 1         |              |                     |



SiteID:  Grade:  ID on Maps:  SINC No:

Site name:  Status:

## Open space typology

PPG17 ID:

PPG17 Typology:

Specify other

## Planning status

- SSSI
- LNR
- SINC or equivalent
- Green Belt
- Other
- MOL
- Green chain
- Green corridor
- No open space designation
- Conservation Area

Specify other:

## Other information

Ownership:

Public access:

Public access restrictions:

Entry points:

Maintenance and management:

Predominant recreational use:

Level of use:

## Accessibility (score 0-2)

Pedestrian:  Private car:  Cycle:  Wheelchair:  Public transport:

## Facilities

Tennis courts (specify number):  Playing pitches Mini:  Junior:  Full:

- Cricket pitch
  - Athletics track
  - Bowling green
  - Golf course
  - Pitch putt/crazy golf
  - Driving range
  - Changing rooms
  - Motor cross
  - Outdoor swimming pool
  - Outdoor paddling pool
  - Fishing
  - Watersports
  - Basketball hoops
  - All weather
  - Natural
  - Floodlit
  - All weather
  - Natural
  - Floodlit
  - All weather
  - Natural
  - Floodlit
  - Refreshments
  - Litter bins
  - Recycling facilities
  - Dog litter bins/area
  - Nature trail
  - Animal/bird enclosure
  - Open air performance area
  - Car parking
  - Horse riding
  - Waymarked walking
  - Cycle paths
  - Historic features
  - Art gallery
  - Sculptures/monuments
  - Public art
  - Facilities other
- Specify other:

## Threats and disturbances (give details of severity etc)

- Invading plants
- Erosion
- Motorcycle scrambling
- Intrusive buildings
- Boundary treatment
- Redevelopment
- Safety security

SiteID: SINC 6      Grade: Grade 1      ID on Maps: 10h      SINC No: SINC 6

Site name: Yeading Brook & Minet Country Park      Status: Extension

- Vandalism  Burnt ground - area used for a bonfire
- Litter
- Dogfouling
- Fly Tipping
- Pollution
- Aircraft noise
- Rail/road noise
- Other

### Interest/potential for enhancement

|                  |  |
|------------------|--|
| Recreation:      |  |
| Structural:      |  |
| Amenity:         | Remove and manage vandalism and litter |
| Ecology:         | Improve disturbed, rough ground        |
| Education:       |  |
| Social cultural: |  |
| Heritage:        |  |
| Health:          |  |
| Accessibility:   |  |
| Other:           |  |
| Comments         |  |

### Changes since last survey

|           |  |
|-----------|--|
| Changes:  |  |
| Comments: |  |

SiteID:  Grade:  ID on Maps:  SINC No:

Site name:  Status:

## Habitats %

|                                     |   |  |
|-------------------------------------|---|--|
| 01: Native broadleaved woodland     | 08: Acid grassland                          | 28: Arable                             |
| 02: Non-native broadleaved woodland | 40 09: Neutral grassland (semi-improved)    | 16: Bog                                |
| 03: Coniferous woodland             | 35: Neutral grassland (herb rich)           | 17: Reedswamp                          |
| 15 37: Scattered trees:             | 10: Basic grassland                         | 40: Typha etc. swamp                   |
| 05: Recently felled woodland:       | 11: Improved/reseeded agric grassland       | 18: Wet marginal vegetation            |
| 15 06: Scrub                        | 10 07: Amenity grassland                    | 19: Fen carr (woodland/scrub over fen) |
| 38: Planted shrubbery               | 12: Ruderal or ephemeral                    | 20: Standing water (includes canals)   |
| 25: Native hedge                    | 10 33: Roughland (intimate mix of 9, 14 6)  | 21: Ditches (water filled)             |
| 34: Non-native hedge                | 13: Bracken                                 | 23: Intertidal mud, sand, shingle etc  |
| 31: Orchard                         | 14: Tall herbs                              | 24: Saltmarsh                          |
| 36: Vegetated walls, tombstones etc | 15: Heathland                               | 30: Habitat information not available  |
| 5 26: Bare soil and rock            | 39: Allotments (active)                     |  |
| 27: Bare artificial habitat         |   |  |
| 29: Other                           | 29: Other description: <input type="text"/> |  |

## Habitat qualifiers

|                         |                      |                                      |
|-------------------------|----------------------|--------------------------------------|
| Treeline without hedge: | Grazed:              | Floating vegetation:                 |
| Even-aged plantation:   | Infrequently mown:   | Submerged vegetation:                |
| Coppice:                | Frequently mown:     | Emergent vegetation:                 |
| Flush:                  | Cuttings removed:    | Saline:                              |
| Dead wood:              | Unmanaged grassland: | Tidal:                               |
| Wet:                    | Ridge and furrow:    | Naturally formed riverbank:          |
| Hedge with treeline:    | Flush:               | <input type="checkbox"/> Eutrophic   |
| Ancient woodland:       | Wet:                 | <input type="checkbox"/> Mesotrophic |
| Pollarded:              | Sand/clay bank:      | <input type="checkbox"/> Oliotrophic |
| Wood shrub layer:       |                      | <input type="checkbox"/> Dystrophic  |

## Interest

|                                       |                                       |   |
|---------------------------------------|---------------------------------------|---|
| <input type="checkbox"/> Invertebrate | <input type="checkbox"/> Higher Plant | Additional comments: <input type="text"/> |
| <input type="checkbox"/> Fish         | <input type="checkbox"/> Bryophyte    |   |
| <input type="checkbox"/> Amphibian    | <input type="checkbox"/> Lichen       |   |
| <input type="checkbox"/> Reptile      | <input type="checkbox"/> Fungi        |   |
| <input type="checkbox"/> Mammal       | <input type="checkbox"/> Geology      |   |
| <input type="checkbox"/> Bird         | <input type="checkbox"/> other        |   |

## Species Richness

Species richness:



SiteID:

SINC 6

Grade:

Grade 1

ID on Maps:

10h

SINC No:

SINC 6

Site name:

Yeading Brook & Minet Country Park

Status:

Extension

## Nature conservation value

Nature conservation value (surveyor's personal opinion):

Series of open spaces supporting a diverse habitat mosaic along watercourses (Yeading Brook and Grand Union Canal) providing a potentially valuable wildlife corridor between other existing SINC's. Includes a large parcel associated with Minet Country Park previously suggested along with Hitherbroom Park. These should be treated as separate designations (see site 12).



Historic England

James Gleave  
Planning Policy Team Manager  
London Borough of Hillingdon  
3N/02, Civic Centre  
High Street  
Uxbridge  
UB8 1UW

Our ref:

8 December 2015



Dear Mr Gleave,

**Hillingdon Local Plan Part 2  
Development Management Policies, Site Allocations and Policies Map changes  
And Strategic Environmental Assessment (SEA)**

Thank you for the opportunity to comment on the Hillingdon Local Plan Part 2 documents relating to Development Management, Site Allocations and Policy Map changes.

As the government's adviser on the historic environment we have reviewed the documents in light of the National Planning Policy Framework (NPPF) and its core principle that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations. Accordingly, the comments in this response are put forward to ensure consistency with the NPPF and the National Planning Policy Guidance and related guidance in the Good Practice Advice Notes.

We note that representations are invited on the changes to the proposed submission Site Allocations document, the Development Management Policies and changes to the Policies Map. Some of our responses are couched to ensure that there is consistency within the local plan documents so that there is a positive strategy for the historic environment throughout. This is to ensure that the plan accords with the requirement in paras 126 and 157(8) of the NPPF.

Historic England has engaged with the Council on the Hillingdon Townscape Character Study, published in November 2013. We are pleased to see that the study is referenced within the Part 2 documents. It is essential that this evidence base is easily accessed so that users of the local plan can readily refer to it. We see this as important not only as it is part of the plan baseline but also as it provides a reference document with a continuing role for those



Please note that Historic England operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available.





Historic England

considering developments in the borough, taking account of the character and historic significance of the borough's attributes.

While there is much that we welcome in the proposed changes, including additional references to heritage assets within the site allocation policies, there are some individual points we would like to raise at this stage to in the interests of soundness so that the development plan documents are fully justified and consistent with the national policy in the NPPF. Our detailed comments are attached. We would be pleased to discuss these with you with a view to agreeing amendments in the areas indicated.

I hope this is helpful to you and I look forward to further discussions with you.

Yours sincerely



Katharine Fletcher  
Historic Environment Planning Adviser



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## **Historic England's Schedule of specific comments and recommendations**

### **Development Management Policies – Revised Proposed Submission**

#### **Chapter 2 The Economy**

Para 2.24

The recent completion of repairs to Harmondsworth Great Barn (listed grade I) and provision of public access in our view justifies a reference to it in bullet point 6 of this paragraph.

#### Policy DMEI 7 Farm Diversification

Renewable energy installations may impact directly and indirectly on the significance of heritage assets. For instance, solar panel farms may affect archaeological remains while wind turbines can adversely affect the setting of heritage assets. Such impacts should be highlighted within the policy in the interests of clarity, so that they can be assessed and managed appropriately. We recommend that part iv) includes 'the significance of heritage assets' after 'nature conservation value'.

#### **Chapter 5 Historic and Built Environment**

Para 5.1

As the NPPF seeks active enhancement we suggest that the words 'or enhanced' are added to the end of the opening sentence.

Para 5.4

The Council has prepared the Townscape Character Study (2013) to inform the Local Plan Part 2 Development Plan Documents. This should be referred to in para 5.4 to draw attention to its importance as part of the evidence base. It should also be made accessible within the local plan pages of the Council's website.

#### Policy DMHB 1 Heritage Assets

We recommend the addition to the policy of an overarching sentence stating that the Council will expect development proposals to avoid harm to the historic environment in line with paras 8 and 152 of the NPPF. The objective of sustainable development is to integrate and manage environmental, social and economic aims to achieve positive outcomes across all areas. Paras 126 and 131 of the NPPF provide for such a positive approach in relation to the historic environment.

We strongly support part C) to policy DMHB 1 giving a commitment to repair and beneficial use of heritage assets, and improvements to the conservation areas at risk. These matters may be taken further through the proposed heritage strategy.





Para 5.15

We recommend that the following is added to the end of this paragraph – ‘where these are available and other relevant assessments including the Hillingdon Townscape Character Assessment’.

Archaeological Priority Areas and Archaeological Priority Zones

Paras 5.24 to 5.27

The 2013 study commissioned by the Council from CgMs reviewed the APAs and recommended a number of changes. These changes resulted in the identification of two APZs and 19 APAs (not 9 as stated in para 5.24). We note that the Policies Map does reflect these changes. It would be appropriate, for clarity, to retain a reference to the CgMs report stage 2, and the adoption of the changes in paras 5.24/5.25. This would ensure that the change in the APAs/APZs referenced in the local plan Part 1 (Strategic Policies, paras 7.5/7.6) is accounted for.

To comply with the NPPF (para 128) paragraph 5.26 should also refer to applicants undertaking field evaluation to inform planning applications where necessary and to making reasonable amendments to schemes to minimise harm. The final sentence of 5.26 could be taken to imply that consent would be granted provided archaeological investigation takes place, and to avoid this interpretation it would be better to move it to 5.27.

Reference is made in 5.27 to securing archaeological investigations through a planning agreement but a condition is the mechanism normally used. Please add reference to submission of the report and archive to the Museum of London.

Planning applications for a number of the proposed site allocations will warrant archaeological assessment, and possibly field evaluation, subsequently leading on to post-consent mitigation measures.

High Buildings and structures

Para 5.33

With reference to the last sentence, we note that the Townscape Character Assessment refers to the potential to cluster tall buildings but also identifies the need for particular sensitivity in both of the preferred locations for tall buildings. The study notes that that within both of the two centres considered suitable locations for tall buildings there are sensitivities of the context to be considered. Within Uxbridge ‘. . . the juxtaposition of modern tall buildings and the historic high street is a condition that needs careful monitoring to ensure a harmonious relationship is encouraged in future’. In the interests of clarity we therefore recommend that the final sentence of para 5.33 is not amended as





proposed but reads: ‘Within the two town centre locations higher density can also offer the potential to regenerate an area and a tall building can emphasise a point of civic or visual significance’.

#### Policy DMHB 10 High buildings and structures

Strategic Policy BE1 (11) (Built environment ) states that outside Uxbridge and Hayes town centres tall buildings will not be permitted, and this position is confirmed in the Townscape Character Assessment findings (p88-90). The Character Assessment report states that within these centres the townscape character may be sensitive, and tall buildings should be considered where they integrate well with the existing townscape and contribute positively to the creation of an improved environment. In light of these conclusions we consider that some of the changes to policy DMHB10 are not justified, and recommend as follows:

- in the opening sentence omit ‘dominant’ – this could be open to a number of interpretations and may override consideration of the setting of a vulnerable heritage asset
- in part i) omit ‘or an area identified by the Borough’ – this creates uncertainty and departs from the background evidence
- retain previous parts iv (contribution to the skyline) and v (heritage assets and views) – these are justified in relation to the background evidence.

### **Site Allocations and Designations – Revised Proposed Submission**

#### **Chapter 3 Identifying sites for new homes**

##### Policies SA 4 Fairview Business Centre; SA 5 Land South of the Railway, Hayes.

The Grand Union Canal is an undesignated heritage asset whose significance is acknowledged within the local plan Strategic Policy HE1(1) and in the Townscape Character Assessment as among key defining features of the borough’s form. It is important that the significance of the canal, its local distinctiveness, amenity and sense of place is respected and that the corridor is enhanced. Such enhancement should be achieved through consideration of how new development along the canal relates to the character and quality of the corridor to ensure that regeneration builds on the asset in a positive manner. Enhancement may also be achieved through improvements to the public realm, but it is important that a strategic approach is taken to the canal and the places it has created, and will continue to create.

Taking this forward, it is essential that the provision in policies SA4 and SA5 for higher density along the canal frontage should be balanced and moderated by the need to avoid harm to the enjoyment of this key asset while building on and responding to local character and reinforcing local distinctiveness. Consequently we recommend that the policies should refer to an assessment of appropriate density, taking account of the



heritage, recreational and townscape value of the canal. This would reflect paragraphs 58, 60 and 61 of the NPPF, and the guidance for LDF preparation in policy 7.30 of the London Plan.

#### Policy SA 23 Silverdale Road/Western View, p76

The second bullet point in the policy for Site A currently appears to focus new development in the area close to the canal bridge, and lacks clarity in terms of the expectations. Site A is within an area of predominantly lower rise buildings with Station Road leading into a fairly intimate town centre environment. The Old Crown Public House within Site A is a pivotal building within the Victorian townscape, at the entrance to the town centre and is an integral part of the canalside heritage. It is identified as a locally listed building. We consider that policy SA 23 should specify that this building is retained in any new development.

We are further concerned that within the criteria for Sites A and B reference is made to maximising the canal frontage. Although the meaning is not entirely clear, we are concerned, in line with the comments on policies SA 4 and SA 5 above, that the policy is seeking to maximise densities along the canal corridor. The policy should include a further criterion to ensure that the quality and scale of new development is appropriate to the local context, including the appreciation of the canal. This would be consistent with the approach, for instance, in policy SA 5 (p35). Without this addition, there could be some danger that the scale of development on the south side of the canal will be replicated and create a potentially enclosed and alien environment.

#### Policy SA 16 Northwood Station

The site encompasses parts of the Norwood Town Centre and Green Lane Conservation Area and the Frithwood Conservation Area, as described in the introductory text (p62). Consequently we recommend that bullet 8 to the policy is amended by omitting the word 'adjacent'.

#### Policy SA 30, Grand Union Park, Packet Boat Lane, p93

We note that change of use is permitted here through the prior approval process. The canal and its bridges to the south west are particularly attractive features in the vicinity of the site. In case of future planning applications it may be suitable to refer to these assets and the potential opportunities for enhancement.

## **Chapter 6 Key Transport interchanges**

#### Uxbridge Town Centre, p228

We welcome the additional references added here to highlight the listed status of Uxbridge station and the conservation area.



# HILLINGDON

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### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |  |
|----------------------------|--|
| Title                      |  |
| First name                 | Roger                                    |
| Last Name                  | Taylor                                   |
| Organisation (if relevant) | London Wildlife Trust (Hillingdon Group) |
| Unit                       |  |
| House name                 |  |
| Address 1                  |  |
| Address 2                  |  |
| Town                       |  |
| County                     |  |
| Postcode                   |  |
| Telephone                  |  |
| Email                      |  |

| 2. Agent's Name and Address (if applicable) |              |  |
|---|--------------|--|
| Title                                       |              |  |
| First name                                  |              |  |
| Last name                                   |              |  |
| Company                                     |              |  |
| Unit  | House number |  |
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| Postcode                                    |              |  |
| Telephone                                   |              |  |
| Email                                       |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |           |
|-------------------------------|-----------|
| Policy number;                |           |
| Paragraph number;             |           |
| Table or figure number; or    | Table 5.4 |
| Map number (Atlas of Changes) |           |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

We welcome and support the New SINC's which have been added since the first consultation.





**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
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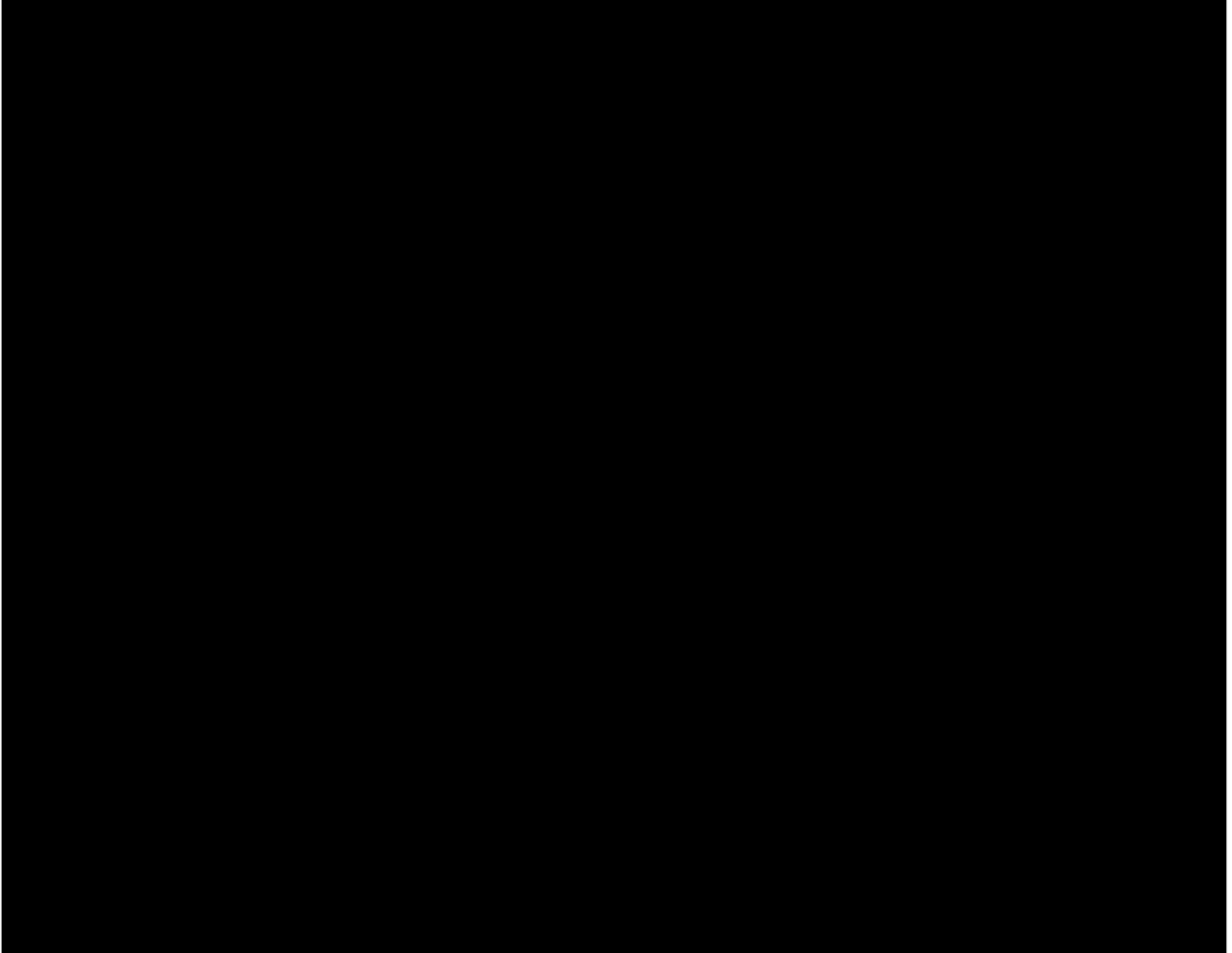
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## Monitoring Questions

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# HILLINGDON

LONDON

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| Telephone                  |  |
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| 2. Agent's Name and Address (if applicable) |              |  |
|---|--------------|--|
| Title                                       |              |  |
| First name                                  |              |  |
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**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |           |
|-------------------------------|-----------|
| Policy number;                |           |
| Paragraph number;             | Para 5.12 |
| Table or figure number; or    |           |
| Map number (Atlas of Changes) |           |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
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**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

We note a response to the first consultation which sought the deletion of part of Hayes Park from the Green Belt. We strongly support the Council's position to retain full Green Belt protection on all of this important site.





**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

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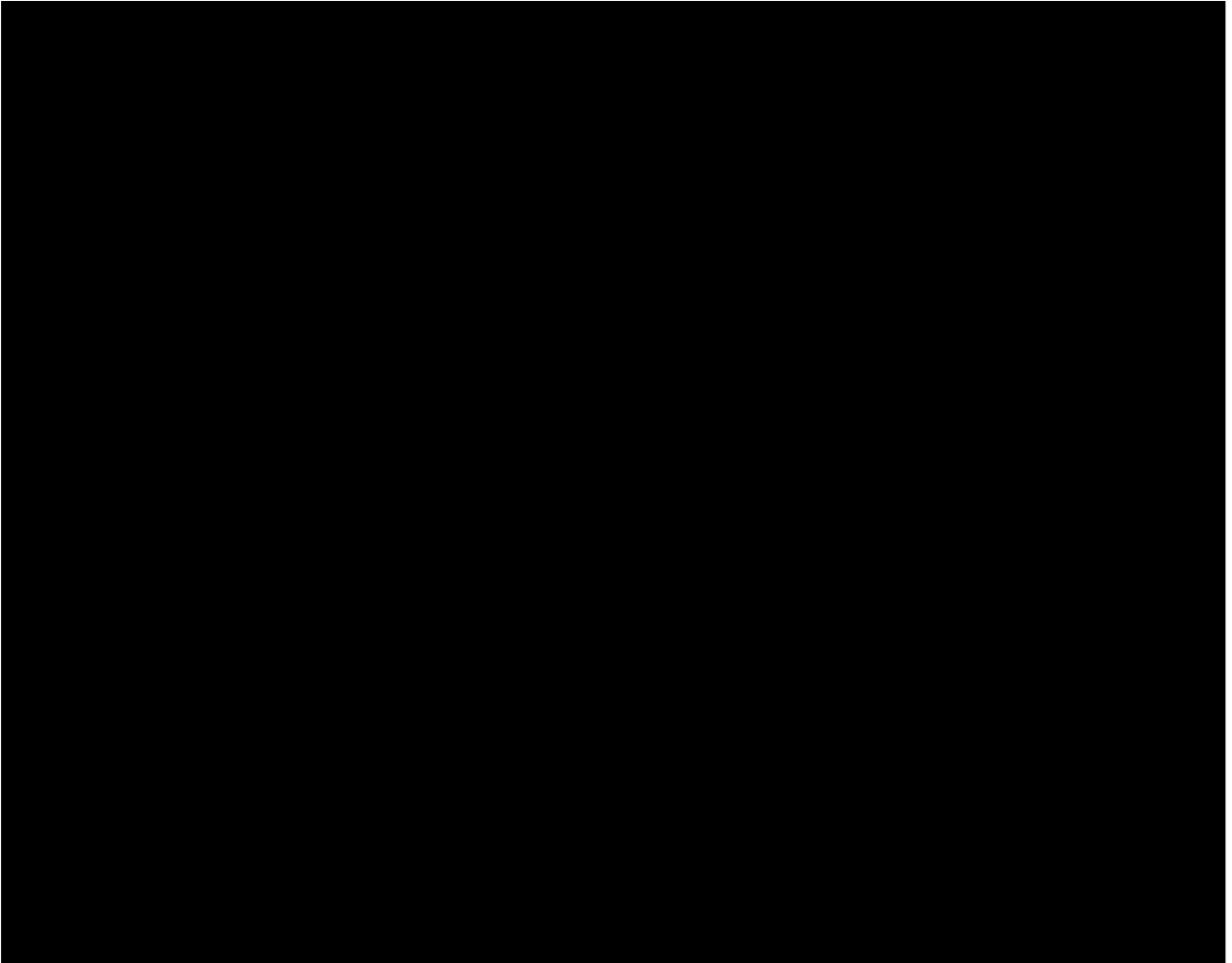
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# HILLINGDON

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| House name                                  |              |  |
| Address 1                                   |              |  |
| Address 2                                   |              |  |
| Town  |              |  |
| County                                      |              |  |
| Postcode                                    |              |  |
| Telephone                                   |              |  |
| Email                                       |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input checked="" type="checkbox"/> | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |  |
|-------------------------------|--|
| Policy number;                |  |
| Paragraph number;             |  |
| Table or figure number; or    |  |
| Map number (Atlas of Changes) |  |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

We note that some nature reserve boundaries are omitted from the Policies Map, as we pointed out in our response to the first consultation. We assume they will be added before the final document is produced.

They include:

- The full extent of the Frays Island - Mabey's Meadow Nature Reserve (West Drayton).
- Frays Farm Meadows and the wider Frays Valley LNR (Ickenham).
- Crane Meadows (Heathrow East).





**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

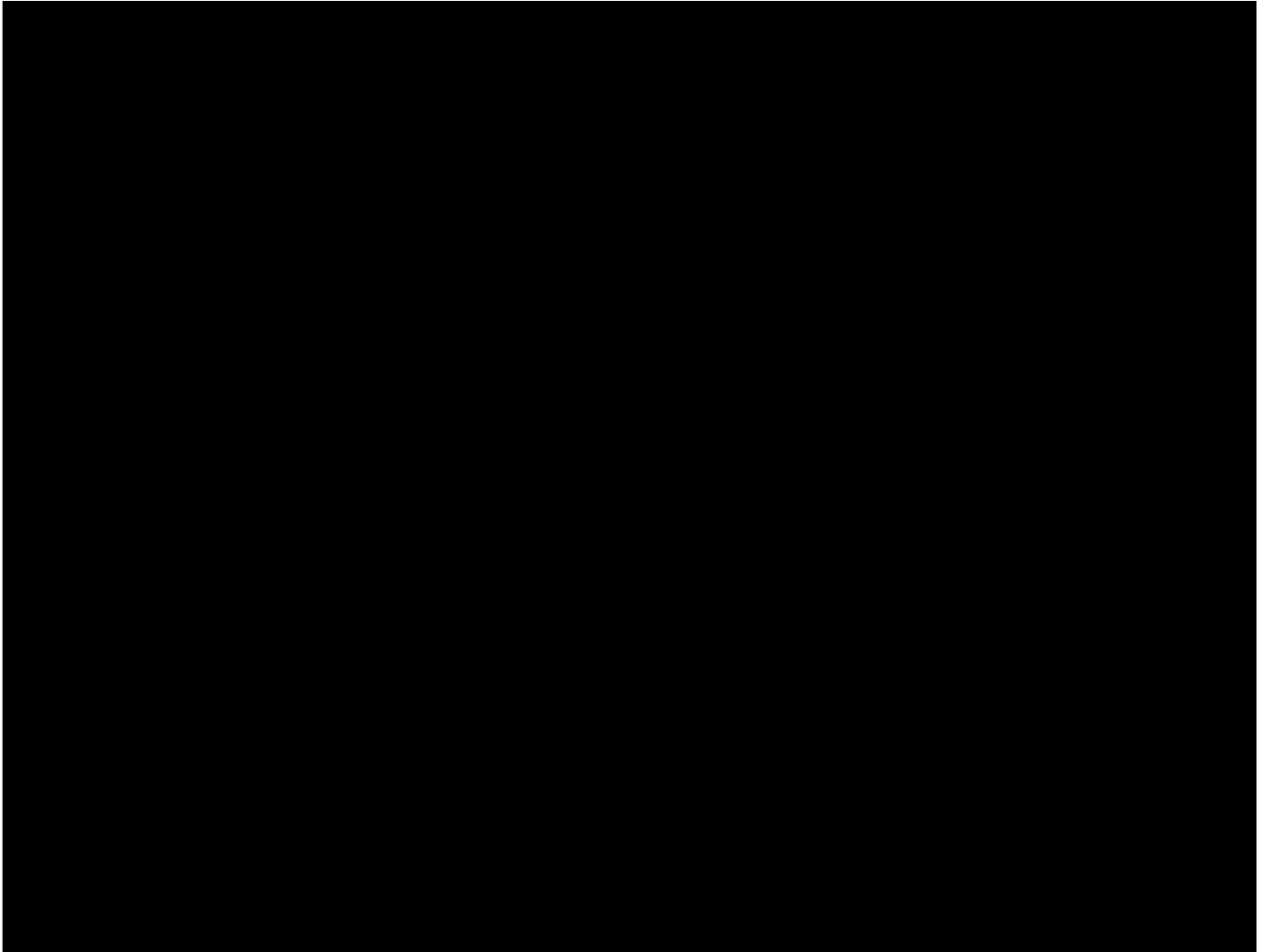
- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## **Monitoring Questions**

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.





# HILLINGDON

LONDON

## Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

Please read the **Guidance Note** for an explanation of how to complete the form and, the **Statement of Representations Procedure** for details on where to view the Local Plan Part 2 and its associated documents. Forms must be received by the Council by **5pm Tuesday 4<sup>th</sup> November 2014**.

### PART A - Your Details (must be completed)

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |        |
|----------------------------|--------|
| Title                      | MR     |
| First name                 | RAYAN  |
| Last Name                  | MAHMUD |
| Organisation (if relevant) |        |
| Unit                       |        |
| House name                 |        |
| Address 1                  |        |
| Address 2                  |        |
| Town                       |        |
| County                     |        |
| Postcode                   |        |
| Telephone                  |        |
| Email                      |        |

| 2. Agent's Name and Address (if applicable) |              |  |
|---|--------------|--|
| Title                                       |              |  |
| First name                                  |              |  |
| Last name                                   |              |  |
| Company                                     |              |  |
| Unit  | House number |  |
| House name                                  |              |  |
| Address 1                                   |              |  |
| Address 2                                   |              |  |
| Town  |              |  |
| County                                      |              |  |
| Postcode                                    |              |  |
| Telephone                                   |              |  |
| Email                                       |              |  |

## PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on:**  
(please tick relevant box)

| Local Plan Part 2                   |                                   |
|-------------------------------------|-----------------------------------|
| <input type="checkbox"/>            | Development Management Policies   |
| <input checked="" type="checkbox"/> | Site Allocations and Designations |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| Technical Reports (answer Q1 & Q9 only) |   |
|---|---|
| <input type="checkbox"/>                | Sustainability Appraisal pre-submission version                     |
| <input type="checkbox"/>                | Consultation statement  |
| <input type="checkbox"/>                | Addendum to the Strategic Flood Risk Assessment and Sequential Test |

**Q2. To which part of the document does this representation relate?**

|                               |   |
|-------------------------------|---|
| Policy Number; or             |   |
| Paragraph Number; or          |   |
| Table or Figure Number; or    |   |
| Map Number (Atlas of Changes) | MAPA 2.14: 50 RESERVOIR ROAD.<br>GREEN BELT ASSESSMENT. |

**Q3. Do you consider that the Local Plan Part 2 is:** (please tick)

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below** (Tick relevant box/es)

|                          |                                     |                                     |   |
|--------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/>            | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with National policy |

**Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.**

*(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

PLEASE SEE ATTACHED LETTER WHICH EXPLAINS  
WHY, IN MY OPINION, THE GREEN BELT  
DESIGNATION OF MY PROPERTY IS NOT SOUND.

Please continue on a separate sheet if necessary



**Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)**

I BELIEVE MY PROPERTY SHOULD BE  
REMOVED FROM THE GREEN BELT FOR THE  
REASONS SET OUT IN THE ATTACHED LETTER  
DATED 30/5/13.

Please continue on a separate sheet if necessary

**Q7.** If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q.8** If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

I WOULD LIKE TO DISCUSS MY CASE  
AT THE EXAMINATION FOR THE REASONS  
SET OUT IN MY ATTACHED LETTER  
DATED 30/5/13.

**Q9** If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

*NO COMMENTS*

Please continue on a separate sheet if necessary

## PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

|                                     |   |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | When the Local Plan Part 2 Plan has been submitted for independent examination  |
| <input checked="" type="checkbox"/> | The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2. |
| <input checked="" type="checkbox"/> | The adoption of the Local Plan Part 2   |

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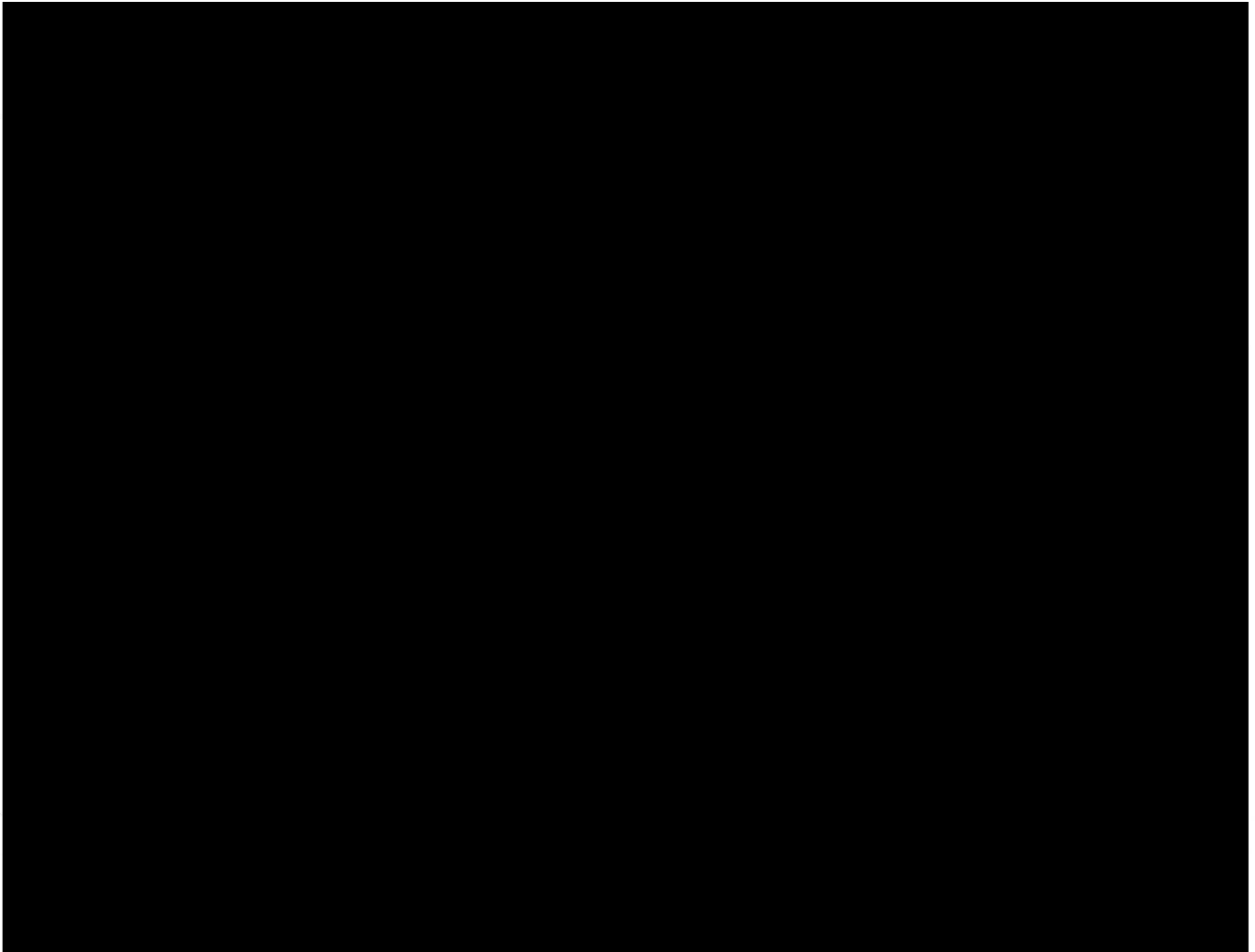
- **Email to:** [localplan@hillingdon.gov.uk](mailto:localplan@hillingdon.gov.uk)
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillingdon.gov.uk](mailto:localplan@hillingdon.gov.uk)

**All forms must be received by the Council by 5pm 4<sup>th</sup> November 2014.**

## Monitoring Questions

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# MERCER PLANNING CONSULTANTS LTD.

Local Development Framework Team,  
Residents Services  
London Borough of Hillingdon  
3N/02 Civic Centre, Uxbridge  
Middlesex,  
UB8 1UW

30<sup>th</sup> May 2013.

Dear Sir/ Madam,

**RE: Public Consultation on Part 2 of the Hillingdon Local Plan (19 April - 31 May 2013).**

**Notice of Preparation of a Local Plan Document under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 201**

I am instructed by Mr. Rayan Mahmud of 59 Reservoir Road, Ruislip to make a written representation on his behalf to the Part 2 Consultation paper of the Hillingdon Local Plan regarding the property No.59 Reservoir Road, Ruislip, which is in his ownership, and is located within the green belt.

59 Reservoir Road is currently located within the Green Belt. The site is developed and contains a detached two-storey dwellinghouse with associated parking area, hardstanding and garden. To the northeast of the site lies a large car park which belongs to the Waters Edge Public House sited to the southeast, both of these sites are also currently within the Green Belt. All three sites are served by an access road which serves properties within Reservoir Road and terminates with a turning circle at its end adjacent to the public house and the car park. The road is wide and is heavily trafficked by people using it for access to the dwellings in Reservoir Road and the public house and is not what is normally characteristic to a Green Belt location. Despite 59 Reservoir Road being within the Green Belt the area is developed and has a developed character which is reflected by the dwellinghouses sited to the west of the property that are within the defined urban area. No.59 is viewed as a continuation of the designated urban area in Reservoir Road.

The inclusion of the 59 Reservoir Road within the Green Belt is awkwardly shown on the current proposals map where the Green Belt line has been drawn to include this dwelling. A more natural line could be drawn showing the property as a continuation of the urban area with the Green Belt boundary being defined by the woodland to the rear. Given the urban context of 59 Reservoir Road and the

awkwardly drawn Green Belt line the emerging Local Plan Part 2 should carry out a detailed review of the existing built up area/Green Belt boundaries as it is clear, using the above site as an example, that changes are needed.

There is justification to remove the site from the Green Belt as its inclusion within the Green Belt does not meet the tests outlined in the National Planning Policy Framework (2012) set out below.

The NPPF (paras 79 - 80) states that *'the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Green Belt serves five purposes:*

- *to check the unrestricted sprawl of large built-up areas;*
- *to prevent neighbouring towns merging into one another;*
- *to assist in safeguarding the countryside from encroachment;*
- *to preserve the setting and special character of historic towns; and*
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.'*

Furthermore Policy EM2 of the Local Plan Part 1 considers that the most important attribute of the Green Belt is its openness and its main purpose within Hillingdon is to keep land open and free from development, to maintain the character and identity of individual settlements and to make a clear distinction between rural and urban environments.

Regard must be therefore be paid to both the NPPF and the adopted Hillingdon Local Plan Part 1 in the review of the Green Belt for the Local Plan Part 2 in order to ensure that the Plan and its Proposals Map is consistent with the aims and objectives of these two documents. The Local Plan Part 1 allows for this review under policy EM2 which says that there will be minor alterations to the Green Belt through a Site Specific Allocations LDD.

The inclusion of 59 Reservoir Road within the Green Belt does not check against the unrestricted sprawl of the built up area as the site is already developed as it has a dwelling house and associated development sited on it. No.59 is sandwiched between the defined urban area immediately to its west and by the pub car park to the northeast, which although within the Green Belt, is urbanising in its appearance. The removal of the small site constituting 59 Reservoir Road will therefore not result in any further sprawl of the built up area as it is already contained within a built up area albeit not reflected by the current policy allocation.

Copse Wood and Mad Bess' Wood to the north of 59 Reservoir Road provide a natural woodland buffer to prevent any sprawl from occurring, appropriately both of these woods are located within the Green Belt and prevent Eastcote West from merging with the neighbouring settlement Northwood West to the north west. These woods are also currently afforded protection under the designations of: Nature Conservation Sites of Metropolitan or Borough Grade I Importance, Nature Reserve and as a Site of Special Scientific Interest, presumably these strict designations will be carried forward into the Local Plan Part 2.

The site is located within Greater London and therefore the Green Belt allocation of the site does not act to safeguard countryside from development, the woods however help to maintain the rural character of the area to the north of no.59.

The location of 59 Reservoir Road within the Green Belt also does not help to preserve the setting and special character of historic towns due to its location within a modern residential location on the edge of the urban area.

The retention of no.59 within the Green Belt also fails to assist with urban regeneration as the site is already developed and is within an urbanised location however the designation prevents its regeneration despite the fact that any further development on the site would not harm the open character of the Green Belt. The retention of 59 Reservoir Road within the Green Belt therefore fails to meet the tests for Green Belt designation set out within the NPPF.

Para 84. of the NPPF states that *'When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary'*. The existing Green Belt boundary in relation to 59 Reservoir Road does not promote sustainable patterns of development as the boundary appears awkward as it includes a developed site within the Green Belt whilst the surrounding properties in Reservoir Road are within the defined urban area. The inclusion of 59 Reservoir Road within the Green Belt, whilst all of the surrounding dwellinghouses are in the urban area, is therefore unjustified and objectives of promoting sustainable development within urban areas are not fulfilled.

Within regard to plan making Para 85. of the NPPF states that *'When defining boundaries, local planning authorities should:*

- *ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- *not include land which it is unnecessary to keep permanently open;*



- *where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- *make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*
- *satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.'*

The inclusion of no.59 within the defined Green Belt would fail to meet the tests required for designating land within the Green Belt. The site has no impact on the open character of the Green Belt and its release would continue to preserve this open character as the site is already developed and the woodland to its rear ensures the open character of the area is protected whilst providing a check against urban sprawl.

The site does not need to be safeguarded from development as any further development would be viewed as a continuation of the designated urban area, no associated urban sprawl occur given the sandwiched-in location of the site between existing development and the protected woodland which will not come forward for development. Given that no harm would occur to the Green Belt through any future development on the site there is no justified reason to retain 59 Reservoir Road within the Green Belt.

The boundary of the Green Belt should be defined by physical features of the area in accordance with the NPPF, in this location this is easily and naturally achievable as the woodland to the north (that is also afforded various protection under various nature designations) is readily recognisable as the boundary of the Green Belt and will help to preserve its open and rural character and provide a check against urban sprawl. The woodland will remain a permanent feature due to its other nature conservation designations and the release of no.59 from the Green Belt would not put any pressure on the development of this woodland. The tests for Green Belt policy would therefore be met by revising the Green Belt boundary in this location to be defined by the woodland.

The inclusion of 59 Reservoir Road within the Green Belt therefore fails to meet the tests set out for Green Belt allocation in the NPPF and its release would cause no harm to the open character of the Green Belt, result in urban sprawl and would maintain the distinction between urban and rural locations. As such

the current Proposals Map in relation to the Green Belt is therefore unsound as it does not robustly meet the Green Belt allocation tests set out within the NPPF. 59 Reservoir Road should, therefore, be removed from the Green Belt when the boundaries are redefined when drawing up the Proposals Map for the Local Plan Part 2.

Yours faithfully

M. Mercer BSc MA MRTPI  
Director  
Mercer Planning Consultants Ltd



On behalf of Mr. R Mahmud





Local Plan <localplan@hillington.gov.uk>

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## local plan part 2

2 messages

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**Rayan Mahmud** [REDACTED]  
To: localplan@hillington.gov.uk

7 December 2015 at 14:18

Hello,

Please can I be notified when the next hearing takes place for LDF green belt part. I would wish to make myself present or my agent to explain our case.

Thank you

Rayan Mahmud

---

**Local Plan** <localplan@hillington.gov.uk>  
To: Rayan Mahmud [REDACTED]

15 December 2015 at 10:08

Dear Mr Mahmud

Thank you for your comments. These will be considered by the Council and forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination.

Should you have any queries in the meantime, please contact the Planning Policy Team on 01895 250 230 or by email at [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk).

Planning Policy Team  
London Borough of Hillington

[www.hillingdon.gov.uk](http://www.hillingdon.gov.uk)

[Quoted text hidden]



# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |                   |              |  |
|----------------------------|-------------------|--------------|--|
| Title                      |                   |              |  |
| First name                 |                   |              |  |
| Last Name                  |                   |              |  |
| Organisation (if relevant) | Brunel University |              |  |
| Unit                       |                   | House number |  |
| House name                 |                   |              |  |
| Address 1                  |                   |              |  |
| Address 2                  |                   |              |  |
| Town                       |                   |              |  |
| County                     |                   |              |  |
| Postcode                   |                   |              |  |
| Telephone                  |                   |              |  |
| Email                      |                   |              |  |

| 2. Agent's Name and Address (if applicable) |               |
|---|---------------|
| Title                                       |               |
| First name                                  |               |
| Last name                                   |               |
| Company                                     | Bilfinger GVA |
| Unit  |               |
| House name                                  |               |
| Address 1                                   |               |
| Address 2                                   |               |
| Town  |               |
| County                                      |               |
| Postcode                                    |               |
| Telephone                                   |               |
| Email                                       |               |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input checked="" type="checkbox"/>                  | Consultation Statement                          |
| <input checked="" type="checkbox"/> | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                 |
|-------------------------------|-----------------|
| Policy number;                | Entire document |
| Paragraph number;             | Entire document |
| Table or figure number; or    | Entire document |
| Map number (Atlas of Changes) | All             |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/>            | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

1. The draft plan has not been informed by an objective assessment of the development needs of the higher education/ research institution sector (including Brunel University), and fails to plan positively to meet such needs in full. As a consequence, the draft plan is:
  - o Not positively prepared
  - o Not consistent with national policy (including NPPF paragraphs 14, 17, 19 and 20)
  - o Not justified
2. The draft plan proposes to designate land at Brunel University (Site 4 of the Uxbridge Campus) as a Nature Conservation Site of Borough Grade 2 or Local Importance. We have been unable to obtain any published evidence to underpin this designation, therefore consider that the plan is not justified in this regard.

We consider that the Plan can be made sound by the following changes:

1. Undertake an objective assessment of the development needs of the higher education/research institution sector, and add policies to the Plan to meet those needs in full (to include allocating specific sites for development). This should include the allocation of Brunel University's Uxbridge campus (Sites 1 to 5 – refer to Site Plan at Enclosure A) for higher education/research uses, and to include a Green Belt boundary review that removes the Green Belt designation from Site 1, 2, 3 and 4.
2. Delete the proposed designation of Site 4 of the University's Uxbridge campus as a Nature Conservation Site of Borough Grade II or Local Importance.

Refer to the supporting letter (dated 08/12/2015) and associated enclosures.

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

---

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

Brunel University considers the draft Local Plan Part 2 to be unsound. The University is a significant local economic stakeholder, with substantial development needs over the forthcoming plan period which are not accounted for in the draft plan.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |



## Returning your form

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- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

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**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

### 1) What is your gender?

Male  Female

### 2) To which age group do you belong?

under 15  25 – 44  65 – 85  
 15 - 24  45 - 64  85+

### 3) Do you consider yourself to be a disabled person?

No  Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |

Our ref: 02B450664

8<sup>th</sup> December 2015

Planning Policy Team  
London Borough of Hillingdon  
3N/02  
Civic Centre  
High Street  
Uxbridge  
UB8 1UW

Dear Sir or Madam

**Consultation on the Revised Proposed Submission Draft Local Plan Part 2 (Site Allocations and Designations, Development Management Policies, and Policies Map (Atlas of Changes))**

We write on behalf of Brunel University regarding the above consultation.

## 1. Context

Brunel University is a single campus University based in Uxbridge (refer to Site Plan at Enclosure A). It was established in 1966 and has been subject to continuous growth since. It has 12,948 students (2014/15), employs 2,473 staff, has an annual turnover of £192.4m (2014/15), and contributes an estimated £445m per annum to the UK economy. As such, it is a significant economic asset. It is recognised as a quality provider of higher education allied to industry with a strong and growing research function, as reflected in the following rankings:

- 226<sup>th</sup> of universities globally in the 2014/15 Times Higher Education Survey (THES) World University Rankings;
- 1<sup>st</sup> in London, 4<sup>th</sup> out of 14 UK Institutions in the 2014 THES Top 100 ranking of higher education institutions that are less than 50 years old (29<sup>th</sup> in the world);
- 1<sup>st</sup> in London and 27<sup>th</sup> in the UK for student experience in the 2014 THES;
- In addition, Brunel University has been awarded one of the most prestigious awards – the Queen's Anniversary Prize for Further and Higher Education for its ground-breaking research.

The University wishes to capitalise on its success and is preparing for significant growth, with student numbers planned to increase to 21,500 by 2022/23 with a focus on growing its research capability, which requires a significant programme of development over the next 5-10 years in order provide the necessary accommodation (expected to comprise the refurbishment of existing buildings together with new development). The growth plans have the potential deliver significant economic and social benefits to the borough and London as a whole.

The University has made the Council aware of its growth plans (and associated development needs) and is deeply concerned that the Local Plan Part 2, as currently drafted, is silent on this matter (as the absence of planning policy support for the principle of development poses a significant risk to the University's growth programme).

## 2. Soundness of the Draft Plan

We consider the Plan to be unsound on the following grounds:

1. It has not been informed by an objective assessment of the development needs of the higher education/research institution sector (including Brunel University), and fails to plan positively to meet such needs in full. As a consequence, the Plan is:
  - Not positively prepared;
  - Not justified; and
  - Not consistent with national policy (including NPPF paragraphs 14, 17, 19, and 20).

2. It proposes to designate land at Brunel University (Site 4 of the Uxbridge Campus) as a 'Nature Conservation Site of Borough Grade 2 or Local Importance'. However we consider there to be insufficient evidence to justify this designation, consequently the plan is not justified in this regard.

We consider that the Plan can be made sound by the following changes:

1. Undertake an objective assessment of the development needs of the higher education/research institution sector, and add policies to the Plan to meet those needs in full (to include allocating specific sites for development). This should include the allocation of Brunel University's Uxbridge campus (Sites 1 to 5 – refer to Site Plan at Enclosure A) for higher education/research uses, and to include a Green Belt boundary review that removes the Green Belt designation from Site 1, 2, 3 and 4.
2. Delete the proposed designation of Site 4 of the University's Uxbridge campus as a Nature Conservation Site of Borough Grade II or Local Importance.

We provide an explanation below:

### 3. Development Need

The NPPF makes it clear at paragraphs 14 and 17 that, in preparing their Local Plans, Local Planning Authorities (LPAs) should make every effort to objectively assess the development needs of their area and plan to meet those needs in full (subject to the tests at paragraph 14). It is on this basis that, in order for the Local Plan to be sound, it should be informed by an assessment of the needs of the Higher Education/Research sector (including those of Brunel University) and plan positively to meet those needs unless:

- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF when taken as a whole; or
- Specific policies in the NPPF indicate that development should be restricted.

We consider the Higher Education/Research sector to fall within the definition of 'Economic Development' (as per NPPF Annex 2), and therefore the provisions of NPPF paragraphs 18-22 apply. This reinforces paragraph 14's requirement for 'positive' planning, by requiring the planning system to do everything it can to support sustainable economic growth, with planning operating to encourage and not act as an impediment to sustainable growth. Significant weight should be placed on the need to support economic growth through the planning system, with LPA's required to plan proactively to meet the development needs of business and support an economy fit for the 21<sup>st</sup> century. An Economic Impact Assessment is provided at Enclosure J, which highlights the economic significance of the University.

The NPPF in-principle requirement for LPA's to support the growth of the higher education/research sector is echoed in the London Plan (Policy 3.18), which requires Local Plans to assess the need for higher education development and secure sites for provision.

This strategic position is reflected at paragraph 9.50 of the adopted Hillingdon Local Plan Part 1, which recognises that the borough contains highly respected higher education institutions. It states that '*Policies will be developed in subsequent LDDs to ensure that a high standard of teaching can continue to be provided in these establishments over the period of the Hillingdon Local Plan Part 1. The Council will continue its collaborative working arrangements with these institutions (e.g. Brunel University) during the preparation of the Hillingdon Local Plan and during subsequent monitoring and reviews*'. We further note that the completion of a 'new masterplan' for Brunel University is listed in the Infrastructure Schedule at Appendix 2 of the Local Plan Part 1. The need for such a masterplan is identified '*to enable the University to deliver international standards of research and teaching facilities, which necessitates continued expansion and improvements to its accommodation*'.

The Council's published Local Development Scheme indicates that the Local Plan will comprise the adopted Part 1 plus the Part 2 documents currently under consultation only. It follows that the 'subsequent LDDs' referred to at 9.50 of the Part 1 Local Plan can only comprise the Part 2 documents currently under consultation, and that therefore the scope of the Local Plan Part 2 should cover the higher education/research sector (and the specific needs of Brunel University) in order to accord with Part 1 (and for the Local Plan as a whole to accord with the NPPF and London Plan).

The University has made the LPA aware that it has significant future development needs and has submitted representations to previous Local Plan consultation opportunities to provide details of these needs and expressing a desire to engage with the Council in the plan preparation process.

The University remains keen to work collaboratively with the Council to ensure that a sound Local Plan is brought forward at the earliest opportunity, which plans positively for the needs of the higher education/research sector. To inform this, and to helpfully address the current evidence void, the University has prepared an assessment of its development needs (refer to Enclosure B) (this is an update to the version that was issued to the Council as part of representations to the Proposed Submission Draft Local Plan Part 2 in November 2014).

The enclosed Need Assessment indicates that the University has a need for approximately 213,000m<sup>2</sup> of new academic, research and student residential accommodation over the plan period. This is a location specific need: new accommodation must be provided within or adjacent to the existing campus on operational grounds; and land must be suitable for the required use and form of development, be available for development, and either owned by the University or capable of being acquired (within reasonable time and cost constraints). We do not have details of phasing at this stage, but for the purposes of this representation assume that this will come forward at an even rate over the next 5-10 years.

The enclosed Need Assessment (Enclosure B) and Site Capacity Assessment and Concept Masterplan (Enclosure C) provide an assessment of the potential to intensify the existing built-up parts of Site 1 and 2, as a means of accommodating the assessed development need without encroaching further into the Green Belt. This evidence indicates that a proportion of the need can be met via intensification, however a significant amount of the identified need remains outstanding.

Sites 1, 2, 3 and 4 (see Site Plan at Enclosure A) are considered to have sufficient physical capacity to accommodate this need (on land which is suitable and available), and it is the University's preference to accommodate growth here. The key policy issue associated with this is that the site is currently designated as Green Belt, which means that NPPF paragraphs 79-92 apply when applying the presumption in favour of sustainable development. The NPPF allows for LPA's to revise Green Belt boundaries as part of Local Plan reviews, where exceptional circumstances apply.

A 'Concept Masterplan' document has been prepared and is provided at Enclosure C. This sets out the University's vision of how its development needs (as defined above) could be met. It also indicates how further undefined future development needs/opportunities could be met (beyond those identified to date), potentially including those associated with healthcare. The concept masterplan is at the early stages of its development and will be progressed further over the forthcoming months.

#### **4. Alternative Site Assessment**

We consider this to be a location specific need. Brunel University is the only single campus university in London and its aspiration is to accommodate its needs at its existing Uxbridge Campus as a means of strengthening this position. The single campus format carries the following benefits:

- It is a key part of its identity and attractiveness to prospective students (especially those from overseas)
- It facilitates practical operational efficiencies (consolidated support services etc)
- Reduces the need to travel for staff and students (which carries sustainability and transport capacity related benefits)

Notwithstanding this, we have investigated whether there are potential alternative sites that could meet part of the identified need. This has focussed on the student housing element of the need. This has concluded that (subject to reasonable criteria) there are no suitable and available sites capable of meeting this need, with the exception of other Green Belt sites.

Furthermore, we note that even if potentially suitable sites had been identified as part of this exercise, this would have reduced the supply of available land for other uses for which there is a demonstrable need – particularly housing and/or employment. This is in the context of the finite supply of land available for development in London.

## 5. Green Belt Appraisal

We note that a Green Belt Assessment Update was undertaken and published in September 2013 to inform the preparation of the Local Plan Part 2 however, this did not consider land in/around the University. Our previous representations (dated 3<sup>rd</sup> November 2014) to the previous version of the Proposed Submission Draft document requested that this be updated to include the University, however this has not been undertaken.

Therefore, the University has commissioned Gillespies LLP to undertake a Green Belt Study of the Uxbridge Campus (sites 1-7). This study is provided at Enclosure E.

The study assessed the campus against the five purposes of Green Belts, as set out in the National Planning Policy Framework (NPPF). The appraisal concludes:

- None of the sites are contiguous with the countryside and can play no role in checking the spread of large built up areas into the countryside;
- None of the sites can prevent neighbouring towns merging with one another;
- None of the sites fully assist in safeguarding the countryside from encroachment;
- None of the sites make a significant contribution to Green Belt objectives associated with historic towns,
- Sites 1 and 4 have some limited inter-visibility with local Conservation Areas and therefore arguably make a limited contribution to Green Belt objectives associated with historic towns, however the remainder of the sites make no contribution to this purpose.
- All of the sites make a contribution to assisting in urban regeneration by incentivising development on previously developed land.

In summary, the assessment concludes that the sites do not make a significant contribution to the purposes of including land within the Green Belt (as defined by the NPPF). Furthermore, the removal of Sites 1-4 from the Green Belt would not be likely to have an adverse impact on the functionality of the remainder of the Green Belt.

## 6. Transport Appraisal

The University has commissioned WSP to prepare a 'Transport Feasibility Report' ('TFR'), which is appended as Enclosure I. This report appraises the ability of the transport network to support the quantum and form of proposed development. This report also appraises the ability for satisfactory access arrangements to be achieved.

In summary, the appraisal concludes that the University's future growth could be implemented without generating any additional vehicular trips above the existing position as a consequence of car parking restraint, rigorous travel planning, and enhancements to public transport, cycling and pedestrian infrastructure. Consequently, there are no highways (or other transport) related barriers to development.

## 7. Historic Use of Site 4

A report is provided at Enclosure G which provides details of Site 4's former use as a market garden. This included an extensive network of buildings and fixed structures, the remains of which are still evident on the site. Of note is that this historic development has left a legacy of contaminated land (refer to details at Enclosure K). The redevelopment of the site will offer the opportunity to remediate this, which would otherwise be unlikely to be achieved.

## 8. Comparables

There are a number of comparable schemes whereby the release of Green Belt land has been allowed because exceptional circumstances exist. Further details of these schemes are appended to this letter at Enclosure F.

### University of Cambridge

A notable example is the North West Cambridge Area Action Plan DPD, which was adopted in 2009 and enabled the release of a significant amount of Green Belt land for the University of Cambridge to accommodate their development needs. By evidencing its economic importance on a regional and national scale, and their land availability and requirements, the Inspector concluded that the University of

Cambridge had demonstrated a clear need to retain and, if possible, increase the educational, intellectual and economic roles of the University. The needs shown by the evidence submitted to the examination were considered of greater weight than the Green Belt functions of the land.

In particular, a significant shortage of staff/key worker housing was demonstrated, along with a need for 2,000 units of student accommodation and the provision of market housing to make the development viable. The failure to provide such housing was considered to potentially render the University less attractive to the best students, thereby harming the University's international position, economic importance and ability to contribute to research.

#### Edge Hill University

The West Lancashire Local Plan was adopted in October 2013. Approximately 10 hectares of Green Belt land was released through this process to enable the expansion of the existing campus at Edge Hill University. The Inspector concluded that exceptional circumstances had been justified for this release, in view of the University's economic importance to the borough, the lack of other land onto which to extend the campus, the adverse effects of the proliferation of student Houses in Multiple Occupation (HMOs), and the significant traffic and parking impacts associated with the previous access arrangements.

### **9. Nature Conservation Site of Borough Grade 2 or Local Importance**

Part of our representation concerns land referred to as Site 4 as shown on the Site Plan (see Enclosure A). We understand that the Site Allocations and Designations document proposes an extension to an existing 'Nature Conservation Site of Borough Grade 2 or local importance' to include 'Site 4'. As noted above, the proposed designation appears to be unjustified (and is therefore unsound).

We acknowledge that a 'Review of Proposed New and Existing SINCS' has been published as part of the evidence base for this revision of the Local Plan. In this document, Site 4 (Council Ref: SINC 18) continues to be identified as a Nature Conservation Site of Borough Grade 2 or Local Importance.

The University has commissioned WSP to prepare an 'Ecological Appraisal' (March 2015) of Site 4 to determine the ecological/nature conservation value of the site. This appraisal concludes that the justification for the inclusion of Site 4 within the SINC designation is unclear and flawed, especially because the citation for this site describes the site as supporting habitats which in part are no longer present (replaced by the Bicentennial Gardens). The proposed site's allocation plan notes that the proposed extension was informed by 'field work and updated citations on the flora and fauna supported at sites' however, the results of field work are not held by either the London Borough of Hillingdon or Greenspace Information for Greater London (GiGL).

In addition, the University has prepared a 'Historical Land Use Report' specific to Site 4. This report notes that asbestos was found and removed from several locations on Site 4 in 2012. This exercise was hampered by dense undergrowth but every effort was made to identify and remove asbestos containing materials lying on the surface. It is possible that asbestos may be present below the surface, which would significantly diminish the site's conservation value.

### **10. Council's Responses to Previous Representations**

We respond to the responses provided by Council (in italics) in relation to our representations to the previous version of the Proposed Submission Draft as follows:

1. *The Local Plan Part 1 was informed by the Strategic Infrastructure Plan, which set out infrastructure required to support key areas of growth over the plan period. The University was consulted during the production of this key document and did not highlight any strategic areas of growth. Had they done so, these would have been included.*

Consultation with Brunel University (as a 'Strategic Infrastructure Provider') is referred to in Table E of the Strategic Infrastructure Plan (SIP). It is recorded at that time that the University's development masterplan covered the period up to 2014 and that the University will bring forward a new masterplan covering the period up to 2021.

Furthermore, it is reiterated in paragraph 6.4.2 of the SIP that the University indicated they are "committed to the production of a new masterplan covering the period from 2014 – 2021 and consider this to be

masterplan essential to its continuing success". As referred to above, a Concept Masterplan document is enclosed as part of this representation and illustrates how the University's development needs can be met.

Paragraph 6.4.3 of the SIP notes that "the 2014-21 masterplan will set out its plans to expand and/or improve the University's research programme, teaching, science park and residential facilities to continue to build on its growing national and international reputation".

Given the above, it is clear that the Council has been aware of the University's growth needs for some time and therefore the response is unwarranted.

2. *The Local Plan Part 2: Site Allocations implements the policies and targets contained in the Part 1 document. It is not the appropriate mechanism for making strategic changes, such as the significant releases of Green Belt to meet housing or education needs. Such a proposal would be contrary to the Part 1 policy and would need to be addressed through a review of the Part 1 document.*

This is contrary to paragraph 54 of the Inspector's Report on the examination into Part 1 of the Local Plan, which states that the Council "...will also consider the expansion needs of educational bodies such as Brunel University in relation to the Green Belt boundary at the more detailed next stage of the Local Plan. I consider this approach is sufficiently justified, and accordingly no main modifications are needed to this part of the Local Plan."

It is clear that the Inspector considered the preparation of Local Plan Part 2 to be an appropriate mechanism for planning positively for the University's expansion needs (including Green Belt boundary review).

3. *The key issue relating to these proposals is the release of land from the Green Belt to meet development needs. Policy EM2 in the Local Plan Part 1 states that any proposals in the Green Belt will be assessed against national policy, including the very special circumstances test. The representor has put forward the following very special circumstances to justify development in the Green Belt:*
  - *There is a need for education development in the borough. In itself, it is not considered that need constitutes very special circumstances.*
  - *There is a location specific need. The analysis provided indicates preference for new facilities to meet growth targets to be co-located on the site. There is no analysis to demonstrate that other sites are not available, or that sites in other locations would not meet the University's needs.*

As discussed above, it is our opinion that the additional information enclosed with these representations satisfies the above concerns.

4. *The loss of sites 1, 2, 3 and 4 would not have a significantly adverse effect on the objectives of the Green Belt. Officers are of the view that in the vicinity of Brunel, the Green Belt meets two of the five purposes of Green Belt contained in the NPPF:*
  - *To check the unrestricted sprawl of large built up areas and*
  - *To assist in safeguarding the countryside from encroachment.*

The Council's opinion is not underpinned by an evidence base (noting that the site was not considered in the Council's Green Belt Appraisal that forms part of the Local Plan evidence base).

The Green Belt Appraisal provided at Enclosure E does, however, provide an appropriate evidence base against which this concern can be considered. This indicates that the sites are not capable of contributing to the Green Belt purposes referred to by the Council on the basis that they are contained and surrounded by existing urban development, they do not meet the characteristics of 'countryside' themselves, nor are they contiguous with nor connected to the countryside.

## **11. Summary and Next Steps**

Brunel University considers the draft Local Plan Part 2 to be unsound on 2 grounds, the principal ground being that the Plan has not been informed by an objective assessment of development needs of the higher education/research sector (including Brunel University), and does not plan positively to meet the demonstrable development needs of this sector. We have set out details of how the plan can be made



sound – by allocating Brunel University’s Uxbridge campus (Sites 1-5) for development; removing the Green Belt designation that currently affects Site 1, 2, 3, and 4; and deleting the proposed Nature Conservation designation for Site 4.

The content of this letter and the enclosures provides the evidence to confirm that the necessary exceptional circumstances exist to justify this, on the following grounds:

- There is an economic need for development
- There is an education need for development
- This is a locational specific need – there are no suitable/available alternative (non-Green Belt) sites capable of meeting this need
- Site 1-4 make a very limited contribution to the purposes of including land within the Green Belt, and their removal from the Green Belt would not prejudice the functionality of the remainder of the Green Belt.
- There are no transport or environmental constraints to the principle of development
- The development of Site 4 would facilitate the remediation of a contaminated site
- The above grounds have been confirmed to satisfy exceptional/very special circumstances Green Belt policy tests in numerous comparable cases.

The recommended revisions are critical to managing the risks associated with the University’s growth plans, which require a policy position to be established in the Local Plan that supports the principle of development at the Uxbridge campus. This is in the context that the delivery of growth at the University offers the potential to realise very significant benefits to the borough and London as a whole.

The Local Plan process allows Local Planning Authorities to consider comments received as part of this consultation stage and to make amendments to this proposed submission version of the plan in advance of submission to the Secretary of State for examination. Therefore, we consider that there remains ample opportunity to action the recommended amendments outlined above.

The recommended amendments will allow the Local Plan Part 2 to take the opportunity to plan positively to meet the borough’s needs and reflect the Government’s position, set out within the NPPF, that great importance should be placed on economic development, and the strategic position set out in the London Plan, which recognises the importance of London’s world class higher education and research institutes.

As a key stakeholder, landowner and higher education provider within the LB Hillingdon, Brunel University is keen to work closely with the LPA to bring forward a sound Local Plan that plans positively for the growth of the University in a manner that optimises the benefits to the borough as a whole. It is on this basis that Brunel University request the following:

- A meeting with the Local Planning Authority at the earliest opportunity to discuss this representation; and
- The Council to consider preparing and consulting on a revised draft of the Local Plan Part 2 prior to submitting to the Secretary of State.

Please contact GVA (the University’s Planning Advisors):



Yours faithfully



**GVA**  
For and on behalf of GVA Grimley Ltd

Enclosure A: Site Plan  
Enclosure B: Brunel University – Assessment of Development Need

Enclosure C: Site Capacity Assessment and Concept Masterplan Report  
Enclosure D: Alternative Site Assessment  
Enclosure E: Green Belt Study  
Enclosure F: Comparables  
Enclosure G: Historical Use Report  
Enclosure H: Ecological Appraisal  
Enclosure I: Transport and Feasibility Report  
Enclosure J: Economic Impact Assessment  
Enclosure K: Site 4 Asbestos Survey

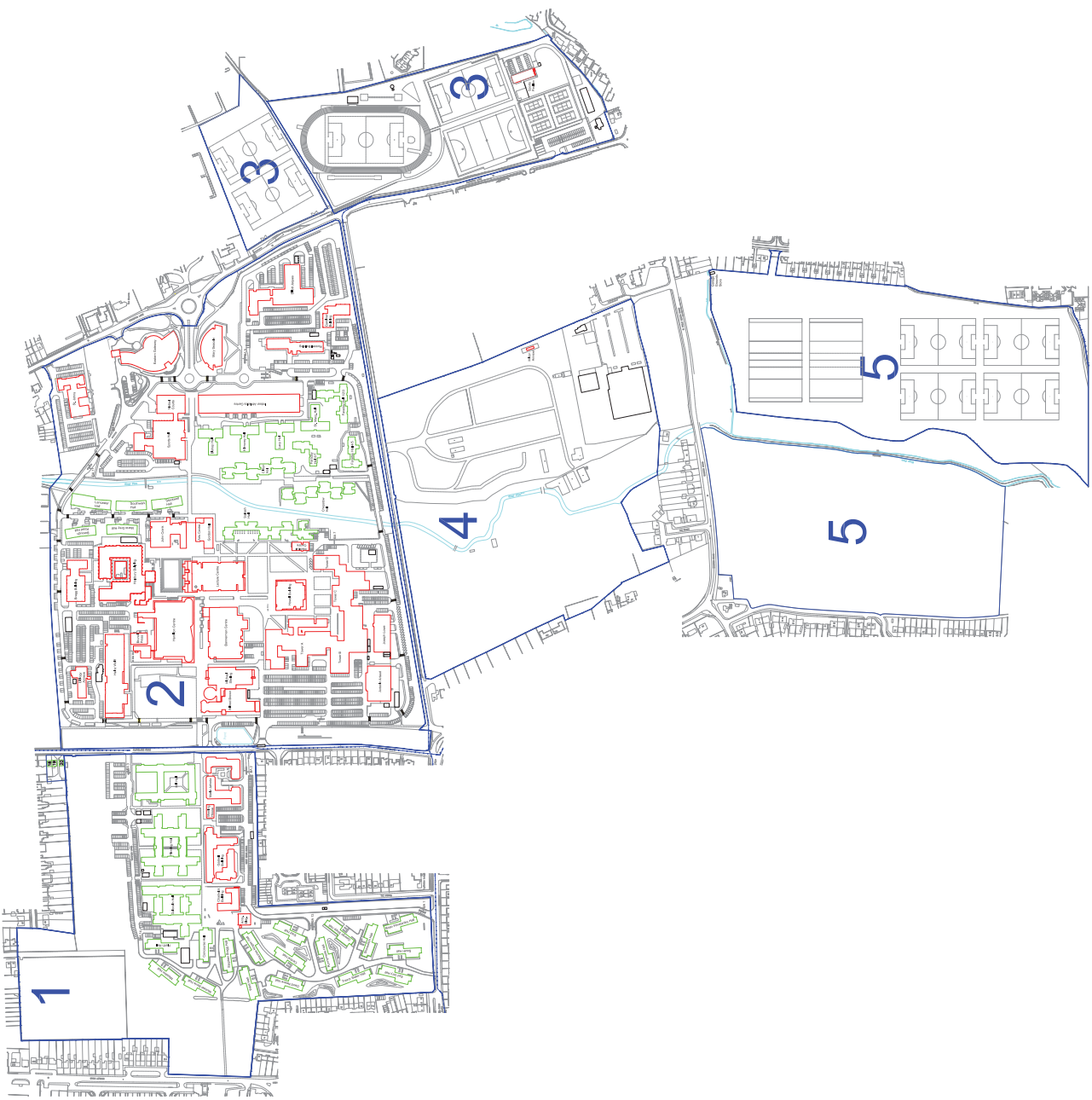
## **Enclosure A**

Site Location Plan and Aerial Photo

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**Notes:**

1. In order to meet our service standards, it is the responsibility of the contractor to verify all dimensions and levels before commencing work.
2. The contractor is responsible for verifying all the setting out dimensions before commencing work.
3. Dimensions shown on this drawing shall not be scaled. Only written or electronic dimensions shall be used.



**SCHEDULE OF SITE AREAS**

- SITE 1**
  - 34.03 Acres
  - 13.78 Hectares
- SITE 2**
  - 66.17 Acres
  - 26.78 Hectares
- SITE 3**
  - 19.82 Acres
  - 8.02 Hectares
- SITE 4**
  - 30.64 Acres
  - 12.40 Hectares
- SITE 5**
  - 42.82 Acres
  - 17.33 Hectares

|     |          |           |    |
|-----|----------|-----------|----|
| 1   | PLANS    | COMPLETED | NO |
| 2   | SECTION  | COMPLETED | NO |
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**Brunel UNIVERSITY LONDON**

BRUNEL UNIVERSITY  
UNIVERSITY OF THE ARTS  
UNIVERSITY OF THE WEST OF ENGLAND  
UNIVERSITY OF WATFORD  
UNIVERSITY OF WOLVES  
UNIVERSITY OF WYOMING  
UNIVERSITY OF YORK

Product: BRUNEL UNIVERSITY ESTATE  
Drawing No: UNBRIDGE CAMPUS ALL SITES

RECORD DRAWING

DATE: 11/10/2000  
SCALE: 1:2000  
DRAWN BY: [Name]  
CHECKED BY: [Name]  
APPROVED BY: [Name]

BRUNEL UNIVERSITY OF THE ARTS  
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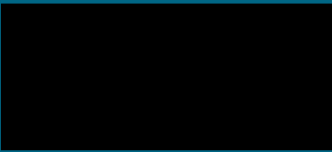
## Enclosure B

### Development Need Assessment

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GVA



# **Brunel University**

## **Assessment of Development Need**

October 2014 (with Foreword dated December 2015)

## FOREWORD

This report comprises an updated version of the 'Brunel University Assessment of Development Need' (interim) report dated October 2014, which was submitted as part of representations to the Hillingdon Local Plan Part 2 Consultation in November 2014. The extent of the update comprises the insertion of this foreword only – the remainder of the report is unchanged.

Since preparing this need assessment, the University has prepared further evidence to support the planning case. This further evidence includes:

- **Site Capacity Assessment and Concept Masterplan.** This has taken a more refined (masterplan-led) approach to determining the likely capacity of the existing built up parts of Sites 1 and 2 to accommodate more development and to how the development need can be most appropriately met. It has the effect of updating the findings set out in Section 6 of this report. Of note, is that the Concept Masterplan proposes development on Sites 1, 2, 3 and 4 (as opposed to just Sites 1, 2 and 4) – noting that this paper had considered Site 3 unsuitable for development on the grounds that it currently comprises playing fields. The rationale for this is to respond positively to specific needs of the University's Sports Department who require new indoor sports facilities to be co-located with the University's existing intensive outdoor sports facilities, which are located on Site 3, with the loss of the existing outdoor sports pitches to be mitigated through the enhancement of existing grass pitches on Site 5 (provision of all-weather pitches or similar). Accordingly, the recommended policy response set out in Section 7 is now updated to put in place a site-specific policy covering the entire Brunel University campus (Sites 1-5) which should specifically confirm the principle of development on Sites ~~1, 2 and 4~~ 1, 2, 3, and 4 to include the revision of the Green Belt designation boundary to exclude Sites ~~1, 2 and 4~~ 1, 2, 3 and 4.
- **Green Belt Study.** This has the effect of supplementing the content of Section 6 in respect to the contribution that the site makes to the purposes of including land within the Green Belt.
- **Alternative Site Assessment.** This should be read alongside Section 6, The location specific need for the identified development need to be provided on or adjacent to the existing campus remains, however this paper confirms that there are no suitable and available potential alternative sites in reasonably accessible alternative locations in any event.
- **Comparables.** This should be read in conjunction with Section 7 of this report, and confirms that 'exceptional circumstances' for the revision of Green Belt boundaries has been confirmed elsewhere in comparable circumstances.
- **Historical Use Report.** This supplements Section 3 of this report by providing more detailed information regarding the buildings and associated surface infrastructure that previously occupied Site 4.
- **Ecological Appraisal.**
- **Transport and Feasibility Report.**
- **Economic Impact Report.** This supplements the details set out in Section 2 of this report.

GVA  
December 2015.



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# 1. Introduction

- 1.1 GVA has been instructed by Brunel University (BU) to undertake an objective assessment of its development needs for the next 10-15 years and to advise on how this need can be most appropriately met in planning terms. This paper sets out the outcomes of this assessment and makes the planning case for development on land known as 'Site 4' which is designated as Green Belt in London Borough of Hillingdon's (LBH) adopted Unitary Development Plan (UDP).
- 1.2 The UDP is under review. LBH adopted Part 1 (strategic policies) of its new Local Plan in November 2012, and is currently preparing a draft 'Part 2' Local Plan which will contain development management policies, site specific allocations and an associated policies map (previously known as a Proposals Map). The University's objective is to ensure that the new Plan establishes an appropriately supportive policy basis that allows the planned growth of the University to proceed.
- 1.3 This paper is structured as follows:
- **Section 2** sets out the context (the education need);
  - **Section 3** provides a description of the site and its planning history;
  - **Section 4** sets out the relevant planning policy context;
  - **Section 5** assesses development need;
  - **Section 6** considers how this need can be best met in terms of site selection (the case for developing Site 4);
  - **Section 7** proposes how the Local Plan can best respond to the identified need;
  - **Section 8** sets out the likely benefits of development; and
  - **Section 9** summarises the paper sets out our conclusions.

## 2. Context

### The UK Higher Education Sector and its Role in UK Economic Success

#### The Economic Benefits of Higher Education

- 2.1 The contribution of higher education to the UK's economic success has become the focus of greater attention over recent years, providing a skilled workforce, stimulating innovation and supporting start-up businesses.
- 2.2 Higher education forms a core part of the UK's economic infrastructure, contributing to GDP by generating employment and output, and attracting export earnings. Through direct and indirect effects, it is reported that UK universities generated £59 billion of output and provided over 668,500 jobs (equivalent to 2.6 % of all full time employment) in 2007.
- 2.3 As well as providing a skilled workforce, universities and colleges act as anchor organisations in their local economies. Highly unlikely to relocate, they play a distinct role in creating the long-term conditions needed for economic growth. Often as the largest employers in their area, universities boost consumer spending through student numbers, supporting local business, housing and tourism.
- 2.4 Universities contributed over £31 billion to UK GDP in 2007/8, with the off-campus expenditure of their international students and visitors making a further £2.4 billion contribution to GDP. Taken together, this contribution came to over £33.4 billion – equivalent to 2.3 % of UK GDP in 2008 (Kelly et al 2009).
- 2.5 Higher education also has an important role in attracting inward investment. The OECD has argued that for securing foreign direct investment, the world class research infrastructure and skilled labour provided by universities is arguably more important than financial incentives.

## The Role of Higher Education in Meeting Economic Growth

### Objectives

- 2.6 The role of higher education institutions in supporting economic growth and development has recently taken centre stage as governments around the world push for private-sector led, innovation driven economic recoveries from the economic downturn.
- 2.7 In May 2010 David Cameron stated the Coalition government's commitment to moving away from 'a narrow foundation for growth' of 'just a few industries', to supporting growing industries such as aerospace, pharmaceuticals, high-value manufacturing, hi-tech engineering and low carbon technology. Central to the growth strategy is a drive to rebalance the economy and place it on a more sustainable footing by moving away from a reliance on government and consumer spending towards net trade and investment (HM Treasury 2011). It aims to move the UK away from relying on the financial and banking sectors and towards growth in other economic sectors, particularly the manufacturing sector. It is said that the country will need to 'reindustrialise' in this way for the government to achieve the growth plans set out in the budget (HM Treasury 2012).
- 2.8 For this rebalancing to succeed however growth sectors require a number of external factors, including the conditions for innovation and skilled workers. Higher education is central to these, creating the conditions for innovation by attracting inward investment, developing research infrastructure and supporting the commercialisation of research, and providing the skilled workforce necessary to stimulate the private-sector growth.

### A Renewed Role for Higher Education Institutions

- 2.9 In the Government's Plan for Growth, education is described as 'the foundation of economic success'. The Government further stated that "our economy needs to become much more dynamic ... and retooled for a high-tech future, if we are going to create the jobs and prosperity we need for the next generation". This aspiration to use science to underpin economic growth has been met with a growing focus on the importance of universities in research and innovation, nurturing entrepreneurship through spin-off firms,

and supporting the development of a knowledge base in Science, Technology, Engineering and Mathematics (STEM) subjects.

- 2.10 In the UK Government's Higher Education White Paper 'Students at the Heart of the System' (June 2011), it is recognised that universities have 'a much wider role' in developing 'a research infrastructure, and a culture of excellence, that has made the UK a place where many of the most talented researchers in the world want to work'. Universities such as Brunel now provide functions beyond education, expanding into research and development, which is of critical importance to innovation.
- 2.11 Universities are also commonly playing an important role in bridging the gap between higher education and enterprise, with the commercialisation of research through spin-off businesses and licensing, and by establishing and supporting the development of incubator businesses. The Government recognised the importance of this function for regional economic development where universities have the potential to anchor regional industrial clusters by attracting and retaining academic, graduate and business talent, developing networks and nurturing entrepreneurship through spin-off firms.
- 2.12 Universities also have a vital role in developing STEM capabilities that are essential to the UK economic growth strategy. A report to the Select Committee on Science and Technology (2012/2013) highlighted that 'the workforce of the future will increasingly require higher-level skills as structural adjustments in the economy force businesses to move up the value chain. These jobs of the future will increasingly require people with the capabilities that a STEM qualification provides'.
- 2.13 However it is reported that there is currently a deficit in the number of STEM graduates and postgraduate required to fulfil this increasing demand and realise the Government's economic ambitions. The Confederation of British Industry (CBI) reported that 'STEM skills shortages are widespread' with over 40% of employers currently experiencing difficulty recruiting staff with STEM qualifications. Supporting universities to fill the vacancies with high quality STEM graduates and postgraduates will be critical to economic growth.

### *The Witty Report (2013)*

- 2.14 The Witty Report (Encouraging a British Invention Revolution: Sir Andrew Witty's Review of Universities and Growth) stressed that UK universities have an 'enhanced 3<sup>rd</sup> mission' of promoting regional economic growth. Noting that universities already contribute an estimated £69billion to the UK economy through employment, provision of skills, creation and transfer of knowledge, inward investment and by working with private sector companies, the report charged them with facilitating economic growth as a core strategic goal by acting as local anchor institutions.

### *The City Growth Commission*

- 2.15 The RSA City Growth Commission is a 12 month inquiry into how best to enable the UK's major cities to drive growth and respond to the fiscal and economic changes. The Final Recommendations 'Unleashing Metro Growth' Report of October 2014 identifies the importance of universities, specifically with a focus on science and innovation. The report identifies university education and research are amongst the UK's largest and fastest growing export industries, and world-class universities are well distributed among the largest metros, across the country. Universities have played a key role in transitioning the UK to a knowledge economy through training graduates in advanced skills, and through research that leads to industrial innovation. In leading the UK economy to succeed in global competition for knowledge intensive industries, universities are a vital competitive advantage for metro economies.
- 2.16 The RSA 'Universities' Report of October 2014 outlines policy recommendations which focus on the relationship between universities and cities. It identifies that Universities are key economic assets in every major UK city. University education is a substantial economic activity and employs 320,000 staff directly, nationwide. University education and research have been among the UK's largest and fastest growing industries in recent decades. The higher education sector generated an estimated £10.7bn of export earnings for the UK in 2011-12 and attracts 100,000 new overseas students annually to study in the UK.
- 2.17 Graduates are a foundation of the UK's economic competitiveness with at least a third of the increase in UK labour productivity between 1994 and 2005
-

attributed to the rising number of people with a university degree. Jobs in higher level occupations, in which graduates skills are most in demand, account for 43% of the current workforce nationally, but higher occupations are forecast to represent 54% of recruitment in the next decade.

- 2.18 Universities also spur stronger economic growth through fostering innovation in several ways, including research partnerships with businesses, technology transfer, spin-off companies, and the entrepreneurial pursuits of students, graduates and faculty. Importantly, universities often have deep historic links with the places in which they are located, whereas other resources for economic growth – such as residents, workers, firms and investors – are more mobile; no UK university has ever relocated out of a metro. Because of this rootedness, the scale of their operations, and related impacts on local economies, universities are often termed ‘anchor institutions’. Metropolitan areas can be confident of the long-term commitment of universities, and the mutual benefits of success. In attracting people, businesses and investment, these areas will benefit from strong universities and universities benefit when their economy prospers and offers an attractive quality of life.
- 2.19 However, despite the world-class performance of UK universities, the report identifies barriers to their continued contribution to UK businesses, including: low levels of investment in research and development (R&D) across much of the UK economy; poor access to (long-term) finance; and below-average management skills in UK businesses. While globally competitive, the UK university system has unique characteristics, which mean that universities need to be understood as institutions with unique attributes.

### Investment Potential

- 2.20 In light of the importance attached to higher education, the UK Government is wholly supportive of the sector and has accordingly made substantial amounts of funding available for institutes, especially those with a strong R&D function.
- 2.21 In 2011 the Government announced a programme of Technology Innovation Centres and an innovation and research strategy, with the 2011 White Paper confirming an increase in total funding for higher education institutions by

2014-15. The grant letter to HEFCE identified funding of around £1.5 billion through the quality-related research grant.

- 2.22 While the Department for Business, Innovation and Skills had to adjust to a 25% reduction in its programme and administrative budgets, and 52% reduction in its capital budget, both the Science budget and HEIF funding were protected in cash terms. This highlights the Government's belief that world class research and effective knowledge exchange are core to the economic recovery.
- 2.23 More recently, an additional £200 million in research capital has been provided by Government related to research and its economic impacts. In January 2012 the Universities Minister set out a target for higher education to increase the total knowledge exchange income by 10 per cent over the next three years.
- 2.24 As a successful and growing university in outer London there is a clear opportunity for Brunel to tap into this significant funding pot, with a substantial degree of future investment potential in Hillingdon.

### Demographic Trends

- 2.25 There will be increasing pressure on student numbers over the next two decades due to a demographic increase in the number of 18-20 year olds, changes on demographics, and increased demand from potential students from disadvantaged backgrounds. The increase in undergraduate student numbers between 2011 and 2035 has been estimated to be between 26% (using current unmet demand) and 68% (assuming all social groups have the same entry rate). In the short term the Government has removed the cap on undergraduate student numbers which has 'unlocked' an estimated extra 60,000 student places a year.

## **Brunel University and its Contribution to Local, Regional and National Economic Success**

### A Successful Education/Research Institution

- 2.26 Brunel University was established in 1966. It has been subject to continuous growth over this period and now has 13,860 students.



2.27 Over the past 50 years the University has established itself as a leading provider of quality higher education allied to industry with a strong culture of research. It is subject to the following rankings:

- 226th of universities globally in the 2013/14 Times Higher Education Survey (THES) World University Rankings;
- 25th out of 154 in the NSS 2014 And Number 1 in London for Student Satisfaction (Times League Table);
- 4th out of 14 UK Institutions in the Times Higher Top 100 ranking of higher education institutions that are less than 50 years old (29th in the world);
- No. 1 in the UK in Engineering and Technology for citations from research articles (THES World Ranking 2014/15); and
- 6th in the UK for Engineering, above Cambridge, Bristol and Imperial (THES World Rankings 2014/15).

2.28 Over recent years BU has sought to align its education and research capabilities more closely with the requirements of the market and the UK's economic growth strategy, which involves it becoming a more research intensive university and placing greater focus on its core subject areas (typically STEM subjects: Science, Technology, Engineering and Mathematics). This approach of building on its existing strengths has ensured that BU has been well placed to take-up nationally significant research opportunities (and access the significant amount of funding available for such work).

2.29 Some examples of BU recent success include the following:

**Supporting the Food Sector to Reduce Energy Usage**

The new RCUK Centre for Sustainable Energy Use in Food Chains will establish a cross-disciplinary hub of engineers, scientists and industry experts to develop energy-efficient food manufacturing, distribution and retail systems to support the UK Government's target of 80% CO2 emissions reduction by 2050. The food supply chain alone is responsible for 22% of the UK's greenhouse gas emissions creating 19 million tonnes of CO2 every year. As the UK's largest manufacturing sector, it employs over 3.5 million people across 196,000 enterprises. In collaboration with Manchester and Birmingham Universities, Brunel is developing innovative approaches, processes and technologies to tackle the imperative to reduce energy demand at all stages of the food chain – from gate to plate. With EPSRC funding of £6 million and a further £6 million from food companies and partner organisations, the Centre will be supported by 33 partners, which include seven major food manufacturers such as Kraft, Heineken and Heinz; four retail partners, including Tesco, Waitrose and M&S; seven equipment manufacturers and suppliers and a number of professional institutions and trade associations.

**Advance Metallic Materials for the Automotive Industry**

The Brunel Centre for Advanced Solidification Technology (BCAST), at Brunel University, is focused on developing new techniques that will revolutionise sustainability in the production of metal components. Its researchers work on highly advanced casting processes to produce metal products that require very little subsequent machining, radically reducing the amount of energy and materials needed to manufacture high quality parts.

BCAST is also creating new methods for making high quality castings from recycled metals. The aim, on a global level, is to minimize the need for newly-mined materials to support manufacturing. If reliable methods can be found to reuse and 'up-cycle' the billions of tonnes of metal that have already been mined, then the enormous amounts of energy and resources currently spent on disposing of used metal and extracting fresh supplies from the ground can be cut dramatically. For example, in the UK alone we landfill 0.31m tonnes of aluminium per year, representing £775m of direct economic loss and an energy loss equivalent to 11m barrels of oil.

BCAST leads the £9 million EPSRC Centre for Innovative Manufacturing in Liquid Metal Engineering (LiME) (2010-2015) which is conducting fundamental research to understand and control the solidification of liquid metal to enable the development of new advanced materials and highly efficient manufacturing technologies. It also leads the £4.2 million EPSRC funded "Towards Affordable, Closed-Loop Recyclable Future Low Carbon Vehicle Structures" (TARF-LCV) project (2011-2015) contributing to the UK government's strategic Integrated Delivery Programme for the development of low carbon vehicles.

JLR are a lead industrial partner in LiME and are developing a strategic partnership to establish a scale up facility for resource efficient technologies for high performance alloys. This will help bridge the gap between lab-proven technology and industrial application to accelerate the industrial take-up of fundamental research undertaken at Brunel.

#### **Engineering a Resilient Energy and Transport Infrastructure**

NSIRC is the world's first educational establishment offering industry-driven research and postgraduate degree programmes in structural integrity. Set up to address the shortage of structural integrity engineers worldwide, the centre is a unique collaboration between TWI, lead academic partner Brunel University, together with Manchester University, Cambridge University and industry partners.

With support from the UK Department of Business, Innovation and Skills, TWI are constructing a multi-million pound postgraduate engineering facility integrated within the expanded TWI headquarters, at Granta Park, Cambridge as part of this £150m initiative to establish a Structural Integrity Research Foundation (SIRF). In addition, Brunel has secured funding from the Higher Education Funding Council for England (HEFCE) to procure specialist research equipment to be housed in the facility and used by NSIRC to carry out fundamental research and programmes of postgraduate training at Masters and doctoral level. The key outputs arising will be industry-ready engineers and scientists in structural integrity disciplines such as fail-safe design, flaw evaluation, corrosion prevention and structural health monitoring, and new techniques and technologies to address the long term structural integrity challenges facing the engineering, energy, transport and aerospace sectors.

NSIRC combines industrially driven academic excellence to address the need for innovation, while delivering a supply of appropriately qualified staff to work across the supply chain and generate very significant economic benefits, both to industry and the UK as a whole.

Brunel's latest collaboration with TWI marks a truly pioneering approach to securing global economic resilience. In November 2012, the Higher Education Funding Council for England (HEFCE) announced funding of £15 million to Brunel in support of plans to form a National Structural Integrity Research Centre (NSIRC). NSIRC will be based at TWI's headquarters outside Cambridge in a new building to be constructed with support from the Department of Business, Innovation and Skills Regional Growth Funding. Lead partners, TWI and Brunel, along with a consortium of leading academic and industrial partners will carry out research programmes, train postdoctoral students and conduct contract R&D specifically in the field of structural integrity.

The facility will provide UK industry with world-class engineers who can lead the development of new, safe, world-leading products in diverse industries, including oil and gas, energy generation, renewables and transport. We estimate that in addition to the environmental and social benefits resulting from the avoidance of engineering failures, the direct economic benefit brought by those graduating from the NSIRC after the first ten years of its operation will be in excess of £350m. This can be multiplied to more than £3.5bn when considering the benefits of the work the qualified engineers will undertake for industry.

## A Valuable Economic Asset

2.35 The University plays a significant role in the local economy:

- The University is a key local economic asset for Hillingdon, playing a key role in the borough's 'knowledge economy' base.
- The economic performance of Hillingdon is driven by its strong knowledge economy base attributed to the biotech cluster
- For the 2013/14 year, the University has 13,860 students (73% are undergraduates and 27% post-graduates). 21% of students are from outside of the UK/EU and approximately 7% are from LBH;
- It employs approximately 2,450 full/part-time staff, of which 36% live in LBH;
- It attracts around 26,500 visitors per annum (2013) in conjunction with academic related conferences, hospitality events and summer schools;
- It has an annual turnover of £179m (2011-12), £184m (2012/13) and £187m (2013-14) (forecast). Universities UK estimate that for every £1 of university turnover a further £1.38 is generated in the other sectors of the economy. This puts the University's annual contribution to the economy at around £445m (2013-14);
- In 2009/10, the University was part of a £4.6m supply chain with Hillingdon businesses, providing services to the value of £1.4m and purchasing £3.2m of products and services from Hillingdon companies and agencies.
- Over £300m has been invested in the capital projects in the period 2006/7-11; and
- It has an active collaboration programme with local further education colleges and secondary/primary schools.

## The Future

- 2.36 Brunel University is clearly a success in terms of an education/research institution and as a local economic driver. The University wishes to capitalise on this success and is preparing for a further period of growth. Its current Transformational Change Programme is designed to enable this vision.
- 2.37 The aim is to cement the University's position in the top 3<sup>rd</sup> of UK higher education institutions. It has prepared a strategic plan for the next 5 years which focuses on the significant growth of its research capability (which includes post-graduate study), alongside modest growth of undergraduate education. It has furthermore worked up headline details for longer term

growth (next 10-15 years) for estates/planning purposes which continues this expansion trend.

- 2.38 In terms of student numbers, it plans to increase these to around 21,500 by 2022/23 (from around 13,860 in 2013/14). Ensuring that the University has suitable accommodation to meet its operational growth requirements is essential. This will require a significant development programme comprising the refurbishment of existing buildings together with new development and public realm upgrades to the Uxbridge campus.
- 2.39 The University aims to increase the proportion of students housed on-campus (in order to reduce impacts on the local community and housing market). At present all first year and masters students are offered a place on campus, however the aim is to extend this to third year and a proportion of research students. This strengthens the University's educational offering, as a greater proportion of students will be on campus, and is attractive to prospective students (especially from overseas) as it emphasises the University's advantage as a 'campus university in London'.

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## 3. The Site and Planning History

- 3.1 Brunel University operates from a 78 hectare campus located approximately 1km to the south of Uxbridge town centre, within the administrative area of the London Borough of Hillingdon (LBH). It is the only single-campus based university in London. Development has been brought forward incrementally in a planned manner, in accordance with a series masterplans the most recent one having been granted outline planning consent in 2004.
- 3.2 The campus is divided into 5 'sub-sites' (refer to plan at Appendix A):
- **Sites 1 and 2** lie either side of Cleveland road and accommodate the majority of the University's built accommodation. This comprises an intensely developed mix of academic/teaching space, specialist research facilities and student housing (halls of residences) across a site area of around 40ha. Existing buildings date from the 1960's onwards.
  - **Site 3** lies to the east of Kingston Lane and **Site 5** lies to the south of Church Road. These accommodate the majority of the University's outdoor sports facilities, which include extensive areas of playing fields (sites extend to approximately 25ha).
  - **Site 4** extends to approximately 12.4ha and is located immediately to the south of Site 2. Part of the site (approximately 1.6ha) accommodates a series of single storey buildings and associated car parking currently used as a garden centre (trading as 'Hillingdon Garden Centre'). The remainder of the site is unused (this land was formerly used as a market garden – there are remains of greenhouses, structures and surface infrastructure associated with this former use/development). The land has been vacant for an extended period of time and is fenced off (there is no public access).
- 3.3 The main vehicle access is via Kingston Lane and the site is served by numerous bus routes which provide connections to the tube network at Uxbridge and national rail at West Drayton. The site has a Public Accessibility Level (PTAL) rating of 2 (poor).
- 3.4 Existing university buildings extend to approximately 233,851sqm (gross internal area) (excluding the garden centre), comprising approximately 125,120sqm of teaching, research and support facilities and 108,731sqm of student

housing. This equates to a gross floorspace to plot size ratio (plot ratio) of around 0.58.

- 3.5 The River Pinn passes north to south through the centre of the University Campus (affecting Sites 2 and 4). The Environment Agency Flood Map (see Parameter Plan at Appendix C) indicates that parts of Sites 2 and 4 are designated as Flood Zone 2/3, while the remainder of the campus is Zone 1.

## Planning History

- 3.6 In 1990, the University prepared a Masterplan for the Uxbridge campus to cover development requirements up to 2000. This was granted outline planning consent in 1992.
- 3.7 The University proceeded to prepare a further masterplan for Sites 1 and 2 in the early 2000's, to guide development over the proceeding 10-15 years. This was granted outline planning consent in 2004 (application ref. 532/APP/2002/2237). The description of development is as follows:

*'Brunel University master plan proposals comprising erection of 48,064 sq.m of new academic floorspace, 69,840 sq.m of new student residential accommodation, ancillary floorspace and infrastructure, provision of 645 additional parking spaces, improved access from Kingston Lane, new access from Cowley Road, highway improvements to Cleveland Road, improved pedestrian and cycle routes, landscaping and environmental improvements (involving demolition of 18,600 sq.m of existing floorspace) (outline application)'*

- 3.8 The Parameters Plan approved under this consent is enclosed at Appendix B.
- 3.9 The 2004 Masterplan has now been partially implemented. The table enclosed at Appendix C provides an overview of the elements that have been implemented and confirms the elements which remain to be built-out. All of the approved student accommodation (69,840sqm) has been implemented, however a balance of 20,546sqm (43%) of the academic floorspace remains to be implemented.

- 3.10 An application was submitted in March 2012 (Ref: 532/APP/2002/2237) to extend the period in which reserved matters applications can be submitted. This application is pending determination.

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## 4. Planning Policy Context

- 4.1 The policies set out in the emerging Hillingdon Local Plan (Part 2) must be in general conformity with policies set out in the National Planning Policy Framework (NPPF) and the London Plan, and should be consistent with policies in the adopted Hillingdon Local Plan (Part 1). Accordingly, this existing policy context establishes a 'framework' within which the new local plan policies must be prepared.
- 4.2 This section provides an overview of this existing policy framework (as relevant), which acts as the policy context for the planning case set out in subsequent sections.

### The National Planning Policy Framework

- 4.3 The NPPF sets out the Government's overarching planning policies for England. It must be taken into account by local planning authorities in the preparation of local plans and is a material consideration in planning decisions.
- 4.4 The key objective of the NPPF is to achieve sustainable development, which is defined by the policies set out in the NPPF. It confirms a general presumption in favour of sustainable development which for plan-making means that:
- Local Planning Authorities should positively seek opportunities to meet the development needs of their area; and
  - Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid changes, unless:
    - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or
    - Specific policies in the NPPF indicate that development should be restricted.
- 4.5 The above 'presumption' establishes the overarching starting point for determining the acceptability of development at the University. Moving beyond this, the principal NPPF policy issues of relevance relate to economic development and Green Belt, as discussed below:



## Building a Strong, Competitive Economy

- 4.6 As discussed in earlier sections, the University acts as an important driver of the local and regional economy. The NPPF establishes very clear in-principle support for economic development, and therefore the growth of the University.
- 4.7 Proactively driving and supporting sustainable economic development is identified in the NPPF as a core land use planning principle which should underpin both plan-making and decision taking (para. 17). This core principle is bolstered by Paragraph 19 which states that the Government's expectation is that the planning system should do everything it can to support sustainable economic growth. It requires significant weight to be placed on the need to support economic growth through the planning system which is expected to operate to encourage and not act as an impediment to sustainable growth.
- 4.8 When preparing Local Plans, paragraph 21 of the NPPF requires local planning authorities to do the following:
- Set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;
  - Identify strategic sites for local and inward investment to match the strategy and meet anticipated needs over the plan period;
  - Support existing business sectors, taking account of whether they are expanding or contracting; and
  - Plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high-technology industries.

## Green Belt Protection

- 4.9 The principal policy constraint to development is the Green Belt policy designation that covers the entire site (a UDP policy).
- 4.10 The NPPF confirms that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts being their openness and their permanence (paragraph 79).
- 4.11 Paragraph 80 of the NPPF confirms the five purposes of Green Belt land, as follows:
-

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

4.12 Paragraph 83 requires Green Belts boundaries to be established in Local Plans. Once established, it states that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

4.13 If Green Belt boundaries are to be reviewed, paragraph 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development. It requires local planning authorities to:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;
- where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

4.14 Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances (NPPF, paragraph 87). The NPPF confirms, at paragraph 89, that the construction of new buildings in the Green Belt should be regarded as inappropriate.

## The London Plan

- 4.15 The London Plan forms part of the development plan affecting the site and, at a local level, London Boroughs must ensure that their Local Plans are in general conformity with it. The current London Plan was adopted in October 2011 and is currently under review. The Mayor published a Revised Early Minor Alterations document in October 2013 and is currently consulting on Further Alterations (January 2014). As per the NPPF, the key relevant London Plan policy considerations relate to education/economic development and Green Belt, as discussed below:

### Education/Economic Development

- 4.16 The London Plan acknowledges the link between London's status as a pre-eminent global business location and the importance of London's world class higher education and research institutes. It recognises that higher education is an important economic sector in its own right and establishes clear in-principle policy support for the growth of education/research institutions.
- 4.17 One of the key objectives of the Plan is to ensure London is '*an internationally competitive and successful city with a strong and diverse economy and an entrepreneurial spirit that benefits all Londoners and all parts of London; a city which is at the leading edge of innovation and research and which is comfortable with – and makes the most of – its rich heritage and cultural resources.*'
- 4.18 It states at paragraph 3.107:  
*'Higher education in London provides an unparalleled choice of undergraduate and postgraduate degrees, continuing professional development, advanced research, and infrastructure to support business growth, e.g., incubation space and business support services. It is also a major employer and attracts major international companies able to benefit from the universities' research reputation, such as in pharmaceuticals and life sciences. Universities also play a vital part in ensuring Londoners have the higher order skills necessary to succeed in a changing economy, and for the capital to remain globally competitive (Policy 4.12).'*

- 4.19 Policy 3.18 requires Boroughs to *'support and maintain London's international reputation as a centre of excellence in higher education.'*
- 4.20 Policy 4.10 relates to new and emerging economic sectors and requires Borough and stakeholders to:  
*'give strong support for London's higher and further education institutions and their development, recognising their needs for accommodation and the special status of the parts of London where they are located...'*
- 4.21 Paragraph 4.54 states:  
*'The Mayor strongly supports measures to secure and develop London's leading role as a centre of higher and further education of national and international importance. These are important economic sectors in their own right with a key part to play in developing London's world city offer, as well as having considerable potential for greater synergies in fostering innovation....'*
- 4.22 Table 2.1 identifies outer London business locations with specialist strengths (e.g. higher education, media, strategic office, logistics / other transport related uses) which potentially or already function about the sub-regional level and generate growth significantly above the long term outer London trend. The intention being that these would complement the network of town and other centres. Uxbridge is identified as a potential outer London development centre in relation to higher education.
- 4.23 Policy 2.1 seeks to ensure that London *'retains and extends its global role as a 'sustainable centre for business, innovation, creativity, health, education and research, culture and art and as a place to live, visit and enjoy'*.
- 4.24 Policy 3.8 (Housing Choice) requires boroughs to address strategic and local requirements for student housing meeting a demonstrable need by working closely with higher education stakeholders and without compromising capacity for conventional homes. Paragraph 3.52 identifies a need for around a further 10-27,000 student bedspaces in the period to 2021.

### Green Belt

- 4.25 Policy 7.16 of the London Plan relates to Green Belt land. It states that the Mayor strongly supports the current extent of London's Green Belt and its protection from inappropriate development. It states that the strongest
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protection should be given to London's Green Belt and that inappropriate development should be refused, except in very special circumstances.

### Draft Further Alterations to the London Plan (January 2014)

- 4.26 The Mayor published draft further alterations to the London Plan for consultation in January 2014. This maintains its firm support for the growth of the higher education sector, but of note is the revised figures for student housing need which indicate a requirement for 20-31,000 bedspaces in the period to 2025. The Mayor has set up an Academic Forum to help plan for student housing needs in London.

### Hillingdon Local Plan (Part 1 – Strategic Policies)

- 4.27 LBH's Local Plan Part 1 (previously known as the Core Strategy) was adopted in November 2012. It establishes an adopted strategic policy basis within which site specific allocations and development management policies should be prepared. As with national/regional policy, the key relevant issues are education/economic development and green belt.
- 4.28 The Local Plan confirms that Uxbridge is the main urban centre in Hillingdon and is classified as a Metropolitan Centre. At Table 5.4, it describes Uxbridge as follows:
- 'Uxbridge has an office stock of around 205,000 sq.m, the fourth largest concentration in outer London, and is a key centre for the office market in West London. A number of operators have their headquarters or European headquarters in Uxbridge which has cluster strengths of pharmaceuticals and IT companies, business support services and food sectors. Businesses are attracted by good road access, the quality of the townscape and service provision, availability of suitable premises, Brunel University and the local skills base.' (our emphasis)*
- 4.29 Paragraph 9.50 of the Local Plan acknowledges that Hillingdon is home to a number of highly respected educational institutes. It states that policies will be developed in subsequent Local Development Documents 'to ensure that a high standard of teaching can continue to be provided in these establishments over the period of the Local Plan and that LBH 'will continue its collaborative working arrangements with these institutions (e.g. Brunel

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University) during the preparation of the Local Plan and during subsequent monitoring and reviews.'

4.30 Paragraph 8.20 of the Local Plan acknowledges that the most important attribute of Green Belts is their openness. It goes on to state that the main purpose of Hillingdon's Green Belt is:

- to keep land open and free from development;
- to maintain the character and identity of individual settlements; and
- to make a clear distinction between rural and urban environments.

4.31 The Local Plan aims to create sustainable communities by concentrating new development in urban areas and local town centres. Paragraph 8.20 states that the Green Belt's role is '*to help reinforce this strategy by strictly controlling development in the open countryside*'. In this context, it is important to note that Site 4 is not within the open countryside nor within a rural environment.

4.32 Site 4 is however within an area identified by the Local Plan (Map 8.1) as a 'Green Chain'. Paragraph 8.22 defines Green Chains as habitats linked by natural and man-made corridors that enable flora and fauna to migrate into the centre of London. It notes that the green links between sites include public footpaths, bridleways, canals, rivers, streams and tree lined streets and road verges, all of which contribute to the green network within the borough.

4.33 Local Policy EM2 relates to Green Belt, Metropolitan Open Land and Green Chains. It states:

*'The Council will seek to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains. Notwithstanding this, Green Chains will be reviewed for designation as Metropolitan Open Land in the Hillingdon Local Plan: Part 2- Site Specific Allocations LDD and in accordance with the London Plan policies.*

*Minor adjustments to Green Belt and Metropolitan Open Land will be undertaken in the Hillingdon Local Plan: Part 2- Site Specific Allocations LDD.*

*Any proposals for development in Green Belt and Metropolitan Open Land will be assessed against national and London Plan policies, including the very special circumstances test.*

*Any proposals for development in Green Chains will be firmly resisted unless they maintain the positive contribution of the Green Chain in providing a*

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*visual and physical break in the built-up area; conserve and enhance the visual amenity and nature conservation value of the landscape; encourage appropriate public access and recreational facilities where they are compatible with the conservation value of the area, and retain the openness of the Green Chain.'*

## The LBH Unitary Development Plan (1998)

- 4.34 LBH's Unitary Development Plan (UDP) was adopted in 1998 and is now out-of-date. The policies contained in the Plan are under review as part of the preparation of the new Hillingdon Local Plan (Part 2) and are expected to be deleted following adoption of the new plan. Accordingly, these policies are not relevant for the purposes of preparing the new plan. Notwithstanding this, headline details of key policies are provided below for the purposes of context.
- 4.35 The key 'Saved Policies' are Policy PR22, which relates specifically to Brunel University, and Policies OL1, OL4 and OL5 which relate to development within the Green Belt.

### Brunel University (Site Specific Policy)

- 4.36 Saved UDP Policy PR22 relates specifically to Brunel University, and which states:
- 'Brunel University Campus shall be reserved for development associated with the University's functioning as a centre for academic learning and research. In order to safeguard the function and open nature of the Green Belt across the campus, infill and development will be encouraged on Site 2 providing it does not harm the environment. Development on the predominantly open land on Site 1 will be acceptable where (i) the proportion of developed to undeveloped land is such that the site retains its open character; (ii) the land is able to sustain its ecological and nature conservation interest; and (iii) development does not detract from residential amenity. Development of Site 3 and Site 5 will be restricted to outdoor sport and informal recreational uses which retain the existing open character.*

*In considering any proposal at the University, the following objectives will be taken into account:-*

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- (i) to preserve and enhance the ecological interest of the land including establishing nature conservation and wildlife corridors;
  - (ii) to seek public access to the campus where this does not compromise the University's operational requirements or the safety and security of the students and staff;
  - (iii) to provide both on and off-site road and junction improvements;
  - (iv) to augment existing tree belts along the northern and western boundaries on Site 1 and provide additional planting and landscaping where appropriate elsewhere;
  - (v) to provide adequate on-site car parking;
  - (vi) to enhance the existing footpath network on the campus;
  - (vii) to protect local residential amenity.'

## Green Belt

4.37 LBH's policy on development within the Green Belt is set out in Saved Policy OL1. This states:

*'Within the Green Belt, as defined on the Proposals Map, the following predominantly open land uses will be acceptable:*

- (i) agriculture, horticulture, forestry and nature conservation;*
- (ii) open air recreational facilities;*
- (iii) cemeteries*

*The local planning authority will not grant planning permission for new buildings or for changes of use of existing land and buildings, other than for purposes essential for and associated with the uses specified at (i), (ii) and (iii) above. the number and scale of buildings permitted will be kept to a minimum in order to protect the visual amenity of the Green Belt.*

*Limited infilling or redevelopment of Major existing developed sites shown in the Proposals Map and set out in Table 3.3 below and in accordance with proposals adopted in this Plan is considered appropriate provided it complies with the criteria detailed in paragraphs C3 to C8 of Annex c to PPG2.'*

4.38 Since Policy OL1 was adopted in 1998, the national planning context had moved on and PPG2 has since been replaced by the NPPF (2012). However, the planning policy position in relation to Green Belt land has predominately remained the same.



- 4.39 UDP Table 3.3 identifies Brunel University as a 'Major Developed Site in the Green Belt'.
- 4.40 Saved UDP Policy OL4 relates to intensification or enlargement of existing buildings within or adjacent to the Green Belt. It states that LBH will only permit such development where:
- (i) the development would not result in any disproportionate change in the bulk and character of the original building;*
- (ii) the development would not significantly increase the built up appearance of the site;*
- (iii) having regard to the character of the surrounding area the development would not injure the visual amenities of the green belt by reason of siting, materials, design, traffic or activities generated.'*
- 4.41 In relation to new development adjacent to the Green Belt, Saved Policy OL5 states that LBH will only 'permit development adjacent to or conspicuous from the Green Belt if it would not injure the visual amenities of the Green Belt by reason of siting, materials, design, traffic or activities generated.'

## Summary and Conclusions

- 4.42 National, regional and Local Plan (Part 1) policies establish a framework within which Local Plan Part 2 policies should conform.
- The planning system in England is underpinned by a presumption in favour of sustainable development. For plan-making this means that Local Planning Authorities should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs, unless:
    - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or
    - Specific policies in the NPPF indicate that development should be restricted.
  - Policy recognises that the higher education constitutes an economic sector in its own right. The planning system is required to do everything it can to support economic development, and should operate to encourage and not act as an impediment to growth. Significant weight
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should be placed on the need to support economic growth through the planning system.

- This firm policy support for growth (on economic development grounds) conflicts with the Green Belt policy designation that affects the site which seeks to prevent 'inappropriate development' on such land. Changes to Green Belt boundaries should be undertaken as part of Local Plan reviews, as acknowledged in the adopted Local Plan Part 1 which allows for boundary reviews to be undertaken in the Part 2 Local Plan.

4.43 In accordance with the above, it is clear that the emerging Hillingdon Local Plan should support the growth of the University and, more specifically, include policies that plan positively to meet the University's development needs in full. With this principle in mind, the next section assesses the University's development needs are.

## 5. Development Need

- 5.1 This section considers existing development needs (space requirements) followed by future development needs.

### Existing Needs

#### Quantitative

- 5.2 Table 5.1 below, provides details of the extent of existing academic accommodation at the University:

*Table 5.1 Existing Accommodation*

| Type of Floorspace                     | Total Floorspace (GIA) |
|--|------------------------|
| Academic (Teaching, Research, Support) | 125,120sqm             |
| Existing No. of Students(2013)         | 13,860 FTE             |
| Academic Floorspace Ratio              | 9.02sqm/student        |

[Source: Brunel University Estates Strategy 2012:2017]

- 5.3 The University's Estates Strategy 2012-27 confirms that the University's existing academic accommodation extends to approximately 125,120sqm (GIA) which equates to a ratio of around 9.02sqm/student (GIA) (a net ratio of around 7.2 on the basis of an assumed typical gross to net ratio of 1:0.8). This compares to typical higher education institutional net-ratio benchmarks of between 6.48 and 7.78sqm/student (NIA) (Estate Management Statistics prepared by the Higher Education Statistics Agency (2010/11)).
- 5.4 This confirms that in terms of quantum, the existing amount of floorspace appears to be reasonably well aligned with comparable Universities (which indicates that there is not a quantitative need for additional floorspace at this point in time).

#### Qualitative

- 5.5 The above quantitative assessment masks existing qualitative deficiencies, including:

- Building stock condition – many of the existing buildings are reaching the end of their economic life and require refurbishment/replacement.
- Flood Risk – many of the existing buildings are now located in Flood Zone 3 due to climate change.
- Functionality – Much of the existing accommodation is no longer fit-for-purpose due to changes teaching methods, technology and an increasing requirement for specialist research facilities. This sits alongside an increasingly demanding student market, where quality of accommodation is increasingly important.

5.6 We expand on these existing qualitative needs below:

#### *Existing Building Stock Condition*

5.7 The core of the University's campus was constructed in the 1960s/70s. This includes the following buildings:

|  |   |
|--|---|
| Antonin Artuad (1967) (2,849sqm)                   | Joseph Lowe (1968) (991sqm)                         |
| Bannerman Centre (1973) (12,040sqm)                | Lecture Theatre (9,007sqm)                          |
| Biology Annex (1971) (484sqm)                      | Medical Centre (1967) (365sqm)                      |
| Bragg Building (1979) (1,270sqm)                   | Sewage Pumping Station (1972) (31sqm)               |
| Engineering Stores (1967) (37sqm)                  | Sports Centre (1972) (5,569sqm)                     |
| Flammable Liquids Store (1971) (146sqm)            | Engineering Complex (Towers A-D) (1967) (14,580sqm) |
| Halsbury Building and Plant Room (1971) (8,081sqm) | Wilfred Browne Building (1967) (4,044sqm)           |
| Hamilton Centre (1967) (7,345sqm)                  | 20 Cleveland Road (residential) (1968) (85sqm)      |
| Heinz Wolff (1971) (8,724sqm)                      | Chepstow Hall (residential) (1969) (4,718sqm)       |
| Howell Building (1968) (4,791sqm)                  | Clifton Hall (residential) (1969/71) (4,707sqm)     |
| John Crank (1968) (3,822sqm)                       | Saltash Hall (1966) (4,526sqm)                      |
| Total Floorspace: 94,912sqm (GIA)                  |   |

5.8 While some piecemeal upgrades have been carried out, most of these buildings are now reaching the end of their life cycle and are in need of major refurbishment works or replacement. This includes the majority of the services infrastructure (pipework, drainage, ventilation, electrical distribution) as well as parts of the building fabric. The majority of these buildings also contain asbestos. The University has identified 16 of the 20 older buildings as "Category C", meaning these are operational but major repair or replacement works are required in the short to medium term. The age and condition of the core 1960s/70s buildings is a constraint on the quality of environment that the University is able to provide, in terms of comfort, service reliability, health and safety, and energy/carbon emissions.

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- 5.9 Due to the design and construction of these buildings, it would be not economically viable to refurbish and adapt these to meet modern needs. The most cost effective approach in many cases will be to demolish and rebuild to provide fit-for-purpose high quality accommodation.
- 5.10 For the purposes of this assessment, it is assumed that these buildings will need to be refurbished or replaced on a like-for-like basis as part of a rolling estate renewal programme. Consequently, there is a **need for 94,912sqm of replacement floorspace** (14,036sqm residential and 80,876sqmsqm academic/support floorspace).

#### *Flood Risk*

- 5.11 There are a number of existing buildings within the site that now lie within the floodplain of the River Pinn (Flood Zone 3), as a consequence of climate change. This has resulted in events of flooding during times of heavy rainfall.
- 5.12 In many instances the uses of these buildings are not suitable for location in the functional flood plain (having regard to the NPPF Technical Guidance), and this furthermore poses a significant operational risk to the University.
- 5.13 Affected buildings comprise the following:
- Saltash Halls of Residence (4,526sqm GIA);
  - Chepstow Halls of Residence (4,718sqm GIA);
  - Engineering Tower C and D (5,497sqm GIA);
  - Medical Centre (365sqm GIA); and
  - Sports Centre (5,570sqm GIA).
- 5.14 All of the above buildings are identified as requiring replacement/refurbishment on stock condition grounds.
- 5.15 The above buildings extend to approximately 20,676sqm (GIA) (comprising 9,244sqm of student residential accommodation and 11,432sqm of academic and support floorspace).
- 5.16 Assuming like-for-like replacement (bearing in mind that this would be in line with standard benchmarks) this equates to a 'gross' **need for 20,676sqm of replacement floorspace** (on an alternative plot in order to avoid flood risk issues). This need is already accounted for under the stock condition need,

therefore for the purposes of this assessment is netted down to zero to avoid 'double-counting'.

### Summary – Existing Needs

- 5.17 In total, in order to meet existing needs, we consider there to be a requirement for land to accommodate approximately **94,912sqm of replacement floorspace (14,036sqm residential and 80,876sqmsqm academic/support floorspace).**

### Future Needs

- 5.18 As explained in Section 2, BU is a success story in terms of its role as an education/research institution and as an economic asset and it wishes to capitalise on this via significant growth. This in-house ambition is a response to the wider political, policy and funding/market conditions which are all in place to drive significant growth, as summarised below:

- There is a significant need for economic development in the UK linked to a restructuring of the economy. This is the UK Government's stated principal priority, which is reflected in national planning policy which requires the planning system to do everything it can to support economic development.
- There is specific political and policy support in UK Government for the growth of higher education/research institutions as a consequence of the significant (and increasing) role that they play in economic development. This is particularly applicable to those institutions with STEM subject capabilities (such as Brunel University).
- In order to support this, the Government has made a significant amount of funding available for research activities, matched with market opportunities for spin-offs (both of which are particularly applicable to institutions with a strong research function, such as Brunel). This makes the growth of the University a viable economic proposition (deliverable).
- The University has proven capability in the key target areas of supported growth, matched with ambitions to grow (in terms of its scale and performance).

- 5.19 The University's growth plans (in terms of student numbers) for the next 10 years are set out in the University's Long Term Strategic Plan, as summarised in Table 5.2 below:

*Table 5.2 Student Population Projections*

| Level                  | Student Population (FTE) |                      |
|------------------------|--------------------------|----------------------|
|                        | 2013/14                  | 2022/23              |
| Undergraduate Students | 10,124                   | 15,705 (+55%)        |
| Post-graduate Students | 2,717                    | 4,215 (+55%)         |
| Post-graduate Research | 1,019                    | 1,571 (+54%)         |
| <b>Total</b>           | <b>13,860</b>            | <b>21,501 (+55%)</b> |

Source: Brunel University Long Term Strategic Plan. Note that growth projections beyond 2023 are not available. Refer to Appendix

- 5.20 The projected headcount increases set out in Table 5.2 generate a need for additional teaching (academic), research, and residential accommodation. We set out detail of the assessed needs of each below:

### Academic

- 5.21 In order to quantify the amount of additional academic floorspace likely to be required by the above growth projections, we have applied the University's existing per student floorspace ratios in Table 5.3 below (noting that these are consistent with typical higher education institutional benchmarks used for space planning):

*Table 5.3 Long Term Academic Accommodation Needs*

|   |                        |
|---|------------------------|
| Increase in Undergraduate and Post-graduate Student Numbers | +7,079                 |
| Gross Floorspace Ratio (sqm/student)                        | 9.02 (sqm)             |
| <b>Assessed Need</b>  | <b>63,852sqm (GIA)</b> |

### Research

- 5.22 The accommodation requirements associated with the growth in the University's research activities are difficult to quantify as each research function tends to require bespoke facilities.

- 5.23 Over the past 3 years, the growth of the University's research functions has required new accommodation extending to 3,550sqm. For the purposes of projecting long term development need, we have assumed that this trend will continue (equating to **a floorspace need of 14,200sqm** in the period 2014-2026). Bearing in mind the University's aim of accelerating the growth of its research function, this should be treated as a conservative estimate of need.

### Residential (Student Housing)

- 5.24 The University's long term aim is offer sufficient student accommodation in order that the majority of 1<sup>st</sup> year students (70%) plus a proportion of overseas and postgraduate students are able to take up a place in halls. The number of 1<sup>st</sup> year students is projected to increase by around 2,000 students (i.e. around one-third of the growth in undergraduate numbers) in the period to 2023. This equates to a need for around 1,400 additional bedspaces. In addition, the University estimates a minimum need for an additional 100 bedspaces to meet the needs of postgraduate/international students. This equates to a total need for around 1,500 bedspaces.
- 5.25 Recent student housing development at the University (Isambard Phase IV) has equated to a floorspace provision of 27sqm per bedspace. Taking this as a benchmark, the requirement for 1,500 additional bedspaces would equate to a **need for around 40,500sqm**.

### Summary – Future Needs

- 5.26 On the basis of the above calculations, it is our view that there is a need for an **additional 118,552sqm of floorspace** to meet future needs arising over the next 10 years.

### Total Needs

#### Floorspace Need

- 5.27 Table 5.4 below, sets out the combined total of existing identified needs and projected future needs over the plan period (to 2026):



*Table 5.4 Total Assessed Floorspace Needs to 2026*

| Type of Floorspace  | Existing Need (GIA) | Future Need (GIA) | Total Assessed Need (GIA) |
|---------------------|---------------------|-------------------|---------------------------|
| Academic            | 80,876sqm           | 63,852sqm         | 144,728sqm                |
| Research            | -                   | 14,200sqm         | 14,000sqm                 |
| Student Residential | 14,036sqm           | 40,500sqm         | 54,536sqm                 |
| <b>Total</b>        | <b>94,912sqm</b>    | <b>118,552sqm</b> | <b>213,264sqm</b>         |

5.28 There is a residual balance of unimplemented development that remains permitted under the provisions of outline planning consent ref. 532/APP/2002/2237), which is accounted for in Table 5.5 below:

*Table 5.5 Residual Floorspace Need to 2026*

|   | Academic Floorspace (GIA) | Research Floorspace (GIA) | Student Residential Floorspace (GIA) |
|---|---------------------------|---------------------------|--------------------------------------|
| Gross Assessed Need                                       | 144,728sqm                | 14,200sqm                 | 54,536sqm                            |
| Balance of Unimplemented Approved Development (committed) | 20,546sqm                 | -                         | Nil                                  |
| Residual Need Sub-total                                   | 124,182sqm                | 14,200sqm                 | 54,536sqm                            |
| <b>Total</b>  | <b>192,918sqm</b>         |                           |                                      |

5.29 On the basis of Table 5.5, above we conclude that there is a residual need for around **192,918sqm of new development** over the period to 2026.

## 6. Meeting the Need

### Site Selection Criteria

- 6.1 The parameters for site selection are as follows:
- A total site area sufficient to accommodate around 118,682sqm of development.
  - The land must be available for development and either owned by the University or capable of being acquired (within reasonable time and cost constraints).
  - The site must be suitable for the proposed development (in technical and functional terms);
  - The site(s) must be within or adjacent to the existing campus. This is a location-specific need linked to Brunel University's existing Uxbridge campus where disaggregation is not feasible on operational terms. The rationale for this is explained further below:

### Location Specific Need

- 6.2 Brunel is a single campus University and wishes to remain as such in order to strengthen its role as a 'campus University in London'. This carries the following competitive advantages:
- The Uxbridge campus represents a cluster of multiple higher education and research activities, all of which benefit from their proximity to one another in terms of operational efficiencies, knowledge sharing/intelligence networks, and added value.
  - The growth of the existing research cluster establishes a greater critical mass of facilities and research capability. This is a key consideration in attracting inward investment, research funding bids, and post-graduate students/staff.
  - The scale considerations outlined above help to drive teaching quality and education attainment.
  - A single campus university is a key selling point for prospective undergraduate students, particularly those from overseas.

## Opportunity Cost

- 6.3 As explained above, the provision of the University's growth on-site will allow it to compete and perform more effectively than would otherwise be the case. If the University is not allowed to grow/expand, the opportunity cost to the local, regional and national economy will be significant.
- 6.4 The development needs of the University should be considered in the context of wider development needs and land supply in the borough and London as a whole, with a balanced judgement taken to how the limited supply of suitable land can be best used (noting that the take-up of development land elsewhere within the borough/London will reduce the reservoir of development land for other uses).

## Potential Sites

- 6.5 On the basis of the above site search parameters, the need can be best met on Sites 1-5. We consider the potential of each below:

### Sites 1 and 2 (Previously Developed Land)

- 6.6 There is a need for 94,912sqm of new/refurbished floorspace to replace existing accommodation. It is assumed that Sites 1 and 2 have capacity to support **74,236sqm** of this need via the 1:1 replacement (or refurbishment) or existing floorspace on the same plot (the remainder of the existing floorspace is located on land subject to flooding and is therefore not suitable for reuse).
- 6.7 The 2004 Masterplan scheme sought to optimise the development capacity of Sites 1 and 2 in order to avoid encroaching on land designated as Green Belt that is not previously developed. The University intends to implement the residual balance of consented development within the next 5 years. This residual balance of approved development has been accounted for in the need calculations in the previous section. The approved Parameters Plan, which is enclosed at Appendix B, identifies the location of existing retained buildings and the proposed new development zones. As is clear from the plan, once fully implemented there will be limited remaining land with potential to support infill development.

6.8 While limited, there remains some potential for intensification via infill development that the University is keen to fully exploit. Further to this, the University considers there to be some potential for selective demolitions and replacement with more intensive development (including the decking of surface car parking areas for example). In order to estimate this potential, a capacity assessment of the previously-developed parts of sites 1 and 2 has been undertaken (May 2014).

### Methodology

6.9 The campus was broken down into defined 'plots' identified from the current layout and the approved Masterplan. Each plot has been reviewed in terms of its area, existing use(s), access, location and adjacent uses and built form. Potential to support intensification has then been assessed on the basis of suitability, availability, viability. Each plot has been classified as having 'high', 'medium' or 'low/nil' potential.

6.10 The outcomes of the assessment are set out at Appendix F, and summarised below:

*Table 6.1 Site Capacity Assessment*

|                                      | Net Site Area  | Gross Capacity   | Net Discounted Capacity | Replacement Floorspace Need Generated by Demolitions | Net Capacity     |
|--------------------------------------|----------------|------------------|-------------------------|--|------------------|
| Nil Potential (non-qualifying sites) | 24.91ha        | -                | -                       | -  | -                |
| Medium Potential                     | 0.74ha         | 6,660sqm         | 3,330qm                 | -3,732sqm (discounted to 1,866sqm)                   | 1,464sqm         |
| High Potential                       | 3.47ha         | 31,230sqm        | 31,230sqm               | -2,821sqm  | 28,409sqm        |
| <b>Total</b>                         | <b>29.12ha</b> | <b>37,890sqm</b> | <b>34,560sqm</b>        | <b>4,687sqm</b>                                      | <b>29,873sqm</b> |

6.11 On the basis of the assessment, we estimate that the previously developed parts of Sites 1 and 2 have the **capacity to accommodate around 29,873sqm of net additional development** through intensification. This would require testing via detailed design work in due course.

6.12 This is in addition to the 1:1 on-plot replacement of 74,236sqm of existing accommodation. In total this indicates that **Sites 1 and 2 have capacity to support 104,109sqm of development.**

6.13 We note that all of Sites 1 and 2 (including the previously developed areas) are designated as Green Belt. On the basis that they are already intensely developed, for the purposes of this assessment we assume that intensification will not give rise to any significant material harm on the openness of the Green Belt and therefore would be acceptable in principle in Green Belt policy terms.

### Sites 3 and 5

6.14 Both of these sites are currently used as sport pitches. These are essential facilities for the University, the loss of which would be to the detriment of the University's sports facilities, which are also used by local schools and the community. Consequently this land is not available for development and therefore is not capable of meeting the need.

### Site 4

6.15 Site 4 extends to approximately 12.4ha. The site comprises 2 distinct areas:

- Unused land formerly used as a market garden; and
- Garden centre site.

#### *Former Market Garden*

6.16 The former market garden site extends to approximately 10.8ha and previously accommodated extensive fixed surface infrastructure and associated structures. Much of the surface infrastructure remains visible.

6.17 It is largely unused, can be made available for development (in full), and is considered suitable for development (with the exception of those parts of the site within the floodplain which are presumed to be unsuitable for new buildings). However, the site's suitability in planning terms is significantly constrained by its designation as Green Belt and it does not meet the statutory definition of previously developed land.

- 6.18 In considering the principle of developing this land, it is necessary to consider the harm that development might have in terms of Green Belt objectives.
- 6.19 The NPPF confirms the five purposes of Green Belt land to be the following:
- to check the unrestricted sprawl of large built-up areas;
  - to prevent neighbouring towns merging into one another;
  - to assist in safeguarding the countryside from encroachment;
  - to preserve the setting and special character of historic towns; and
  - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 6.20 The aerial photograph enclosed at Appendix D illustrates that Site 4 is located within a predominantly built up area – the site (and adjacent land) is entirely encircled by built development. Considering the objectives for Green Belt land above, this land does not serve to control urban sprawl or to prevent neighbouring towns from coalescing; it does not perform a function of safeguarding the countryside from encroachment; it does not preserve the setting/character of a historic town; and there is no obvious way in which it assists in urban regeneration. Given this, it is robust to conclude that this site does not perform a Green Belt function. Its loss, therefore, would not be capable of having a significant detrimental impact on the functioning of the wider Green Belt in Hillingdon.
- 6.21 Addressing LBH's Local Plan suggestion that Hillingdon's Green Belt land serves to maintain a distinction between urban and rural land and to control development in the open countryside, it is important to note that Site 4 is neither within the open countryside nor within a rural environment. It is comprises a pocket of undeveloped land (to which the public has no access) that is encircled by built development.
- 6.22 On the basis of the above, we consider that the site does not make a meaningful contribution towards Green Belt objectives and therefore it is neither necessary nor appropriate to keep this land permanently open. It is on this basis that we consider this site to be suitable for development in principle.
- 6.23 On the basis of an estimated net developable area of around 8ha (reduced from 10.8ha to account for the flood plain) and comparable existing development densities on Sites 1 and 2, we consider this site to have **capacity**
-

**to accommodate around 72,000sqm of development.** This would need to be tested via detailed design and technical work in due course to include a comprehensive landscape/visual impact assessment and masterplanning process.

#### *Garden Centre Site*

- 6.24 The garden centre site is owned by the University but leased to a garden centre operator. It is in active use and not currently available for development, however this position may change in the future.
- 6.25 It is remote from the University's main campus which constrains its development suitability on accessibility grounds. However, this will be overcome if the remainder of Site 4 (market garden site) is brought forward for development.
- 6.26 The site is designated as Green Belt, however (in accordance with the assumptions applied to Sites 1 and 2), on the basis that they are already intensely developed, for the purposes of this assessment we assume that intensification will not give rise to any significant material harm on the openness of the Green Belt and therefore would be acceptable in principle in Green Belt policy terms.
- 6.27 On the basis of a net developable area of 1.6ha and comparable existing development densities on Sites 1 and 2, we consider this site to have capacity **to accommodate around 14,400sqm of development.**

#### *Site 1 (Land not Previously Developed)*

- 6.28 Site 1 accommodates an area of greenfield land to the north and west of the Isambard student housing complex, extending to approximately 4.9ha. It is our view that the principles set out above in respect to the undeveloped parts of Site 4 also apply to this land and therefore we consider this land to be suitable for development. On the basis of the above plot ratio assumptions, we estimate that this land has the **capacity to accommodate around 54,444sqm of development.**

## 3rd Party Land Surrounding the University

6.29 We have investigated the potential of 3rd party land adjacent to the University to meet the identified needs. Our investigations indicate that such land is neither currently available for development nor suitable for the development required, without a comprehensive land assembly process which would likely render the University's growth plans unviable/undeliverable.

## Summary of Identified Capacity

6.30 Table 6.2, below, summarises the assessed capacity:

*Table 6.2 Summary of Assessed Capacity*

| Site                                 | Estimated Capacity |
|--------------------------------------|--------------------|
| Sites 1 and 2 (previously developed) | 104,109sqm         |
| Site 1 (not previously developed)    | 54,444sqm          |
| Sites 3 and 5                        | -                  |
| Site 4 (market garden)               | 72,000sqm          |
| Site 4 (garden centre site)          | 14,400sqm          |
| 3rd Party Surrounding Land           | -                  |
| Total                                | 244,953sqm         |

## Conclusion

6.31 On the basis of the above analysis, we conclude that the assessed needs of the University can be best met via the following:

- Intensification/infilling of Sites 1 and 2 (previously developed and non-previously developed land)
- Development of Site 4 (market garden and garden centre sites).

## Wider Development Management Considerations

- Transport – For the purposes of this assessment of need, it is assumed that suitable vehicle access arrangements to the above sites can be achieved. It is further assumed that highway infrastructure capacity issues



can be dealt with via measures to suppress trip generation rates and the encouragement of sustainable transport modes, supported by upgrade/mitigation works where necessary. The same principle applies to all infrastructure.

- Landscape/Urban Design – A masterplan will need to be draw up in due course to underpin development proposals across the campus as a whole (Sites 1-5), which should seek to minimise adverse effects on the openness of the wider green belt and ensure the highest standards of urban design. We would expect the future masterplan to test in more detail the capacity of the previously developed parts of Sites 1 and 2 (which should be treated as the sequentially preferable location for development).
- Environmental/Technical Matters – We assume that Sites 1, 2 and 4 are subject to numerous unknown environmental/technical constraints which will influence the extent and form of development supportable. Nonetheless, for the purpose of this assessment we assume that such constraints will not preclude development. Survey work will need to be undertaken in due course to confirm this position.

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## 7. Recommended Policy Response

- 7.1 The NPPF advocates a plan-led approach, underpinned by the presumption in favour of sustainable development. For plan-making this means that:
- Local planning authorities should positively seek opportunities to meet the development needs of their area; and
  - Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change unless:
    - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or
    - Specific policies in this Framework indicate development should be restricted.
- 7.2 The key policy issue here is balancing the conflicting objectives of positively planning to meet development needs in full versus protective policies associated with the Green Belt designation that affects the site.
- 7.3 The NPPF allows for Planning Authorities to revise Green Belt boundaries as part of the Local Plan reviews. Reviews must be justified by 'exceptional circumstances'. It is our view that exceptional circumstances exist in this instance to justify the release of Sites 1,2 and 4 from the Green Belt on the following grounds:
- There is an objectively assessed need for economic/education development;
  - This is a locational specific need – there are no suitable or available alternative (non-Green Belt) sites capable of meeting the need
  - The loss of sites 1, 2 and 4 from the Green Belt would unlikely to be capable of having a significant adverse impact on Green Belt objectives (and therefore would carry limited/nil harm in Green Belt terms).
- 7.4 In order to plan positively to meet the identified need, we recommend putting in place a site-specific policy covering the entire Brunel University campus (Sites 1-5) which should specifically confirm the principle of development on Sites 1, 2 and 4, to include the revision of the Green Belt designation boundary to exclude Sites 1, 2 and 4.

## 8. Benefits

- 8.1 As discussed in the previous section, if the University's assessed development needs are to be met, it requires significant development on Sites 1, 2 and 4, much of which is currently open land designated as Green Belt.
- 8.2 In accordance with NPPF paragraph 14, the Local Planning Authority should take a balanced approach in considering the acceptability of this in planning terms. Following this guidance requires the emerging Local Plan to meet the needs (i.e. support development in principle) unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 8.3 It is acknowledged that any development on the undeveloped parts of Sites 1 and 4 will inevitably have an adverse impact on the openness of the Green Belt, albeit this would be a localised impact on land which we do not consider to make a meaningful contribution towards Green Belt objectives.
- 8.4 This limited harm (in policy terms) should be considered in the context of the following benefits (which we consider to be of national significance) that would result from the growth of the University as a higher education provider and research institution:
- Generation of an estimated 1,300 jobs (calculated on the basis of a proportional growth of jobs in line with increase in student numbers);
  - Increase in higher education student places of around 7,000, which would extend education opportunities at a local/regional/national level and directly contribute to improved UK and local economic performance via a more highly and appropriately skilled population. The planned greater focus and growth of STEM subject teaching and research will add further value (in terms of its alignment with UK economic strategy);
  - An increase in the number of overseas students will increase the value of UK service exports;
  - The University will be better able to compete for significant Government funding to support research, which would draw significant investment into Hillingdon that would otherwise go elsewhere. This research work would create significant spin-off opportunities, directly contributing to longer term local/regional/national economic success;

- Increase the annual turnover of the University by around £90m per annum (calculated on a pro-rata basis of the existing), which would generate an estimated additional £124m of turnover in the wider economy as a consequence of multiplier effects;
- Improved profile for London Borough of Hillingdon, London and the UK in terms of its education services and key economic assets;
- Indirect benefits to the local community in terms of outreach programmes and potential for use of facilities;
- Releasing other land on Sites 1 and 4 for development will increase the amount of undeveloped land on Site 2 (a 'swap' position) which will increase its 'openness'. This relates to land that is in the flood plain which currently accommodates buildings and which will not be re-built on.
- Broader environmental benefits, including the amenity of the River Pinn which would be greatly improved by the demolition of buildings on Site 2 and via the restoration of the river on Site 4 (the approach would be to naturalise the channel of the river and increase flood storage opportunities).

## 9. Conclusions

9.1 We consider that the emerging Hillingdon Local Plan (Part 2) should include site specific policy support for the development of academic, research and student residential floorspace on land at Brunel University (Sites 1,2 and 4).

9.2 We consider Site 4 at Brunel University to be suitable for development, on the following grounds:

- UK higher education institutions play an increasingly important role in supporting economic growth and the shift towards a more balanced economy. The Government recognises that the function of universities has moved beyond education, expanding into research and development which are seen as key drivers of innovation and UK economic performance which the Government is eager to support.
- Brunel University is a demonstrably successful and improving higher education and research institution, as confirmed by its league table positions. It also plays a significant role in the local economy by employing 2,450 staff and contributing an estimated £445m to the economy every year.
- The University wishes to capitalise on this success (as an education, research, and economic asset) and is preparing for growth. It intends to increase student numbers by up to 50% over the next 10 years alongside structural/operational changes to align its higher education and research offer more closely with the target areas for growth set out in the Government's economic strategy for the UK (focussing on STEM subjects). This planned growth is dependent on the development of new and improved academic and student residential accommodation at the University.
- National and regional planning policies require the emerging Hillingdon Local Plan to support the growth of the University and, more specifically, include policies that plan positively to meet the University's development needs in full.
- The University's development needs have been assessed in an objective manner having regard to both quantitative and qualitative considerations. This assessment has concluded that there is a need for around 192,918sqm of new development over the next 10 years (over

and above the residual balance allowed under the extant outline consent ref. 532/APP/2002/2237).

- The potential of a number of alternative sites to accommodate this need has been tested (following set criteria). This has concluded that part of this requirement could be met on Sites 1 and 2, however the majority can only feasibly be accommodated on Site 4 (land to the south of the main University built-up campus).
- The entire campus is designated as Green Belt where there is a general presumption against inappropriate development. However, the principle of development on the built-up areas of Sites 1, 2, and 4 has already been established.
- The principle of development on the undeveloped parts of Sites 1 and 4 is not yet established in planning terms. It is our view that this land does not make a meaningful contribution towards Green Belt objectives and therefore carries limited value in Green Belt terms. As a consequence, it is our view that it is neither necessary nor appropriate to keep this land open. This is in the context of the very exceptional circumstances associated with the demonstrable need for development outlined in this paper.
- Allowing development on the undeveloped parts of Sites 1 and 4 would realise a host of socio-economic benefits of national significance which would outweigh the limited harm that development would have on the Green Belt.

## Appendix A

### Site Plan





## Appendix B

### Parameter Plan (2004 Outline Consent)



## Appendix C

### 2004 Outline Consent Reconciliation Table and Plan



## Brunel University Masterplan (Outline Planning Permission ref. 532/APP/2002/2237)

### Reconciliation Table

#### Student Accommodation

| Zone   | Use                               | Approved Under Outline Consent | Reserved Matters Approved | Ref               | Implemented   |
|--|-----------------------------------|--------------------------------|---------------------------|-------------------|---------------|
| R1   | Student residential accommodation | 20,700                         | ✓                         | 532/APP/2006/2339 | ✓             |
| R2   | Student residential accommodation | 12,500                         |                           |                   |               |
| R4   | Student residential accommodation | 17,500                         | ✓                         | 532/APP/2005/308  | ✓             |
| R5   | Student residential accommodation | 19,140                         | ✓                         | 532/APP/2004/2258 | ✓             |
| <b>Sub-total (Student residential accommodation)</b> |                                   | <b>69,840</b>                  | <b>69,840</b>             | -                 | <b>69,840</b> |

## Academic Floorspace

| Zone                                   | Use                 | Approved Under Outline Consent | Reserved Matters Approved | Ref               | Implemented   | Remaining Balance (Future Reserved Matters Applications) |
|--|---------------------|--------------------------------|---------------------------|-------------------|---------------|--|
| A2                                     | Academic floorspace | 4,300                          | -                         | -                 | -             | 4,300  |
| A4                                     | Academic floorspace | 5,000                          | ✓                         | 532/APP/2005/3534 | ✓             | -  |
| A5 + A5a                               | Academic floorspace | 6,950                          | ✓                         | 532/APP/2004/1054 | 1,600         | 5,350  |
| A6                                     | Academic floorspace | 200                            | -                         | -                 | -             | 200  |
| A7                                     | Academic floorspace | <b>5,000</b>                   | ✓                         | 532/APP/2002/2236 | ✓             | -  |
| A8                                     | Academic floorspace | 250                            | ✓                         | 532/APP/2006/251  | 50            | 200  |
| A9                                     | Academic floorspace | 3,000                          | ✓                         | 532/APP/2003/1890 | 1,000         | 2,000*   |
| A10                                    | Academic floorspace | 12,100                         | ✓                         | 532/APP/2009/566  | 7,165         | 4,935  |
| A11                                    | Academic floorspace | 5,264                          | ✓                         | 532/APP/2003/1890 | 3,203         | 2,061*   |
| A12                                    | Academic floorspace | 4,500                          | ✓                         | 532/APP/2004/2092 | ✓             | -  |
| A13                                    | Academic floorspace | 1,500                          | -                         | -                 | -             | 1,500  |
| <b>Sub-total (academic floorspace)</b> |                     | <b>48,064</b>                  | <b>42,064</b>             | -                 | <b>27,518</b> | <b>20,546</b>  |

\* Condition 20 attached to permission ref: 532/APP/2002/2237 states that the combined floorspace of buildings A9 and A11, approved under permission ref: 532/APP/2003/1890 must not exceed 11,162m<sup>2</sup>, including floorspace that already existed prior to the 2003 permission. To date, approximately 8,000m<sup>2</sup> has been constructed and 3,162m<sup>2</sup> of the consented 4,061m<sup>2</sup> is still to be developed.

**GVA**

**16<sup>th</sup> March 2012**





## Appendix D

### Aerial Photograph







## Appendix E

### Student number Projections

## Student number Projections

|   | 2013/14       | 2014/15       | 2015/16       | 2016/17       | 2017/18       | 2018/19       | 2019/20       | 2020/21       | 2021/22       | 2022/23       |
|---|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Level 1 (including foundation and LIBT) | 3,621         | 3,802         | 3,992         | 4,192         | 4,401         | 4,621         | 4,852         | 5,095         | 5,350         | 5,617         |
| Level 2                                 | 3,394         | 3,564         | 3,742         | 3,929         | 4,125         | 4,332         | 4,548         | 4,776         | 5,014         | 5,265         |
| Level 3 (including MEng)                | 3,109         | 3,264         | 3,428         | 3,599         | 3,779         | 3,779         | 4,166         | 4,375         | 4,593         | 4,823         |
| Level 5 – PGT (including PG-CERT)       | 2,717         | 2,853         | 2,995         | 3,145         | 3,303         | 3,303         | 3,641         | 3,823         | 4,014         | 4,215         |
| Level 6 – PGR)                          | 1,019         | 1,070         | 1,123         | 1,180         | 1,239         | 1,239         | 1,366         | 1,434         | 1,506         | 1,581         |
| <b>Total</b>                            | <b>13,860</b> | <b>14,553</b> | <b>15,281</b> | <b>16,045</b> | <b>16,847</b> | <b>16,847</b> | <b>18,574</b> | <b>19,502</b> | <b>20,478</b> | <b>21,501</b> |

## Appendix F

### Site Capacity Assessment

## Brunel University: Sites 1 and 2 Capacity Assessment

### Assessment Rules/Assumptions

#### 1. Qualifying Criteria

The campus was broken down into a series of zones which were each assessed against suitability, availability and viability criteria in order to determine their potential for redevelopment.

#### Suitability

- All sites are previously developed and therefore suitable for development in principle, subject to the following exceptions
  - o Sites within the floodplain are considered unsuitable
  - o Sites accommodating statutorily listed buildings are considered unsuitable
  - o Sites accommodating locally listed buildings are considered 'potentially-suitable'
- All sites will be subject to technical and environmental constraints, however none that will be insurmountable.

#### Availability

- Vacant sites (land not accommodating buildings) assumed to be available
- Sites accommodating existing buildings accounted for as requiring replacement in Section 5 of need assessment (see para 5.7) are classed as not available in order to avoid double-counted. Existing floorspace need is assumed to be replaced via refurbishment or redevelopment on a 1:1 basis on the same plot.
- All other sites can be made available for development (potentially available) (assumed that existing floorspace/infrastructure will require replacing as part of redevelopment solution)
- Sites subject to the 2004 OPP where development has not yet been implemented considered to be not available for development – it is assumed that the approved development is to be implemented (to avoid double-counting)

#### Viability

- Redevelopment of sites accommodating a Category A building is assumed to be not viable (as the value/replacement cost of the existing building will be too high) (unless stated as an exception)
- Redevelopment of sites where development has been implemented pursuant to the 2004 OPP is assumed to be not viable (as the value/replacement cost of the existing building will be too high) (unless stated as an exception), with the exception of car parking areas.
- Redevelopment of sites accommodating Category B buildings assumed to be a potentially-viable proposition if there is scope for significant intensification (double/triple existing density) (value of development solution required to 'absorb' replacement cost of existing)
- Redevelopment of sites accommodating Category C buildings assumed to be viable (as the existing building carries limited value)
  - o if existing buildings have reached the end of their economic lives (Category C) (i.e. they have no value/replacement cost)
  - o if there is potential for significant intensification (double/triple density).

### Assessing the potential for intensification

- In order to 'qualify' as having potential for redevelopment, sites had to score 'yes' or 'potentially' for each of the 3 criteria.
- Sites were categorised as having 'high', 'medium', or 'nil' potential.
- The potential capacity of each site was estimated via the application of an assumed realisable plot ratio of 0.90 (see note on plot ratios below), which calculated a gross development capacity
- It is assumed that existing floorspace would need to be replaced on a like-for-like basis where demolition is necessary to make way for new development. Accordingly, the gross estimated capacity has been netted off by subtracting existing floorspace (demolitions) (which is discounted in line with the net capacity discounting explained below)
- The net capacity of plots with 'medium' potential was discounted by 50% to account for assumed deliverability issues. Sites with 'high' potential were not subject to discounting.
- The result is the net assumed discounted capacity of the site to accommodate new development.

### Notes – Plot Ratios

- The existing development on Plots 1 and 2 extends to approximately 233,851sqm across a gross site area of approximately 40ha. This equates to a gross plot ratio of around 0.58. (a net plot ratio of approximately 0.81)
- Development approved under the outline consent extended to 117,904sqm which is being/has been implemented on a net site area of approximately 13.05ha. This equates to a net plot ratio of around 0.90.

| Site | Building/Plot    | Description  |  | Assessment   | Potential Capacity to Support New Development |
|------|------------------|--|--|--|---|
| 1    | Isambard Complex | Existing Use: Student Accommodation<br>Approximate Age: 2008<br>Storeys: Part 4/5<br>Plot area (approx.): 4ha<br>Existing Floorspace: 35,375sqm<br>Existing Building Condition: Category A<br>Covered by 2004 Masterplan: Yes.<br>Plots R1 and R2. Approved development implemented. | Modern redeveloped plot for student accommodation completed in 2008. The accommodation provides a total of 1,118 en suite rooms and 112 studio flats for couples across 17 blocks, part 4/5 storeys in height. There is also a separate 2 storey plant compound. The plot is intensively covered by the existing buildings, with the remainder covered by landscaping; limited areas of parking which are predominantly for disabled users located adjacent to the blocks; and internal roads providing access for service and emergency vehicles.<br><br>The plot is bound by open space within the university's ownership (Site 1) to the north and west, Station Road to the south, and 2 storey residential properties on The Ave and Ratcliffe Close to the east. | Suitable: Yes<br>Available: Potentially<br>Viable: No – developed pursuant to 2004 consent                   | Nil   |
|      | Galbraith Hall   | Existing Use: Student Accommodation<br>Approximate Age: 1990s<br>Storeys: Part 3/4<br>Plot area (approx.): 0.58ha<br>Existing Floorspace:<br>Existing Building Condition: Category B<br>Covered by 2004 Masterplan: No   | Developed in the 1990s for student accommodation. The accommodation provides 328 rooms within one building comprising five wings, part 3/4 storeys in height. The plot is intensively covered with accommodation set around central landscaped courtyard. The remainder of the plot is covered by a small area of car parking and landscaping.<br><br>The plot is bound by central path to the south, car park to the north and adjacent 3/4 and 4/5 storey student accommodation to the east and west respectively.   | Suitable: Yes<br>Available: Potentially<br>Viable: No – Building category B and reasonably dense development | Nil   |
|      | Fleming Hall     | Existing Use: Student Accommodation<br>Approximate Age: 1990s<br>Storeys: Part 3/4<br>Plot area (approx.): 0.80ha<br>Existing Floorspace: 9,803sqm<br>Existing Building Condition: Category B<br>Covered by 2004 Masterplan: No  | Developed in the 1990s for student accommodation. The accommodation provides 380 rooms within one building comprising a '# ' shape, part 3/4 storeys in height. The plot is intensively covered with accommodation set around central landscaped courtyard. The remainder of the plot is covered by landscaping which separates the adjacent plots.<br><br>The plot is bound by car park to the north, 3 storey Gaskell academic building to the south and adjacent 4 and 3/4 storey student accommodation to the east and west. Soft landscaping separates the adjacent student accommodation.  | Suitable: Yes<br>Available: Potentially<br>Viable: No – Building category B and reasonably dense development | Nil   |
|      | Mill Hall        | Existing Use: Student Accommodation<br>Approximate Age: 1990s<br>Storeys: 4 (plant above)<br>Plot area (approx.): 0.65ha<br>Existing Floorspace: 8,034sqm<br>Existing Building Condition: Category B<br>Covered by 2004 Masterplan: No   | Developed in the 1990s for student accommodation. The accommodation provides 357 rooms within one building comprising four wings and 4 storeys in height (4th storey accommodation in the roof) with plant above. The plot is intensively covered, with the wings intersecting to create two landscaped courtyards. A separate landscaped strip to the east provides separation distance with Cleveland Road.<br><br>The plot is bound by car park to the north, the 2 storey Marie Jahoda academic building to the south, adjacent 3/4 storey student accommodation to the west and Cleveland Road to the east. Soft landscaping to west, east and part north, separating Fleming Hall, Cleveland Road and car park respectively.                                     | Suitable: Yes<br>Available: Potentially<br>Viable: No – Building category B and reasonably dense development | Nil   |

| Site | Building/Plot  | Description   |  | Assessment  | Potential Capacity to Support New Development |
|------|----------------|---|--|---|---|
|      | Chadwick       | Existing Use: Academic Building<br>Approximate Age: 1960s/70s<br>Storeys: 2<br>Plot area (approx.): 0.17ha<br>Existing Floorspace: 1,005sqm<br>Existing Building Condition: Category C<br>Covered by 2004 Masterplan: Yes. Plot A2. Approved development not implemented. | Temporary prefabricated two-storey building and temporary single storey port-a-cabin toilet covering approximately 50% of plot with soft landscaping on the remainder of the plot to the north.<br><br>The plot is bound by 3/4 storey student accommodation to the north, West Spur Road to the south, 3 storey Gaskell building to the east and 3 storey Social and Amenity building to the west. Two storey residential terrace properties are located off-campus further south of West Spur Road.  | Suitable: Yes<br>Available: No (covered by 2004 OPP)<br>Viable: Yes   | Nil   |
|      | Gaskell        | Existing Use: Academic Building<br>Approximate Age: 1990s<br>Storeys: 3 (plant above)<br>Plot area (approx.): 0.4ha<br>Existing Floorspace: 4,797sqm<br>Existing Building Condition: Category B.<br>Covered by 2004 Masterplan: No  | Developed in the 1990s for academic use and is occupied by the School of Arts. The plot has been intensively developed and comprises a modern 3 storey red brick building with plant above and central courtyard and small area of car park to the south, access from West Spur Road.<br><br>The plot is bound by 3/4 storey student accommodation to the north, West Spur Road to the south, car park to the east and temporary 2 storey Chadwick building to the west. Two storey residential terrace properties are located off-campus further south of West Spur Road.   | Suitable: Yes<br>Available: Potentially<br>Viable: No – Building category B and reasonably dense development                                | Nil   |
|      | Marie Jahoda   | Existing Use: Student Accommodation<br>Approximate Age: 1990s<br>Storeys: 2<br>Plot area (approx.): 0.51ha<br>Existing Floorspace: 2,921sqm (MJ)+ 160 (meeting house) = 3,081sqm<br>Existing Building Condition: Category B.<br>Covered by 2004 Masterplan: No            | Modern 2 storey red brick 'U' shape building around landscaped courtyard. Occupied by School of Social Sciences. Separate single storey building (Meeting House - Chaplaincy) located to the west adjacent to Gaskell building. Existing buildings cover approximately 75% of the plot. Remainder of plot covered by car park surveyed at capacity during site visit.<br><br>The plot is bound by 4 storey student accommodation to the north, West Spur Road to the south, Cleveland Road to the east and car park to the west. Two storey residential terrace properties are located off-campus further south of West Spur Road. | Suitable: Yes<br>Available: Potentially<br>Viable: Potentially  | Medium  |
|      | West Spur Road | Existing Use: Car Park<br>Approximate Age: N/A<br>Storeys: N/A<br>Plot area (approx.): 0.31ha<br>Existing Floorspace: N/A<br>Existing Building Condition: N/A<br>Covered by 2004 Masterplan: No   | Access leading to Isambard Complex, and buildings and car park north of the Road. Provision of car parking spaces south of the road.   | Suitable: No – site shape/configuration unsuitable for new buildings (noting need to maintain access road)<br>Available: Yes<br>Viable: Yes | Nil   |

| Site | Building/Plot               | Description  |   | Assessment   | Potential Capacity to Support New Development |
|------|-----------------------------|--|---|--|---|
|      | Social and Amenity Building | Existing Use: Student Amenity<br>Approximate Age: 2000s<br>Storeys: 3 (plant above)<br>Plot area (approx.): 0.23ha<br>Existing Floorspace: 651sqm<br>Existing Building Condition: Category B<br>Covered by 2004 Masterplan: Yes. Plot R2. Development implemented.   | Modern 3 storey building with plant above used for student amenity purposes. Building covers approximately 25% of the plot with modern hard landscaped amenity area fronting building.<br><br>The plot is bound by 3/4 storey student accommodation to the north, the 4/5 storey student accommodation to the south and west, and the temporary Chadwick building to the east. Two storey residential terrace properties are located off-campus, but in close proximity to the south west of the building further south of West Spur Road.  | Suitable: Yes<br>Available: Potentially available<br>Viable: Potentially | Medium  |
| 2    | Heinz Wolff                 | Existing Use: Academic Building<br>Age (approx.): 1971<br>Storeys: 3 (plant above)<br>Plot area (approx.): 1.51ha<br>Existing Floorspace: 8,724sqm<br>Existing Building Condition:<br>Main building: Category B<br>Plant Room: Category C.<br>Greenhouse: Category B.<br>Covered by 2004 Masterplan: Yes. In part. Car parking area I/P6 (implemented) and Development Zone A6 (not implemented) (takes-up a small proportion of the site) | Part of the core of the original university campus, completed in 1971 and comprises 3 storey building, with plant above at 4th and 5th storeys. Occupied by Department of Sports Science. Bound by extensive car park to the north and east, area of open space and Brunel University Press building to the south and Cleveland Road to the west.<br><br>A part single/ 2 storey plant room and single storey greenhouse are located in the car park to the north.<br><br>The north of the car park is adjacent to the boundary of the playing fields of Uxbridge High School (also designated Green Belt).   | Suitable: Yes<br>Available: No<br>Viable: Potentially                    | Nil   |
|      | Bragg                       | Existing Use: Academic Building<br>Age (approx.): 1979<br>Storeys: 1<br>Plot area (approx.): 0.37ha<br>Existing Floorspace: 1,270sqm<br>Existing Buildings: Category C<br>Covered by 2004 Masterplan: In part – car parking area I/P7.   | Part of the core of the original university campus, completed in 1979 and comprises a single storey building and car park. The building is used as the Experimental Techniques Centre and comprises approximately 75% of the plot with the remainder comprising soft landscaping and car park.<br><br>The site is bound by the North Loop Road to the north, the 2/3 storey Halsbury Building to the south, 4 and 5 storey buildings of the Lancaster Complex to the east and car park to the west.<br><br>The north of the campus boundary is the playing fields of Uxbridge High School (also designated Green Belt). This part of the playing field has recently been developed for a 3-4 storey indoor sports facility. | Suitable: Yes<br>Available: No<br>Viable: Yes                            | Nil   |



| Site | Building/Plot             | Description  |  | Assessment   | Potential Capacity to Support New Development |
|------|---------------------------|--|--|--|---|
|      | Halsbury                  | <p>Existing Use: Academic Building</p> <p>Built (approx.): 1971</p> <p>Storeys:2/3</p> <p>Plot area (approx.): 0.61ha</p> <p>Existing Floorspace: 7,936sqm</p> <p>Existing Buildings: Category C (out-of-date – the building has just been subject to a significant capital works programme to extend its economic life)</p> <p>Covered by 2004 Masterplan: In part – car parking area I/P7.</p> | <p>The plot has been intensively developed and is part of the original core university campus, completed in 1971. The main building is part 2/3 storeys with plant above and is occupied by the Department of Education.</p> <p>Additional 2 storey buildings also occupy the south of the plot, fronting the entrance to the main building and are occupied by the Graduate School for Postgraduates and Early Career Researchers.</p> <p>The plot is centrally located within the campus and is bound by the Bragg building and car park to the north, the Quad courtyard to the south, a 6 storey building of the Lancaster Complex to the east and car park to the west.</p>   | <p>Suitable: Yes</p> <p>Available: No</p> <p>Viable: Yes</p>         | Nil   |
|      | John Crank                | <p>Existing Use: Academic Building</p> <p>Built: 1968</p> <p>Storeys: part 2/7 (with plant above)</p> <p>Plot area (approx.): 0.34ha</p> <p>Existing Floorspace: 3,822sqm</p> <p>Existing Buildings: Category C.</p> <p>Covered by 2004 Masterplan: No</p>   | <p>The plot has been intensively developed and is part of the original core university campus, completed in 1968. The building comprises part 2 storey building with part 7 storey tower element with plant above. The 7 storey element is one of the tallest buildings on site. The 2 storey element covers the majority of the plot.</p> <p>The plot is centrally located within the campus and is bound by the 3 storey Halsbury building and a 6 storey building of the Lancaster Complex to the north and east, the 6 storey Art Centre to the south, and the Quad courtyard to the west.</p>   | <p>Suitable: Yes</p> <p>Available: No</p> <p>Viable: Yes</p>         | Nil   |
|      | Arts Centre / Gordon Hall | <p>Existing Use: Art Centre</p> <p>Built: 2006</p> <p>Storeys: part 1/6</p> <p>Plot area (approx.): 0.15</p> <p>Existing Floorspace: 2,931sqm</p> <p>Existing Buildings: Category A</p> <p>Covered by 2004 Masterplan: Yes (forms part of Zone R4)</p>   | <p>The plot comprises two modern buildings completed as part of the wider Lancaster Complex in 2006. The single storey building on the north of the plot is an art centre open to students, staff and members of the public.</p> <p>The 6 storey building on the south of the plot is Gordon Hall which comprises 100 rooms of student accommodation. This plot is centrally located and coverage is intensively developed. The close proximity of the buildings would not allow the single storey Arts Centre to be intensified without adversely affecting the accommodation in Gordon Hall.</p> <p>The plot is bound by the 2/7 storey John Crank building to the north, 4 storey student accommodation to the south, the River Pinn to the east and the 3 storey Lecture Centre to the west.</p> | <p>Suitable: Yes</p> <p>Available: Potentially</p> <p>Viable: No</p> | Nil   |

| Site | Building/Plot     | Description  |  | Assessment  | Potential Capacity to Support New Development |
|------|-------------------|--|--|---|---|
|      | Lancaster Complex | <p>Existing Use: Student Accommodation</p> <p>Age (approx.): 2006</p> <p>Storeys: part 4/5/6</p> <p>Plot area (approx.): 1.07ha</p> <p>Existing Floorspace: 2,986sqm</p> <p>Existing Buildings: Category A</p> <p>Covered by 2004 Masterplan: Yes (forms part of Zone 4)</p> | <p>Recently developed plot completed in 2006. The buildings provide a conference centre and office space along with 398 rooms over five buildings from 4 storeys in height stepping up to 5 and 6 storeys towards the centre of the campus. The plot is intensively covered by the existing buildings, with the remainder covered by landscaping; limited areas of parking which are predominantly for disabled users located adjacent to the blocks; and internal roads providing access for service and emergency vehicles. The plot includes some of the tallest buildings on campus.</p> <p>The plot is bound by the North Loop Road to the north, River Pinn to the south and east and 2/7 storey John Crank and 3 storey Halsbury buildings to the west.</p> <p>The eastern building line is adjacent to a 1 in 100 year flood risk zone which extends into the landscaped area of the plot adjacent to the River Pinn. Three storey residential properties are located off-campus further north of the campus boundary.</p> | <p>Suitable: In part (part flood-plain)</p> <p>Available: Potentially</p> <p>Viable: No</p> | Nil   |
|      | Sports Centre     | <p>Existing Use: Sports Centre</p> <p>Age (approx.): 1972</p> <p>Storeys: 2</p> <p>Plot area (approx.): 1.04ha</p> <p>Existing Floorspace: 5,569sqm</p> <p>Existing Buildings: Category C</p> <p>Covered by 2004 Masterplan: Yes (Zone A9)</p>                               | <p>The plot has been intensively developed as part of the core of the original university campus, completed in 1972. It comprises a 2 storey brick building and dome extension which covers approximately 30% of the plot and is in use as the sport centre, open to students, staff and members of the public. The remainder of plot covered by car park and landscaping adjacent to the River Pinn.</p> <p>The plot is bound by the North Loop Road to the north and east, the 3/4 storey athletics centre and 6/7 storey student accommodation to the south and River Pinn to the west.</p> <p>The majority of the undeveloped part of this plot and also the sports centre building lie within Flood Zone 3 which is at risk of 1 in 100 years flooding. The Estate Strategy identifies a longer term strategy to relocate existing buildings out of Flood Zone 3 where possible.</p>  | <p>Suitable: Yes</p> <p>Available: No</p> <p>Viable: Yes</p>                                | Nil   |
|      | St John           | <p>Existing Use: Academic Building</p> <p>Age (approx.): 2,495sqm</p> <p>Storeys:</p> <p>Plot area (approx.): 1.31ha</p> <p>Existing Floorspace: 2,495sqm</p> <p>Existing Buildings: Category C</p> <p>Covered by 2004 Masterplan: Yes (Zone A10) (not implemented)</p>      | <p>The plot comprises a 2 storey building set in the north east corner of the campus which covers approximately 25% of the plot with the remainder comprising formal/informal parking and an area currently used as storage.</p> <p>The part of the plot currently used as informal overflow car parking was previously occupied by a temporary building that has since been demolished. This part of the site is to be redeveloped in accordance with the masterplan under the existing approved outline planning consent.</p> <p>The part of the plot currently used as storage is a triangular area of approximately 0.1ha adjacent to the northern campus boundary and is constrained in terms of size, layout, access and adjacent uses.</p> <p>The plot is bound by 2 storey residential properties to the north, Eastern Gateway to the south, Kingston Lane to the east and the North Loop Road to the west.</p>   | <p>Suitable: Yes</p> <p>Available: No</p> <p>Viable: Yes</p>                                | Nil   |

| Site | Building/Plot           | Description  |   | Assessment  | Potential Capacity to Support New Development |
|------|-------------------------|--|---|---|---|
|      | Eastern Gateway         | Existing Use: Academic Building<br>Age (approx.): 2000s<br>Storeys: part 4/5<br>Plot area (approx.): 0.67ha<br>Existing Floorspace: 8,722sqm<br>Existing Buildings: Category A<br>Covered by 2004 Masterplan: (Yes Zone A10) | Modern 4/5 storey building occupied by the Business School faculty and also houses main reception. This plot has been recently developed with the majority covered by the existing building. The existing height reflects the height of the adjacent Mary Seacole building, but is taller than older buildings within the vicinity, such as the Sports Centre and Science Park. It provides a step up from the campus boundary from Kingston Lane toward the Bishop Complex.  | Suitable: Yes<br>Available: No<br>Viable: No          | Nil   |
|      | Mary Seacole            | Existing Use: Academic Building<br>Age (approx.): 2000s<br>Storeys:<br>Plot area (approx.): 0.67ha<br>Existing Floorspace: 4,215sqm<br>Existing Buildings: Category A<br>Covered by 2004 Masterplan: Yes (Zone A12)          | Modern 4 storey building occupied by School of Health Sciences and Social Care. Similarly to the Eastern Gateway this plot has been recently developed with the majority covered by the existing building. The existing height reflects the height of the adjacent Eastern Gateway building, but is taller than older buildings within the vicinity, such as the Sports Centre and Science Park. It provides a step up from the campus boundary from Kingston Lane toward the Bishop Complex.   | Suitable: Yes<br>Available: Potentially<br>Viable: No | Nil   |
|      | Indoor Athletics Centre | Existing Use: Athletics Centre<br>Built (approx.): 2000s<br>Storeys: 3-4<br>Plot area (approx.): 0.64ha<br>Existing Floorspace: 3,141sqm<br>Existing Buildings: Category B<br>Covered by 2004 Masterplan: Yes (Zone A11)     | The plot comprises a modern purpose built athletics centre equivalent to 3/4 storeys in height and spanning majority of plot. A soft landscape buffer to the east separates the building from the internal road.<br><br>The plot is bound by the extension to the sports centre to the north, 5, 6 and 7 storey student accommodation to the south and west and the internal Loop Road to the east.   | Suitable: Yes<br>Available: Potentially<br>Viable: No | Nil   |
|      | Hamilton Centre         | Existing Use: Social Facilities and Student Union<br>Age (approx.): 1967<br>Storeys: 2<br>Plot area (approx.): 0.65ha<br>Existing Floorspace: 7,345sqm<br>Existing Buildings: Category C<br>Covered by 2004 Masterplan: No   | The plot has been intensively developed as part of the core of the original university campus, completed in 1967. The majority of the plot is occupied by a 2 storey building for student union and leisure uses with associated structured over resulting in an additional storey in height. An adjoining single storey building occupied by the University press is located north of the main building, along with an area for service access.<br><br>The plot is located in the centre of the campus and is bound by the 3 storey Heinz Wolff building to the north, the concourse and 4 storey Bannerman Centre to the south, the Quad courtyard to the east and an area of open space to the west. | Suitable: Yes<br>Available: No<br>Viable: Yes         | Nil   |

| Site | Building/Plot                    | Description  |   | Assessment  | Potential Capacity to Support New Development |
|------|----------------------------------|--|---|---|---|
|      | The Quad                         | Existing Use: Courtyard<br>Age (approx.): N/A<br>Storeys: N/A<br>Plot area (approx.): 0.18ha<br>Existing Floorspace: N/A<br>Existing Buildings: N/A<br>Covered by 2004 Masterplan: No  | Area of soft landscaping (grass) around hard landscaped (steps) courtyard area which separates the change of levels between the Hamilton Centre, Lecture Centre, Halsbury and John Crank Buildings.   | Suitable: No (important amenity space and setting of historic buildings)<br>Available: Yes<br>Viable: Yes | Nil   |
|      | Wilfred Brown/Michael Sterling   | Existing Use: Admissions and Academic Buildings<br>Age (approx.): 1967 /<br>Storeys:<br>Plot area (approx.): 0.61ha<br>Existing Floorspace: 5,346sqm (MS) + 4,043sqm (WB) = 9,389sqm<br>Existing Buildings<br>Wilfred Brown Building: Category C<br>Michael Sterling Building: Category A<br>Covered by 2004 Masterplan: Yes (Zone A4) | The plot was developed as part of the core of the original university campus initially occupied by the Wilfred Brown building, completed in 1967. A subsequent modern extension known as the Michael Sterling building was added on the eastern part of the plot.<br><br>The majority of the plot is occupied by the two buildings. The Wilfred Brown building is part 2/3/4 storeys and is occupied by the Admissions Department. The Michael Sterling building is 4 storeys in height and is occupied by the School of Engineering and Design. A small area for service vehicles is located on the south of the plot.<br><br>The plot is bound by an area of open space to the north, car park to the south, the 4 storey library to the east and pond fronting Cleveland Road to the west. | Suitable: Yes<br>Available: No<br>Viable: No  | Nil   |
|      | Car Park (east of Tower Complex) | Existing Use: Car Park<br>Age (approx.): N/A<br>Storeys: N/A<br>Plot area (approx.): 1.00ha<br>Existing Floorspace: N/A<br>Existing Buildings: N/A<br>Covered by 2004 Masterplan: Yes (car parking area)   | Large surface car park on campus used for visitor, student and staff parking. Site is bound by 3/4 storey Wilfred Brown building to the north, southern campus boundary with Site 4 to the south, Tower Complex to the east and landscaping fronting Cleveland Road to the west. Two storey residential properties are located west of Cleveland Road and south of the footpath which separates Sites 2 and 4.  | Suitable: Yes<br>Available: Potentially<br>Viable: Yes  | High  |

| Site | Building/Plot                    | Description   |   | Assessment  | Potential Capacity to Support New Development |
|------|----------------------------------|---|---|---|---|
|      | Bannerman Centre (and extension) | Existing Use: Library and Student Centre<br>Age (approx.): 1973 / 2000s<br>Storeys: 4<br>Plot area (approx.): 0.64ha<br>Existing Floorspace: 12,040sqm<br>Existing Buildings: Category Part B/Part C<br>Covered by 2004 Masterplan: Yes (Zone A7) | The plot was developed as part of the core of the original university campus initially occupied by the Bannerman Centre, completed in 1967. A subsequent modern extension was added on the eastern part of the plot.<br><br>The majority of the plot is occupied by the building which is 4 storeys in height and occupied by the Library and Student Centre. A small area for parking is located on the south of the plot.<br><br>The plot is centrally located on campus bound by the concourse and 2 storey Hamilton Centre to the north, the Tower Complex to the south, the 3 storey Lecture Centre to the east and 4 storey Michael Sterling building to the west.<br><br>The condition of the original part of Bannerman Centre has been assessed by the Estate Strategy as Category C and will require repair/maintenance in the short to medium term. The extension has been assessed as Category B. | Suitable: Yes<br>Available: No<br>Viable: Potentially   | Nil   |
|      | Lecture Centre                   | Existing Use: Academic Building<br>Age (approx.): 1960s<br>Storeys: 3 plant above<br>Plot area (approx.): 0.55ha<br>Existing Floorspace: 9,007sqm<br>Existing Buildings: Category C<br>Covered by 2004 Masterplan: Yes (Zone A8)                  | The plot was developed as part of the core of the original university campus initially occupied by the Bannerman Centre, completed in the 1960s.<br><br>The majority of the plot is occupied by the building which is 3 storeys in height and occupied by the Lecture Centre which is Grade II listed. A small area of soft landscaping is located on the south of the plot and provides separation between the Howell Centre.<br><br>The plot is centrally located on campus bound by the Quad courtyard to the north, the 4 storey Howell Centre to the south, 6 storey student accommodation to the east and the 4 storey Bannerman Centre to the west.  | Suitable: No (listed buildings)<br>Available: No<br>Viable: Potentially   | Nil   |
|      | Tower Complex (A-D)              | Existing Use: Academic Building<br>Age (approx.): 1967<br>Storeys:<br>Plot area (approx.): 2.00ha<br>Existing Floorspace: 14,580sqm<br>Existing Buildings: Category C<br>Covered by 2004 Masterplan: No   | The complex forms part of the core of the original university campus, completed in 1967 and comprises mainly 2 storey accommodation, with tower elements of 4 storeys with plant above (Tower B) or 5 storeys (Towers, A, C and D). The complex is occupied in conjunction with the Howell building by the School of Engineering and Design.<br><br>The buildings were originally designed by Richard Sheppard and are <u>locally listed</u> , having been considered to have social and community significance.<br><br>Approximately 25% of the site (including Tower D and parts of Tower C) are located within the flood plain.  | Suitable: Potentially suitable (existing buildings are locally listed and approximately 25% of the site is flood plain)<br>Available: No<br>Viable: Yes | Nil   |
|      | Antonin Artaud                   | Existing Use: Academic Building<br>Age (approx.): 1967<br>Storeys: 2<br>Plot area (approx.): 0.12ha<br>Existing floorspace: 2,848sqm<br>Existing Buildings: Category B<br>Covered by 2004 Masterplan: No  | The plot forms part of the core of the original university campus, completed in 1967 and comprises a 2 storey building used by the School of Arts for performance and studio space in the south west corner of the Site 2.<br><br>The plot is bound by the large area of car park to the north and west, the South Loop Road to the south and Tower B and the Joseph Lowe buildings to the east.<br><br>Two storey detached residential properties are situated on the west of Cleveland Road and south adjacent to Site 4. All these residential properties are screened by the existing planting along the boundary. Further south is a vehicular access to Site 2 and a public footpath that runs between the boundaries of Site 2 and Site 4.   | Suitable: Yes<br>Available: No<br>Viable: Potentially   | Nil   |

| Site | Building/Plot                     | Description  |  | Assessment   | Potential Capacity to Support New Development |
|------|-----------------------------------|--|--|--|---|
|      | Joseph Lowe                       | Existing Use: Distribution and Maintenance<br>Age (approx.): 1968<br>Storeys: par 1/2<br>Plot area (approx.): 0.18ha<br>Existing Floorspace: 991sqm<br>Existing Buildings: Category C<br>Covered by 2004 Masterplan: No  | The plot forms part of the core of the original university campus, completed in 1967 and comprises a part single / 2 storey building occupied by the distribution and maintenance departments. The plot is bound by the Tower Complex to the north, the South Loop Road to the south, car park to the east and the Antonin Artaud building to the west.  | Suitable: Yes<br>Available: No<br>Viable: Yes                      | Nil   |
|      | Howell Centre                     | Existing Use: Academic Building<br>Age (approx.): 1968<br>Storeys: 4<br>Plot area (approx.): 0.50ha<br>Existing Floorspace: 4,791sqm<br>Existing Buildings: Category C<br>Covered by 2004 Masterplan: No   | The plot was developed as part of the core of the original university campus initially occupied by the Bannerman Centre, completed in 1968.<br><br>The majority of the plot is occupied by the building which is 4 storeys in height and occupied by the School of Engineering and Design in conjunction with the adjacent Tower Complex. A small area of soft landscaping is located on the east of the plot and provides separation between Saltash House (student accommodation).<br><br>The plot is centrally located on campus bound by the 3 storey Lecture Centre to the north, the 2/4/5 storey Tower Complex to the south and west and 4 storey student accommodation to the east.  | Suitable: Yes<br>Available: No<br>Viable: Yes                      | Nil   |
|      | Saltash Hall (and Medical Centre) | Existing Use: Student Accommodation / Medical Centre<br>Age (approx.): 1966<br>Storeys: 4<br>Plot area (approx.): 1.24ha<br>Existing Floorspace: 364sqm (medical centre) + 4,525sqm (halls) = 4,889sqm<br>Existing Buildings:<br>Saltash Hall: Category C<br>Medical Building: Category B<br>Covered by 2004 Masterplan: Yes (zone R4) | The plot was developed as part of the original core university campus with Saltash Hall completed in 1966 and the Medical Centre in 1967.<br><br>The two buildings are centrally located within the plot, with Saltash Hall located adjacent to the River Pinn. Saltash Hall comprises 184 rooms of student accommodation over 4 storeys. The Medical Centre is located west of Saltash Hall and is a small single storey building. Soft landscaping separates Saltash Hall from the adjacent buildings. A larger area of open space occupies the north, south and west of the plot.<br><br>The plot is bound by 6 storey student accommodation to the north, the South Loop Road to the south, 4 storey student accommodation to the east and the Tower Complex, Howell Centre and Lecture Centre to the west.<br><br>The majority of the plot (including all buildings) lies within Flood Zone 3 and is at risk of 1 in 100 years flooding. The Estate Strategy identifies a longer term strategy to relocate existing buildings out of Flood Zone 3 where possible. | Suitable: No (flood plain)<br>Available: No<br>Viable: Potentially | Nil   |

| Site | Building/Plot  | Description  |  | Assessment  | Potential Capacity to Support New Development |
|------|--|--|--|---|---|
|      | Chepstow Hall & Clifton Hall                               | Existing Use: Student Accommodation<br>Age (approx.): 1969/1971<br>Storeys: 4<br>Plot area (approx.): 1.33ha<br>Existing Floorspace: 4,718sqm (Chepstow) + 4,707 (Clifton) = 9,425sqm<br>Existing Buildings: Category C<br>Covered by 2004 Masterplan: Yes (Zone R5) | The plot was developed as part of the original core university campus and completed between 1969-1971 and comprises two halls of student accommodation, Chepstow and Clifton Hall providing 231 and 236 rooms respectively. Both Halls are 4 storeys in height. Clifton Hall occupies the north east of the plot and Chepstow Hall occupies the south west of the plot. A large area of open space separates the River Pinn along the majority of the western boundary of the plot.<br><br>The plot is bound the Lancaster Complex to the north, the South Loop Road and 5 storey student accommodation to the south, the 6/7 storey student accommodation to the east, and 4 storey student accommodation to the west.<br><br>The south west of the plot (encompassing Chepstow Hall) lies within Flood Zone 3 and is at risk of 1 in 100 years flooding. | Suitable: Partly (approx. half of site is in flood plain)<br>Available: No<br>Viable: Yes | Nil   |
|      | Bishop Complex   | Existing Use: Student Accommodation<br>Built: 2005<br>Storeys:<br>Plot area (approx.): 0.86ha<br>Existing Floorspace:<br>Existing Buildings: Category A<br>Covered by 2004 Masterplan: Yes (Zone R5)   | Modern redeveloped plot for student accommodation completed in 2005. The accommodation provides a total of 698 rooms across 4 blocks of 6 and 7 storeys in height. Plot coverage is intensively developed with some landscaping, but no car parking. The existing height of the 7 storey buildings are some of the tallest on the campus.<br><br>The plot is bound by the sports centre to the north, 5 storey student accommodation to the south, the athletics centre to the east and 4 storey student accommodation to the west.  | Suitable: Yes<br>Available: Potentially<br>Viable: No                                     | Nil   |
|      | Faraday Complex  | Existing Use: Student Accommodation<br>Age (approx.): 1990's<br>Storeys: 5<br>Plot area (approx.): 0.76ha<br>Existing Floorspace: 6,794sqm<br>Existing Buildings: Category B<br>Covered by 2004 Masterplan: Yes (Zone R5)  | Modern redeveloped plot for student accommodation. The accommodation provides a total of 279 rooms across 3 blocks of 5 storeys in height. Plot coverage is intensively developed with some landscaping, but no car parking.<br><br>The plot is bound by the 6/7 storey student accommodation the north, South Loop Road to the south, Loop Road and Science Park to the east and 4 storey student accommodation to the west.<br><br>The western building line of two of the blocks is adjacent to a 1 in 100 year flood risk zone which covers the adjacent Chepstow Hall.  | Suitable: Yes<br>Available: Potentially<br>Viable: No                                     | Nil   |
|      | Brunel Science Park<br>Russell / Gardiner / Elliot Jacques | Existing Use: Science Park<br>Age (approx.): 1990's<br>Storeys: 1-2<br>Plot area (approx.): 2.47ha<br>Existing Floorspace: 2,821sqm<br>Existing Buildings: Category B<br>Covered by 2004 Masterplan: Yes – Partly within Zone A13 (small scale development only)     | The plot comprises one part single / 2 storey building (Elliot Jacques) and two 2 storey buildings (Russell and Gardiner) set in the south east corner of the campus set around a central car park. Additional car parks are also located on the southern boundary east and west of the Gardiner building.<br><br>The Elliot Jacques building is occupied by the Law School, with the other two buildings forming Brunel Science Park.<br><br>The plot is bound by the 4 storey Mary Seacole building to the north, southern campus boundary with Site 4 to the south, eastern campus boundary with Kingston Lane to the east and athletics centre and 5 storey student accommodation to the west.   | Suitable: Yes<br>Available: Potentially<br>Viable: Yes                                    | High  |

## Summary of Capacity Assessment

|                                      | Net Site Area  | Gross Development Capacity | Net Discounted Development Capacity | Replacement Floorspace Need Generated by Demolitions | Net Development Capacity |
|--------------------------------------|----------------|----------------------------|-------------------------------------|--|--------------------------|
| Nil Potential (non-qualifying sites) | 24.91ha        | -                          | -                                   | -  | -                        |
| Medium Potential                     | 0.74ha         | 6,660sqm                   | 3,330sqm                            | -3,732sqm<br>(discounted to -1,866sqm)               | 1,464sqm                 |
| High Potential                       | 3.47ha         | 31,230sqm                  | 31,230sqm                           | -2,821sqm  | 28,409sqm                |
| <b>Total</b>                         | <b>29.12ha</b> | <b>37,890sqm</b>           | <b>34,560sqm</b>                    | <b>-4,687sqm</b>                                     | <b>29,873sqm</b>         |

**GVA**  
**June 2014**

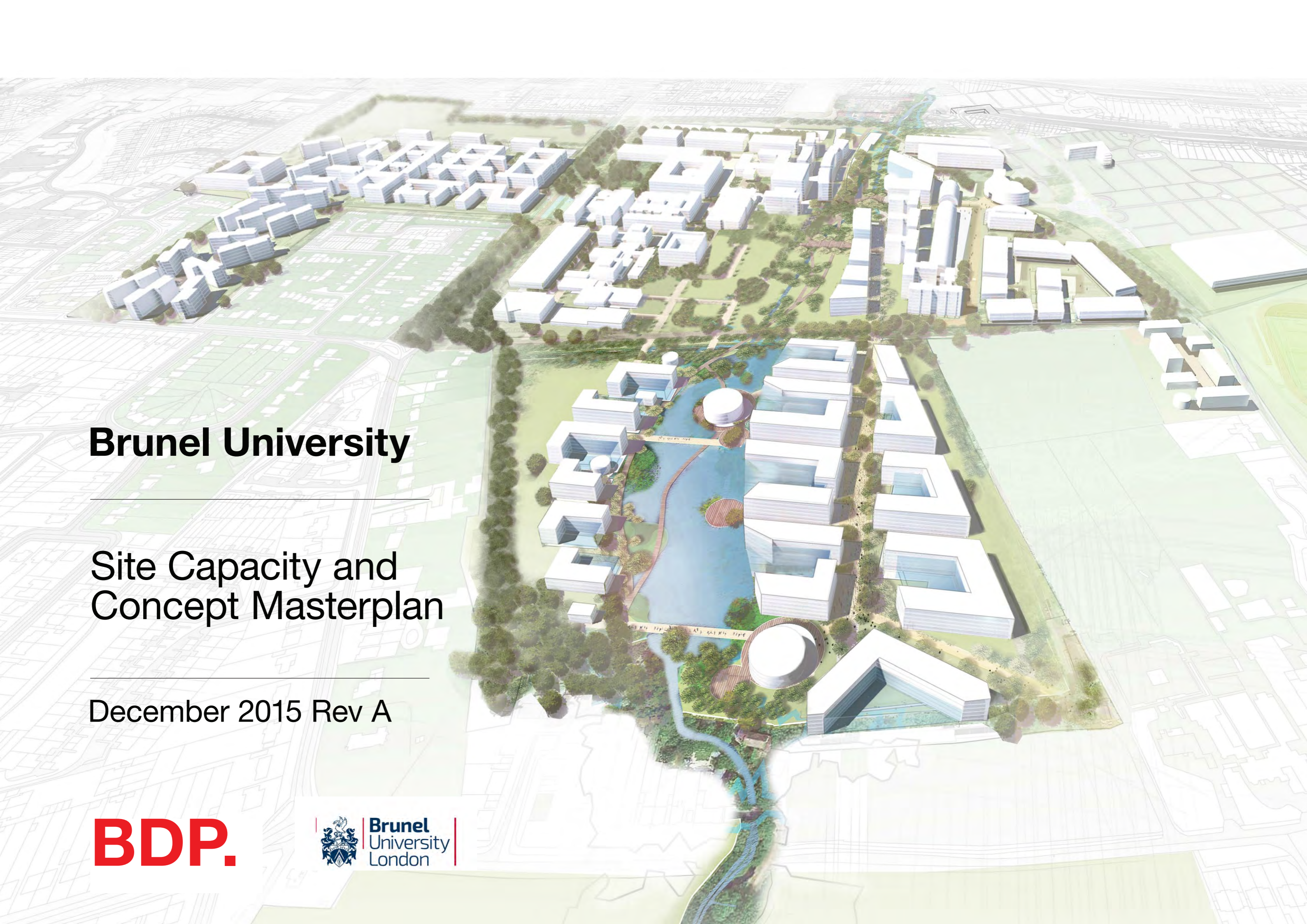


## Enclosure C(i)

### Site Capacity and Concept Masterplan (Part 1)

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# Brunel University

## Site Capacity and Concept Masterplan

December 2015 Rev A

**BDP.**









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## 1.0 Introduction

### 1.1 Purpose and Brief

- 1.1.1 This Concept Masterplan Report has been prepared by BDP for Brunel University to examine how their development needs could be accommodated on the land within their ownership. The extent of development need is identified in the October 2014 Assessment of Development Need Interim Report prepared by GVA for the University.
- 1.1.2 This Concept Masterplan Report has been informed by and should be read in conjunction with the Assessment of Development Need report, Ecological and Transport Appraisals undertaken by WSP and the Green Belt Appraisal prepared by Gillespies.
- 1.1.3 The subsequent sections of this report are arranged in three parts:
- Section 2** investigates development opportunities across sites 1 and 2 (see plan on adjacent page). This identifies the capacity of existing developed land within Brunel University ownership.
- Section 3** identifies opportunities and principles for developing beyond the existing developed land to accommodate Brunel University's assessed space needs up to 2026.
- Section 4** illustrates the proposed concept masterplan to reflect Brunel University's assessed space needs up to 2026 and an extended concept masterplan which identifies opportunities for future development beyond the assessed space need 2026.



**Schedule of Site Areas**

- Site 1  
34.03 acres  
13.78 hectares
- Site 2  
66.17 acres  
26.78 hectares
- Site 3  
19.82 acres  
8.02 hectares
- Site 4  
30.64 acres  
12.40 hectares
- Site 5  
42.82 acres  
17.33 hectares

North





## 2.0 Site 1 & 2 Capacity Assessment

### 2.1 Building Condition Appraisal (Sites 1 & 2)

# 2

- 2.1.1 In considering opportunities and constraints for intensification of use across the existing developed areas of sites 1 & 2 of Brunel University Campus, we are broadly in agreement with the assumptions made in the site capacity assessment contained within the GVA Assessment of Development Need (October 2014).
- 2.1.2 In order to determine the potential capacity of the existing developed areas at the Brunel University Campus it is necessary to identify where additional development could be located and where intensification of existing development could occur. At the same time, sites which are not available for development and existing development which should not be considered for intensification must be addressed.
- 2.1.3 The diagram on the adjacent page illustrates the extent of the greater than 1 in 100 year annual probability of river flooding across the land in the ownership of Brunel University. This represents the latest information provided by the Environment Agency. Several buildings are currently located within the extent of this flood plain. These buildings will need to be demolished and replaced as part of any development intensification on the existing developed areas at Brunel University. Sites within this flood risk zone have been generally considered unsuitable for potential development. However, sites at the edge of the Flood Risk Zone are considered to be potentially suitable for development subject to appropriate protective measures being incorporated within their design or a site alleviation scheme put in place.
- 2.1.4 Two building complexes on campus are listed. The Lecture Theatre Block (Grade II) by John Heywood is statutorily listed and is therefore not considered appropriate for demolition and intensification. The Engineering Complex Towers A-D by Richard Sheppard are locally listed. However, two of the Towers (C&D) lie in the Flood Risk Zone and so for the purposes of this report are presumed to have been removed.
- 2.1.5 Condition assessment ratings for the existing buildings are also shown on the diagram on the adjacent page. These are drawn from the Capital and Stock Condition assessment contained within the Brunel University Estates Strategy 2012-2017 (version 4 April 2013).
- 2.1.6 It is not considered viable to replace buildings in Category A condition unless significant intensification can be achieved. Following an assessment of each building there are no Category A condition buildings which would provide the opportunity for such significant intensification.
- 2.1.7 Category B condition buildings have been reviewed individually based on density, use, and site location. Where significant intensification (at least double the existing density) can be achieved we consider it viable to identify the site for replacement at an increased density of use. Where such intensification is not possible the site has been considered as unavailable for redevelopment. Sports facilities in general are in high demand on campus. The Indoor Athletics Centre and Netball Courts are unique facilities and thus have not been considered available for redevelopment.
- 2.1.8 Category C condition buildings have generally been considered viable for redevelopment. We have made exceptions to this approach where:
- buildings are listed
  - buildings adjoin more recent development of better condition category
  - increase in density unlikely and thus does not add to site capacity.
- 2.1.9 Surface car-parking areas are generally considered available for development subject to multi-level car-parking being provided to replace lost spaces.





2

**Key**

- Category A**
- Category B**  
(Sound, Operationally Safe and exhibiting only minor deterioration)
- Category C**  
(Operational but major repair or replacement needed in the short to medium term)
- A **Listed Buildings: Statutory -**  
= Lecture Theatre Block
- B **Locally Listed -**  
= Tower A, B, C, D
- Flood Risk zone from River Pinn**

**North**



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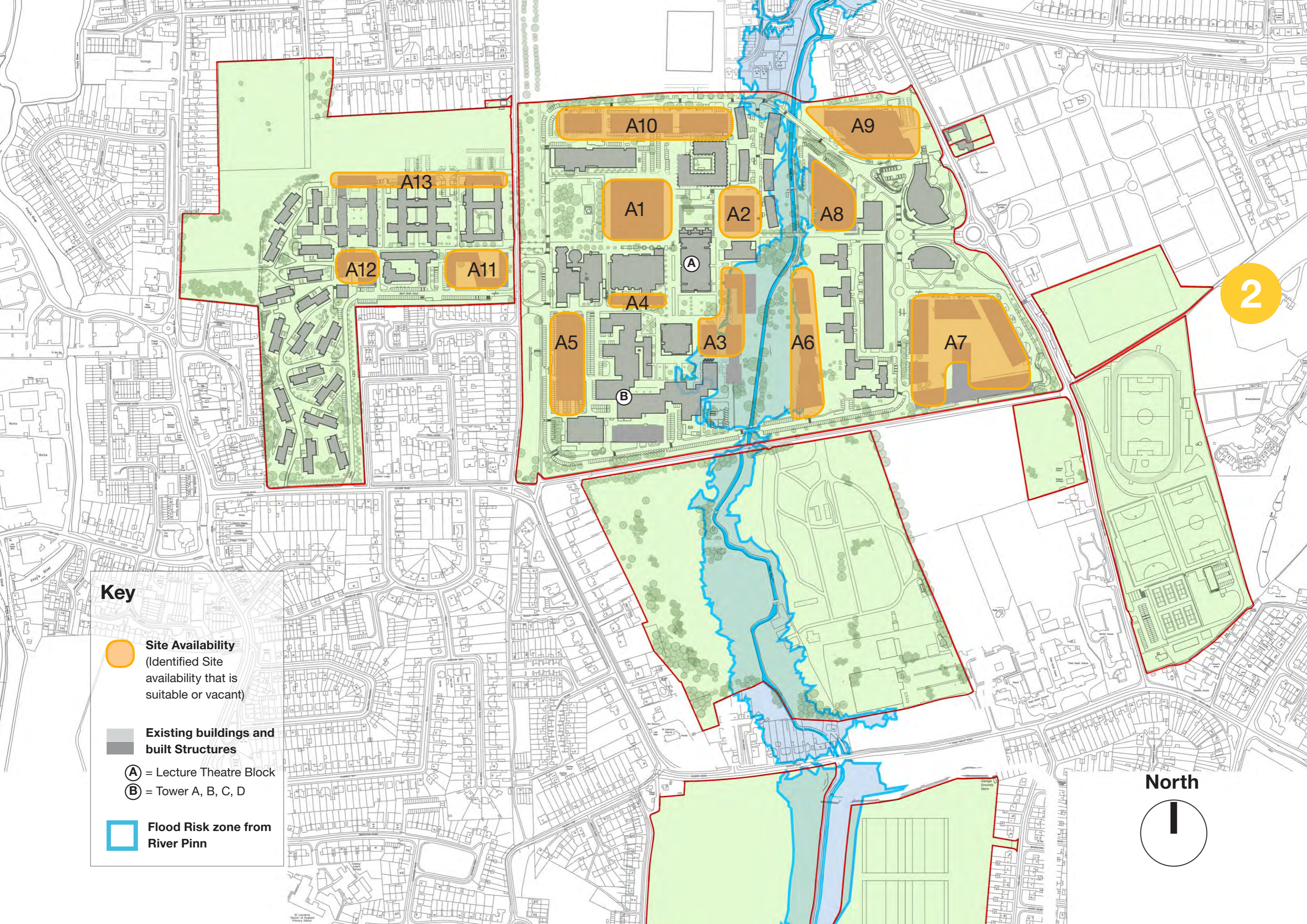


## 2.2 Suitable, Available and Viable Sites for Development (Sites 1 & 2)

### 2

- 2.2.1 The diagram on the adjacent page shows the sites within the existing developed areas of Sites 1 & 2 which are considered to be available for development and intensification.
- 2.2.2 Site 1 is already fairly densely occupied with buildings, however opportunities for increasing development on this site have been identified (plots A11-13). The open space to the North and West of the existing buildings on Site 1 has been retained as an open space and car parking as existing with no encroachment by potential development.
- 2.2.3 The majority of the opportunity for development and intensification is indicated on Site 2. The mature green spaces along the River Pinn have been protected from potential development as has the green space with its associated mature trees adjacent to Cleveland Road.
- 2.2.4 On Site 2 the areas of greatest opportunity are on the surface level car parks at the outer edges of Site 2 (plots A5 & A10) which also coincide with developments of relatively low density. The lost car parking spaces would need to be replaced within multi-level car parks on campus.
- 2.2.5 Some buildings around the Grade II listed Lecture Theatre Block (Plots A1, 2 & 4) provide an opportunity for intensification. These buildings are of relatively low density and are in condition Category C.
- 2.2.6 An opportunity exists to increase the density on the East side of the River Pinn on Site 2 through replacement of existing buildings some of which are in condition Category C (Plots A7-9). Plot A7 has been presumed to house further engineering research and thus does not provide significant opportunity for intensification. It could, however, provide opportunity to co-locate facilities.
- 2.2.7 We consider there is potential to utilise sites at the edge of the identified Flood Risk Zone with development which incorporates appropriate flood protection measures or with the incorporation of a site flood alleviation scheme (Plots A6 & A8).
- 2.2.8 Plot A3 had been considered potentially available, but as it falls almost completely within the flood risk zone it has been discounted.
- 2.2.9 It should be noted that the diagram identifies potential sites for development / intensification. The diagram does not incorporate phasing strategies or investigate constraints in relation to building use which may preclude potential development.
- 2.2.10 Brunel University, as with all campus universities, need to be able to create new permanent development to replace existing facilities before they are able to remove existing campus buildings. New buildings should be located appropriately to ensure effective and efficient working and campus organisation. The existing campus may preclude delivery of the full capacity potential of Site 2 requiring development outside of the existing developed areas to facilitate full development within Site 2.





**Key**



**Site Availability**  
(Identified Site availability that is suitable or vacant)



**Existing buildings and built Structures**



**(A) = Lecture Theatre Block**



**(B) = Tower A, B, C, D**



**Flood Risk zone from River Pinn**

2

**North**





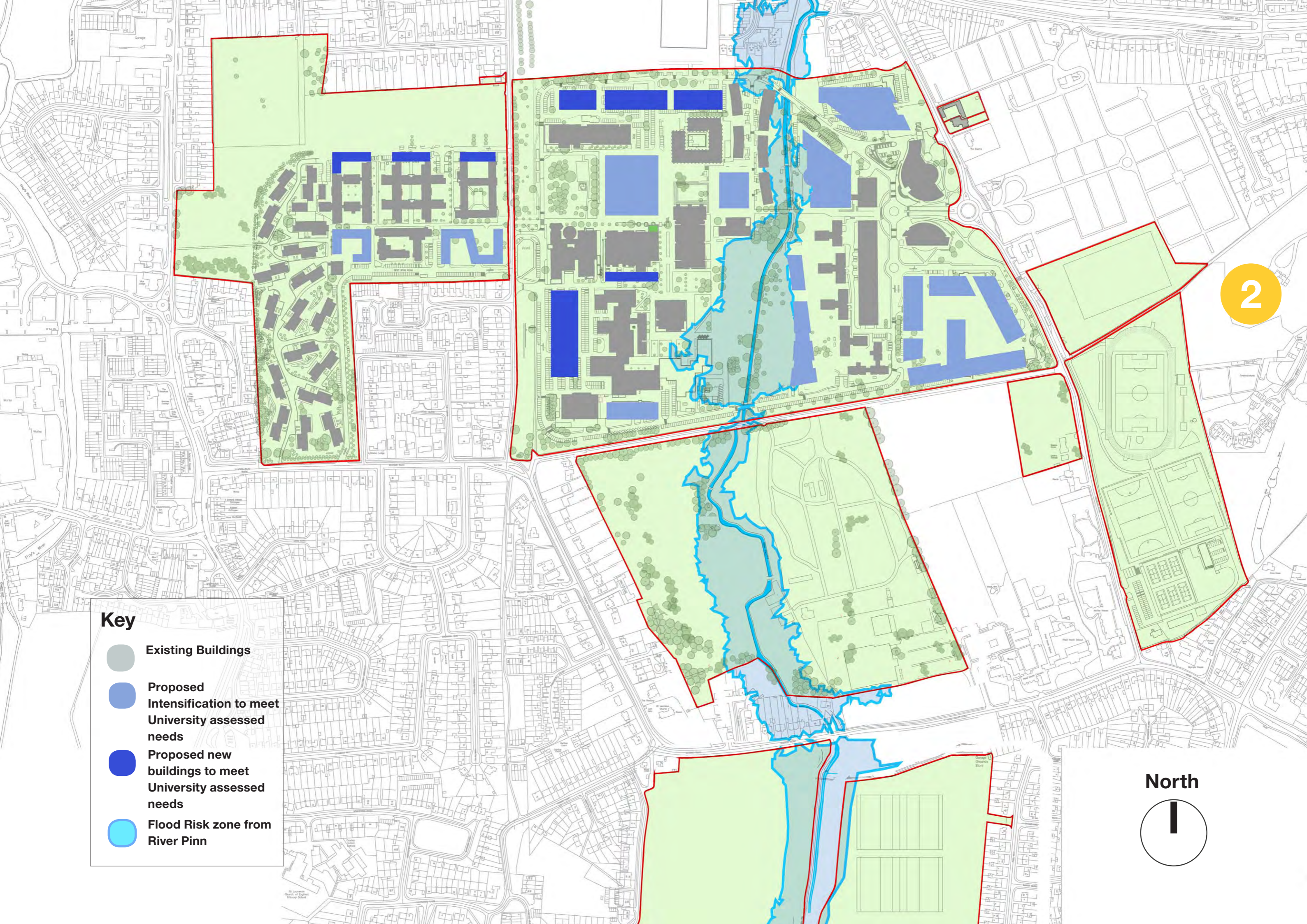
## 2.3 Site Capacity Assessment for Sites 1 & 2

2

- 2.3.1 The GVA Assessment of Development Need for Brunel University identified a total net additional requirement beyond existing / refurbished space of 118,550m<sup>2</sup> by 2026. This is shown in Table 5.4 of the GVA document and referred to as “Future Need”.
- 2.3.2 The drawing on the adjacent page identifies potential redevelopment capacity across the existing developed areas of Sites 1 & 2 of the Brunel University Campus. The drawings are coloured to show new, replaced and retained existing buildings.
- 2.3.3 Building areas have been calculated typically allowing for a range of three to five floors. This is led by existing heights across the campus. The edges of the sites are generally expected to be lower than the central areas. This reflects the low rise areas around the edges of the Campus sites. We have allowed for higher buildings around the central “Quad”.
- 2.3.4 Use of the surface car parking for development necessitates provision of multi-level car parks. The area of these is outside the Assessed Development Need and thus are excluded our area calculations.
- 2.3.5 The table on this page identifies the total gross internal area of potential development. It also identifies the area of demolished buildings in order to provide total additional areas for Sites 1 & 2.
- 2.3.6 Sites 1 & 2 can accommodate an additional 45,400m<sup>2</sup> providing 38% of the assessed additional space need for to 2026. A further 73,150m<sup>2</sup> is required on sites outside the existing campus developed areas.
- 2.3.7 In order to provide space for the continued education and research business of the University, it may be necessary to first develop sites outside the existing developed areas of the Campus before existing sites can be redeveloped.

|   | <b>Total Added</b> | <b>Total Removed</b> | <b>Resultant Addition</b> | <b>(Sqm.)</b> |
|---|--------------------|----------------------|---------------------------|---------------|
| <b>Site 1</b>   | <b>15795</b>       | <b>5235</b>          | <b>10560</b>              |               |
| <b>Site 2</b>   | <b>91020</b>       | <b>56180</b>         | <b>34840</b>              |               |
| <b>Total Additional Area provided by Sites 1+2:</b>     |                    |                      | <b>45400</b>              |               |
| <b>Total Assessed Additional Area required by 2026:</b> |                    |                      | <b>118550</b>             |               |
| <b>Shortfall in Area:</b>                               |                    |                      | <b>73150</b>              |               |





2

**Key**

- Existing Buildings
- Proposed Intensification to meet University assessed needs
- Proposed new buildings to meet University assessed needs
- Flood Risk zone from River Pinn

North





## 3.0 Concept Masterplan Principles

### 3.1 Brunel University Campus Context Green Belt and Land Use

- 3.1.1 A number of studies have been undertaken to inform the development of a concept masterplan which meets the assessed space needs of Brunel University to 2026. These include the Historical Use (Site 4) Report, the Transport Appraisal and the Green Belt Appraisal. The diagrams on the right have been produced to illustrate the land-use surrounding the site within the ownership of Brunel University, and the developed areas of land within the green belt designation.
- 3.1.2 The Brunel University owned lands sit on the midway point between Uxbridge and West Drayton town centres. Whilst the area around Brunel University is mostly residential, the area also hosts a number of other education and health-related institutions.
- 3.1.3 It can be seen that the green belt designated areas include development. This applies not only to the Brunel University Campus, but includes other educational and sports facilities, as well as the, now closed, commercial nursery.
- 3.1.4 A 'natural corridor' exists each side of the River Pinn running through the developed areas of the Brunel Campus. This 'natural corridor' adds to the quality and character of the campus.
- 3.1.5 The open areas of Site 4 struggle to support sustained growth of self-seeded trees due to the quantity of obstructions in the ground remaining from its previous commercial use. This land is also subject to contamination.
- 3.1.6 For these reasons it might be considered appropriate to develop educational facilities on Site 4 as long as development respects and enhances the environs of the River Pinn and improves the landscape and habitat quality of the area. Development may provide opportunities for improving public access to this area. It should be noted that the removal of buildings from flood risk areas provides increased open area on site 2.

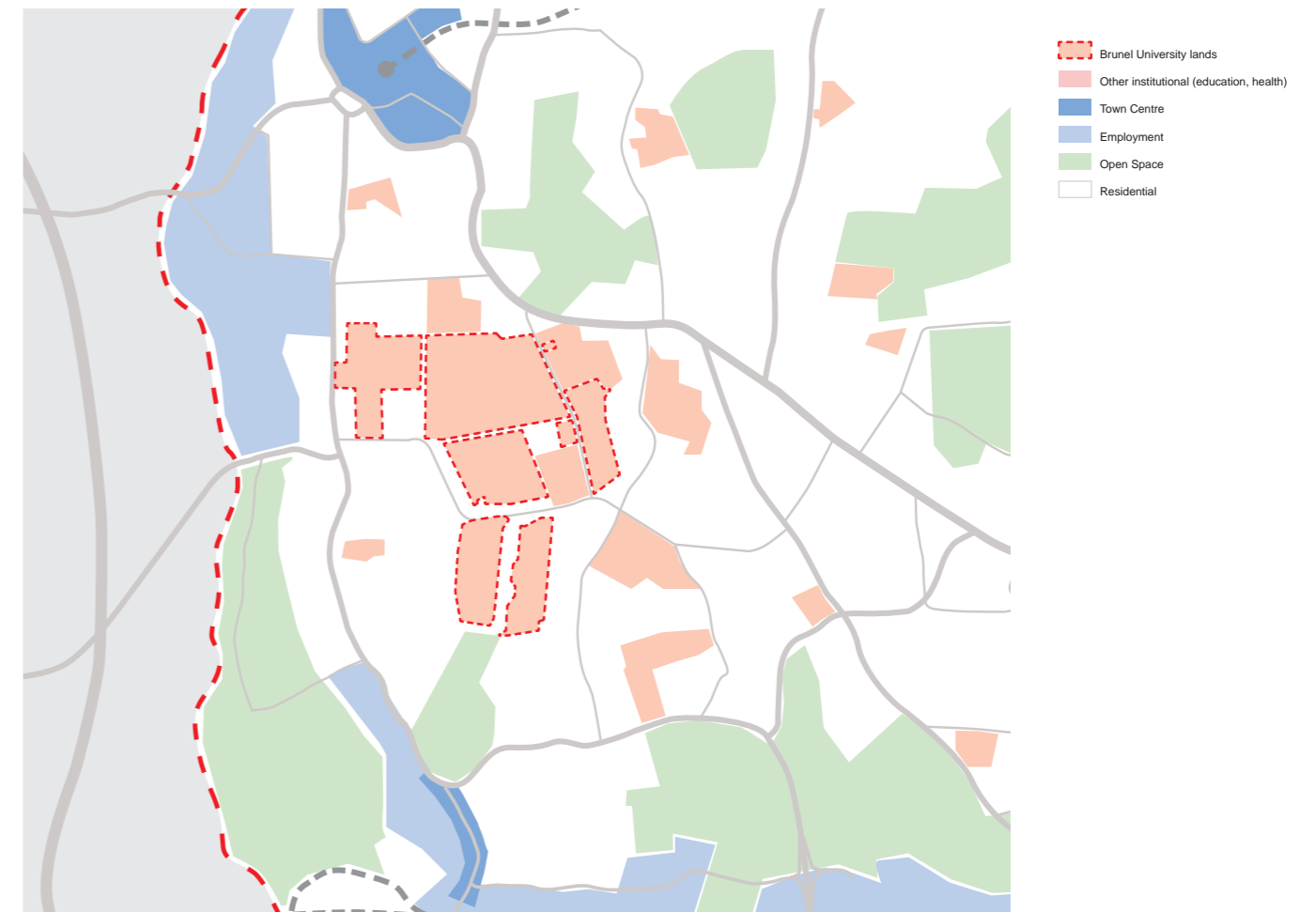


Diagram illustrating land use

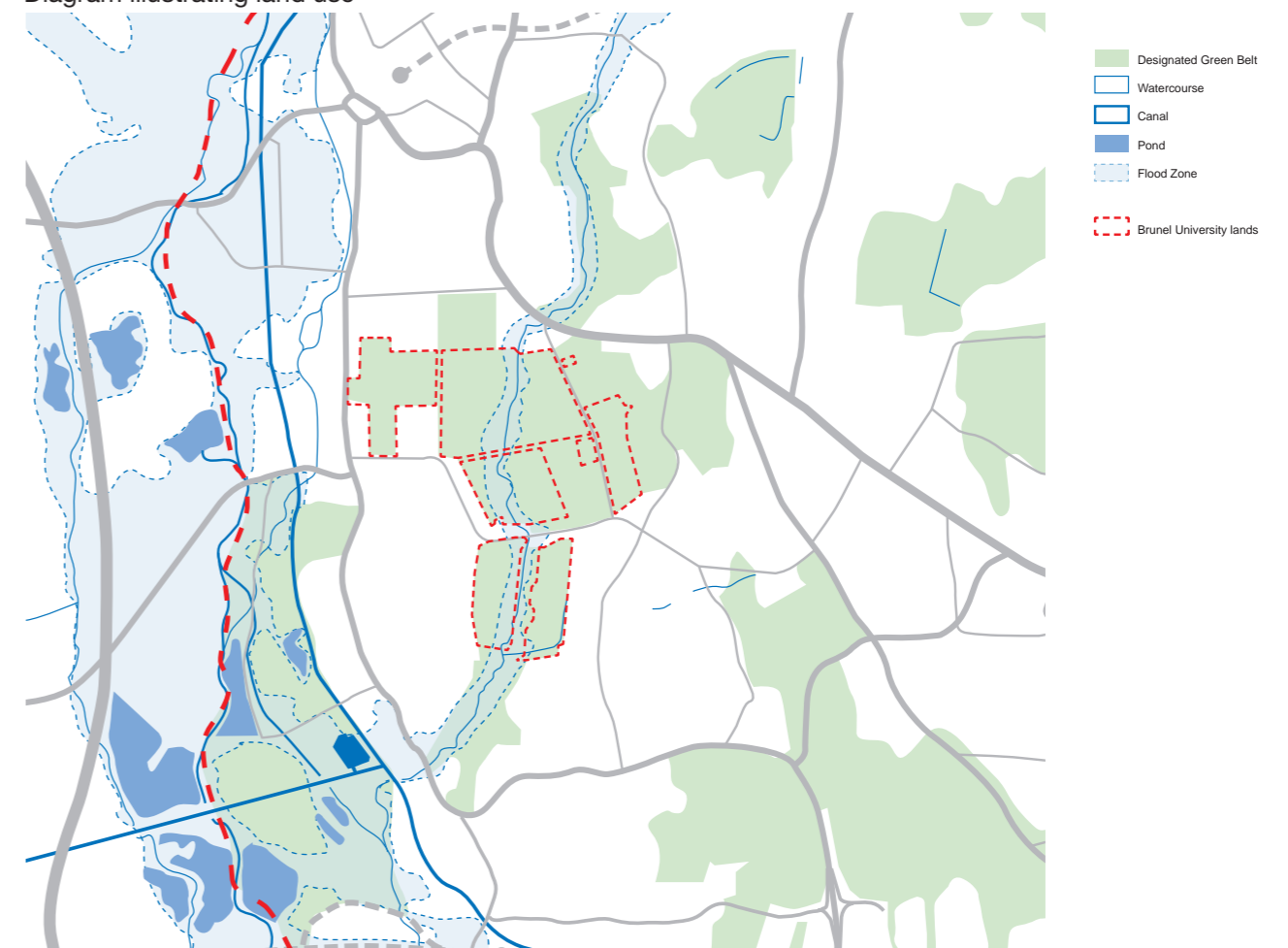


Diagram illustrating water courses



- Designated Green Belt
- Built-up areas of Green Belt lands
- Green Belt lands with public access
- Public open space outside Green Belt
- Brunel University lands

Diagram illustrating development with green belt designation

## 3.2 Brunel University Campus Context Transport

- 3.2.1 The diagrams on these pages illustrate the transport context of the Brunel University owned lands. These should be read in conjunction with the Transport Assessment.
- 3.2.2 The campus is generally served by B roads. There is no vehicle access from Cowley Road. The undesignated Cleveland Road runs between Sites 1 & 2 and is the route for a number of the University bus routes.
- 3.2.3 Church Road / Pield Heath Road runs to the South of Site 4 and provides access to Site 4 via the entrance to the now closed plant nursery. Kingston Lane provides the main vehicle access to Site 1 and the Sports Park.
- 3.2.4 Sites 1 and 2 are separated by the non-vehicle Nursery Lane which also forms part of the Celandine Walk Route.
- 3.2.5 36% of students live on campus, with a further 13% living within the UX8 postcode area. The remaining 51% travel from further afield. Students and staff arrive at campus from both Uxbridge and West Drayton directions making use of the local and University bus routes.
- 3.2.6 Cycle and walking routes should be considered further as part of a detailed study informed by the Transport Assessment.
- 3.2.7 Extending the Campus southwards into site 4 would improve proximity of the University campus for those arriving from West Drayton and increase access to local and University bus routes running along Church Road / Pield Heath Road. New development in Site 4 will allow for improved cycle routes into the campus along a new route running North-South to complement the East-West route.



Diagram illustrating PTAL rating

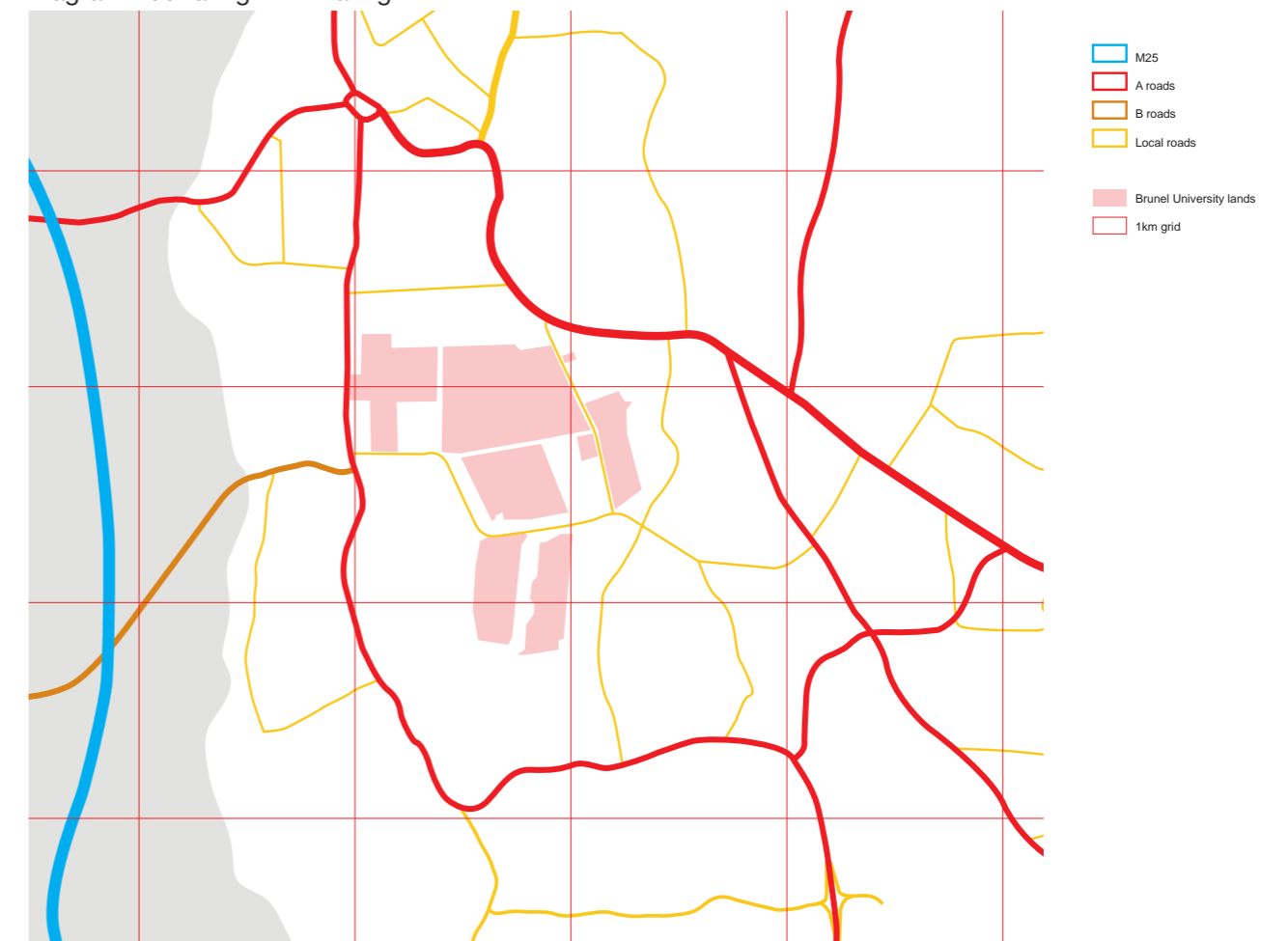
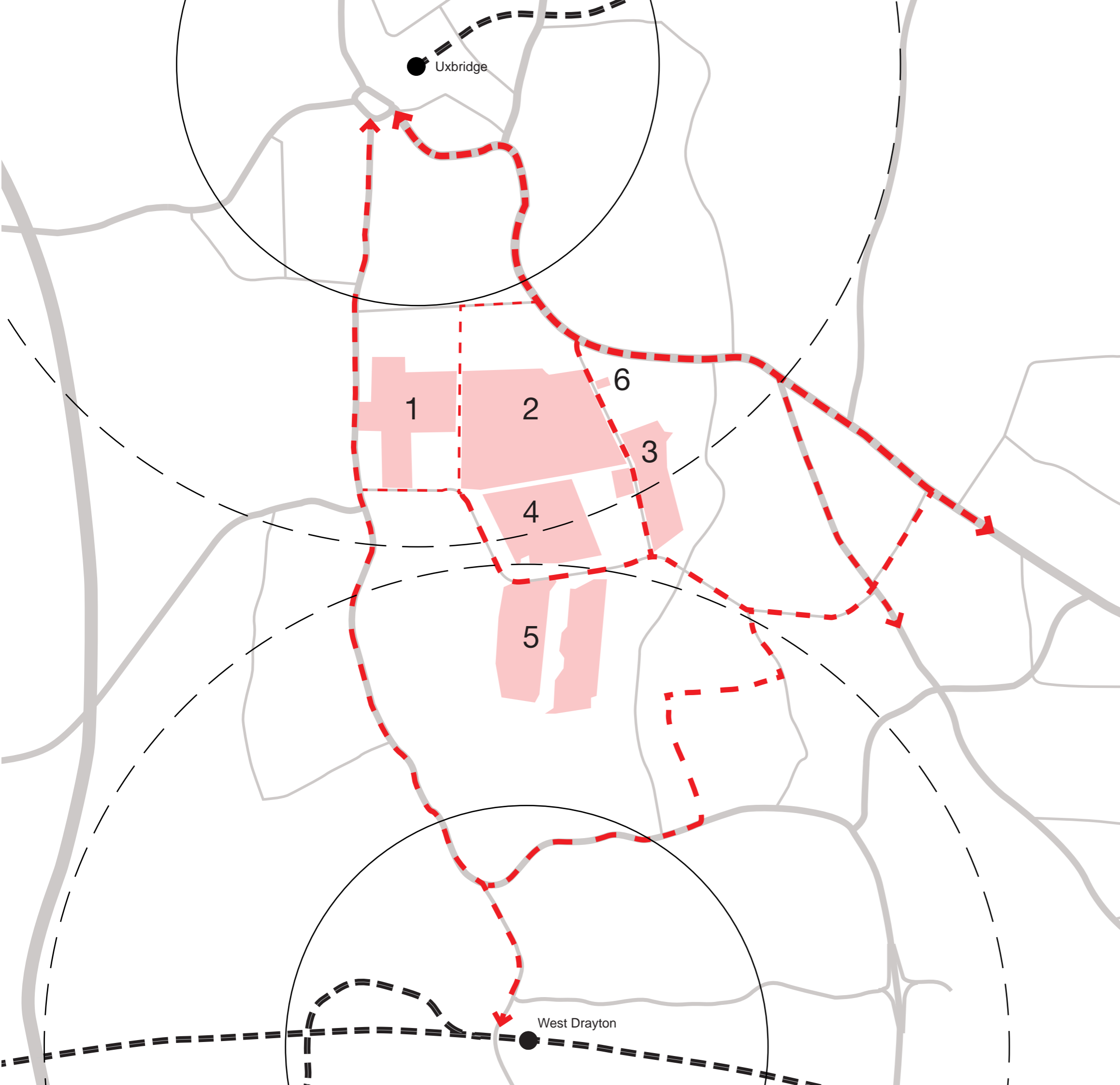


Diagram illustrating surrounding road hierarchy



- Rail / Tube station
- 1km walking distance
- - - 2km walking distance
- ▬▬▬ 5+ bus routes
- ▬▬▬ 3-4 bus routes
- ▬▬▬ 1-2 bus routes
- Brunel University lands

Diagram illustrating local public transport routes

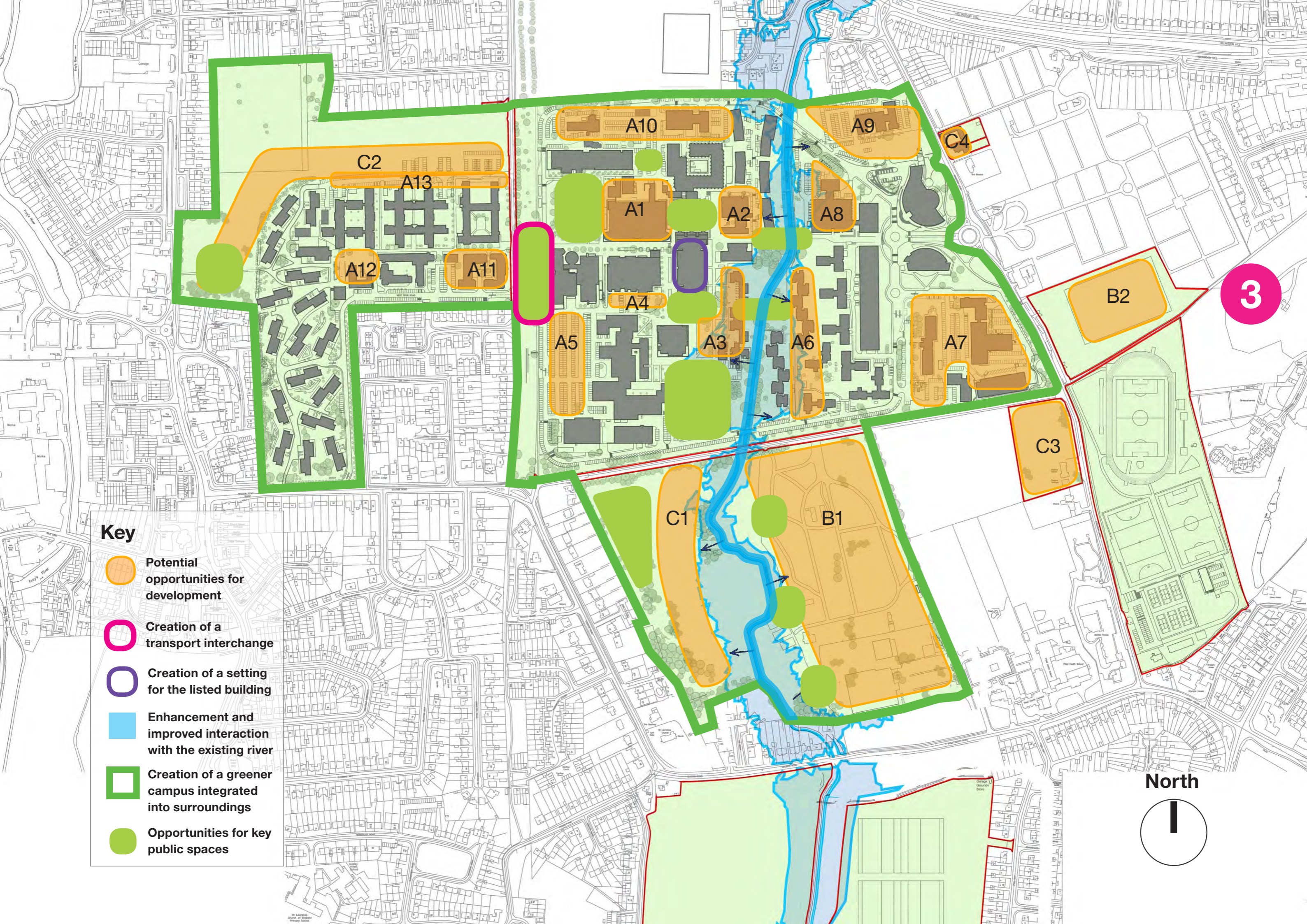


### 3.3 Potential Development Opportunities Sites 1-6







## 3

- 3.3.1 The drawing on the adjacent page illustrates the potential development opportunities across all of the sites which form the University campus.
- 3.3.2 The A reference plots are the same as identified in Section 2 of this report and represent appropriate intensification and additions to existing developed areas of the campus.
- 3.3.3 Plot B1 represents an opportunity to develop new academic facilities in a landscaped setting extending the existing campus southwards towards Church Road / Field Heath Road utilising the site of the now closed commercial plant nursery and repurposing the land for educational use.
- 3.3.4 There is an opportunity to consider works to the River Pinn to increase capacity in times of flood and help alleviate flood risks both to the Brunel University campus and for properties downstream.
- 3.3.5 Plot B2 provides an opportunity to provide new sports related accommodation adjacent to the sports pitches. This would allow for the release of plot A8 for intensified development on Site 2.
- 3.3.6 Further development could be accommodated on plot C1 on the West side of the River Pinn on Site 4. This plot is defined by the flood plain extent and by a generous landscape buffer zone between the rear boundary of the adjacent properties.
- 3.3.7 Plot C2 utilises a band to the North of the existing residential village which is defined by the depth of the surface car parking north of the access road. This plot extends around to Cowley Road providing an opportunity for a new gateway building to the Campus. A clear landscape buffer is maintained on the northern part of the site.
- 3.3.8 Plots C3 and 4 provide opportunities for residential development.
- 3.3.9 No development is proposed on Site 5 of the Campus.





**Key**

-  Potential opportunities for development
-  Creation of a transport interchange
-  Creation of a setting for the listed building
-  Enhancement and improved interaction with the existing river
-  Creation of a greener campus integrated into surroundings
-  Opportunities for key public spaces

3

North



A10 A9 C4  
 C2 A13 A1 A2 A8  
 A12 A11 A4 A3 A6 A7  
 A5

C1 B1 C3 B2



## Enclosure C(ii)

### Site Capacity and Concept Masterplan (Part 2)

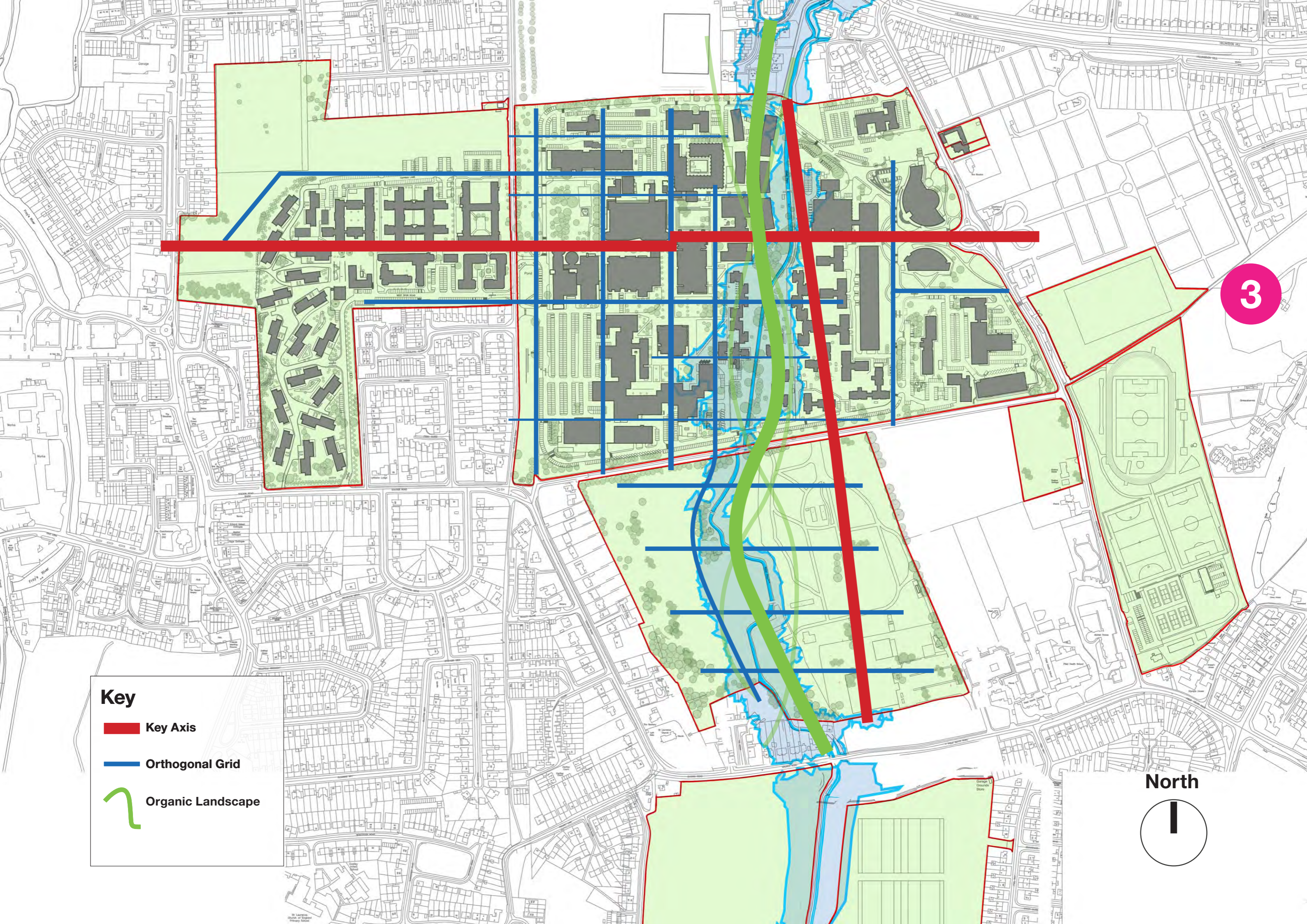
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### 3.4 Concept Masterplan Principles Organisation

## 3

- 3.4.1 Site 2 of the campus is defined by a loose orthogonal grid defined by the main East-West route which runs through Sites 1 & 2 from Kingston Lane to Cowley Road. This grid provides a good organising principle for the definition of plots on Site 2. Running through the grid is the natural wind of the river corridor providing a natural counterpoint to the rectilinear organisation.
- 3.4.2 Extending the campus development to the south onto Site 4 provides an opportunity to develop an equally strong North-South route to provide a single line running from the point at which the river meets the site boundary to a point linking with the access to Site 4 from Church Road / Field Heath Road. This North-South route will provide much better links across the Eastern part of the existing campus.
- 3.4.3 A softer more naturalistic organisation could be created on the West side of the River Pinn setting buildings sympathetically into the landscape, creating East-West links across the river and linking to the western part of the existing campus. Increased open space is provided along the River Pinn following the removal of buildings in the Flood Risk Zone.
- 3.4.4 The reinforcement of the river corridor through Site 4 provides opportunities to strengthen the ecological benefit of the Site, create water features to help alleviate the impact of flood events and potentially improve access to the Landscape.
- 3.4.5 Site 3 would benefit from better pedestrian links to Site 2 of the campus utilising the existing crossing point on Kingston Lane and linking to the existing sports facilities.





3

**Key**

-  Key Axis
-  Orthogonal Grid
-  Organic Landscape



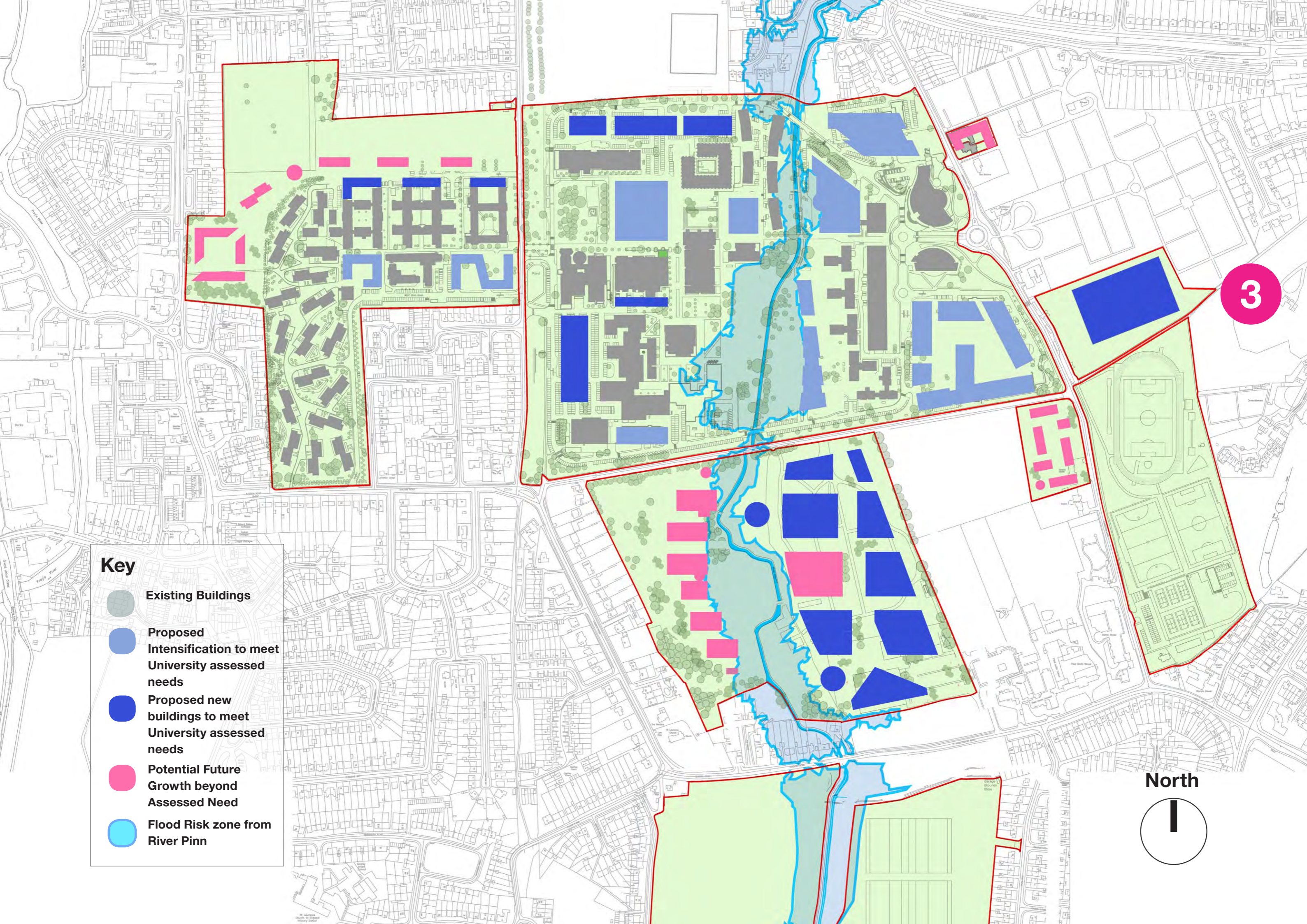


## 3.5 Concept Masterplan Principles Buildings

### 3

- 3.5.1 The building plot definition has been developed following the principles outlined in this section of the report thus far. Utilising a range of building heights from 3 to 5 storeys on Site 4 and 1 to 2 Storeys on Site 3 we have determined that the additional area required to meet the University's assessed space need can be accommodated within Plot B1 and B2.
- 3.5.2 The diagram on the adjacent page illustrates in blue the intensification of existing building plots (light blue) and development on empty plots (dark blue) required to provide the additional 118,550m<sup>2</sup> to meet the assessed space need for the University to 2026.
- 3.5.3 Buildings on the East side of the River Pinn on Site 4 would be defined by routes and view lines to the river, maintaining defined long views between the buildings across the site. These buildings would be set at the waters edge and around a new natural quad reflecting the arrangement of the earlier parts of the existing campus. Buildings will be set in from the tree-lined edge of the site with the strong pedestrian route running between the buildings.
- 3.5.4 Buildings indicated in pink represent opportunity for further development beyond the assessed space needs to 2026. This represents approximately 60,000m<sup>2</sup> and could potentially be increased to 70,000m<sup>2</sup>.
- 3.5.5 Site 1 could, we believe, accommodate buildings of 4 to 5 storeys with a small encroachment into the open space to the north of the Student Village, but within the depth defined by the existing surface car parks.
- 3.5.6 The Grundon Site (at the South West corner of Site 2) and Site 6 could accommodate lower density building for student / staff residences.
- 3.5.7 Site 4 could accommodate buildings on the West side of the River Pinn with a range of heights between 3 & 4 storeys set amongst the landscape designed to accommodate flood waters within an improved ecological setting.





**Key**

- Existing Buildings
- Proposed Intensification to meet University assessed needs
- Proposed new buildings to meet University assessed needs
- Potential Future Growth beyond Assessed Need
- Flood Risk zone from River Pinn

**North**



**3**



## 3.6 Concept Masterplan Principles Character Zones

3

- 3.6.1 Brunel Gateway marks the East entrance into the campus. A mix of existing buildings will remain, with significant new development located within the quarter. It will be landscaped to form a new and easily recognisable point of entry, preserving and strengthening key routes and building entrances.
- 3.6.2 Within the Pioneer Quarter the zone around the original campus buildings will be reestablished reflecting the original grid. A series of existing spaces will be enhanced and new spaces created forming key civic public environments for recreation. The main route through the quarter will become the main axis, a social street, linking the different areas of the campus together.
- 3.6.3 The Arrival Square will provide a new key transport interchange into the campus. Located at a pivotal section, it will strengthen the existing gateway into the Pioneer Quarter and the Student Village. A feature sheltered canopy will be positioned and shared surface will provide an inviting and welcoming nodal point to the campus visitors.
- 3.6.4 The Student Village will continue to provide a green lush setting for the buildings which integrates into the existing greenbelt and surrounding tree buffer.
- 3.6.5 The Waterside, originating from the central River Pinn will be turned into an ecological haven for both recreation and educational purposes. The proposed development will be soft in its form to reflect the river and natural setting. Broadwalks will lead off the central axial boulevard and span across the new lake to encourage interaction with the River Pinn and its landscape.
- 3.6.6 The Sports Park will remain as existing, with the support of a new building, which will in turn strengthen the sports village facilities on offer to Brunel University.

BRUNEL GATEWAY



PIONEER QUARTER



ARRIVAL SQUARE



STUDENT VILLAGE



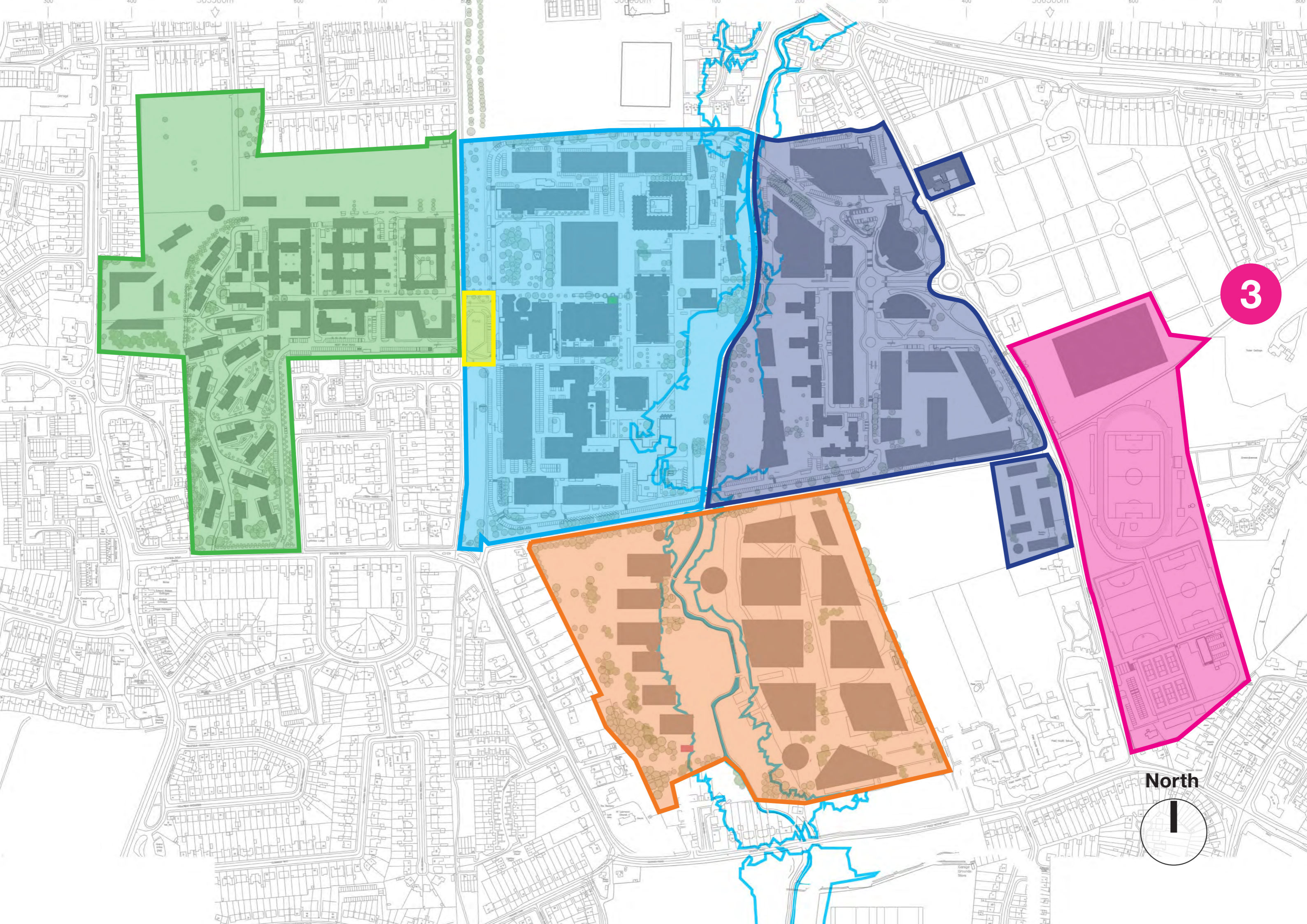
WATERSIDE



SPORTS PARK







3

North



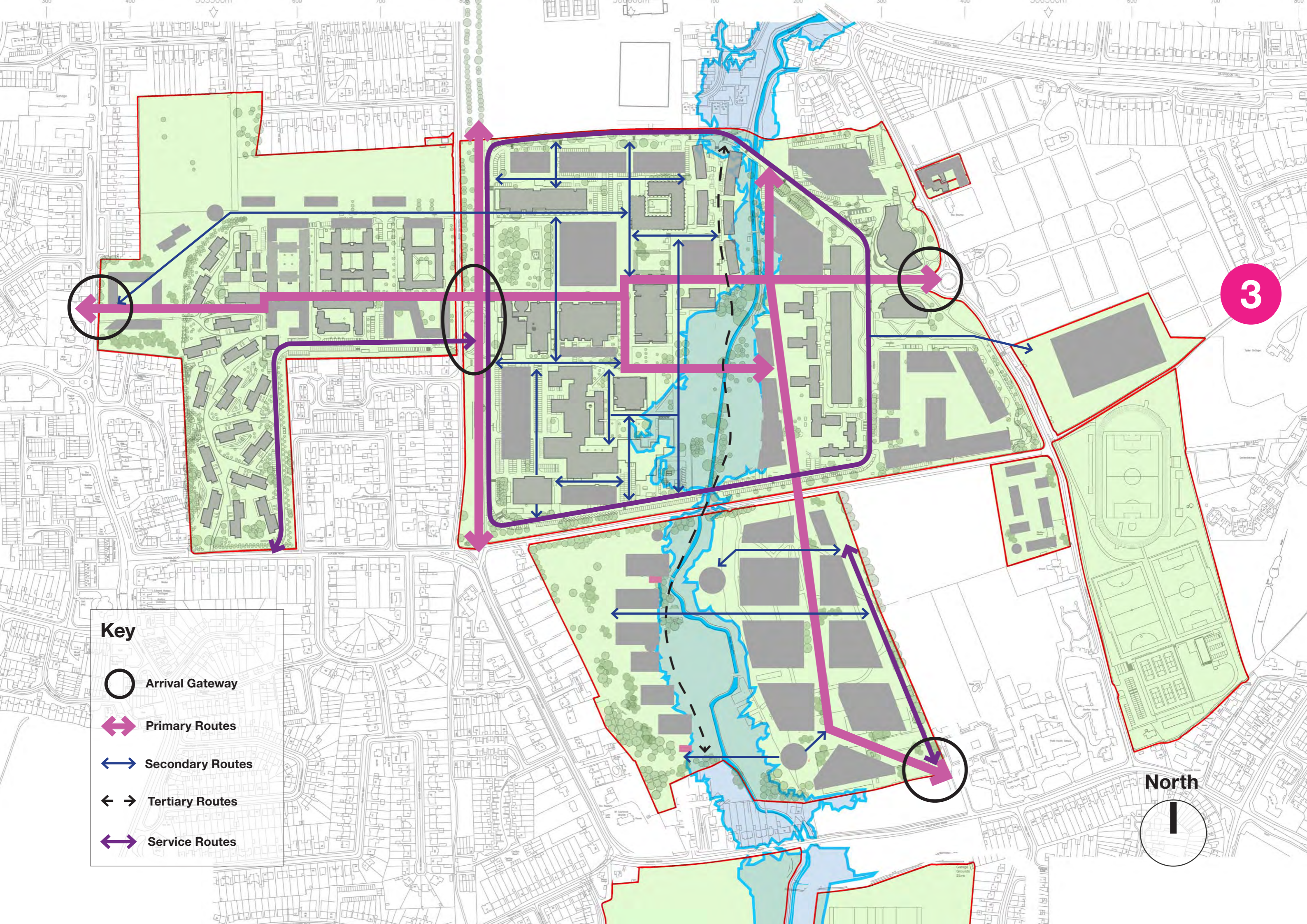


## 3.7 Concept Masterplan Principles Access and Movement

### 3

- 3.7.1 The vision for the campus is to create a pedestrian friendly environment, ensuring vehicular routes are located at the perimeter of the campus redesigning routes to give the pedestrian priority.
- 3.7.2 Key arrival gateways into the campus will be highlighted and strengthened to create a prominent identity for the University. Opening up routes from the North, East, South and West will create a more permeable environment for access and movement.
- 3.7.3 Primary axes runs East-West and North-South, these axes define the primary routes for movement through the campus. The routes will be carefully treated to enhance their hierarchy through surface material, landscape and tree planting.
- 3.7.4 A collection of secondary routes are dispersed throughout the campus, always connecting back to the primary access routes. These routes are smaller in scale and more intimate in character and strongly link all parts of the campus.
- 3.7.5 Tertiary routes are located alongside the River Pinn to create meandering footpaths access routes along the riverside from Site 2 to Site 4.
- 3.7.6 The existing loop road which circulates the campus within Site 2 will remain, and be changed into a shared surface for vehicular access and movement. Other vehicular service routes to The Waterside Campus and Student Village will be positioned on the perimeter.





3

**Key**

- Arrival Gateway
- ↔ Primary Routes
- ↔ Secondary Routes
- ← → Tertiary Routes
- ↔ Service Routes

North





## 3.8 Concept Masterplan Principles Height Zoning

### 3

- 3.8.1 In considering how to meet the space needs of Brunel University we have ensured that sufficient external space at ground level is defined to maintain the character of the Campus as a series of complementary buildings linked by high quality external space.
- 3.8.2 Building heights have been determined in relation to surrounding properties, existing building heights on campus and in line with a strategy which sees the tallest of the new buildings centred around the existing 'quad' space and at the edges of the River Pinn corridor. The diagram on the adjacent page illustrates a contour map of building heights across the campus. This diagram reflects both existing and proposed building heights.
- 3.8.3 The tallest existing buildings on site are 7 storeys, and no proposed building is higher than 6 storeys. The heights typically range from 3 to 6 storeys, with most proposed new buildings being 4 or 5 storeys.
- 3.8.4 The heights of the buildings have been set to maximise development potential across the Campus commensurate with the academic need and ensuring the edges of the campus respect the height and density of neighbouring areas. The tallest parts of the campus centre around the 'quad' and along the River Pinn as currently seen on the existing campus with the flood risk zone generally defining the proximity of buildings to the river. This ensures that sufficient space is given to the 'natural corridor' of the River Pinn.
- 3.8.5 The height of buildings on Site 1 are commensurate with the existing buildings on the site and in line with the previously approved masterplan.





3

**Key**

-  7 Storeys
-  6 Storeys
-  5 Storeys
-  4 Storeys
-  3 Storeys
-  1-2 Storeys

North





## 4



Indicative View of the Concept Masterplan from the West

## 4.0 Concept Masterplan

### 4.1 Concept Masterplan 2015-2026

- 4.1.1 The developed concept masterplan illustrated on this and the following three pages meets the additional assessed space needs of Brunel University as set out in the GVA Assessment of Development Need Report (October 2014). This equates to 118,550m<sup>2</sup> of additional space. 45,400m<sup>2</sup> of this space is achieved on Sites 1 & 2 with the remaining 73,150m<sup>2</sup> located on Sites 3 & 4.
- 4.1.2 The masterplan sets out to create a framework for development for the University strengthening and extending the best parts of the Campus while improving and developing the areas in most need of integration. Improved pedestrian links around the campus, and reduced impact of surface car parking improve the character of the campus to its edges.
- 4.1.3 Low density buildings are replaced on Site 1 (generally in line with the existing approved masterplan) and new residential accommodation is proposed enclosing courtyards at the north edge of the existing buildings.
- 4.1.4 The concept masterplan improves the quality and quantity of green space around the campus to create natural gathering spaces beyond the well-used 'quad' and main East-West movement axis. Additional crossing points over the River Pinn extend the main pedestrian circulation options to a parallel route to the south, easing circulation around the campus and providing an improved setting for the listed Lecture Centre. Additional open space is created by the removal of buildings in the Flood Risk Zone.
- 4.1.5 The 'natural corridor' along the River Pinn is widened and enhanced and the opportunity to create a new body of water in Site 4 is considered to alleviate the impact of flooding events and create a wetland setting for new buildings on the West of the River Pinn on Site 4.
- 4.1.6 The extension of the Campus into Site 4 is gathered along a strong new North-South route, creating new science and health-related academic space. This develops a cohesive extension to the existing built area of the Campus and improves movement among the existing buildings.
- 4.1.7 Sports facilities are proposed for Site 3 improving Sports Park facilities.





4

North



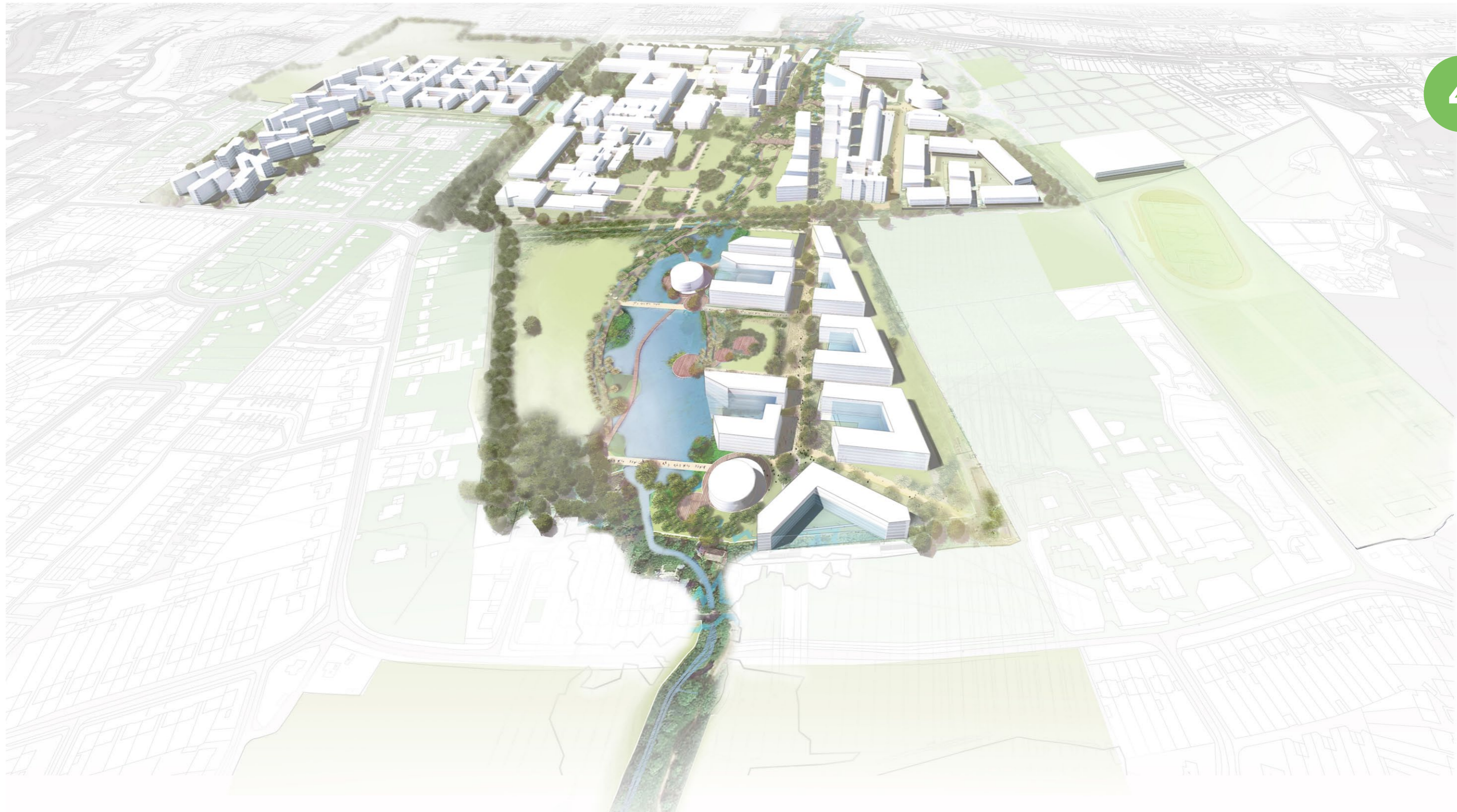


4



Indicative View of the Concept Masterplan from the East





Indicative View of the Concept Masterplan from the South



## 4



Indicative View of the Concept Masterplan from the West including additional further

## 4.2 Concept Masterplan Beyond Assessed Future Need

- 4.2.1 The Concept Masterplan illustrated in section 4.1 of this report reflects Brunel University's assessed space needs to 2026. It is possible there may be need for further growth beyond this point. For example we are aware that Hillingdon Hospital may have an interest in being part of a health campus on Brunel land; and the University have started early discussions regarding the need for staff accommodation on site to support staff retention and growth in the face of house price inflation.
- 4.2.2 The Masterplan illustrated on this and the following three pages shows the capacity of the Campus to accommodate further development in line with the principles described in this report.
- 4.2.3 Additional development on Site 4 to the West of the River Pinn would complete the academic quarter set around the new wetland habitat. This area would be formed of smaller buildings set into the landscape. A pedestrian link across Nursery Lane and across the wetland ensures the southern extension forms a cohesive part of the Academic campus.
- 4.2.4 New development to the North and West of the existing Residential Village provide a gateway building from Cowley Road and increases space provision whilst maintaining open space between the residential village and neighbouring properties.
- 4.2.5 Additional lower density residential provision is proposed on the Grundon Site (at the south east corner of Site 2) and Site 6, replacing the existing buildings on these sites.
- 4.2.6 We believe this approach could provide between 60-70,000m<sup>2</sup> space beyond the 2026 assessed requirements of Brunel University, and improve the Campus experience for students, staff and local residents.

Concept Masterplan illustrating further potential development beyond the 2026 Assessed Development Need of Brunel University (shown right)





4

North







Indicative View of the Concept Masterplan from the East including additional further development





Indicative View of the Concept Masterplan from the South including additional further development



# Enclosure D

## Alternative Sites Assessment

---

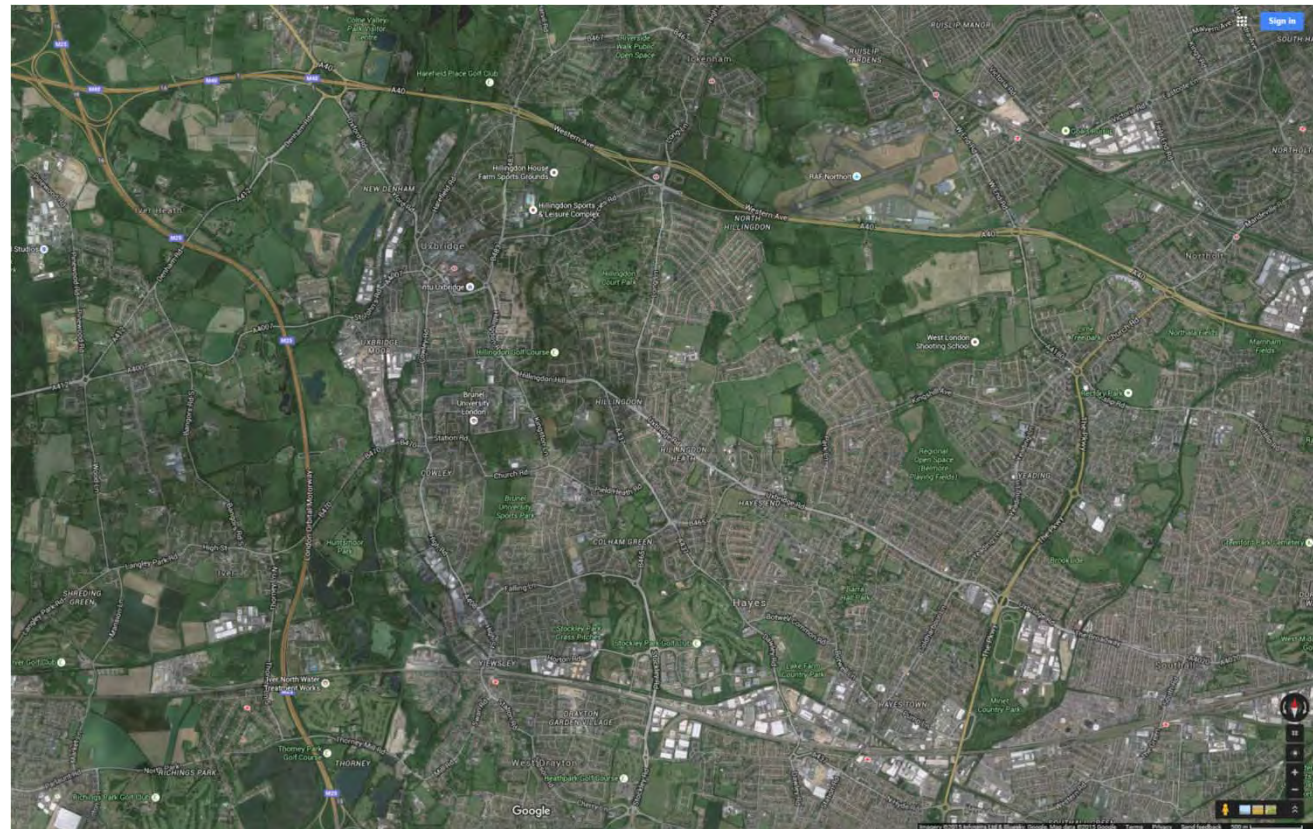




Brunei  
University

Student Housing  
Sequential Site  
Search

December 2015



[gva.co.uk](http://gva.co.uk)



# Introduction

## Purpose

- Brunel University is a significant economic stakeholder, and asset, in Uxbridge and the London Borough of Hillingdon. It has an annual turnover of £187m (2103/14 forecast) and contributes an estimated £445m per annum to the UK economy.
- The university has a strong and growing research function, and building on its success is seeking to grow significantly in relation to its research capability and student numbers. This will deliver economic and social benefits to the local area, the Borough, and London as a whole.
- This analysis considers the locational opportunities for a new, high quality, fully serviced student housing facility to advance the University's mission.

## Assumptions

- The university currently has a student population of approximately 13,860 students (2013/14). Student numbers are planned to increase to 21,500 by 2022/23.
- This will require substantial development over the next 5-10 years to provide accommodation for the increased student population. This will incorporate refurbishment of existing accommodation and the development of new accommodation.
  - 14,036sqm of existing floorspace is planned to be replaced
  - There is a requirement for an additional 1,500 bed spaces (40,500 sqm)
  - The assumption is for 27sqm per bedspace
  - the total requirement is for 54,536sqm of student housing.
- It is assumed that a plot to floorspace ratio of 3 would be appropriate, providing for circulation space, some on-site landscaping/open space, service areas (for waste, utilities etc.), service vehicle access, and a small amount of staff and other parking
- This would result in a land requirement of approximately 1.8ha



## Approach to Student Housing Site Search

- Travel times between student accommodation and the university campus are considered in relation to the use of public transport and walking (using data from Transport for London)
- A maximum travel time of 15 minutes for the centre of the campus for these modes is considered appropriate and has been mapped.
- This area radius is mapped over a number of aerial photos, base maps and the Local Plan map
- The search is for a site of approximately 1.8ha, which could accommodate 1,500 additional bedspaces.
- This 1.8ha area is mapped in the context of the area of search, to identify potential development sites.
- A series of maps and aerial photos including the LB Hillingdon Local Plan Part 2 Policies Map is used to identify the sites that meet these locational and size requirements
- Five sites are initially identified within the search area which could accommodate the required scale of development. The details and land use/policy constraints are considered to identify whether are suitable for the new student accommodation development.
  - Sites which have current recreational /open space uses are discounted (e.g. school and community playing fields, recreation grounds, golf courses etc.)
  - Sites with Local Plan Site Allocations are discounted.
- At this time there are no sites which meet the locational and size criteria within the area of search, beyond Green Belt sites within the University area.

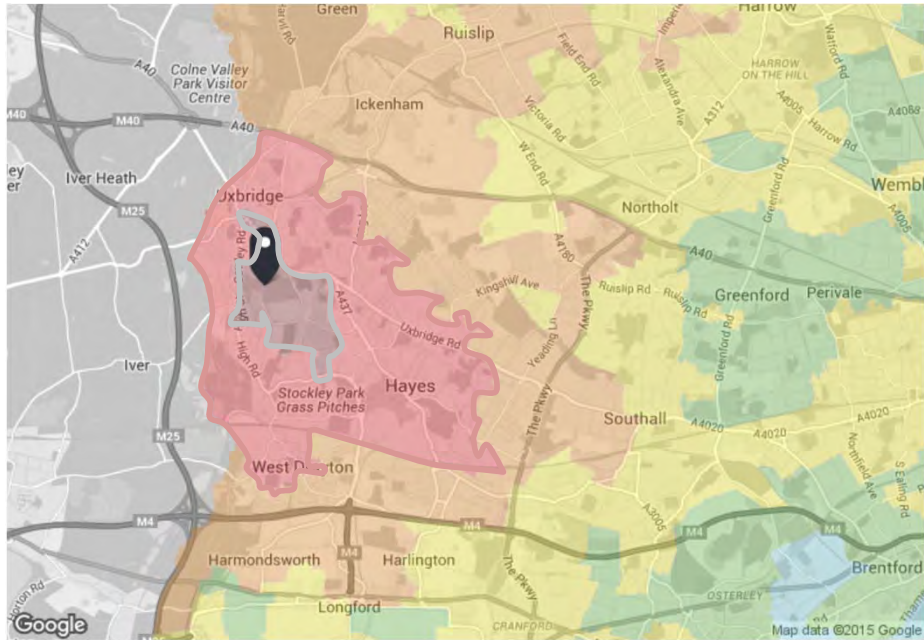


Travel Time  
Analysis

Public  
Transport and  
Walking



# Travel Times: Public Transport to and from Brunel University Campus (central point)



TIM output for 2011 (Base year)  
 Mode: All public transport modes. Time of day: AM peak. Direction: From location  
 Easting: 505859. Northing: 182637  
 Code: NT086A05A

**Map key - Travel Time**

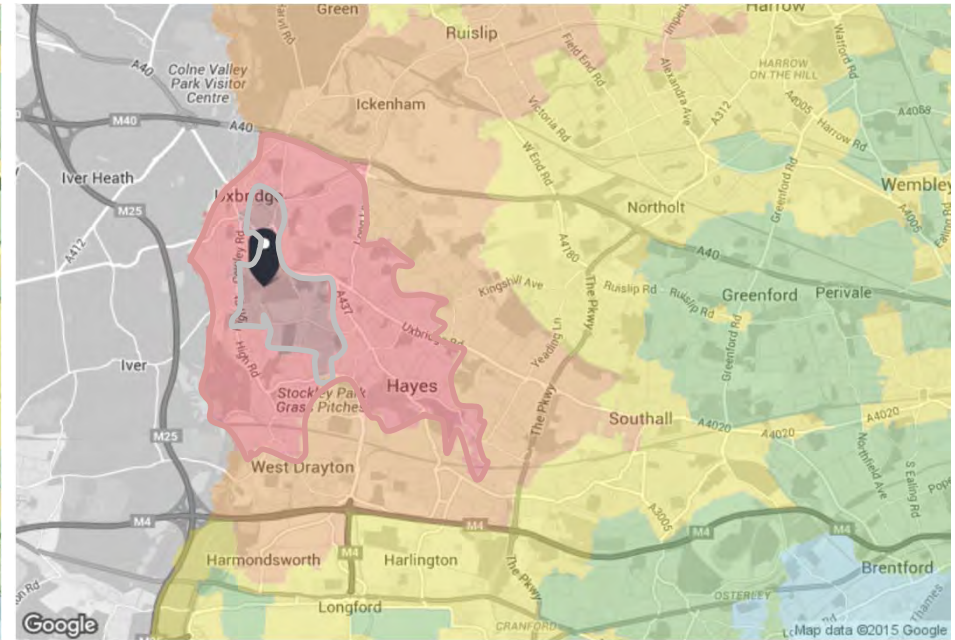
|   |  |
|---|--|
| <span style="display:inline-block; width:10px; height:10px; background-color:red; border:1px solid black;"></span> < 15 minutes           | <span style="display:inline-block; width:10px; height:10px; background-color:orange; border:1px solid black;"></span> 15 - 30 minutes    |
| <span style="display:inline-block; width:10px; height:10px; background-color:yellow; border:1px solid black;"></span> 30 - 45 minutes     | <span style="display:inline-block; width:10px; height:10px; background-color:lightblue; border:1px solid black;"></span> 45 - 60 minutes |
| <span style="display:inline-block; width:10px; height:10px; background-color:lightgreen; border:1px solid black;"></span> 60 - 75 minutes | <span style="display:inline-block; width:10px; height:10px; background-color:lightblue; border:1px solid black;"></span> > 75 minutes    |

Copyright 2015, TfL

Map layers  
● Travel Times

TRANSPORT FOR LONDON

Travelling From Brunel



TIM output for 2011 (Base year)  
 Mode: All public transport modes. Time of day: AM peak. Direction: To location  
 Easting: 505859. Northing: 182637  
 Code: NT086A05A

**Map key - Travel Time**

|   |  |
|---|--|
| <span style="display:inline-block; width:10px; height:10px; background-color:red; border:1px solid black;"></span> < 15 minutes           | <span style="display:inline-block; width:10px; height:10px; background-color:orange; border:1px solid black;"></span> 15 - 30 minutes    |
| <span style="display:inline-block; width:10px; height:10px; background-color:yellow; border:1px solid black;"></span> 30 - 45 minutes     | <span style="display:inline-block; width:10px; height:10px; background-color:lightblue; border:1px solid black;"></span> 45 - 60 minutes |
| <span style="display:inline-block; width:10px; height:10px; background-color:lightgreen; border:1px solid black;"></span> 60 - 75 minutes | <span style="display:inline-block; width:10px; height:10px; background-color:lightblue; border:1px solid black;"></span> > 75 minutes    |

Copyright 2015, TfL

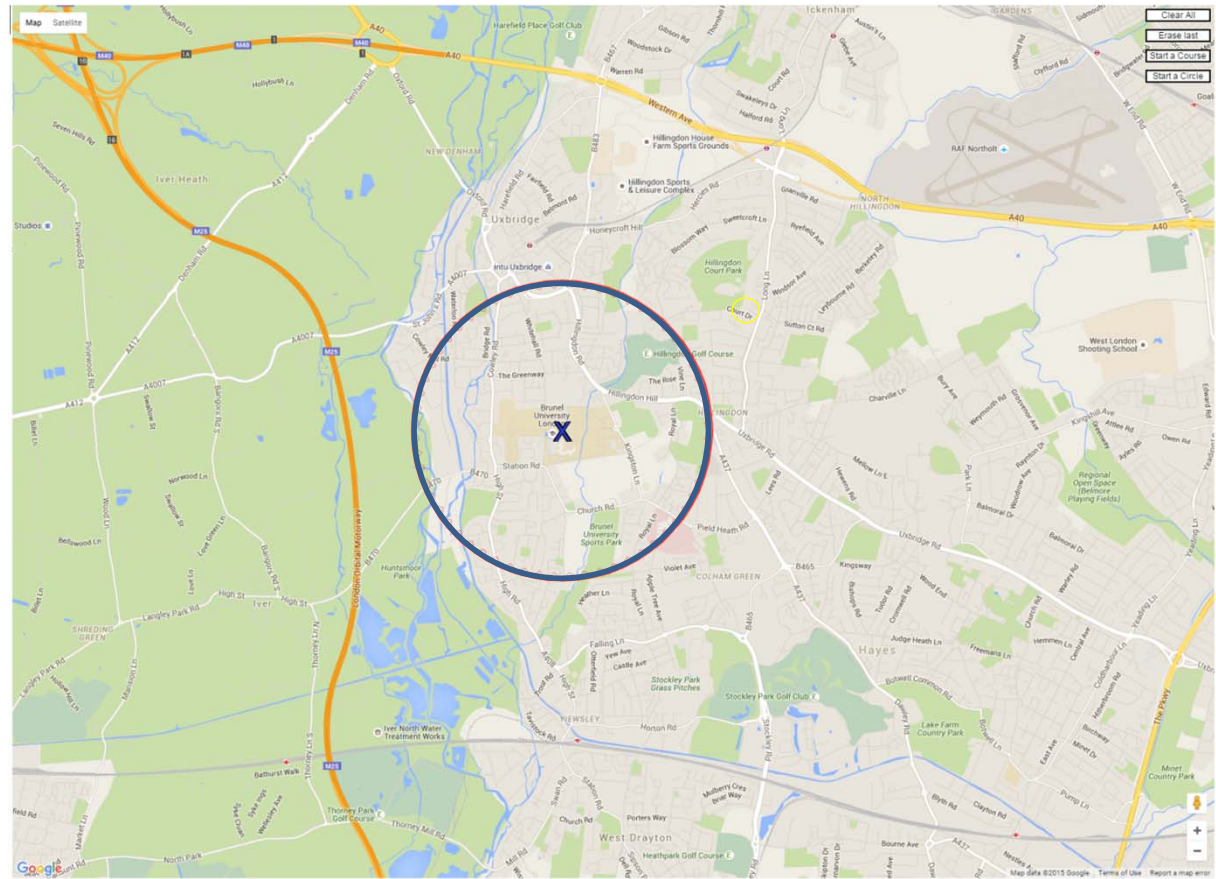
Map layers  
● Travel Times

TRANSPORT FOR LONDON

Travelling To Brunel

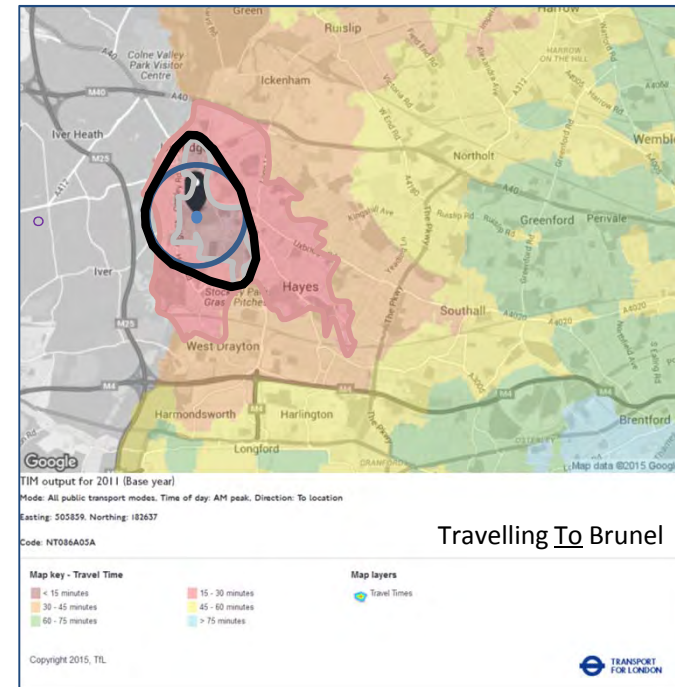
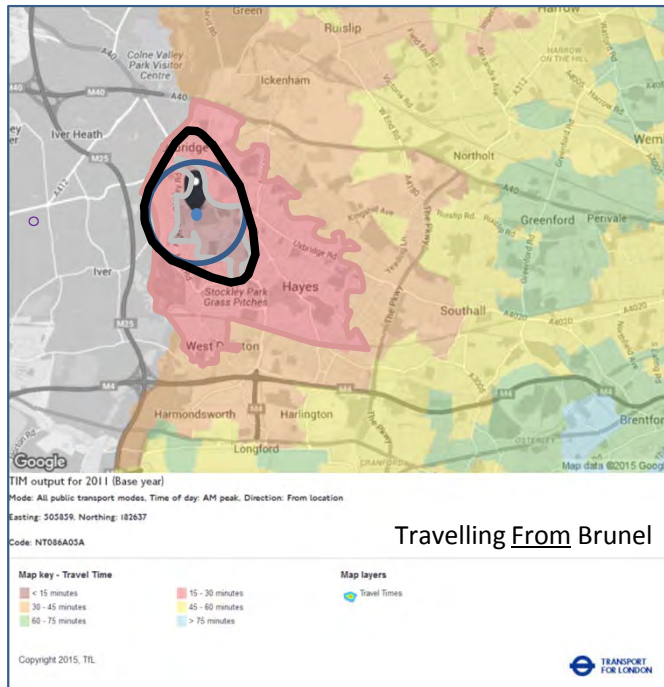
# Travel Times: Walking to and from Brunel University Campus (central point)




- Plotted from central area of Brunel University Area campus
- Approximate 15 minute walking area
- Based on walking at average speed of 5km/hour



Source: <http://www.acscdg.com/>

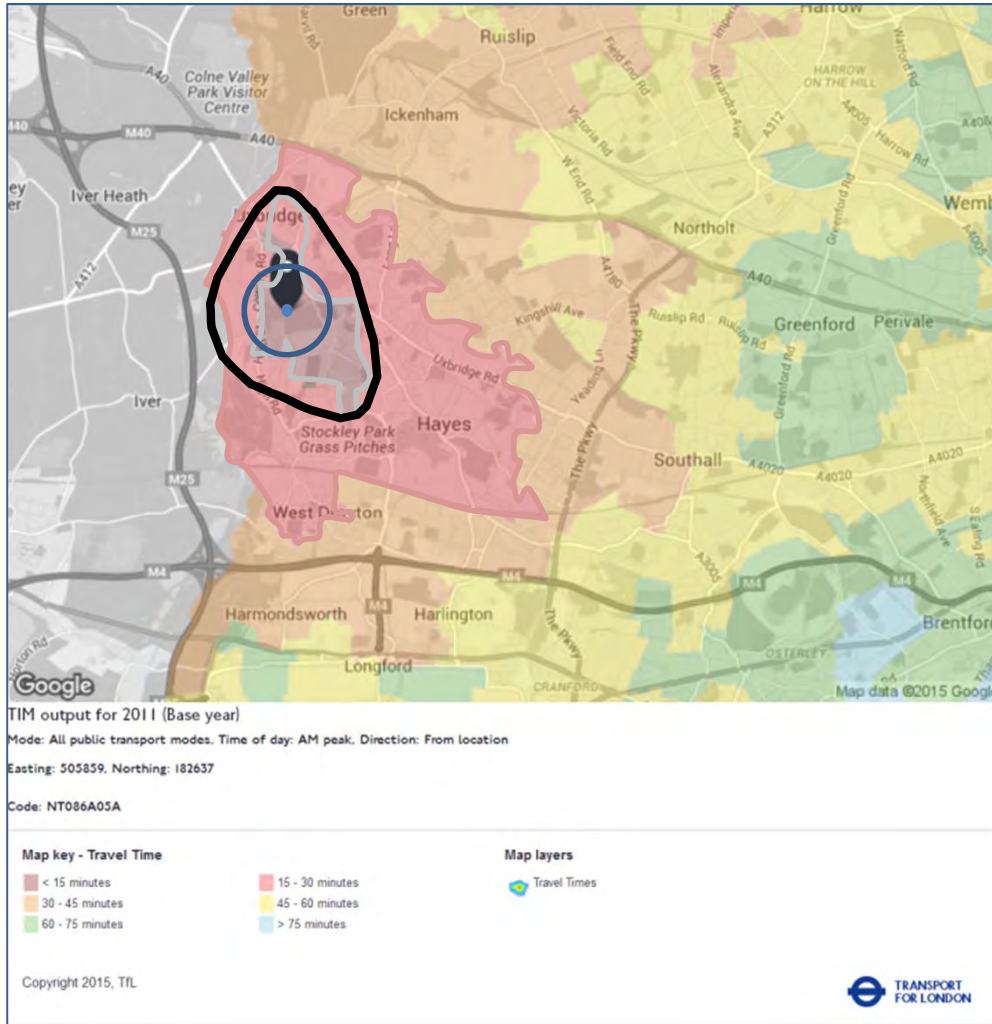
# Combined Public Transport and Walking Areas: Defining the search area



- Brunel University Campus
-  Approximate 15 minute walk distance area
-  Max 15 minute public transport distance area
-  Estimated student housing search area (considering 15 minute walk and public transport areas)
- Estimated 1.817ha land requirement



# Combined Public Transport and Walking Areas: Defining the search area



- Brunel University Campus
- Approximate 15 minute walk distance area
- ⬭ Max 15 minute public transport distance area
- ⬭ Defined student housing search area (considering 15 minute walk and public transport areas)

Travelling To and From Brunel





# Areas of Search: Base Mapping



# Aerial Base Map showing area of search and indicative land requirement area





# Aerial Base Map showing area of search and indicative land requirement area



○ Indicative land requirement area (1.817ha)

N.B. not positioned in relation to a particular site, but to give scale of land requirement

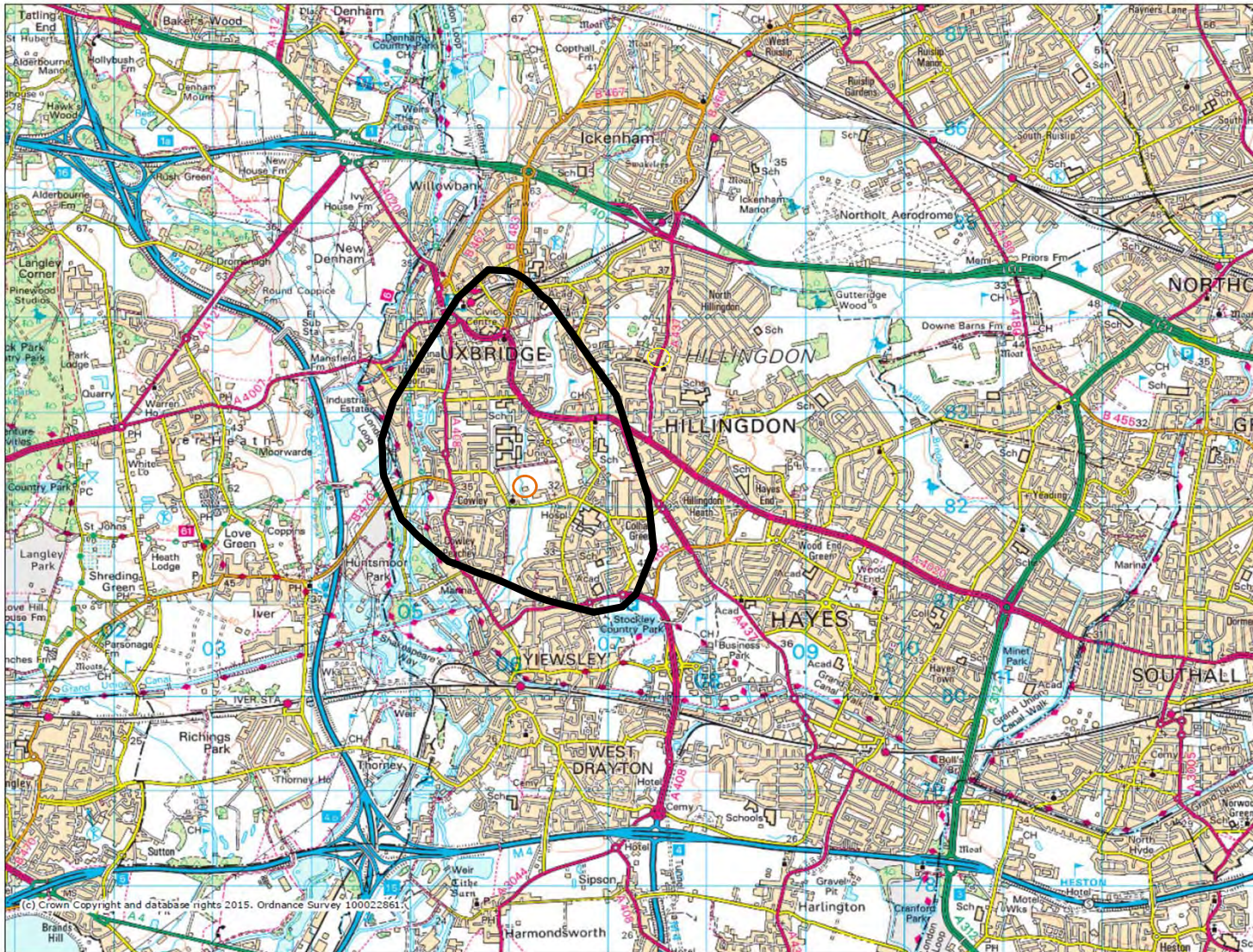


# OS Base Map showing area of search and indicative land requirement area



MAGIC

Uxbridge Base Map (1:40,000)



○ Indicative land requirement area (1.817ha)

N.B. not positioned in relation to a particular site, but to give scale of land requirement

Projection = OSGB36  
xmin = 494900  
ymin = 175800  
xmax = 519700  
ymax = 188800  
Map produced by MAGIC on 30 November, 2015.  
Copyright resides with the data suppliers and the map must not be reproduced without their permission. Some information in MAGIC is a snapshot of the information that is being maintained or continually updated by the originating organisation. Please refer to the metadata for details as information may be illustrative or representative rather than definitive at this stage.

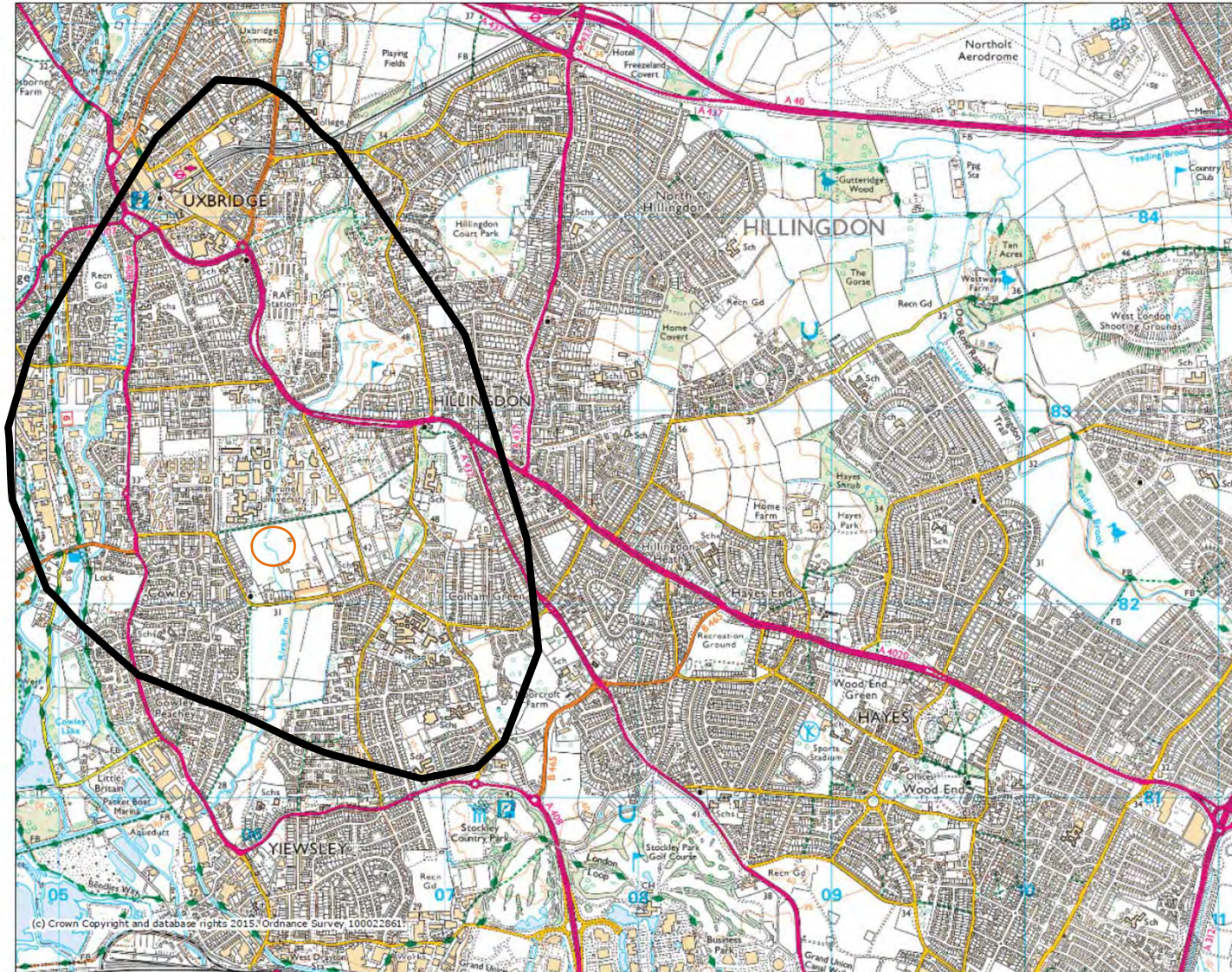


# OS Base Map showing area of search and indicative land requirement area



MAGIC

Uxbridge Base Map (1:20,000)



○ Indicative land requirement area (1.817ha)

N.B. not positioned in relation to a particular site, but to give scale of land requirement

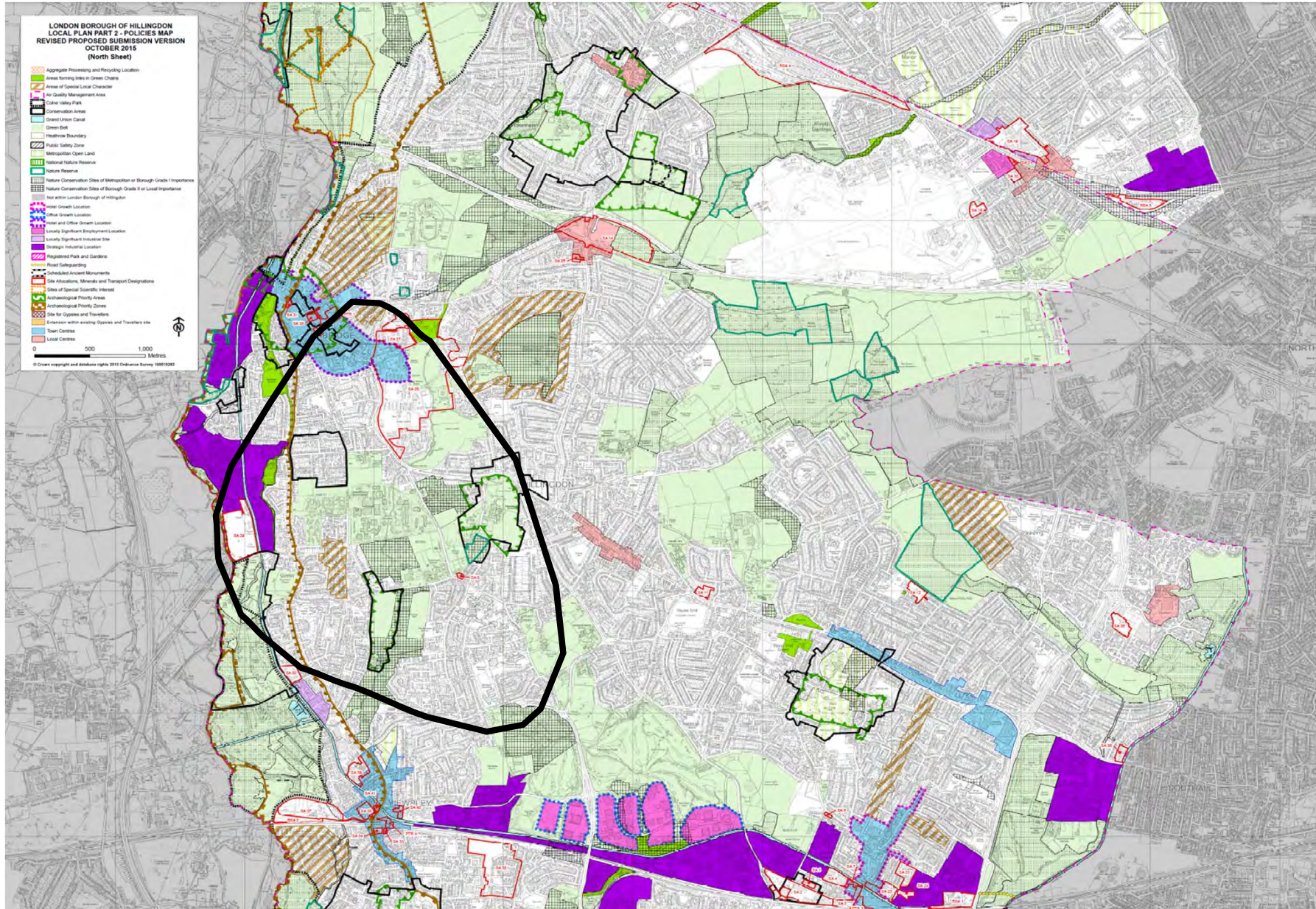
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Map produced by MAGIC on 30 November, 2015.  
Copyright resides with the data suppliers and the map must not be reproduced without their permission. Some information in MAGIC is a snapshot of the information that is being maintained or continually updated by the originating organisation. Please refer to the metadata for details as information may be illustrative or representative rather than definitive at this stage.



Area of  
Search: Local  
Plan  
Allocations

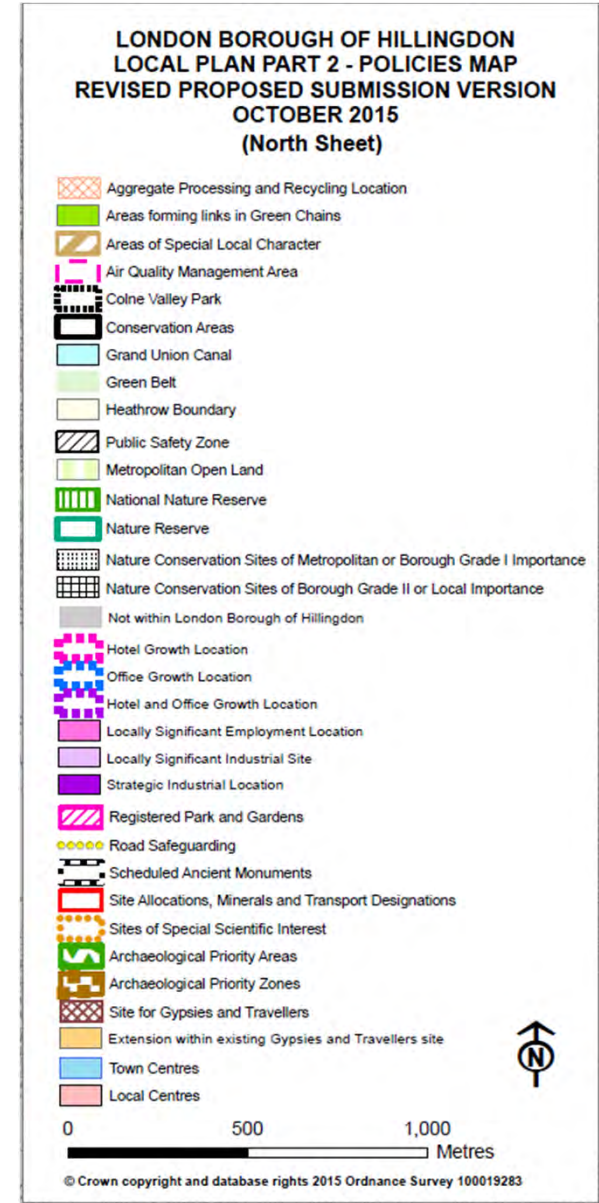
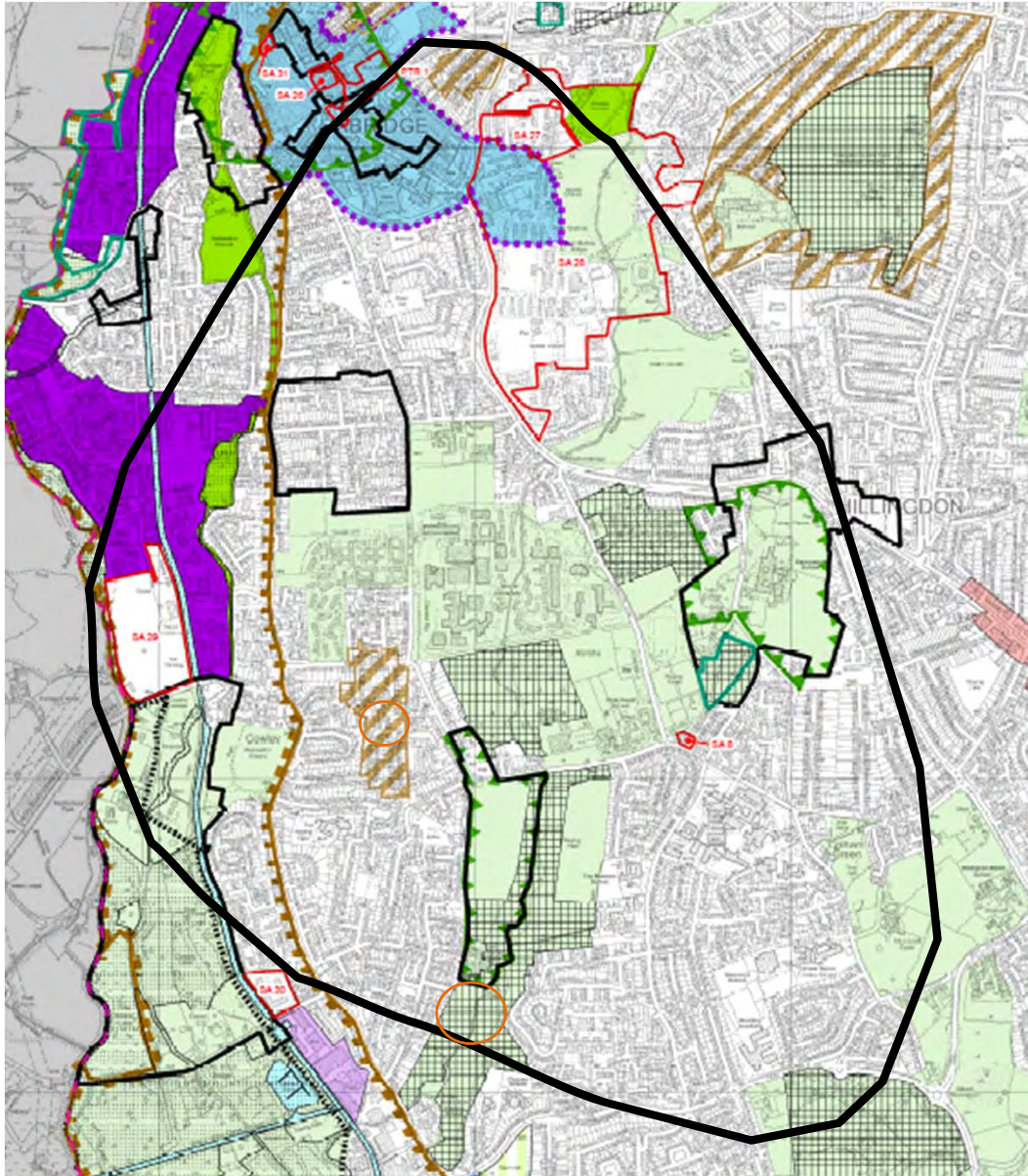


# Local Plan Part 2 Policies Map showing area of search





# Local Plan Part 2 Policies Map showing area of search and indicative land requirement area



## Local Plan allocations evident within area of search



- Areas forming links in green chains
- Areas of Special Local Character
- Colne Valley Park
- Conservation Areas
- Green Belt
- Nature Reserve
- Nature Conservation Sites of Borough Grade II or Local Importance
- Not within London Borough of Hillingdon
- Hotel and Office Growth Location
- Strategic Industrial Location
- Site Allocations, Minerals and Transport Designations:
  - **SA8 – Olympic House, 1a Grove Lane** - Proposed residential development (9 units). Residential permission expired in 2014. Site identified in Hillingdon Housing Trajectory. Indicative phasing: 2016 - 2021
  - **SA27 & SA28 – St Andrew’s Park (Former RAF Uxbridge)**- Identified for high quality residential-led mixed use development, accommodating up to 1,600 homes, around 14,000sqm of office space and a 90 bed hotel. Expected to deliver c.1,160 permanent jobs and form an extension to Uxbridge Town Centre. SA28 permission granted in 2013 (585/APP/2009/2752). Site identified in Hillingdon Housing Trajectory. Indicative phasing: 2011 – 2021.
  - **SA29 – Cape Bards Site, Iver Lane, Cowley** – Part of Hayes Industrial Estate PIL. Limited potential for release for housing. Proposed 20% of site for commercial mixed use (incl. B1/B2/B8, 70% for residential use and 10% for publicly accessible open space. Proposed 315 units. Indicative phasing 2021 - 2026
- Archaeological Priority Areas
- Archaeological Priority Zones
- Town Centre



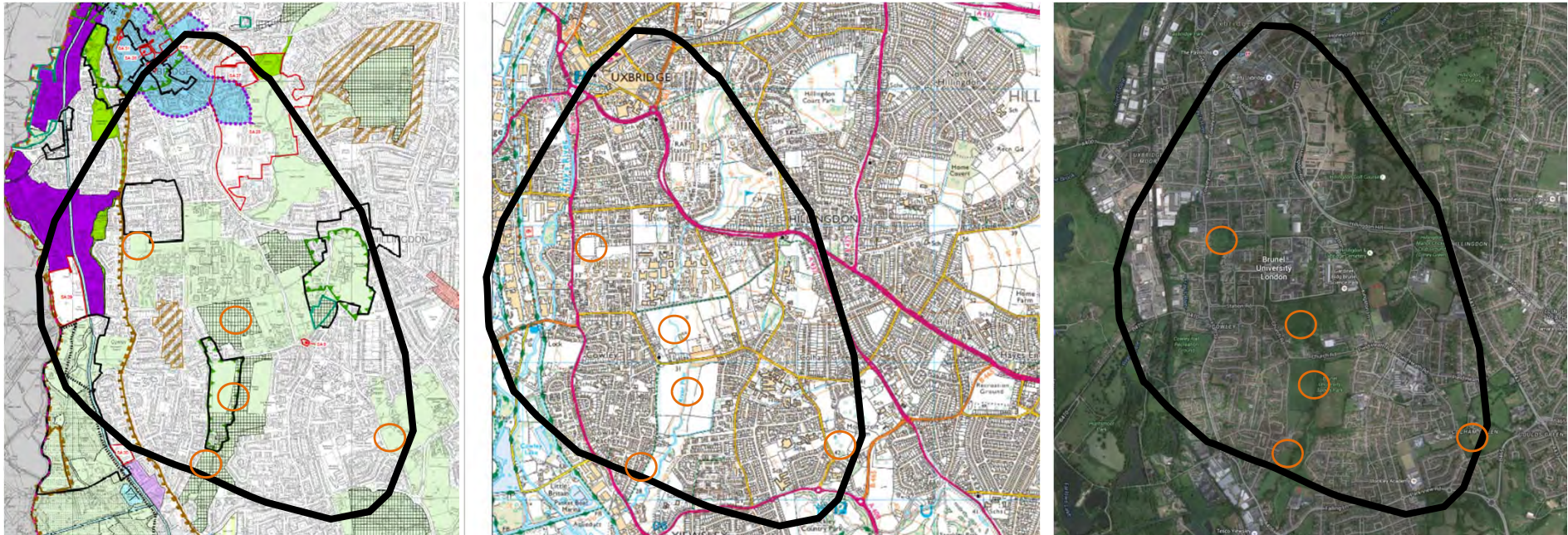
## Area of

## Search:

Potential Sites  
based on Site  
Area  
requirement



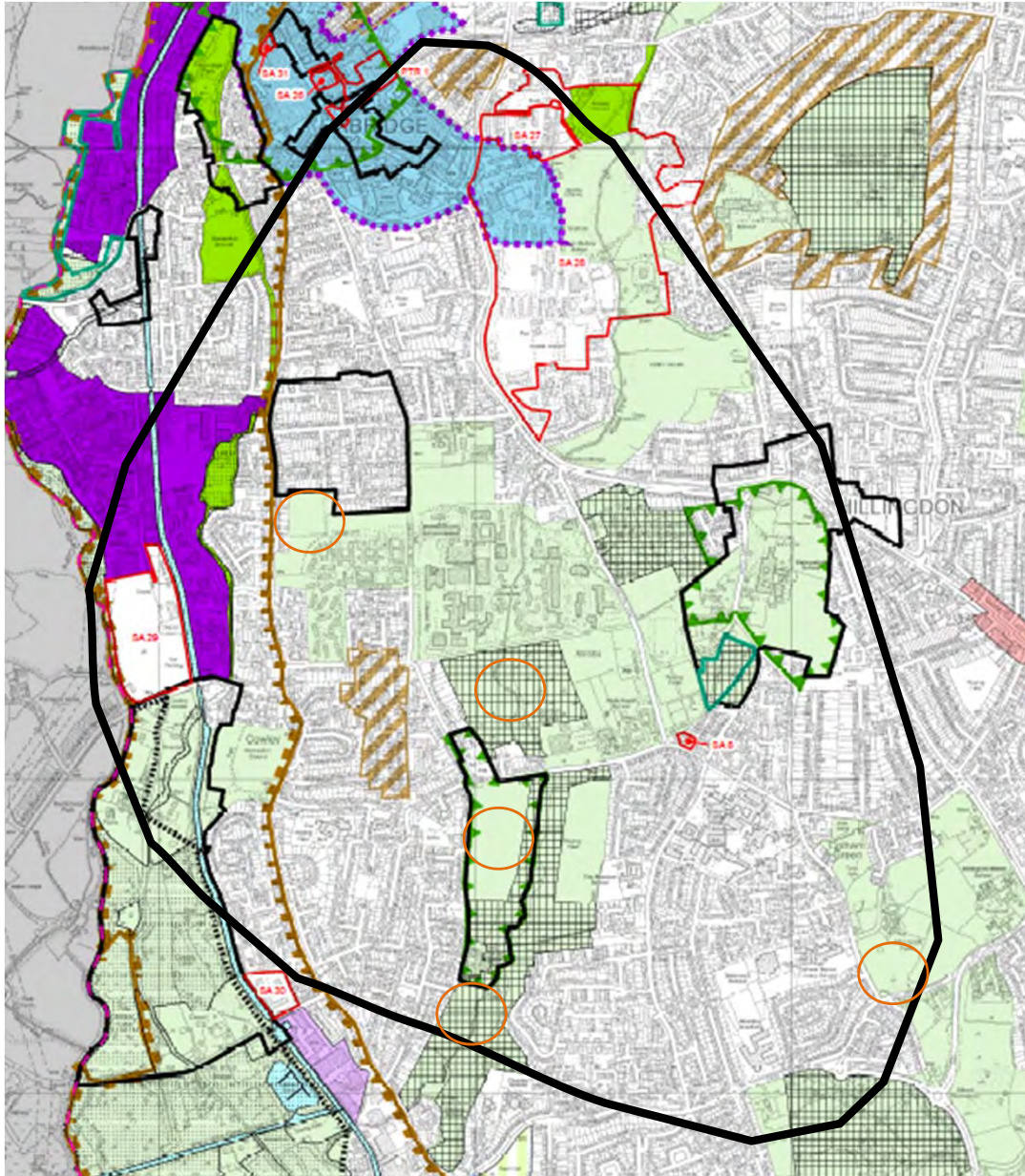
# Identified sites of a suitable scale to accommodate the estimated land requirement




- Five sites within the search area could accommodate the estimated land requirement for the new student housing development (c. 1.8ha). These are circled in the above maps
  - Sites with current recreational/open space uses have not been considered (e.g. school and community playing fields, recreation grounds, golf courses etc.)
  - Sites with Local Plan Site Allocations are also not considered
  - Land ownership does not form part of this initial consideration of sites
- The suitability and high level deliverability of these sites is considered in further detail in the following slides



# Identified sites of a suitable scale to accommodate the estimated land requirement



 Estimated 1.8ha land requirement area



# Identified sites of a suitable scale to accommodate the estimated land requirement

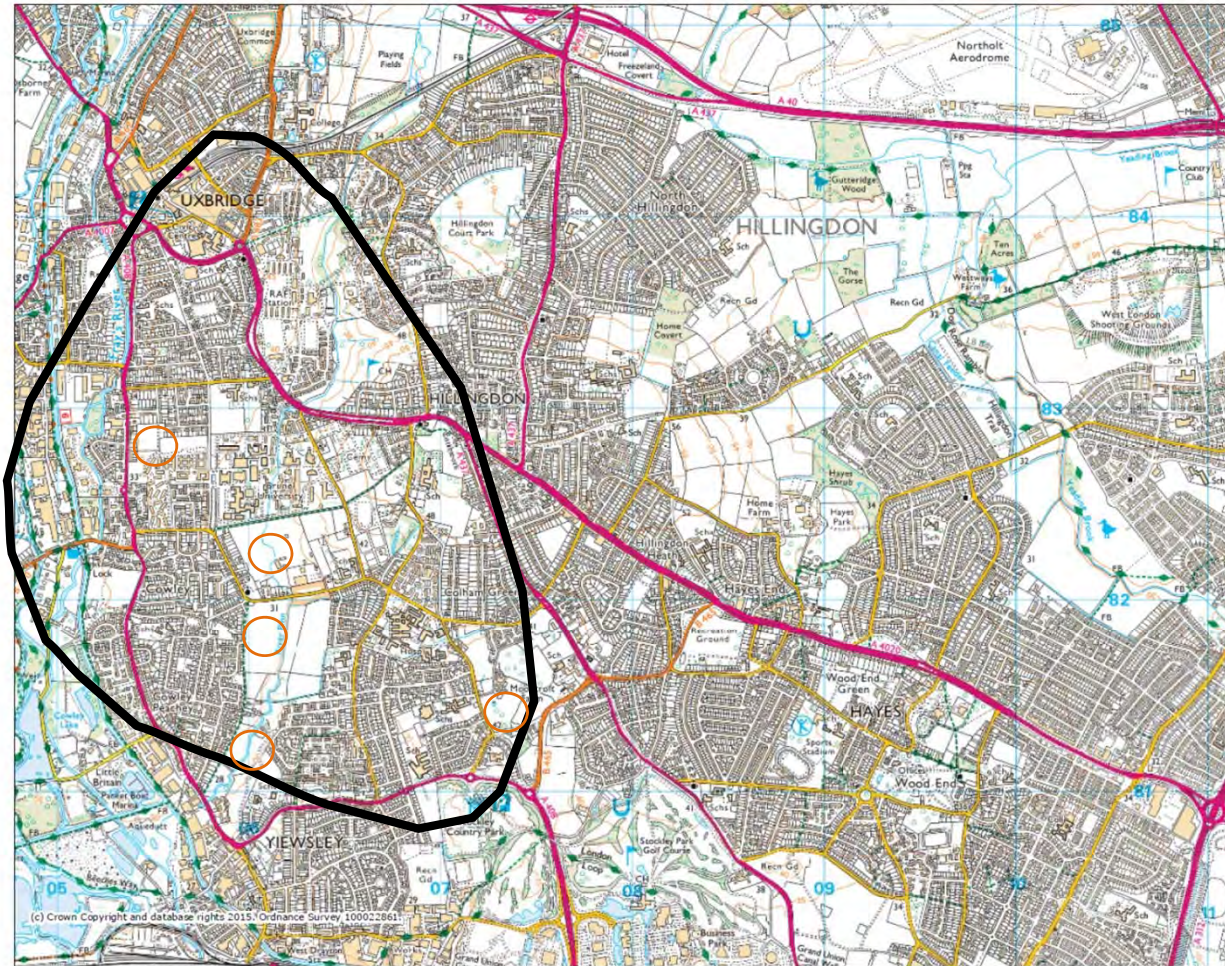


MAGIC

Uxbridge Base Map (1:20,000)



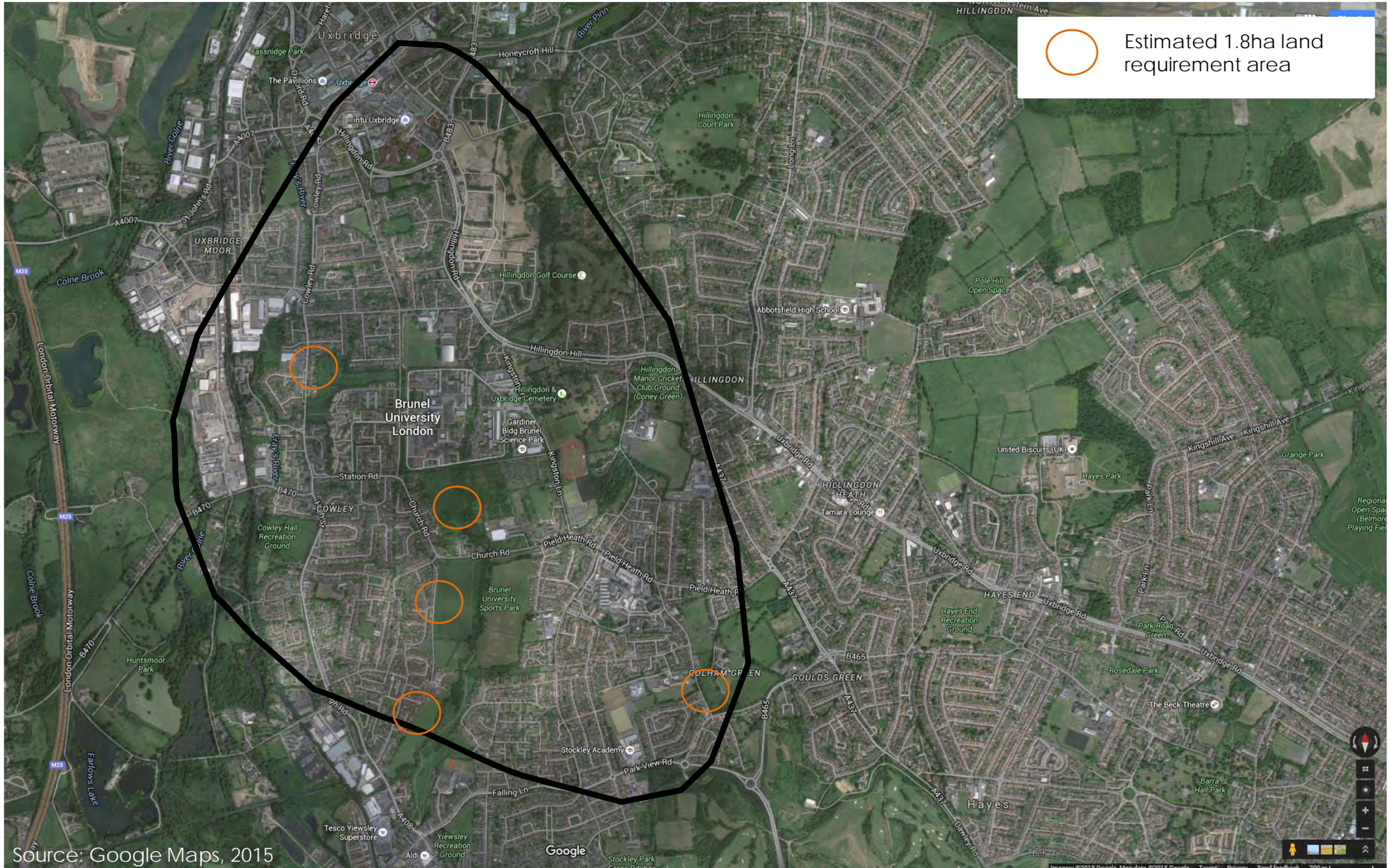
Estimated 1.8ha land requirement area



Projection = OSGB36  
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Map produced by MAGIC on 30 November, 2015.  
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# Identified sites of a suitable scale to accommodate the estimated land requirement



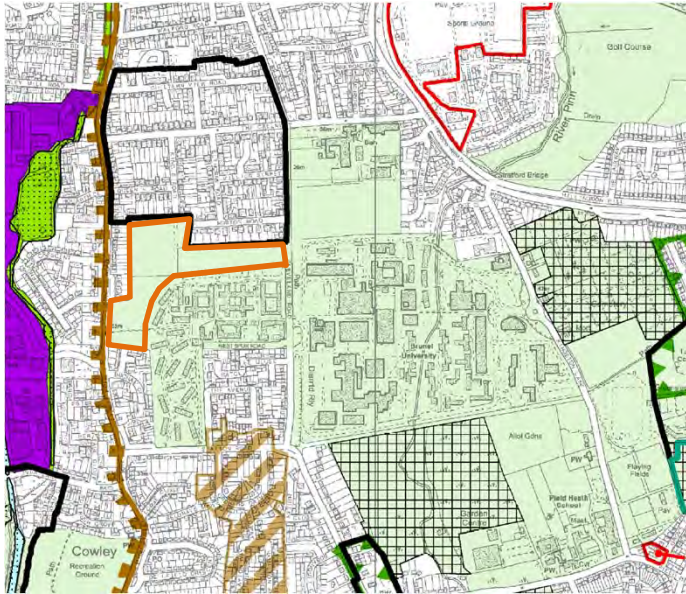
Source: Google Maps, 2015





# Identified Potential Sites: Details and Constraints

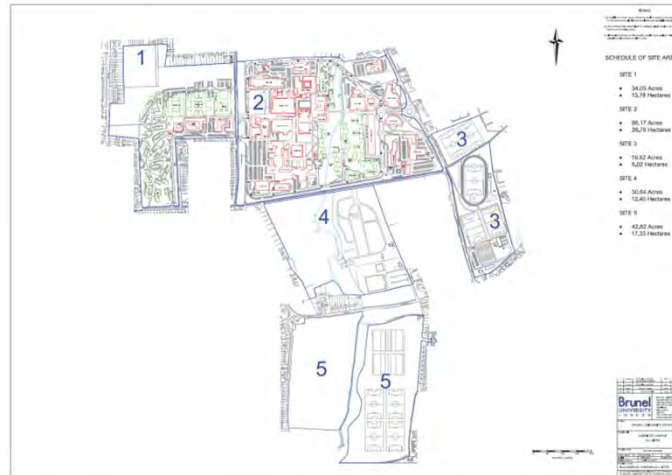
# Brunel University Estate - Site 1



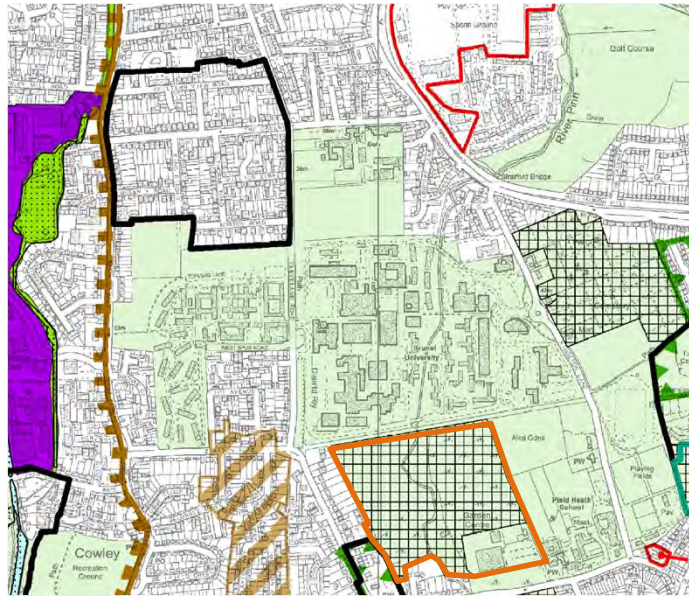
- Land adjacent to existing Brunel student accommodation – part of Brunel University Estate (Site 1)
- Greenfield site
- Site area = c. 4ha
- **Development Constraint: Green belt designation**



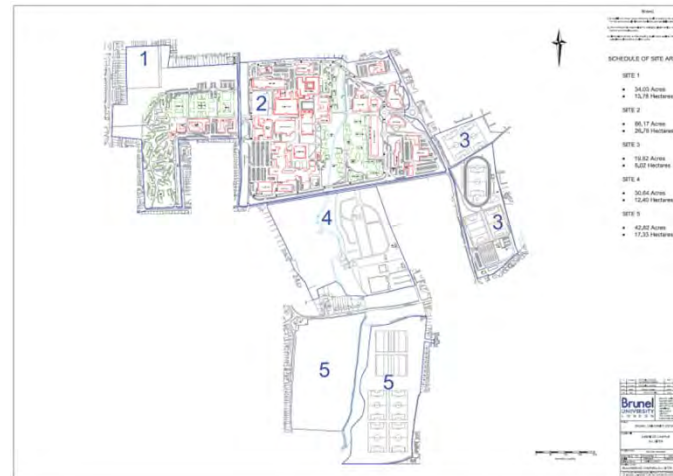
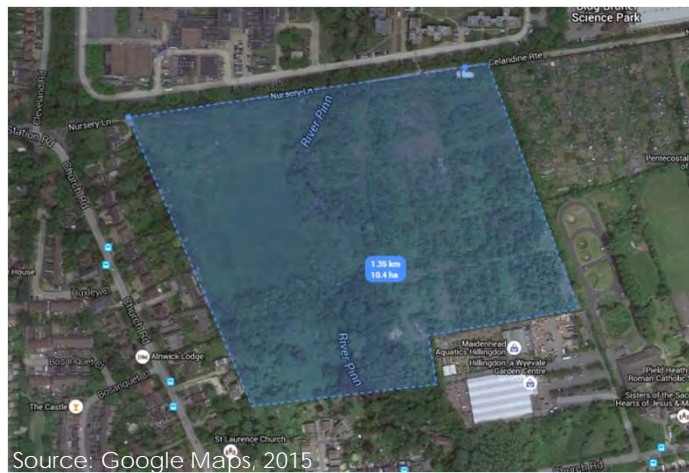
Source: Google Maps, 2015



# Brunel University Estate – Part of Site 4

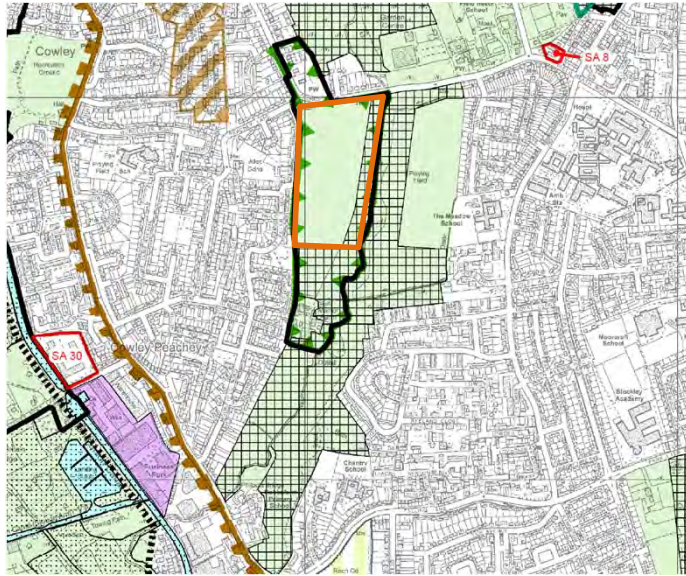


- Land adjacent to existing Brunel University buildings – part of Brunel University Estate Site 4
- Greenfield Site
- Site area = c. 10ha
- **Development Constraint: Green Belt designation, Nature Conservation Sites of Borough Grade II or Local Importance designation, and potentially River Pinn proximity.**





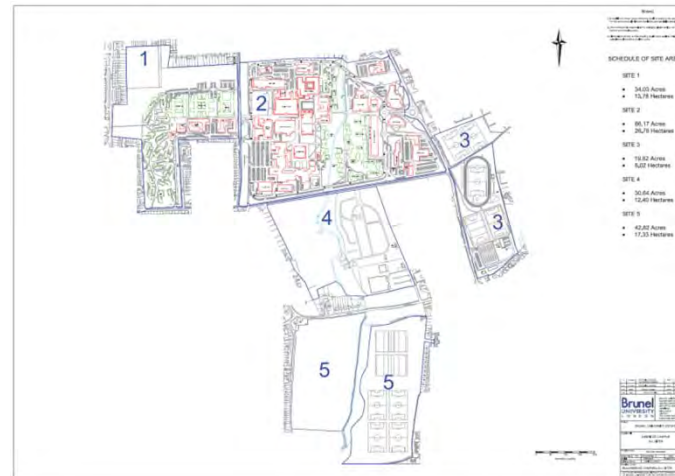
# Brunel University Estate – Part of Site 5



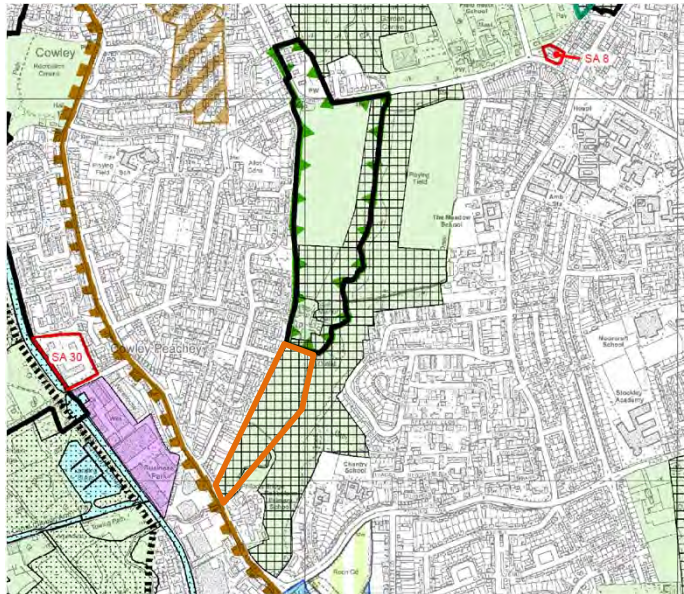
- Land forming part of Brunel University Estate – Site 5
- Greenfield Site
- Site Area = c. 7ha (could extend by a further c. 2ha if including agricultural land to south)
- **Development Constraint: Green belt designation, Conservation Areas, Archaeological Priority Areas, and potentially River Pinn proximity**



Source: Google Maps, 2015



# Manor Farm Agricultural Land

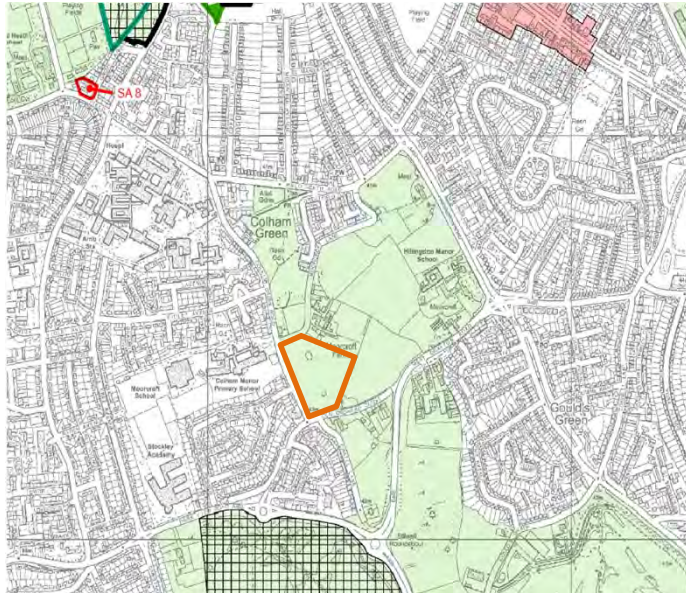


- Land immediately south of Brunel University Estate
- Agricultural land
- Site area = c. 3ha
- **Development Constraint: Green belt designation, Nature Conservation Sites of Borough Grade II or Local Importance designation, and potentially River Pinn proximity**





# Moorcroft Farm Agricultural Land



- Agricultural land
- Site area = c. 3ha
- **Development Constraint: Green Belt designation**



Source: Google Maps, 2015



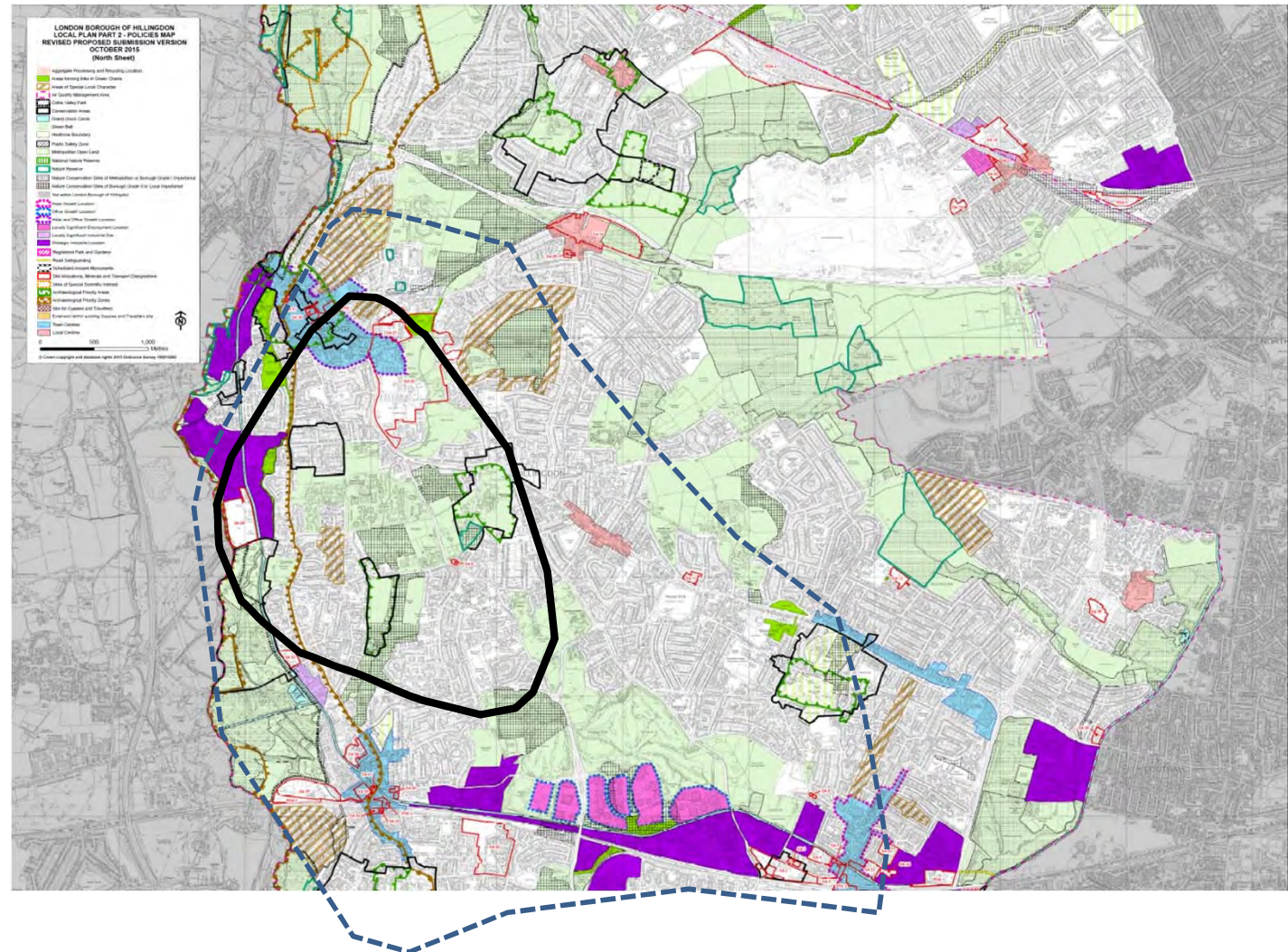
# Extending the Search Area



[gva.co.uk](http://gva.co.uk)

# Extending the search area to a maximum of 30 minutes by public transport and/or foot

- Green belt designations and other Local Plan Site Allocations still act as constraints in the wider area
- There appears to be similarly limited land availability within a 30 minute travel time area
- This pushes the distance considered appropriate to travel between accommodation and the campus



# Key Findings & Conclusion



# Key Findings



## Area Context

- Hillingdon has particular characteristics in the form of;
  - Extensive residential neighbourhoods (primarily from the 20th century)
  - A significant proportion of other land which has historically been made up of campus environments: military bases, hospitals, university
  - Significant open space and environmental designations
- A significant proportion of land is designated as green belt, at both the periphery of urban area, and dispersed within it.
- In addition to this there are higher density, retail-oriented mixed-use town centres, in the form of Uxbridge and Hayes and extended corridors such as the Uxbridge Road.
- These factors mean that this part of London does not have a history of generating un-constrained sites at the size required for this facility.

## Requirements

- Testing at a Plot ratio of 3, it is estimated that to accommodate student housing growth there is a land requirement of **1.8ha**.
- It is considered that a **15 minute travel radius by public transport and foot** from the university campus, is the appropriate search area for a new student housing site.

# Key Findings



## Identified Sites and Constraints

- Five sites are identified in the search area that could accommodate the estimated land requirement
  - However, there are clear development constraints to each of these sites.
  - **Green Belt designation is the constraint affecting all identified sites**
  - Other constraints affecting certain sites relate to nature conservation and archaeological designations, as well as potential development difficulties cause by the River Pinn proximity
- 
- **It is clear from this analysis that there is very limited appropriate land availability within the travel time area.**
  - **There are no appropriately sized sites which are free from constraints.**
  - **Green Belt designations act as a constraint to all identified sites.**
  - **When expanding the search area to a maximum 30 minute journey time, there remains a shortage of appropriate, unconstrained sites.**

# Enclosure E

Green Belt Study

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## Green Belt Study

# Brunel University London Uxbridge Campus

Prepared on behalf of:  
**Brunel University London**

Date:  
**December 2015**

**GILLESPIES**



|  |                 |           |             |               |                                      |                                |
|--|-----------------|-----------|-------------|---------------|--------------------------------------|--------------------------------|
| <b>00</b>                                  | <b>05.11.15</b> | <b>KD</b> | <b>KP</b>   | <b>DRAFT</b>  |                                      |                                |
| <b>REV</b>                                 | <b>DATE</b>     | <b>BY</b> | <b>CHKD</b> | <b>STATUS</b> | <b>REASONS FOR REVISION/COMMENTS</b> |                                |
| <b>ORIGINATOR</b><br><b>GILLESPIES LLP</b> |                 |           |             |               | <b>ORIGINATOR REFERENCE</b>          | <b>REVISION</b><br><b>P 01</b> |

## CONTENTS

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| 2 | Context             | 2  |
| 3 | Methodology         | 6  |
| 4 | Assessment Criteria | 7  |
| 5 | Findings Summary    | 11 |
| 6 | Conclusion          | 25 |

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## GLOSSARY AND ABBREVIATIONS

## REFERENCES

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## APPENDICES

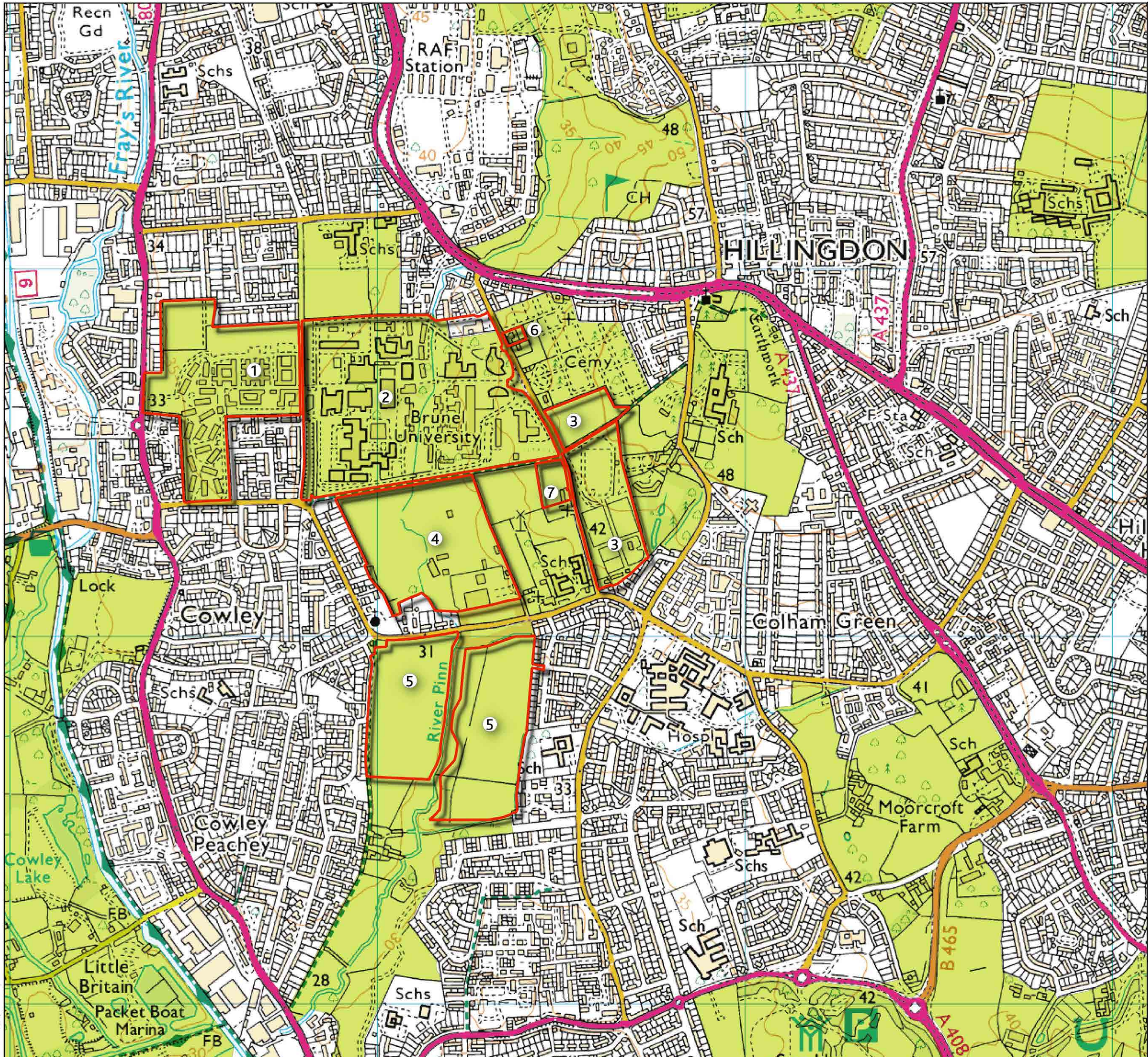
Appendix 1 Figures

## 1 Introduction

### 1.1 The purpose of the study

- 1.1.1 In October 2015, Gillespies was instructed by Brunel University London (BUL) to prepare a Green Belt Study for seven land areas which form part of the Uxbridge campus of BUL. BUL operates from a 78 ha campus located approximately 1km to the south of Uxbridge town centre, within the London Borough of Hillingdon (LBH).
- 1.1.2 The study assessed these land areas against the five purposes of Green Belts, as set out in the National Planning Policy Framework (NPPF). The report sets out the context for the study in terms of national and local policy context and the landscape character of the assessment areas and their wider context. The seven land areas assessed are shown on **OX3476/3 Figure 01 Land Areas for Assessment**. The report sets out the study findings for each land area.





**LEGEND**  
 Land Area Locations  
 Green Belt Extents



Project  
 OX5376-3  
 Brunel University London Green Belt Assessment

Drawing Title  
 Land Area Locations

Drawing Number  
 Figure 01

|                |  |            |  |   |
|----------------|--|------------|--|---|
| Drawing Status |  | Revision   |  | Client<br><b>Brunel University London</b> |
| <b>DRAFT</b>   |  | 00         |  |   |
| Date           |  | Scale      |  |   |
| Nov 11         |  | 1 : 10,000 |  |   |
| Drawn By       |  | Checked By |  |   |
| MG             |  | KP         |  |   |

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## 2 Context

### 2.1 Introduction

2.1.1 This section identifies and describes legislation, policy and guidance of relevance to the assessment.

### 2.2 National Green Belt policy

2.2.1 The National Planning Policy Framework (NPPF) takes forward previous national Green Belt policy set out in PPG2 (Green Belts).

Paragraph 79 of the NPPF states that;

*'...the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence'.*

2.2.2 This is elaborated in NPPF paragraph 80, which states that Green Belts should serve five purposes, as set out in below:

- To check the unrestricted sprawl of large built-up areas.
- To prevent neighbouring towns merging into one another.
- To assist in safeguarding the countryside from encroachment.
- To preserve the setting and special character of historic towns.
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.2.3 In paragraph 83 of the NPPF states that local planning authorities should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy.

*'Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.'*

2.2.4 Paragraph 84 of the NPPF states:

*'When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary'.*

2.3 Paragraph 85 of the NPPF says that Local Planning Authorities should ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development; not include land which it is unnecessary to keep permanently open; may wish to identify areas of 'safeguarded land' between the urban area and the Green Belt to accommodate long-term development needs well beyond the plan period. New boundaries must have regard for the permanence of the designation by redefining boundaries which endure beyond the Local Plan period. New boundaries should be defined clearly, using readily recognisable, permanent physical features.

2.4 Current guidance therefore makes it clear that the Green Belt is a strategic planning tool designed primarily to prevent the spread of development and the coalescence of urban areas. As a result, land should be designated because of its position, rather than its landscape quality or recreational use. However, Paragraph 81 of the NPPF states:

*"Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land."*

## 2.5 **London Green Belt**

2.5.1 The Green Belt which covers the BUL Uxbridge Campus is part of the larger London Green Belt. The London Green Belt covers 514,080 square hectares. The purpose of the London Green Belt was to prevent the sprawl of London merging with surrounding towns and



encroachment in to the surrounding countryside. It also helped to preserve the setting and character of the main urban areas. The Green Belt helped to encourage regeneration by directing development to brownfield sites within major urban areas.

2.5.2 On 10 March 2015, the Mayor adopted the Further Alterations to the London Plan (FALP). Policy 7.16 Green Belt of the London Plan states ‘The Major *strongly supports the current extent of London’s Green Belt, its extension in appropriate circumstances and its protection from inappropriate development*’.

2.5.3 *‘The strongest protection should be given to London’s Green Belt, in accordance with national guidance. Inappropriate development should be refused, except in very special circumstances. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt as set out in national guidance’.*

## 2.6 Green Belt in the London Borough of Hillingdon

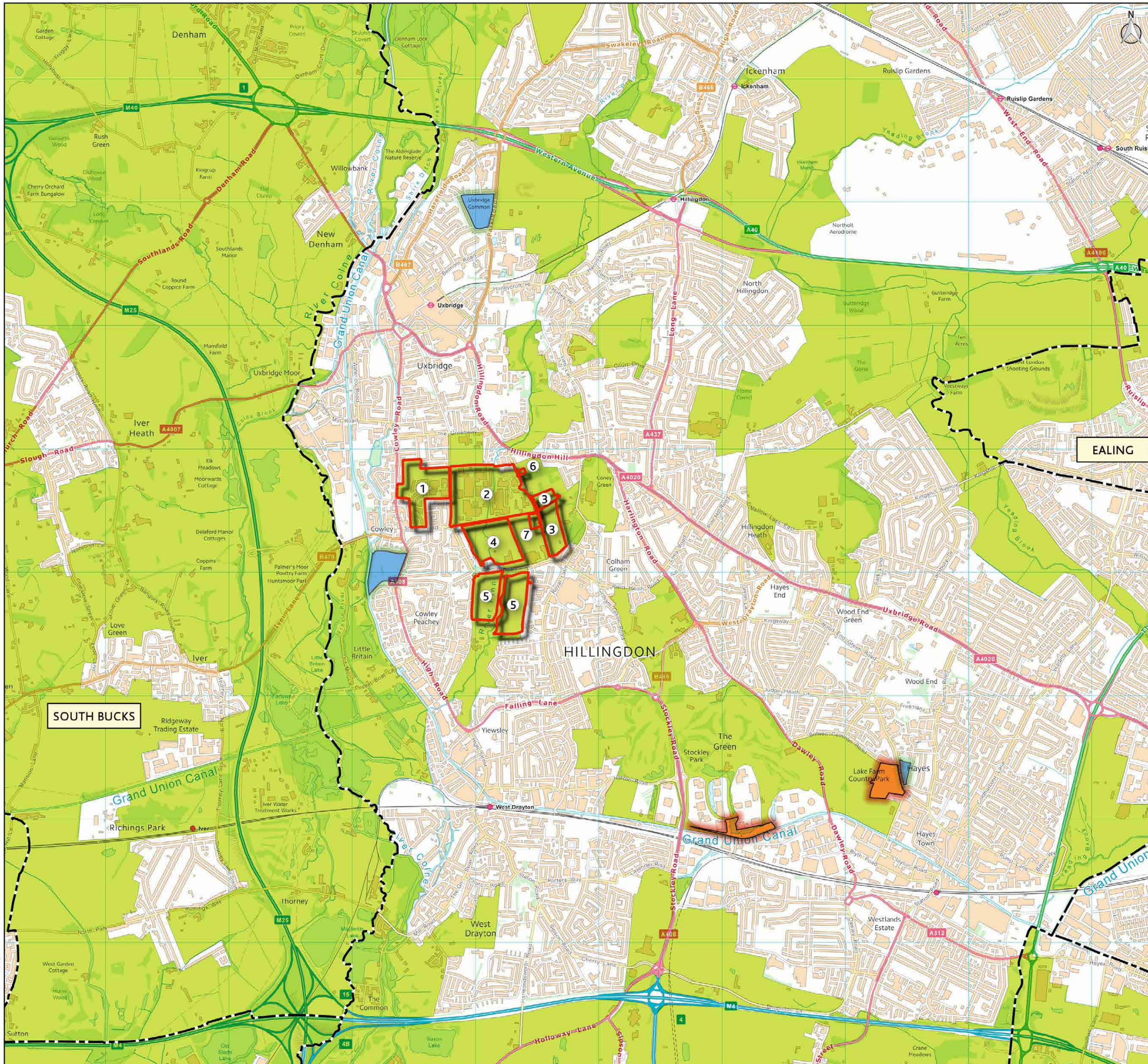
2.6.1 The study area is located within the London Borough of Hillingdon (LBH). The Development Plan for the borough comprises the Unitary Development Plan (UDP 1995, saved policies 2007) and Hillingdon Local Plan: Part 1 - Strategic Policies, adopted in November 2012. Consultation is currently being undertaken on site specific allocations development management policies and a policies map which will be adopted as Hillingdon Local Plan: Part 2. Consultation ends on the 8th December 2015. The plan will play a key role in shaping the future of the borough up to 2026. It will influence what development will take place, how much and where within the Borough it will be located.

2.6.2 The purposes of the Green Belt are set out within the Paragraph 8.20 of the Hillingdon Local Plan Part 1- Strategic Policies:  
*“The most important attribute of Green Belts is their openness. The main purpose of Hillingdon’s Green Belt is to keep land open and free from development, to maintain the character and identity of individual settlements and to make a clear distinction between rural and urban environments, in support of strategic objective SO3. The Hillingdon Local Plan: Part 1- Strategic Policies aims to create sustainable communities by concentrating new development in urban areas and local town centres. The Green Belt’s role is to help reinforce this strategy by strictly controlling development in the open countryside.”*

2.6.3 The current extent of the London Green Belt within Hillingdon is 4,970 square hectares and is shown in **OX5376-3 Figure 02** Green Belt Extents 1 and **OX5376-3 Figure 03** Green Belt Extents 2 shows the context of the Hillingdon Green Belt in the wider landscape.

2.6.4 The national and local policies which apply to the BUL Uxbridge Campus are shown on **OX3476-3 Figure 04 National Designations** and **OX3476-3 Figure 05 Local Plan Policies**. LBH's UDP was adopted in 1998 and is now out of date, as the policies contained in the Plan are under review as part of the preparation of the new Hillingdon Local Plan – Part 2. The proposed policies that apply to the land areas are shown on **OX3476-3 Figure 06 Draft Local Policies**. For the purposes of context is noted that Saved UDP Policy PR22 related specifically to BUL and Table 3.3 originally identified Brunel University as a '*Major Development Site in the Green Belt*'. It was under this policy that much of the recent redevelopment of the University took place.



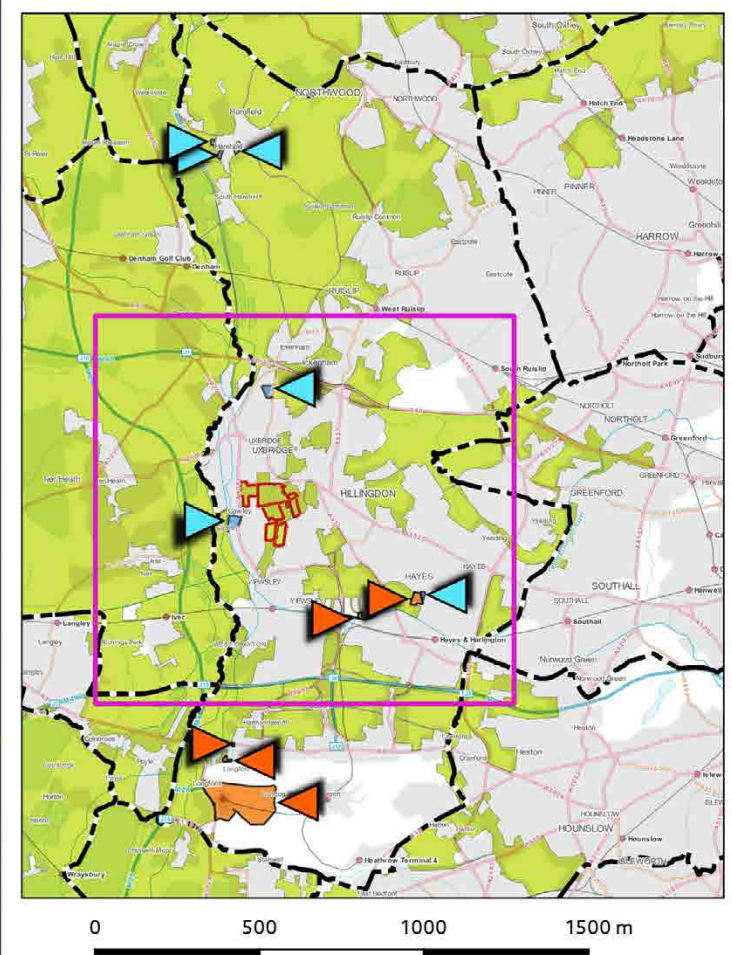


**LEGEND**

- Land Area Locations
- Administrative Boundary

**PROPOSED CHANGES TO GREEN BELT\***

- Green Belt
- Proposed Additions to Green Belt
- Proposed Deletions from Green Belt



**NOTES:**

Green Belt changes are derived from the Hillingdon Local Plan Part 2: Policies Map - Atlas of Changes (Revised Proposed Submission Version, October 2015)

Project  
OX5376-3  
Brunel University London Green Belt Assessment

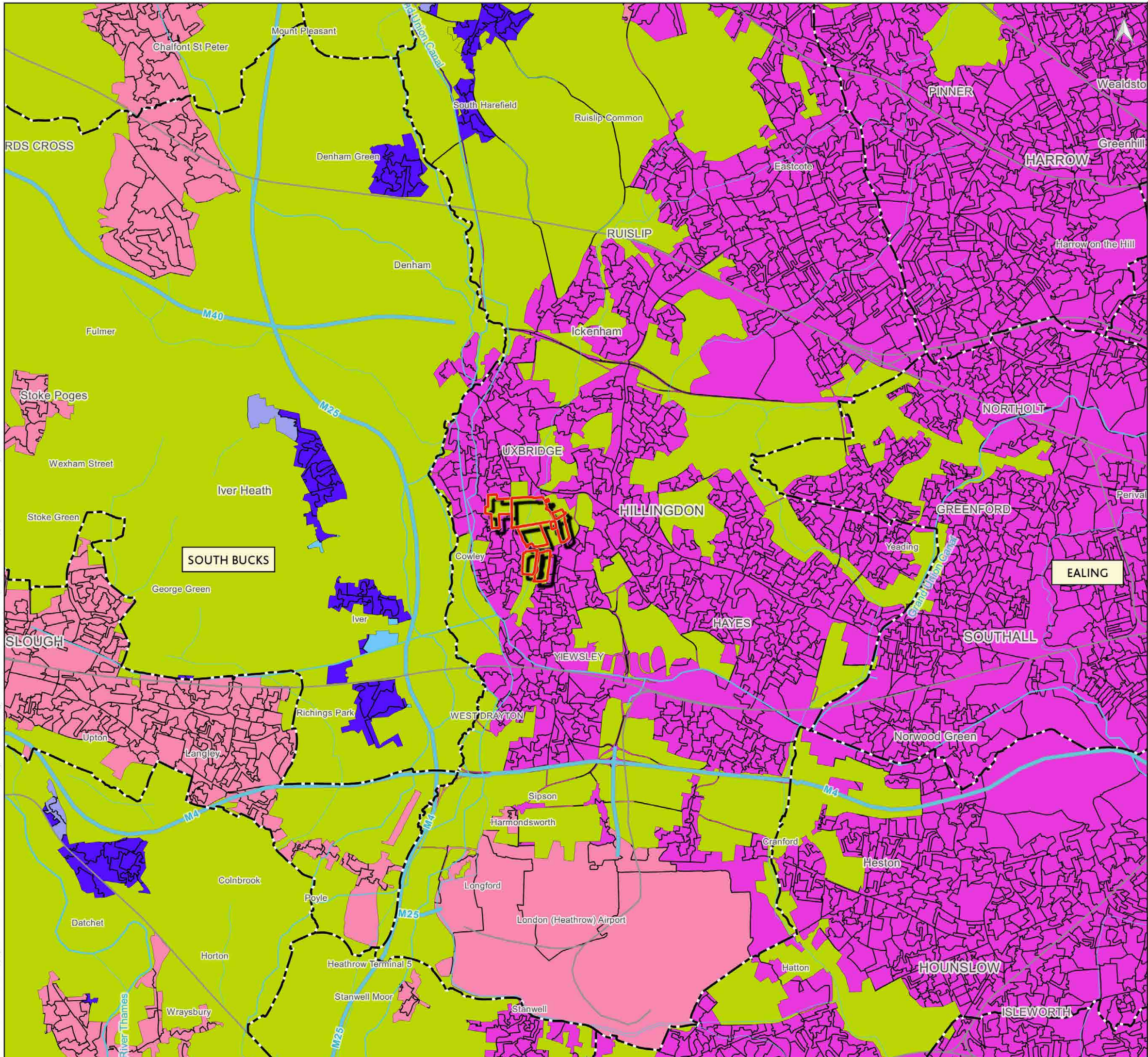
Drawing Title  
Green Belt Extents

Drawing Number  
Figure 02

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| Date<br>Nov 11   | Scale<br>1 : 30,000 |                                    |
| Drawn By<br>MG   | Checked By<br>KP    |                                    |
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**LEGEND**

- Land Area Locations
- District/ Borough Boundary
- Green Belt Extents

**2011 RURAL-URBAN CLASSIFICATION**

- Rural: Hamlets and Isolated Dwellings
- Rural: Village
- Rural: Town and Fringe
- Urban: City and Town
- Urban: Major Conurbation



**NOTES:**

The Rural-Urban Classification is derived from GIS Shapefiles for Local Enterprise Partnerships (LEPs) showing the 2011 Rural-Urban Classification for Local Authority Districts in England. Department for Environment, Food & Rural Affairs, 2013.

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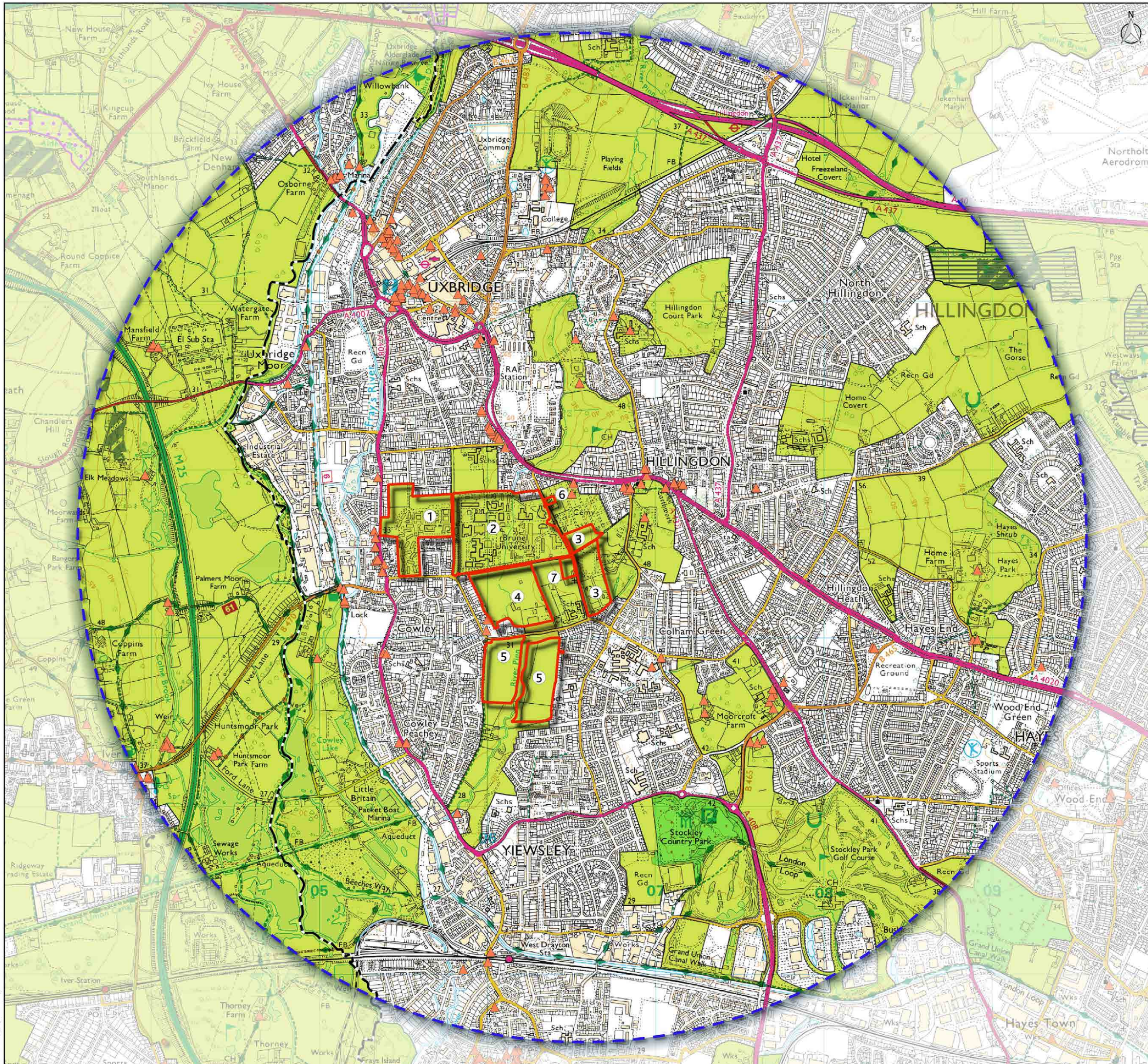
Drawing Title  
Green Belt Extents 2

Drawing Number  
Figure 03

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| Date           | Scale      | Client<br>Brunel University London   |
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| MG             | KP         |  |

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**LEGEND**

- Land Area Locations
  - Study Area (3km radius from site location)
  - Administrative Boundary
- NATIONAL DESIGNATIONS**
- ▲ Listed Building
  - Scheduled Ancient Monument
  - Site of Special Scientific Interest
  - Local Nature Reserve
  - Ancient Woodland
  - Country Parks
  - Green Belt



**NOTES:**

Natural Designations are derived from GIS Datasets compiled by Natural England and Historic England.

Project  
OX5376-3  
Brunel University London Green Belt Assessment

Drawing Title  
National Designations

Drawing Number  
Figure 04

|                |            |   |
|----------------|------------|---|
| Drawing Status | Revision   | Client<br><b>Brunel University London</b> |
| <b>DRAFT</b>   | 00         |   |
| Date           | Scale      |   |
| Nov 11         | 1 : 22,000 |   |
| Drawn By       | Checked By |   |
| MG             | KP         |   |







- LEGEND**
- Land Area Locations
  - Administrative Boundary
  - Study Area
- LOCAL POLICIES**
- ▲ Locally Listed Buildings
  - River and Canal Corridors
  - Conservation Areas
  - Area of Environmental Opportunity
  - Areas of Special Local Character
  - Local Centres
  - Town Centres
  - Metropolitan Open Land
  - Countryside Conservation Area
  - Local Nature Reserve
  - Area Forming Links in Green Chain
  - Nature Conservation Sites of Borough Grade II or Local Importance
  - Nature Conservation Sites of Metropolitan or Borough Grade I Importance
  - Grand Union Canal (also Nature Conservation Site of Metropolitan Importance)
  - Colne Valley Park (Area of Environmental Opportunity)



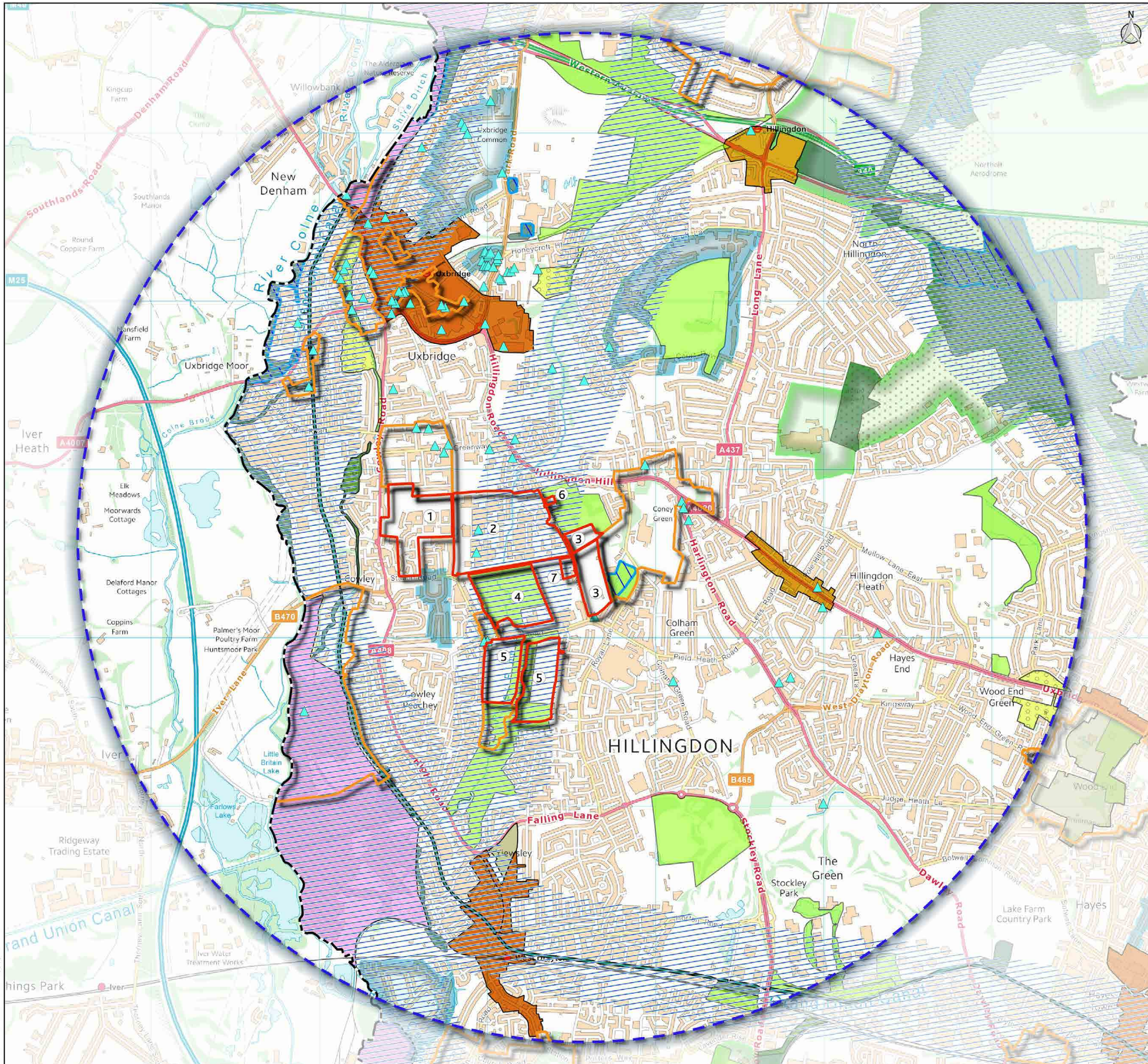
**NOTES:**

Policy Areas derived from: London Borough of Hillingdon Unitary Development Plan (adopted 1998) - Saved Policies; Hillingdon Local Plan: Part 1 - Strategic Policies (2012)

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|--|------------|--|
| Project  |            | OX5376-3   |
| Brunel University London Green Belt Assessment |            |  |
| Drawing Title                                  |            | Local Plan Policies  |
| Drawing Number                                 |            | Figure 05  |
| Drawing Status                                 | Revision   | Client   |
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**LEGEND**

- Site Location
- Administrative Boundary
- Study Area

**DRAFT LOCAL POLICIES**

- Locally Listed Buildings
- Conservation Areas
- River and Canal Corridors
- Area of Environmental Opportunity
- Areas of Special Local Character
- Local Centres
- Town Centres
- Metropolitan Open Land
- Countryside Conservation Area
- Local Nature Reserve
- Area Forming Links in Green Chain
- Nature Conservation Sites of Metropolitan or Borough Grade I Importance
- Nature Conservation Sites of Borough Grade II or Local Importance
- Grand Union Canal
- Colne Valley Park



**NOTES:**

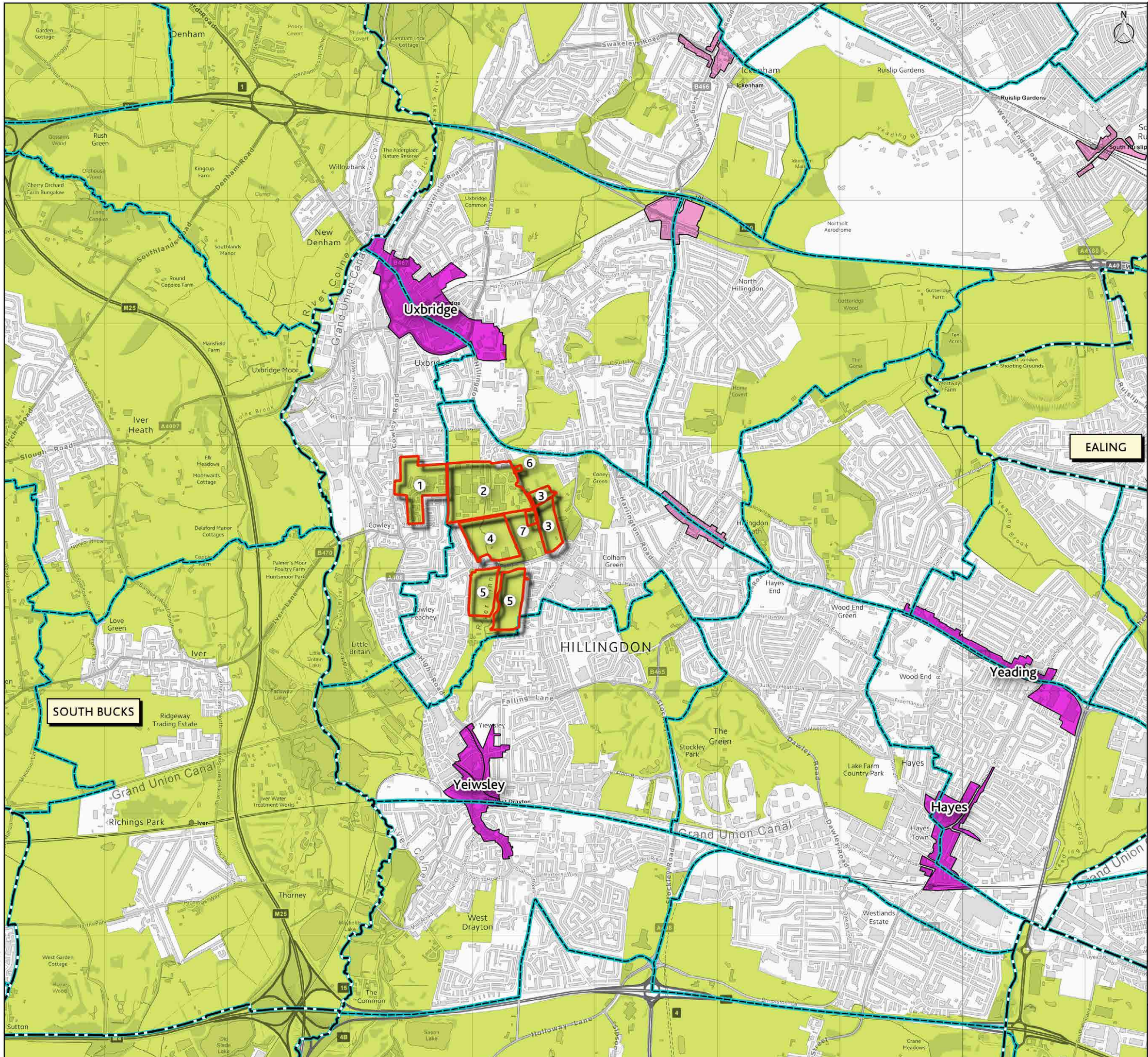
Policy Areas derived from:  
 Hillingdon Local Plan: Part 1 - Strategic Policies (2012);  
 Hillingdon Local Plan: Part 2  
 (Revised Proposed Submission Version, October 2015)

|  |               |                          |
|--|---------------|--------------------------|
| Project  |               | OX5376-3                 |
| Brunel University London Green Belt Assessment |               |                          |
| Drawing Title                                  |               | Draft Local Policies     |
| Drawing Number                                 |               | Figure 06                |
| Drawing Status                                 | Revision      | Client                   |
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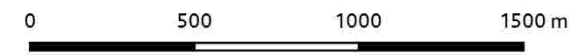


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- LEGEND**
- Land Area Locations
  - District/ Borough Boundary
  - Ward Boundary
  - Town Centres in Hillingdon
  - Local Centres in Hillingdon
  - Green Belt Extents



**NOTES:**

Town Centres, Local Centres and Green Belt Extents are derived from the Hillingdon Local Plan Part 2: Policies Map - Atlas of Changes (Revised Proposed Submission Version, October 2015)

**SOUTH BUCKS**

**EALING**


**HILLINGDON**

**Yeovil**

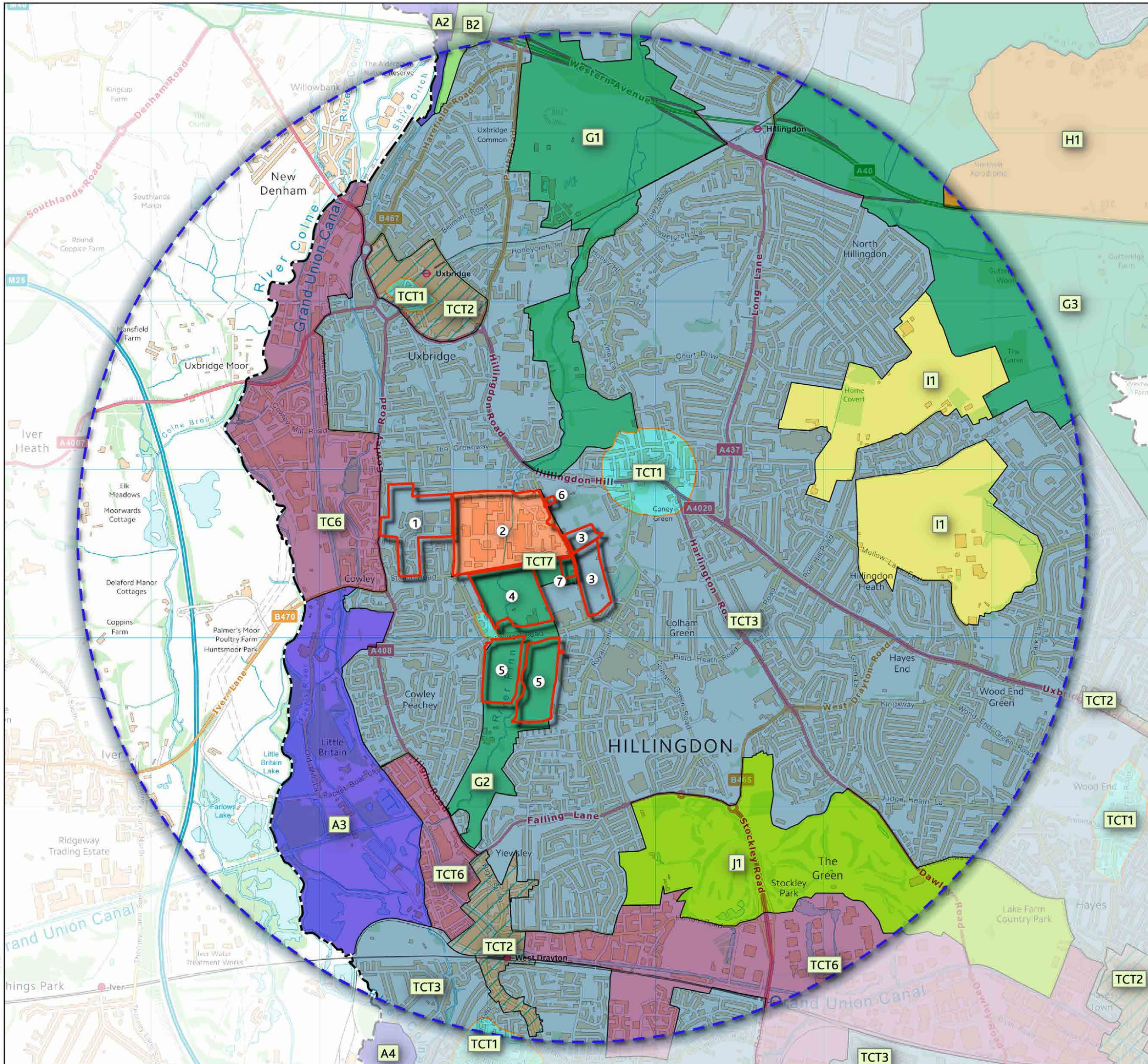
**Hayes**

**Yeadon**

**Uxbridge**

|  |            |  |
|--|------------|--|
| Project  |            | OX5376-3   |
| Brunel University London Green Belt Assessment |            |  |
| Drawing Title                                  |            | Town and local centres in LB Hillingdon  |
| Drawing Number                                 |            | Figure 07  |
| Drawing Status                                 | Revision   | Client<br>Brunel University London   |
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| MG   | KP         |  |





**LEGEND**

- Land Area Locations
- Study Area (3km radius from site location)
- Administrative Boundary

**HILLINGDON LANDSCAPE CHARACTER ASSESSMENT**

**Townscape Character Types**

- TCT1. Historic Core
- TCT2. Retail Centre
- TCT3. Inter-war Suburb/Metroland
- TCT6. Industrial and Commercial Canal Side
- TCT7. Institutional Development

**Landscape Character Types**

- A. Floodplain
- B. Open Valley Sides
- G. River Corridor
- H. Clay Plateau Aerodrome
- I. Encapsulated Farmland
- J. Gravel Terrace Recreation

**Landscape Character Areas**

- A2. Mid Colne Floodplain - Broadwater Lake to Shire Ditch
- A3. Mid Colne Floodplain - Little Britain Lakes
- A4. Lower Colne Floodplain - Frays Island to Standwell Moor
- B2. Uxbridge Open Valley Sides
- G1. Upper Pinn River Corridor
- G2. Lower Pinn River Corridor
- G3. Yeading Brook River Corridor
- H1. Northholt Clay Plateau Aerodrome
- I1. Hayes Park Encapsulated Farmland
- J1. Stockley Gravel Terrace Recreation

0 500 1000 1500 m

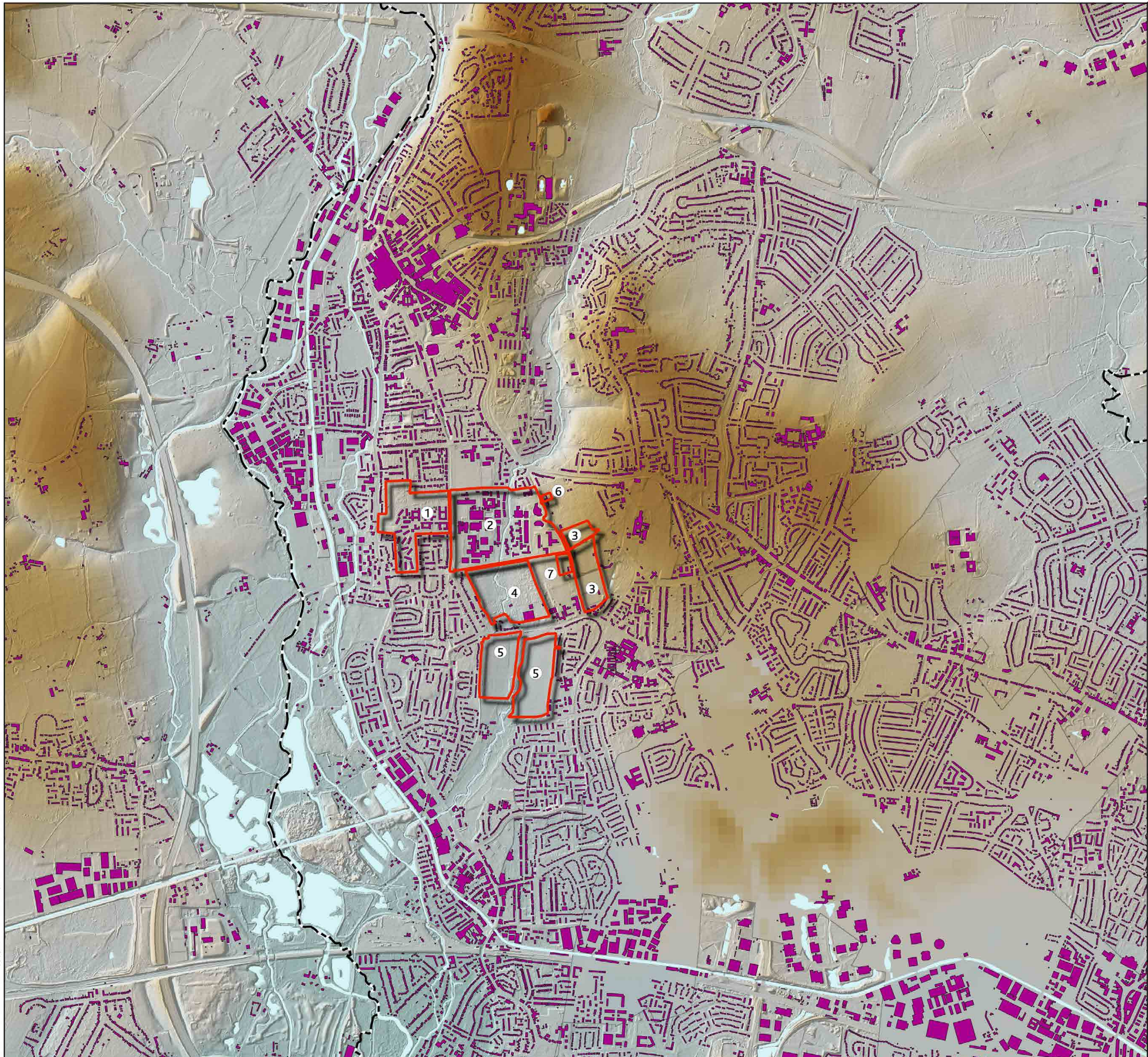
**NOTES:**  
Landscape and Townscape Character Areas derived from Hillingdon Landscape Character Assessment, 2012.

|  |            |  |
|--|------------|--|
| Project  |            | OX5376-3   |
| Brunel University London Green Belt Assessment |            |  |
| Drawing Title                                  |            | Local Character Areas  |
| Drawing Number                                 |            | Figure 08  |
| Drawing Status                                 | Revision   | Client   |
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| Date   | Scale      |  |
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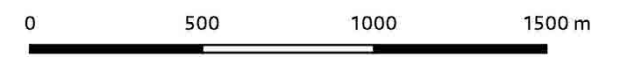
LEGEND


- Land Area Locations
- Administrative Boundary
- Buildings
- Water Bodies

LOCAL TOPOGRAPHY

Height Above Ordnance Datum

- 0-5m
- 5-10m
- 10-15m
- 15-20m
- 20-25m
- 25-30m
- 30-35m
- 35-40m
- 40-45m
- 45-50m
- 50-55m
- 55-60m



|                |            |   |
|----------------|------------|---|
| Project        |            | OX5376-3  |
| Drawing Title  |            | Brunel University London Green Belt Assessment  |
| Drawing Number |            | Urban Fabric and Local Topography   |
| Drawing Number |            | Figure 09   |
| Drawing Status | Revision   | Client<br>Brunel University London  |
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### **3 Methodology**

3.1.1 The study considers the seven land areas on the BUL Uxbridge Campus which are currently within the Green Belt.

3.1.2 The Green Belt study draws on current good practice in England.

- Assessment criteria are based on national planning policy and the performance of land areas against these criteria is assessed, ensuring that the justification of each score is clear and as free from value judgements as possible.
- No Green Belt purpose is considered more important than any other in the NPPF so no weighting has been applied in the method.
- The assessment is focussed on the purposes of Green Belt. While it is important to consider the wider benefits of Green Belt as countryside, these benefits are not an explicit policy objective of Green Belt designation so the relative value of the land areas as ecological or landscape assets is not considered.

### **3.2 Constraints**

3.2.1 The presence of significant constraints have been mapped using GIS data and shown within each land area. Their presence is acknowledged in the assessments and reflected in the judgements so far as they are relevant to the Green Belt purposes.

## 4 Assessment Criteria

- 4.1.1 Table 1 sets out the five Green Belt purposes and the criteria used to assess the land areas against each purpose and the potential scores that can be assigned to each criteria along with notes on how the judgements associated with each criteria were made.
- 4.1.2 The minimum and maximum scores for any purpose are the same (between 0 and 4). All land areas score 4 for Purpose 5 (to assist in urban regeneration by encouraging the recycling of derelict and other urban land) as all Green Belt makes a strategic contribution to urban regeneration by restricting the land available for development.
- 4.1.3 Other studies have used criteria to assess the contribution of land areas to Purpose 3 of the Green Belt by examining the strength or otherwise of the natural or man-made features/boundaries that would prevent encroachment of the countryside within the Green Belt land area. However, given the fragmented nature of the Green Belt and the urban setting of the BUL land areas, it was considered that all seven areas had equally weak boundaries and played an equivalent role in preventing encroachment from urban development.



**Table 1: Green Belt Study Criteria**

| NPPF Green Belt Purposes |  | Criteria   | Score |  | Assessment Method Notes   |  |
|--------------------------|--|--|-------|--|---|--|
| 1                        | Check the unrestricted sprawl of large built up areas  | a. Does the land area play a role in stopping the spread of urban areas into the countryside by preventing ribbon development and/or has the Green Belt in the land area already been compromised by ribbon development? | 2     | strong role (land area inhibits development along 2 or more sides of a road corridor so restricting the spread of urban areas into the countryside)            | <p><b>Sprawl</b> is the outward spread of urban areas into the neighbouring countryside in an irregular way i.e. the expansion of settlements into the neighbouring countryside</p> <p><b>Ribbon development</b> is linear development along any route ways where direct access from a development to the road would be possible.</p> |  |
|                          |  |  | 1     | Some role (land area inhibits development along one side of a road corridor and plays some role in restricting the spread of urban areas into the countryside) |   |  |
|                          |  |  | 0     | No role  |   |  |
|                          |  | b. Is the land area free from development?<br><br>Does the land area have a sense of openness?   | 2     | Land area contains no development and a strong sense of openness   |   | <b>Development</b> means any built structure |
|                          |  |  | 1     | Land area has limited development and relatively strong sense of openness  |   |  |
|                          |  |  | 0     | Land area contains development compromising sense of openness  |   |  |
| 2                        | To prevent neighbouring towns merging into one another | Is the land area located within an existing settlement?<br>If not what is the width of the gap between the settlements at the point that the land area is intersected?   | 4     | Land area is less than 0.5km away from a neighbouring settlement and so play a strong role preventing settlements merging                                      | <p><b>Merging</b> is the joining of blurring of boundaries between two settlements.</p> <p>A straight line is measured at the narrowest point between settlements. The line must pass through the land area being assessed.</p>   |  |
|                          |  |  | 2     | Land area is between 0.5km and 2.5km away from a neighbouring settlement and so plays some role in preventing settlements merging.                             |   |  |
|                          |  |  | 0     | Within an existing settlement or more than 2.5km away from a neighbouring settlement and so play no role is preventing settlements merging.                    |   |  |

|   |  |  |  |  |   |
|---|--|--|--|--|---|
| 3 | <b>To assist in safeguarding the countryside from encroachment</b>                                       | Does the land area have the characteristics of countryside and/or connect to land with the characteristics of countryside?   | 4  | Land area contains the characteristics of countryside and has no urbanizing development and is open.   | <p><b>Encroachment</b> from urbanising influences is the intrusion/gradual advance of buildings and urbanised land beyond an established limit.</p> <p><b>Urbanising</b> influences include features such as roads lined with street lighting and pavements, large areas of hardstanding, floodlit sports fields etc.</p> <p><b>Urbanising built development</b> does not include development which is in keeping with the countryside e.g. agriculture or forestry related development, isolated dwellings, historic schools and churches.</p> <p><b>Countryside</b> is land/scenery which is rural in character i.e. a relatively open, natural, semi-natural or farmed landscape with an absence of built development.</p> |
|   |  | Has the land area already been affected by encroachment of urbanised built development?  | 2  | Land area contains the characteristics of countryside has limited urbanising development and is relatively open  |   |
|   |  | 0  | Land area does not contain the characteristics and /or is not connected to land with the characteristics of countryside. Contains urban development that compromises openness. |  |   |
| 4 | <b>To preserve the setting and special character of historic towns</b>                                   | Is the land area partially or wholly within or adjacent to a Conservation Area (CA) <u>within a historic town</u> ?  | 4  | If land area is partially or wholly within or adjacent to a Conservation Area (CA) within an historic town and has good intervisibility with the historic core of the town | Site visits and topographic maps are used to inform judgements as to whether land areas have good intervisibility with the historic core of a historic town.  |
|   |  | Does the land area have good intervisibility with the historic core of an historic town?   | 2  | Land area is partially or wholly within or adjacent to a Conservation Area (CA) within an historic town or has good intervisibility with the historic core of the town     |   |
|   |  | 0  | The land area has none of these features.  |  |   |
| 5 | <b>To assist in the urban regeneration by encouraging the recycling of derelict and other urban land</b> | It is difficult to assess whether one individual land area considered in isolation makes a more significant contribution than another to incentivising development on previously developed land. So it is considered that all land areas make an equally significant contribution to this purpose and so all land areas have been given the <u>same</u> score. |  |  |   |

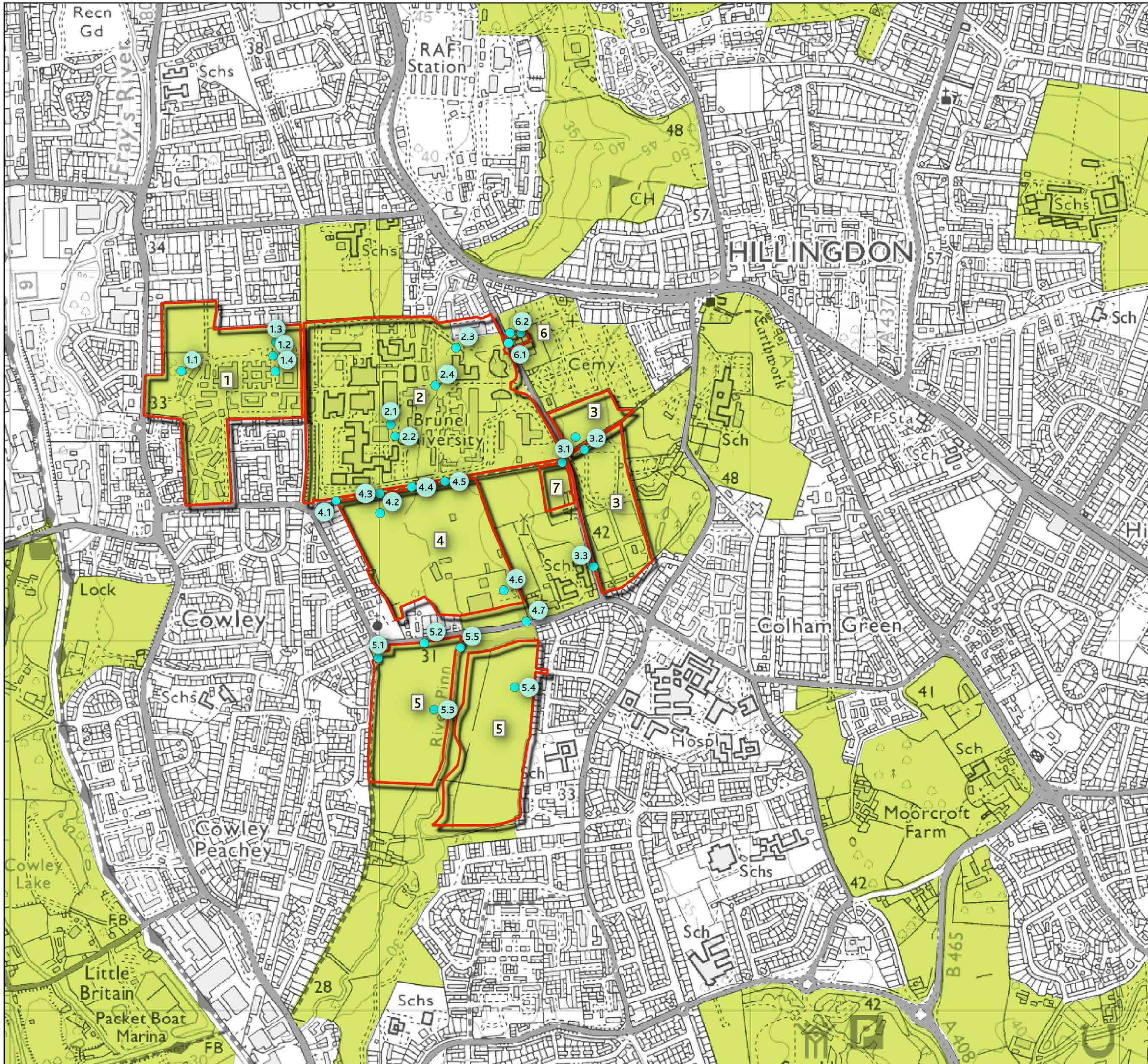
## 4.2 Overall Scores

4.2.1 The scores against the criteria were combined to generate a total score for each land area. The higher the score, the greater the land area's overall contribution to the Green Belt purposes. The scores for each land area are presented below.

## 4.3 Site Visits

4.3.1 The land areas were assessed through desk study using GIS mapping, OS maps and aerial images. All seven land areas were then visited to assess their performance against the purposes of the Green Belt. Views of the land areas were documented and viewpoint locations are listed in **OX3476-3 Figure 10 Viewpoint Locations**.





**LEGEND**

- Land Area Locations
- Green Belt Extents

**VIEWPOINTS**

- Viewpoint

| Number | Label  |
|--------|--|
| 1.1    | Site 1 - Northwestern Bypass Path                        |
| 1.2    | Site 1 - Footpath to Northeastern Boundary               |
| 1.3    | Site 1 - Northeast Boundary                              |
| 1.4    | Student Houses   |
| 2.1    | Bannerman Centre   |
| 2.2    | Howell Building and Tower D                              |
| 2.3    | Site 2 - Northeastern Road                               |
| 2.4    | Bridge over River Pinn in Site 2                         |
| 3.1    | Site 3 North - Inside                                    |
| 3.2    | Site 3 South- Running Track                              |
| 3.3    | Site 3 South - Sports Park Entrance                      |
| 4.1    | Site 4 - Northwestern Entrance                           |
| 4.2    | Site 4 - Inside  |
| 4.3    | Site 4 from the North / in front of Joseph Lowe Building |
| 4.4    | Nursery Lane / River Pinn Crossing                       |
| 4.5    | Bicentenary Gardens Entrance / Gate C                    |
| 4.6    | Garden Center Parking Lot                                |
| 4.7    | Church Road, Garden Center Entrance                      |
| 5.1    | Site 5 West from Northwest                               |
| 5.2    | Site 5 - View Towards Church Road                        |
| 5.3    | Site 5 West - Inside                                     |
| 5.4    | Site 5 East - Inside                                     |
| 5.5    | Celandine Route / Robbie Bell Bridge over River Pinn     |
| 6.1    | Site 6 from Kingston Lane                                |
| 6.2    | Hillingdon & Uxbridge Cemetery North of Site 6           |
| 6.3    | Site 6 - back  |
| 7.1    | Site 7 Entrance  |



Project  
OX5376-3  
Brunel University London Green Belt Assessment

Drawing Title  
Viewpoint locations

Drawing Number  
Figure 10

|                |            |  |
|----------------|------------|--|
| Drawing Status | Revision   | Client<br>Brunel University London   |
| <b>DRAFT</b>   | 00         |  |
| Date           | Scale      | <p>1 St John's Square, London EC1M 4DH<br/>P: 0207 2532929 F: 0207 2533900 E: design.london@gillespies.co.uk</p> |
| Nov 15         | 1 : 10,000 |  |
| Drawn By       | Checked By |  |
| MG             | KP         |  |

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## 5 Findings Summary

### 5.1 Land Area 1

5.1.1 Land Area 1 comprises the western half of the BUL campus which lies to the west of Cleveland Road.

| <b>Green Belt Purpose 1 : To check the unrestricted sprawl of large built-up areas</b> |  |              |   |
|--|--|--------------|---|
| <b>Issue No.</b>   | <b>Issue</b>   | <b>Score</b> | <b>Notes</b>  |
| 1a   | <b>Urban Development</b><br>Does the land area play a role in preventing the spread of urban areas?<br>Does the land area stop ribbon development?                     | 0            | The land areas plays no role in preventing the spread of urban areas into the countryside. Firstly the land area is largely developed itself. Secondly it is surrounded on all sides by large areas of urban development. The Cowley Road to the west of the land parcel has residential development on both sides of the road in this area.  |
| 1b   | <b>Openness</b><br>Is the land area free from development?<br>Does the land area have a sense of openness?   | 1            | This land area accommodates the majority of the University's student housing as well as some teaching blocks and research facilities. This existing development compromises the sense of openness of the land area.<br><br>A smaller area to the north of the land parcel is made up of undeveloped land comprising rough unmanaged grassland crossed by informal paths. There is a relic pattern of overgrown field hedges. Areas of self-seeded woodland mark the northern and western boundaries of the land area with some small patches within the area create a sense of containment. |
| <b>Green Belt Purpose 2 : To prevent neighbouring towns merging into one another</b>   |  |              |   |
| 2  | Is the land area located within an existing settlement?<br>If not what is the width of the gap between the settlements at the point that the land area is intersected? | 0            | The land areas cannot prevent neighbouring towns merging into one another as it is located within an urban area and dense urban development surrounds and contains it. The original settlements surrounding the BUL campus have coalesced over time leaving no gap between settlements The land area adjoins existing residential area of Uxbridge known as the Greenway to the north, to the south and west the land area adjoins the residential areas of Cowley and to the east is the existing university campus.   |

| <b>Green Belt Purpose 3 : To assist in safeguarding the countryside from encroachment</b>                                       |  |               |   |
|---|--|---------------|---|
| 3   | <p>Does the land area have the characteristics of countryside and/or connect to land with the characteristics of countryside?</p> <p>Has the land area already been affected by encroachment of urbanised built development?</p> | 0             | <p>The land area does not contain the characteristics of the countryside but is located within a major urban conurbation. It contains features such as roads lined with street lighting and pavements, large areas of car parking and is surrounded on all sides by residential development. Only a small area to the north of the land area has degraded countryside characteristics of a formally farmed landscape.</p> |
| <b>Green Belt Purpose 4 : To preserve the setting and special character of historic towns</b>                                   |  |               |   |
| 4   | <p>Is the land area partially or wholly within or adjacent to a Conservation Area within a historic town?</p> <p>Does the land area have good intervisibility with the historic core of an historic town?</p>                    | 0             | <p>The land area is adjacent to the Greenway CA and has limited intervisibility with the CA. However The Greenway CA is not within a historic town but an area of middle to late Victorian housing on a rectangular grid street pattern to the south of the town centre of Uxbridge.</p>  |
| <b>Green Belt Purpose 5 : To assist in the urban regeneration by encouraging the recycling of derelict and other urban land</b> |  |               |   |
| 5   | <p>Does the land area incentivize development on derelict and other urban land within settlements</p>  | 4             | <p>All land areas make a contribution to this purpose</p>   |
| <b>Total Score</b>  |  | <b>5 / 20</b> |   |





Viewpoint 1.1.



Viewpoint 1.2.

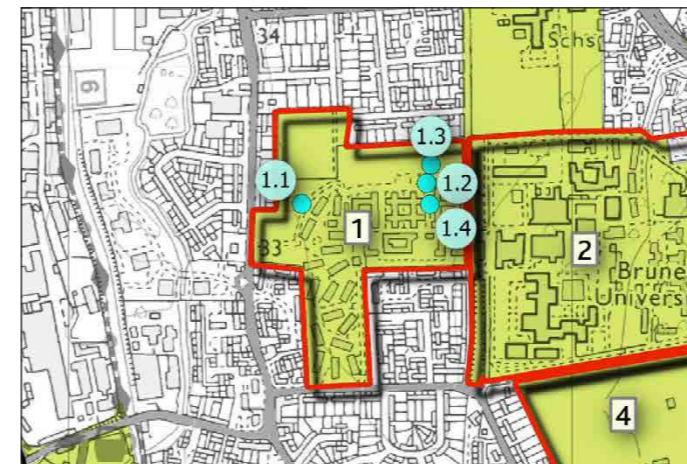


Viewpoint 1.3.



Viewpoint 1.4.

Notes:



|  |              |  |
|--|--------------|--|
| project  |              | OX5376-3   |
| Brunel University London Green Belt Assessment |              |  |
| drawing title                                  |              | Land Area 1  |
| drawing number                                 |              | Figure 11  |
| drawing status                                 | revision     | client   |
| DRAFT  | 00           | Brunel University London   |
| date   | scale        |  |
| Nov 15   | Not To Scale |  |
| drawn  | checked      | <b>GILLESPIES</b><br><small>1 St John's Square, London, EC1M 4BH<br/>         P 0207 253 2929 F 0207 253 3300 E design.london@gillespies.co.uk</small> |
| MG   | KP           |  |



## 5.2 Land Area 2

5.2.1 Land Area 2 comprises the central area BUL campus which lies to the east of Cleveland Road.

| <b>Green Belt Purpose 1 : To check the unrestricted sprawl of large built-up areas</b>    |  |              |  |
|---|--|--------------|--|
| <b>Issue No.</b>  | <b>Issue</b>   | <b>Score</b> | <b>Notes</b>   |
| 1a  | <p><b>Urban Development</b></p> <p>Does the land area play a role in preventing the spread of urban areas?<br/>Does the land area stop ribbon development?</p>   | 0            | <p>The land areas plays no role in preventing the spread of urban areas into the countryside. As a fully developed urban site, the land area cannot be assessed for its role in preventing the spread of urban development.</p> <p>The land area is surrounded on three sides by large areas of urban development, to the west by the BUL campus, and to the north by Uxbridge High School and residential development. To the east of Kingston Lane is the Hillingdon and Uxbridge Cemetery and the BUL sports grounds.</p>   |
| 1b  | <p><b>Openness</b></p> <p>Is the land area free from development?<br/>Does the land area have a sense of openness?</p>   | 0            | <p>This land area is dominated by the university campus including teaching blocks and research facilities. The land area has no sense of openness.</p>   |
| <b>Green Belt Purpose 2 : To prevent neighbouring towns merging into one another</b>      |  |              |  |
| 2   | <p>Is the land area located within an existing settlement?<br/>If not what is the width of the gap between the settlements at the point that the land area is intersected?</p>   | 0            | <p>The land areas cannot prevent neighbouring towns merging into one another as it is located within an urban area and dense urban development surrounds and contains it.</p> <p>The original settlements surrounding the BUL campus have coalesced over time leaving no gap between settlements .The land area adjoins existing residential area of Uxbridge to the north, and residential areas of Cowley to the west and Hillingdon to the east.</p>  |
| <b>Green Belt Purpose 3 : To assist in safeguarding the countryside from encroachment</b> |  |              |  |
| 3   | <p>Does the land area have the characteristics of countryside and/or connect to land with the characteristics of countryside?</p> <p>Has the land area already been affected by encroachment of urbanised built development?</p> | 0            | <p>The land area does not contain the characteristics of the countryside but is a fully developed urban site. It contains features such large institutional buildings, roads lined with street lighting and pavements and large areas of car parking</p> <p>The land areas is not connected to land with the characteristics of countryside but is located within an urban area. It is surrounded on three sides by residential development and the BUL sports facilities and a cemetery to the east.</p> <p>The land area is connected to the south with the River Pinn river corridor.</p> |

| <b>Green Belt Purpose 4 : To preserve the setting and special character of historic towns</b>                                   |  |        |   |
|---|--|--------|---|
| 4   | Is the land area partially or wholly within or adjacent to a Conservation Area within a historic town?<br>Does the land area have good intervisibility with the historic core of an historic town? | 0      | The land area is not within or adjacent to a CA within a historic town. |
| <b>Green Belt Purpose 5 : To assist in the urban regeneration by encouraging the recycling of derelict and other urban land</b> |  |        |   |
| 5   | Does the land area incentivize development on derelict and other urban land within settlements   | 4      | All land areas make a contribution to this purpose                      |
| Total Score   |  | 4 / 20 |   |





Viewpoint 2.1.



Viewpoint 2.2.

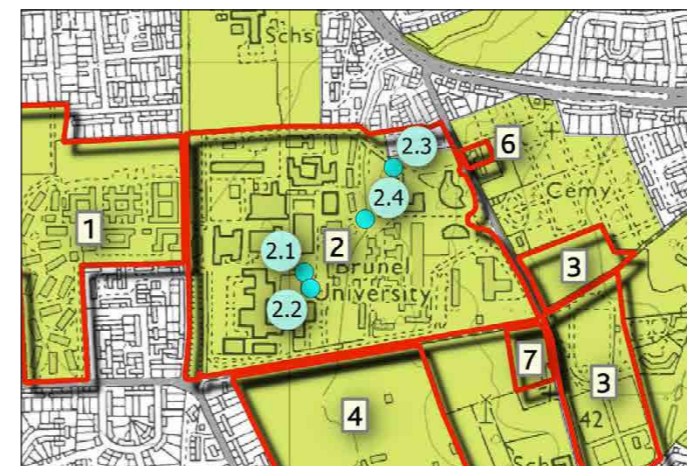


Viewpoint 2.3.



Viewpoint 2.4.

Notes:



project  
OX5376-3  
Brunel University London Green Belt Assessment

drawing title  
Land Area 2

drawing number  
Figure 12

|                                |                |                                    |
|--------------------------------|----------------|------------------------------------|
| drawing status<br><b>DRAFT</b> | revision<br>00 | client<br>Brunel University London |
|--------------------------------|----------------|------------------------------------|

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| date<br>Nov 15 | scale<br>Not To Scale |  |
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|-------------|---------------|---|
| drawn<br>MG | checked<br>KP | <b>GILLESPIES</b><br><small>1 St John's Square, London, EC1M 4JH<br/>P 0207 253 2929 F 0207 253 3300 E design.london@gillespies.co.uk</small> |
|-------------|---------------|---|



### 5.3 Land Area 3

5.3.1 Land Area 3 is situated to the east of Kingston Lane and accommodates the BUL outdoor sports facilities.

| <b>Green Belt Purpose 1 : To check the unrestricted sprawl of large built-up areas</b> |   |              |   |
|--|---|--------------|---|
| <b>Issue No.</b>   | <b>Issue</b>  | <b>Score</b> | <b>Notes</b>  |
| 1a   | <p><b>Urban Development</b></p> <p>Does the land area play a role in preventing the spread of urban areas?</p> <p>Does the land area stop ribbon development?</p>                 | 0            | <p>The land areas plays no role in preventing the spread of urban areas into the countryside.</p> <p>The land area is adjacent to the BUL campus and is contained to the south by residential areas of Hillingdon. However to the north and west of the land area, are open areas associated with Hillingdon and Uxbridge Cemetery and a small area of woodland, beyond which is Coney Green</p> <p>As a result the land area does not play a role in stopping the spread of urban areas into the countryside as it is an area surrounded by associated with a large urban conurbation.</p> |
| 1b   | <p><b>Openness</b></p> <p>Is the land area free from development?</p> <p>Does the land area have a sense of openness?</p>   | 1            | <p>This land area is dominated by the university outdoor sports facilities, with all-weather sports pitches, a running track and associated facilities. There is a sense of openness although it is compromised by the high fencing, hedges, paved areas and overhead lighting.</p>   |
| <b>Green Belt Purpose 2 : To prevent neighbouring towns merging into one another</b>   |   |              |   |
| 2  | <p>Is the land area located within an existing settlement?</p> <p>If not what is the width of the gap between the settlements at the point that the land area is intersected?</p> | 0            | <p>The land areas cannot prevent neighbouring towns merging into one another as it is located within an urban area and dense urban and peri-urban development surrounds and contains it.</p> <p>The original settlements surrounding the BUL campus have coalesced over time leaving no gap between settlements .The land area adjoins existing residential area of South Hillingdon to the south, To the north and east is the Hillingdon and Uxbridge Cemetery with Hillingdon Village beyond it. To west is the BUL campus.</p>  |

| <b>Green Belt Purpose 3 : To assist in safeguarding the countryside from encroachment</b>                                       |  |       |  |
|---|--|-------|--|
| 3   | <p>Does the land area have the characteristics of countryside and/or connect to land with the characteristics of countryside?</p> <p>Has the land area already been affected by encroachment of urbanised built development?</p> | 1     | <p>The land area does not contain the characteristics of the countryside but is fully developed as a sports ground. It contains features such as flood lit sports fields, all weather courts and large areas of car parking. However it does retain its openness.</p> <p>The land area is located within an urban area. It is surrounded on two sides by residential or institutional development and on the other two sides by a cemetery and a small area of land to the east where there is an area of isolated woodland which is designated as a Nature Conversation Site of Local Importance.</p> |
| <b>Green Belt Purpose 4 : To preserve the setting and special character of historic towns</b>                                   |  |       |  |
| 4   | <p>Is the land area partially or wholly within or adjacent to a Conservation Area within a historic town?</p> <p>Does the land area have good intervisibility with the historic core of an historic town?</p>                    | 0     | <p>The land area is located within 0.2 km of the Hillingdon Village CA but has <u>no intervisibility</u> with the historic core of the village.</p> <p>Under the proposed Local Plan Part 2 it is proposed to extend the CA to cover the Hillingdon and Uxbridge Cemetery which will mean that the CA is adjacent to Land Area 3. However, the land area will still play a limited role in preserving the setting of the CA.</p>   |
| <b>Green Belt Purpose 5 : To assist in the urban regeneration by encouraging the recycling of derelict and other urban land</b> |  |       |  |
| 5   | Does the land area incentivize development on derelict and other urban land within settlements   | 4     | All land areas make a contribution to this purpose.  |
| Total Score   |  | 6/ 20 |  |





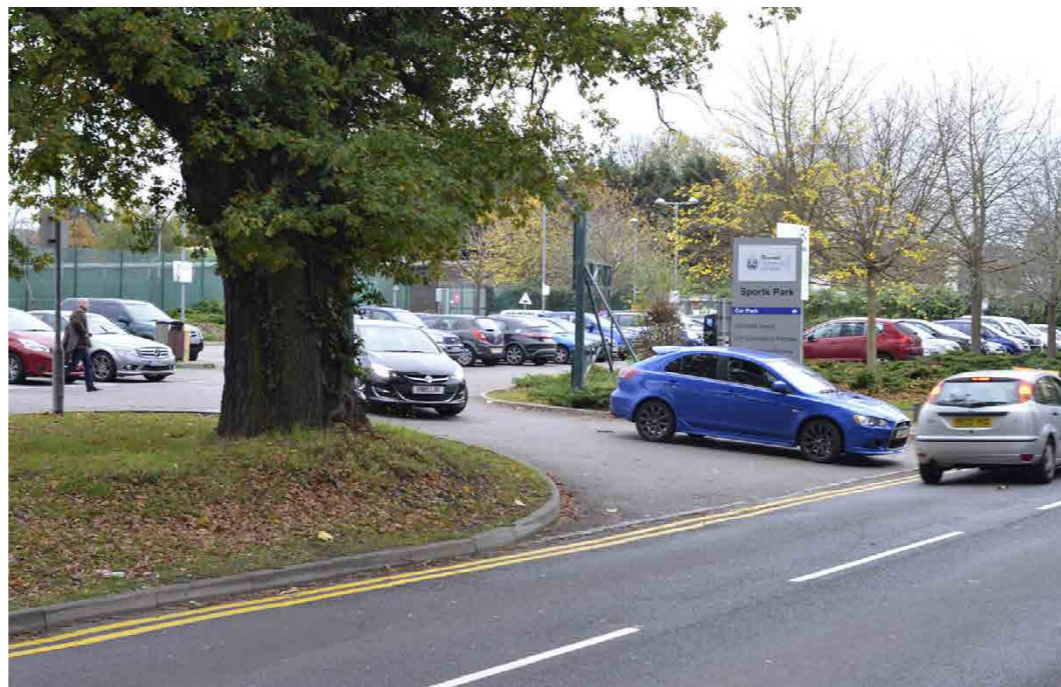
Viewpoint 3.1. - Looking northwest



Viewpoint 3.1. Looking northeast

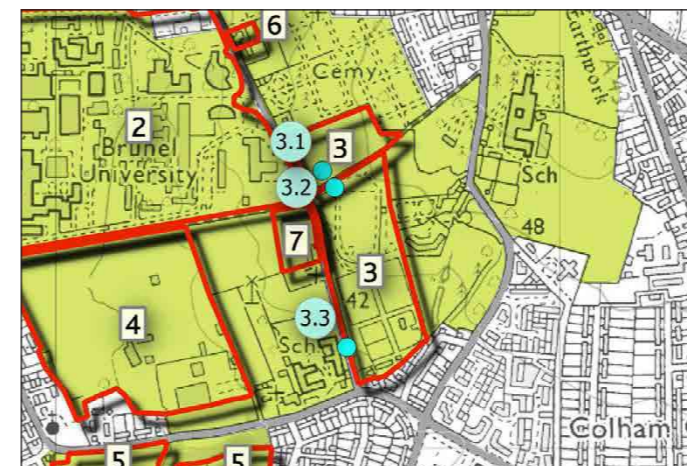


Viewpoint 3.2.



Viewpoint 3.3.

Notes:



|  |              |  |
|--|--------------|--|
| project  |              | OX5376-3   |
| Brunel University London Green Belt Assessment |              |  |
| drawing title                                  |              | Land Area 3  |
| drawing number                                 |              | Figure 13  |
| drawing status                                 | revision     | client   |
| DRAFT  | 00           | Brunel University London   |
| date   | scale        |  |
| Nov 15   | Not To Scale |  |
| drawn  | checked      | <b>GILLESPIES</b><br><small>1 St John's Square, London, EC1M 4BH<br/>         P 0207 253 2929 F 0207 253 3300 E design.london@gillespies.co.uk</small> |
| MG   | KP           |  |

## 5.4 Land Area 4

5.4.1 Land Area 4 is located to the south the BUL campus, south of Nursery Lane.

| Green Belt Purpose 1 : To check the unrestricted sprawl of large built-up areas |   |       |   |
|---|---|-------|---|
| Issue No.   | Issue   | Score | Notes   |
| 1a  | <p><b>Urban Development</b></p> <p>Does the land area play a role in preventing the spread of urban areas?</p> <p>Does the land area stop ribbon development?</p> | 0     | <p>The land area plays no role in preventing the spread of urban areas into the countryside as it is an area surrounded by a large urban conurbation.</p> <p>The land area is a low flat floodplain on either side of the small River Pinn, a tributary of the River Colne. The majority of the land area was formerly used as a market gardens. The land has been vacant for some time and is fenced off from public access due to the dangers posed by the remaining structures, asbestos pollution and disused underground services. The land area contains open areas of scrubby grassland to the west of the River Pinn but dense regenerated woodland to the east of the river. Part of the land area to the south contain a series of single storey buildings and associated car parking currently used as a garden centre.</p> <p>The land area is surrounded and contained by urban settlement. To the north is the BUL campus and to the west and south are residential areas along Church Road. To the east of the land area, are open areas associated with the Nursery Road allotments and the grounds associated with Pield Heath House School.</p> <p>The land area form part of LCA G2 Lower Pinn River Corridor in the Hillingdon Landscape Character Assessment (2012).</p> |
| 1b  | <p><b>Openness</b></p> <p>Is the land area free from development?</p> <p>Does the land area have a sense of openness?</p>   | 2     | <p>This land area contains a small area of development to the south of the land area associated with the existing garden centre and ground level structures associated with its former use as market gardens.</p> <p>Although it is contained by urban development on three sides and enclosed by high hedgerows to the east. Despite this close proximity to urban development, the land area retains an open character.</p>   |

| <b>Green Belt Purpose 2 : To prevent neighbouring towns merging into one another</b>  |  |       |   |
|---|--|-------|---|
| 2   | <p>Is the land area located within an existing settlement?</p> <p>If not what is the width of the gap between the settlements at the point that the land area is intersected?</p>  | 0     | <p>The land areas cannot prevent neighbouring towns merging into one another as it is located within an urban area and dense urban and peri-urban development surrounds and contains it.</p> <p>The original settlements surrounding the BUL campus have coalesced over time leaving no gap between settlements .This land area adjoins existing residential area of Hillingdon to the south and east and Cowley to the west,. The BUL campus lies to the north beyond which is residential areas associated with Uxbridge.</p>   |
| <b>Green Belt Purpose 3 : To assist in safeguarding the countryside from encroachment</b>                                       |  |       |   |
| 3   | <p>Does the land area have the characteristics of countryside and/or connect to land with the characteristics of countryside?</p> <p>Has the land area already been affected by encroachment of urbanised built development?</p> | 1     | <p>The land area was previously the site of a commercial market garden. It contains features such as concrete blocks and disused services from its previous use as a commercial market garden. To the south are, commercial buildings and areas of car parking.</p> <p>Land Area 4 is located within the Pinn River Corridor and retain its openness in parts, particularly to the west of the River Pinn. Although it cannot be classified as countryside it does contain some semi-natural characteristics and it is proposed in the Draft Local Plan Part 2 to designate the land area as a Nature Conservation Site of Local Importance.</p> <p>The land area is located within an urban area. It is surrounded on three sides by residential, commercial or institutional development and on the other side by peri-urban development in the form of allotments. Any potential connection along the the River Pinn Corridor is separated by residential and institutional development along Church Road.</p> |
| <b>Green Belt Purpose 4 : To preserve the setting and special character of historic towns</b>                                   |  |       |   |
| 4   | <p>Is the land area partially or wholly within or adjacent to a Conservation Area within a historic town?</p> <p>Does the land area have good intervisibility with the historic core of an historic town?</p>                    | 1     | <p>The land area is located adjacent to the Cowley Church CA. There is some intervisibility with the historic core of this hamlet and the land area plays some part in the preserving the special character of the CA although it is softened by the intervening tree line and the wooded edge to the area.</p>   |
| <b>Green Belt Purpose 5 : To assist in the urban regeneration by encouraging the recycling of derelict and other urban land</b> |  |       |   |
| 5   | <p>Does the land area incentivize development on derelict and other urban land within settlements</p>  | 4     | <p>All land areas make a contribution to this purpose</p>   |
| Total Score   |  | 8/ 20 |   |





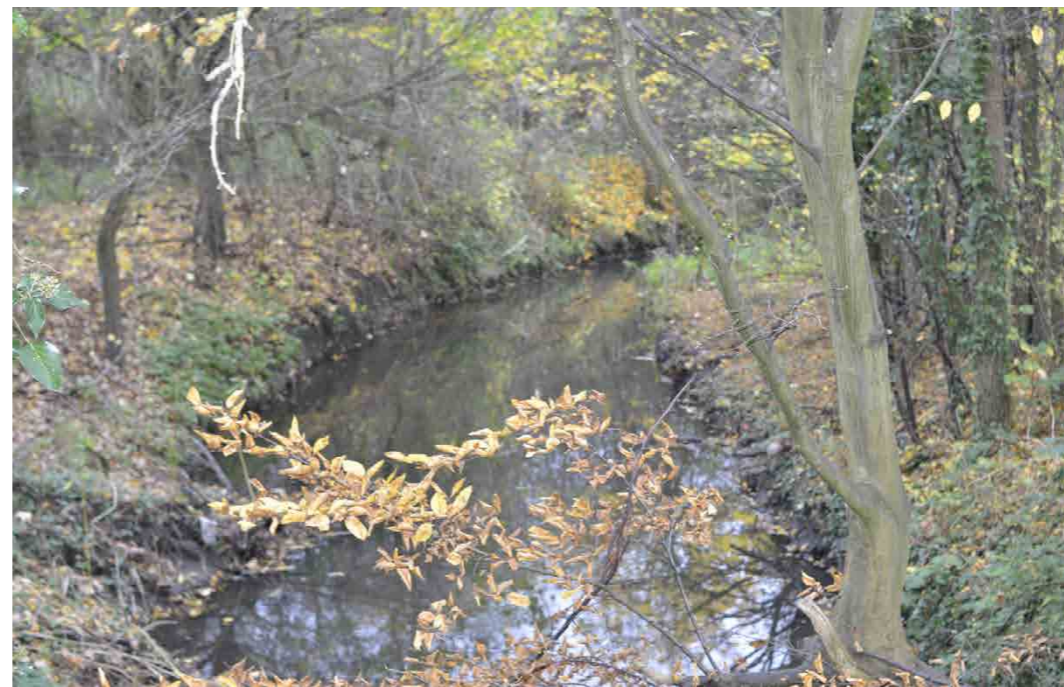
Viewpoint 4.1.



Viewpoint 4.2.

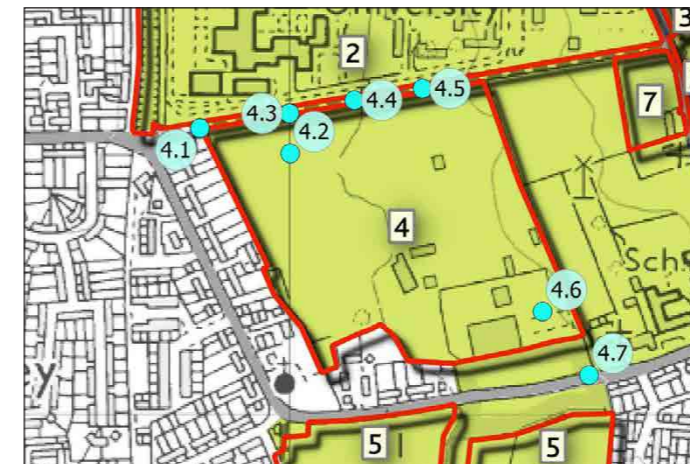


Viewpoint 4.3.



Viewpoint 4.4.

Notes:



|  |              |  |
|--|--------------|--|
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| Brunel University London Green Belt Assessment |              |  |
| drawing title                                  |              | Land Area 4. - 1.  |
| drawing number                                 |              | Figure 14  |
| drawing status                                 | revision     | client   |
| DRAFT  | 00           | Brunel University London   |
| date   | scale        |  |
| Nov 15   | Not To Scale |  |
| drawn  | checked      | <b>GILLESPIES</b><br><small>1 St John's Square, London, EC1M 4BH<br/>         P 0207 253 2929 F 0207 253 3300 E design.london@gillespies.co.uk</small> |
| MG   | KP           |  |





Viewpoint 4.5.



Viewpoint 4.6.



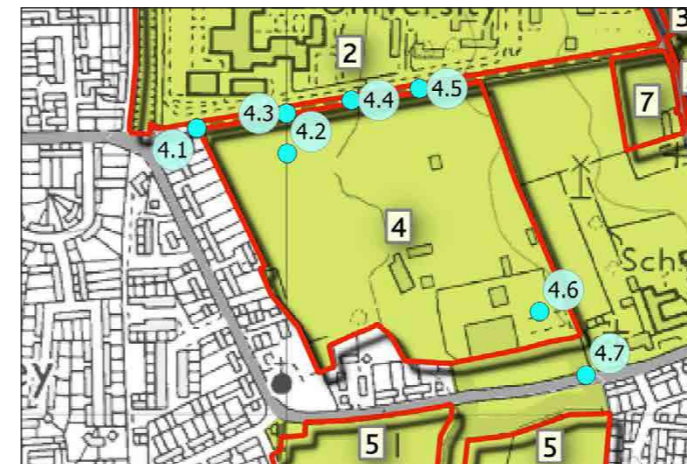
Viewpoint 4.7. Looking northwest



Viewpoint 4.7. Looking east

Notes:

Blank area for notes.



|  |              |  |
|--|--------------|--|
| project  |              | OX5376-3   |
| Brunel University London Green Belt Assessment |              |  |
| drawing title                                  |              | Land Area 4. - 2.  |
| drawing number                                 |              | Figure 15  |
| drawing status                                 | revision     | client   |
| DRAFT  | 00           | Brunel University London   |
| date   | scale        |  |
| Nov 15   | Not To Scale |  |
| drawn  | checked      | <b>GILLESPIES</b><br><small>1 St John's Square, London, EC1M 4BH<br/>         P 0207 253 2929 F 0207 253 3300 E design.london@gillespies.co.uk</small> |
| MG   | KP           |  |



## 5.5 Land Area 5

5.5.1 Land Area 5 is located south of Church Road either side of the River Pinn.

| <b>Green Belt Purpose 1 : To check the unrestricted sprawl of large built-up areas</b> |  |              |   |
|--|--|--------------|---|
| <b>Issue No.</b>   | <b>Issue</b>   | <b>Score</b> | <b>Notes</b>  |
| 1a   | <p><b>Urban Development</b></p> <p>Does the land area play a role in preventing the spread of urban areas?<br/>Does the land area stop ribbon development?</p>                 | 0            | <p>The land areas plays no role in preventing the spread of urban areas into the countryside as it is an area contained and surrounded by a large urban conurbation.</p> <p>The land area is a low flat floodplain bisected by the River Pinn (a tributary of the River Colne). This small river is enclosed by dense tree cover and is largely hidden within the wider landscape.</p> <p>Meadow grassland occupies the area to the west of the river which is crossed by local footpaths which provide informal access to the area. A marked local trail runs along the east bank of the River Pinn.</p> <p>East of the river, are extensive playing fields which are fenced and provide no public access.</p> <p>The land area form part of LCA G2 Lower Pinn River Corridor in the Hillingdon Landscape Character Assessment (May 2012).</p> |
| 1b   | <p><b>Openness</b></p> <p>Is the land area free from development?<br/>Does the land area have a sense of openness?</p>   | 2            | <p>This land area contains no development although it is surrounded by urban settlement.</p> <p>Despite the close proximity of this dense urban development it has an open character with views across the fields.</p>  |
| <b>Green Belt Purpose 2 : To prevent neighbouring towns merging into one another</b>   |  |              |   |
| 2  | <p>Is the land area located within an existing settlement?<br/>If not what is the width of the gap between the settlements at the point that the land area is intersected?</p> | 0            | <p>The land area is located within an urban area and dense urban development surrounds and contains it.</p> <p>The original settlements surrounding the BUL campus have coalesced over time leaving no gap between settlements .The land area adjoins existing residential area of Yiewsley to the south, Cowley to the west, Hillingdon to the east .Scattered residential development and a garden centre along Church Road separates this land area from Area 4 beyond which the taller buildings within the BUL campus are visible.</p>   |

| <b>Green Belt Purpose 3 : To assist in safeguarding the countryside from encroachment</b>                                       |  |         |  |
|---|--|---------|--|
| 3   | <p>Does the land area have the characteristics of countryside and/or connect to land with the characteristics of countryside?</p> <p>Has the land area already been affected by encroachment of urbanised built development?</p> | 3       | <p>To the east of the River Pinn, the land area is fully utilised as sports fields.</p> <p>The land area to the west of the River Pinn and along the river corridor contains natural landscape characteristics and it is designated as a Nature Conservation Site of Local Importance. There are long open views across the field.</p> <p>However the prominent settlement edge imparts a strong urban character to the land area and there is constant aural intrusion from the busy road network in the vicinity and flights from Heathrow.</p> <p>The land area is located within an urban area. It is surrounded on three sides by dense residential development and to the north by scattered properties along Church Road. Residential development is prominent along the edges of the land area and there are views to tall buildings such as Hillingdon Hospital although enclosure is provided by tree cover.</p> |
| <b>Green Belt Purpose 4 : To preserve the setting and special character of historic towns</b>                                   |  |         |  |
| 4   | <p>Is the land area partially or wholly within or adjacent to a Conservation Area within a historic town?</p> <p>Does the land area have good intervisibility with the historic core of an historic town?</p>                    | 2       | <p>The land area is located adjacent to the Cowley Church CA. Under the proposed Local Plan Part 2 it is proposed to extend the CA to cover the majority of the western half of the land area and the river corridor.</p> <p>There is some intervisibility with the historic core of this hamlet, particularly the church tower of St Laurence, although it is softened by the intervening tree line. A number of listed buildings sit on the north western edge of the land area including two manor lodges, the Bell House and the Church. The open land around the River Pinn plays some role in preserving the setting of the CA.</p>  |
| <b>Green Belt Purpose 5 : To assist in the urban regeneration by encouraging the recycling of derelict and other urban land</b> |  |         |  |
| 5   | <p>Does the land area incentivize development on derelict and other urban land within settlements</p>  | 4       | <p>All land areas make a contribution to this purpose</p>  |
| Total Score   |  | 11 / 20 |  |





Viewpoint 5.1. Looking south



Viewpoint 5.1. Looking east

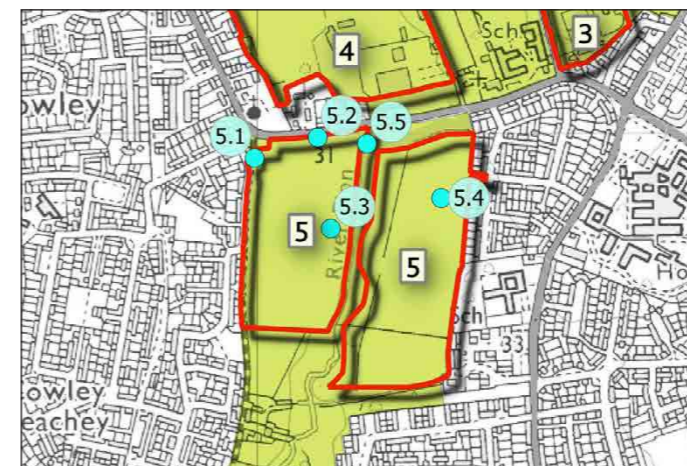


Viewpoint 5.2.



Viewpoint 5.3.

Notes:



project  
OX5376-3  
Brunel University London Green Belt Assessment

drawing title  
Land Area 5. - 1.

drawing number  
Figure 16

|                                |                       |   |
|--------------------------------|-----------------------|---|
| drawing status<br><b>DRAFT</b> | revision<br>00        | client<br>Brunel University London  |
| date<br>Nov 15                 | scale<br>Not To Scale |   |
| drawn<br>MG                    | checked<br>KP         | <b>GILLESPIES</b><br><small>1 St John's Square, London, EC1M 4JH<br/>P 0207 253 2929 F 0207 253 3300 E design.london@gillespies.co.uk</small> |





Viewpoint 5.4. Looking north



Viewpoint 5.4. Looking southwest

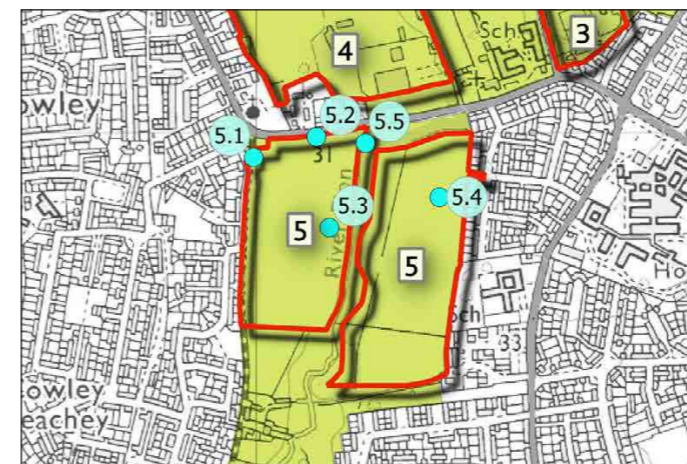


Viewpoint 5.4. Looking southeast



Viewpoint 5.5.

Notes:



project  
OX5376-3  
Brunel University London Green Belt Assessment

drawing title  
Land Area 5. - 2.

drawing number  
Figure 17

|                                |                       |   |
|--------------------------------|-----------------------|---|
| drawing status<br><b>DRAFT</b> | revision<br>00        | client<br>Brunel University London  |
| date<br>Nov 15                 | scale<br>Not To Scale |   |
| drawn<br>MG                    | checked<br>KP         | <b>GILLESPIES</b><br><small>1 St John's Square, London, EC1M 4BN<br/>P 0207 253 2929 F 0207 253 3300 E design.london@gillespies.co.uk</small> |

## 5.6 Land Area 6

5.6.1 Land Area 6 is a small plot located on Kingstone Lane opposite the entrance to the BUL campus.

| <b>Green Belt Purpose 1 : To check the unrestricted sprawl of large built-up areas</b>    |   |              |  |
|---|---|--------------|--|
| <b>Issue No.</b>  | <b>Issue</b>  | <b>Score</b> | <b>Notes</b>   |
| 1a  | <b>Urban Development</b><br>Does the land area play a role in preventing the spread of urban areas?<br>Does the land area stop ribbon development?  | 0            | The land areas plays no role in preventing the spread of urban areas into the countryside as it is an area surrounded by a large urban conurbation.  |
| 1b  | <b>Openness</b><br>Is the land area free from development?<br>Does the land area have a sense of openness?  | 1            | This small land area contains two houses and their gardens. It is not publically accessible and has a limited sense of openness.   |
| <b>Green Belt Purpose 2 : To prevent neighbouring towns merging into one another</b>      |   |              |  |
| 2   | Is the land area located within an existing settlement?<br>If not what is the width of the gap between the settlements at the point that the land area is intersected?  | 0            | The land area is located within an urban area and dense urban development surrounds and contains it.<br>The original settlements surrounding the BUL campus have coalesced over time leaving no gap between settlements .The land area adjoins existing ribbon development along Kingston Lane and is surrounded on three sides by the Hillingdon and Uxbridge Cemetery. Kingston Lane separates this land area from the BUL campus. |
| <b>Green Belt Purpose 3 : To assist in safeguarding the countryside from encroachment</b> |   |              |  |
| 3   | Does the land area have the characteristics of countryside and/or connect to land with the characteristics of countryside?<br>Has the land area already been affected by encroachment of urbanised built development? | 0            | The land area does not have the characteristics of countryside and is not connected to land with the characteristics of countryside. It is surrounded on three sides by the Hillingdon and Uxbridge Cemetery. Under the proposed Local Plan Part 2 it is proposed to extend the Nature Conservation Site of Local Importance to include the cemetery and the woodland within it which back onto the land area.                       |



| <b>Green Belt Purpose 4 : To preserve the setting and special character of historic towns</b>                                   |  |       |  |
|---|--|-------|--|
| 4   | Is the land area partially or wholly within or adjacent to a Conservation Area within a historic town?<br>Does the land area have good intervisibility with the historic core of an historic town? | 0     | The land area is not located within or adjacent to a CA. |
| <b>Green Belt Purpose 5 : To assist in the urban regeneration by encouraging the recycling of derelict and other urban land</b> |  |       |  |
| 5   | Does the land area incentivize development on derelict and other urban land within settlements   | 4     | All land areas make a contribution to this purpose       |
| Total Score   |  | 5/ 20 |  |





Viewpoint 6.1. Looking northwest



Viewpoint 6.1. Looking northeast



Viewpoint 6.2.



Viewpoint 6.3.

Notes:



|  |              |  |
|--|--------------|--|
| project  |              | OX5376-3   |
| Brunel University London Green Belt Assessment |              |  |
| drawing title                                  |              | Land Area 6.   |
| drawing number                                 |              | Figure 18  |
| drawing status                                 | revision     | client   |
| DRAFT  | 00           | Brunel University London   |
| date   | scale        |  |
| Nov 15   | Not To Scale |  |
| drawn  | checked      | <b>GILLESPIES</b><br><small>1 St John's Square, London, EC1M 4DH<br/>         P 0207 253 2929 F 0207 253 3300 E design.london@gillespies.co.uk</small> |
| MG   | KP           |  |



## 5.7 Land Area 7

5.7.1 Land Area 7 is located to the west of Kingston Lane on the south east corner of the BUL campus.

| <b>Green Belt Purpose 1 : To check the unrestricted sprawl of large built-up areas</b>    |   |              |   |
|---|---|--------------|---|
| <b>Issue No.</b>  | <b>Issue</b>  | <b>Score</b> | <b>Notes</b>  |
| 1a  | <b>Urban Development</b><br>Does the land area play a role in preventing the spread of urban areas?<br>Does the land area stop ribbon development?  | 0            | The land areas plays no role in preventing the spread of urban areas into the countryside as it is an area surrounded by a large urban conurbation.<br>The land area is a house and garden located on Kingston Lane.  |
| 1b  | <b>Openness</b><br>Is the land area free from development?<br>Does the land area have a sense of openness?  | 1            | This land area consists of a private house and garden enclosed by high hedges on the edge of a busy road.<br>The small garden has a sense of openness,  |
| <b>Green Belt Purpose 2 : To prevent neighbouring towns merging into one another</b>      |   |              |   |
| 2   | Is the land area located within an existing settlement?<br>If not what is the width of the gap between the settlements at the point that the land area is intersected?  | 0            | The land area is located within an urban area and dense urban development surrounds and contains it.<br>The original settlements surrounding the BUL campus have coalesced over time leaving no gap between settlements .The land area adjoins existing residential and institutional development along Kingston Lane and is opposite the BUL sports ground on the opposite side of Kingston Lane. Nursery Lane separates this land area from the BUL campus to the north. Nursery Allotments lie to the west of the land area. |
| <b>Green Belt Purpose 3 : To assist in safeguarding the countryside from encroachment</b> |   |              |   |
| 3   | Does the land area have the characteristics of countryside and/or connect to land with the characteristics of countryside?<br>Has the land area already been affected by encroachment of urbanised built development? | 0            | The land area does not have the characteristics of countryside and is not connected to land with the characteristics of countryside.  |

| <b>Green Belt Purpose 4 : To preserve the setting and special character of historic towns</b>                                   |  |       |  |
|---|--|-------|--|
| 4   | Is the land area partially or wholly within or adjacent to a Conservation Area within a historic town?<br>Does the land area have good intervisibility with the historic core of an historic town? | 0     | The land area is not located within or adjacent to a CA. |
| <b>Green Belt Purpose 5 : To assist in the urban regeneration by encouraging the recycling of derelict and other urban land</b> |  |       |  |
| 5   | Does the land area incentivize development on derelict and other urban land within settlements   | 4     | All land areas make a contribution to this purpose       |
| Total Score   |  | 5/ 20 |  |

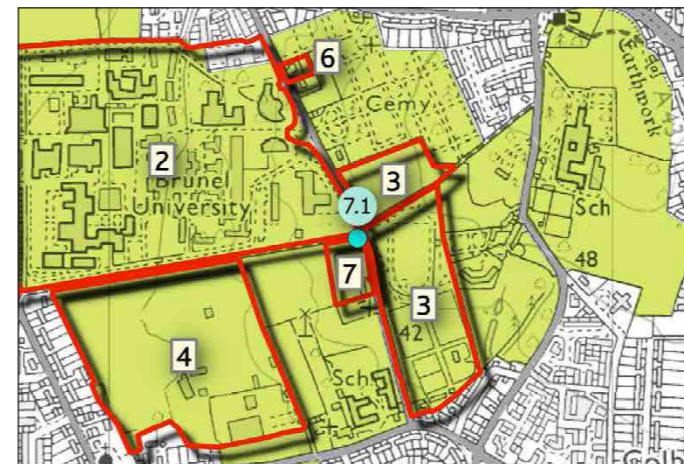


Viewpoint 7.1.



Viewpoint 7.1.

Notes:



project  
OX5376-3  
Brunel University London Green Belt Assessment

drawing title  
Land Area 7.

drawing number  
Figure 19

|                                |                       |  |
|--------------------------------|-----------------------|--|
| drawing status<br><b>DRAFT</b> | revision<br>00        | client<br>Brunel University London   |
| date<br>Nov 15                 | scale<br>Not To Scale |  |
| drawn<br>MG                    | checked<br>KP         | <b>GILLESPIES</b><br><small>1 St John's Square, London, EC1M 4BH<br/>         P 0207 253 2929 F 0207 253 3300 E design.london@gillespies.co.uk</small> |



## 6 Conclusion

- 6.1.1 A significant proportion of LBH comprises countryside and open space. The Green Belt covers much of the northern third of the borough and is semi-rural in character (**OX5376-3 Figure 02 Green Belt Extents 1**). The Colne Valley corridor which defines the western edge to the borough is also designated as Green Belt. This area links with the extensive areas of Green Belt in South Buckinghamshire including the Colne Valley Regional Park which is located either side of the M25 corridor. The Colne Valley Regional Park is the first real countryside to the west of London and hosts a mosaic of farmland, woodland, rivers and canals.
- 6.1.2 Elsewhere in the borough, including the area around the BUL campus, the Green Belt land is heavily fragmented. The BUL land areas assessed in this study are all contained and surrounded by extensive areas of urban development. They are not contiguous with the countryside and as such can play no role in Purpose 1 of the Green Belt by checking the spread of large built up areas into the countryside. Land Areas 1 and 2 (the BUL Campus) are already heavily developed and so their sense of openness is compromised. The remaining open land areas are small landscape remnants with little or no development and so still retain some sense of openness. However, their close proximity to dense urban development and the prominent settlement edge imparts a strong urban character to these land areas.
- 6.1.3 The London Borough of Hillingdon has evolved from a collection of villages which have grown and coalesced over time. The definition between these places is no longer geographically clear, even if each place retains its own identity (see **OX5376-3 Figure 07 Local and Town Centres**). Waves of development over the last two centuries, along transport corridors (industrial development along the Grand Union Canal in the late 18th century followed by extensive interwar suburban development along the Metropolitan and Piccadilly tube lines and along the Uxbridge Road corridor between London and Oxford) have transformed the area into an suburban borough which is an integral part of the wider conurbation of London. In the 2012 *Hillingdon Landscape Character Assessment* the townscape character type (TCT) surrounding all seven land areas is classified as TCT 3 Suburb/Metroland (see **OX5376-3 Figure 08 Landscape and Townscape Character Areas**). As classified in the 2011 DEFRA Rural Urban Classification study, the area is within a Major Conurbation (see **OX5376-3 Figure 03 Green Belt Extents 2**) which sits on the western edge of greater London. Due to the historic coalescence of the original Hillingdon villages through

suburban development and their position within the wider London conurbation, all seven of the BUL land areas cannot perform Purpose 2 of the Green Belt which is to prevent neighbouring towns merging with one another.

- 6.1.4 None of the BUL land areas are connected to land that can be characterised as countryside. The nearest open countryside to the BUL campus is the Colne Valley Park to the west or the area of Green Belt to the north of the Borough. Land Areas 1 and 2 contain extensive institutional development and Land Area 3 is fully developed as the university sports ground. Both Land Area 4 and 5 are located within the Pinn River Corridor and although they cannot be classified as countryside, they both contain semi-natural characteristics. However, Land Area 4 contains a commercial development to the south and other urbanising features from its previous use as a commercial market garden. Land Area 5 is the only land area that is publically accessible and the PRoW along the river is promoted as the Celandine Route. However it cannot be described as a rural landscape as it is surrounded and contained by dense urban development (see **OX5376-3 Figure 09** Urban Fabric and Topography). As a result none of the land areas fully assist in Purpose 3 of the Green Belt which is to assist in safeguarding the countryside from encroachment.
- 6.1.5 Three of the BUL land areas make some contribution to purpose 4 of the Green Belt, to preserve the setting and special character of historic towns. Land Area 1 is adjacent to the Greenway CA, although this does not form part of a town centre and there is limited intervisibility with the CA. Under the proposed Local Plan Part 2 it is proposed to extend the Hillingdon Village CA to cover the Hillingdon and Uxbridge Cemetery which will mean that the CA is adjacent to Land Area 3. However, there is no intervisibility with the historic core of the Hillingdon village. Land Area 4 is located adjacent to and has some intervisibility with the historic hamlet of Cowley Church CA.
- 6.1.6 As described above it is difficult to assess whether one individual land area considered in isolation makes a more significant contribution than another to incentivising development on previously developed land. So it is considered that all the BUL land areas make an equally significant contribution to Purpose 5 of the Green Belt.

## REFERENCES

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5. London Borough of Hillingdon, (2007) London Borough of Hillingdon Unitary Development Plan Saved Policies - September 2007 Published Version
6. London Borough of Hillingdon, (2012) Hillingdon Local Plan: Part 1 - Strategic Policies - *A Vision for 2026* (adopted November 2012)
7. London Borough of Hillingdon, (2015) Hillingdon Local Plan: Part 2 – Development Management Policies (Revised Proposed Submission Version, October 2015)
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9. London Borough of Hillingdon, (2015) Hillingdon Local Plan: Part 2 – Policies Map Atlas of Changes (Revised Proposed Submission Version, October 2015)
10. Land Use Consultants (2012) Hillingdon Landscape Character Assessment – *Prepared for the London Borough of Hillingdon.*
11. London Borough of Hillingdon, (2013) Green Belt Assessment Update.

## Enclosure F

Comparables

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# Enclosure F

## Review of Comparable Planning Cases

| Local Plan Process – Exceptional Circumstances  |   |
|---|---|
| Example 1 – North West Cambridge Area Action Plan DPD (Cambridge City Council/South Cambridgeshire District Council): University of Cambridge |   |
| <p><b>Process</b></p>   | <p>The development of this 'sector' is predominantly for the University of Cambridge, and will include key worker housing for university staff, student housing, new faculty buildings and research facilities, together with a significant amount of private housing and associated community facilities.</p> <ul style="list-style-type: none"> <li>• North West Cambridge Area Action Plan Green Belt Landscape Study <span style="float: right;">May 2006</span></li> <li>• Issues and Options Consultation <span style="float: right;">September-November 2006</span></li> <li>• Preferred options consultation <span style="float: right;">October-December 2007</span></li> <li>• Submission of Draft Area Action Plan to the SoS <span style="float: right;">19 May 2008</span></li> <li>• 6 week consultation on Draft Area Action Plan <span style="float: right;">19 May – 30 June 2008</span></li> <li>• Consultation on sustainability appraisal for Draft Area <span style="float: right;">19 May – 30 June 2008</span></li> <li>• Objection sites consultation <span style="float: right;">8 September – 20 October 2008</span></li> <li>• Independent examination hearing <span style="float: right;">November – December 2008</span></li> <li>• 6 week consultation on inspectors' larger site option <span style="float: right;">9 March – 20 April 2009</span></li> <li>• Further independent examination hearing on inspectors' larger site option <span style="float: right;">9 June 2009</span></li> <li>• Binding inspectors' report <span style="float: right;">24 August 2009</span></li> <li>• Adoption <span style="float: right;">22 October 2009</span></li> </ul> |
| <p><b>North West Cambridge Area Action Plan Green Belt Landscape Study</b></p>  | <p>The acceptability of this location is dependent upon:</p> <ul style="list-style-type: none"> <li>• the needs of the University;</li> <li>• those needs not being capable of being met elsewhere;</li> <li>• the needs outweighing the impact on the purposes of the Green Belt.</li> </ul> <p>Concluded that the location North West Cambridge which relates to land proposed for university and related uses is suitable for inclusion in Policy P9/3c, but it should only be released from the Green Belt on the basis that the University are able to show a need for the land to be brought forward.</p> <p>Following the adoption of the Structure Plan, the Cambridge Local Plan Inspector's Report concluded, in respect of the University land:</p> <p><i>'The Structure Plan reference to the area included as this Area of Major Change in the Local Plan is (land) "between</i></p>   |



|                                  |   |
|----------------------------------|---|
|                                  | <p><i>Madingley Road and Huntingdon Road". This need not mean all of the land between the 2 roads, but to give the necessary freedom in devising a Master Plan for the area I consider that none of the open land between the roads should remain in the Green Belt. The Structure Plan Key Diagram shows a green corridor north of Madingley Road, and the strong hedge north of the Park and Ride site has the necessary characteristics to form a suitable Green Belt boundary. However the Key Diagram is diagrammatic, and the hedge line is some distance north of Madingley Road, well inside the area between the roads. In my opinion the open land north of Madingley Road is not prominent to travellers on the M11, as views of it are limited. I conclude that the land is not so fundamental to the purposes of the Green Belt as to warrant Green Belt designation in the present circumstances obtaining here'.</i></p> <p>The Cambridge City Local Plan 2006 was adopted on a similar basis.</p>   |
| <p><b>Inspector's Report</b></p> | <p>However, a substantial part of the area allocated for development in this AAP falls within South Cambridgeshire and is not covered by the Cambridge City Local Plan. In order to meet the test of justification imposed by this new system, a clear need, on behalf of Cambridge University must be shown for the land to be released.</p> <p>The need for the development was defined as follows:</p> <ol style="list-style-type: none"> <li>1. <b>Academic and research and development</b> <p><b>Economic Importance</b> – a report was published in 2006 estimating that, if the University did not exist, the impact of the loss of its expenditure and employment over the next 10 years would require the replacement of a net present value of £21.2bn and 77,000 new jobs regionally and £4.8bn and 10,800 new jobs nationally. The UK's leading research university. Hugely important part of the local and sub-regional economy.</p> <p><b>Land availability and requirements</b> – the University estate has about 100,000m<sup>2</sup> remaining which will run out in 2015. AAP will enable 100,000m<sup>2</sup> for academic and R&amp;D uses.</p> </li> <li>2. <b>Housing</b> (3 types: University <b>staff/key worker housing</b> shortages arising from affordability difficulties; needs for <b>student accommodation</b> and the need for development to include a substantial quantity of <b>market housing</b> to make the development as a whole viable (Note – this was during the height of the recession).</li> </ol> <p>A lot of staff is living in poor accommodation due to the high costs of housing in Cambridge and staff numbers are expected to rise each year. Such housing conditions can affect recruitment and the retention rates of more permanent staff. Furthermore, key senior staff will not choose to work for the University if the University cannot recruit good quality research staff. The land in the AAP is owned by the University meaning the University can set affordable rents.</p> <p>Market housing is needed to make the University's development of the AAP proposal a viable proposition. However it is not the general housing needs of the area which are the key to releasing the land, but the University's particular needs.</p> <p>A survey of student housing needs conducted in May 2008 reveals that the current unmet need is for 1049 units, almost all for postgraduates. Colleges do not have sufficient housing for this group of students. Many therefore have to live in poor quality and expensive private sector accommodation.</p> <p>The AAP intends to provide about 2000 units of student accommodation, sufficient to provide for needs into the 2020s. A failure to provide satisfactory accommodation for students, particularly postgraduate students, could render the University less attractive to the best students. This could harm the international position of the University and its ability to contribute to research and to the national, regional and local economy.</p> <p>We conclude that the University's need for the land to be released for development is a very weighty consideration in assessing whether the AAP passes the test of justification. The need for affordable key worker housing is both</p> |

|  |   |
|--|---|
|  | <p>immediate and urgent. The need for academic and research uses is longer term but of great significance in view of the University's educational and economic importance.</p> <p>A policy (Policy NW30) was added requiring the submission of a Needs Statement with any planning application to demonstrate that the University has a need for the land to be released for the specific development.</p> <p><u>Green Belt</u></p> <ul style="list-style-type: none"> <li>• <b>Review of existing Green Belt value</b> – it is our judgement that the area included within the AAP is of substantial value to the setting of the City. This is because of its prominence viewed by many people travelling on the M11, its relationship to the City, and its attractive qualities.</li> <li>• <b>The balance between Green Belt purposes and need</b> – The AAP area performs several Green Belt functions. These are especially valuable in the context of Cambridge, and Cambridge is a City with a noteworthy character because of its world-class, and therefore widely-known, historic University. However it is the need to retain and, if possible, increase the educational, intellectual, and economic roles of the University which has led to the proposal to release for development the major part of the area contained within the AAP boundaries. In our judgement the needs shown by the evidence submitted to the examination are of greater weight than the Green Belt functions of the land. In our opinion the University has shown a clear need for the land between Madingley Road and Huntingdon Road, considered generally, to be released, and in this respect the submitted AAP is founded on a robust and credible evidence base. There are exceptional circumstances for removing land from the Green Belt to accommodate the development.</li> </ul> |
| <b>Example 2 – West Lancashire Local Plan (West Lancashire Borough Council): Edgehill University</b> |   |
| <p><b>Process</b></p>  | <ul style="list-style-type: none"> <li>• Issues and Options Consultation January 2009</li> <li>• Preferred options consultation (Part 1) May – June 2011</li> <li>• Preferred options consultation (Part 2) January – February 2012</li> <li>• Publication Document Consultation 9 August – 5 October 2012</li> <li>• Submission of the Local Plan to the SoS 31 October 2012</li> <li>• Independent Examination Hearing 19 February – 7 March 2013</li> <li>• Receipt of Inspector's Report 26 September 2013</li> <li>• Adoption 16 October 2013</li> </ul>   |
| <p><b>Inspector's Report</b></p>   | <p><b>Issue O – Is the Local Plan's policy approach to Edge Hill University, including a 10ha expansion into the Green Belt, justified and effective?</b></p> <p>Edge Hill University is an important asset to the borough, contributing some £75 million annually to the local economy and providing over 1,500 jobs. In this context, policy EC4 provides general support for the university's growth, development and improvement. In particular, it provides for the release of 10ha of Green Belt land to expand the existing campus facilities and provide improved highway access and parking. I agree that exceptional circumstances justify this release, in view of the university's importance to the borough, the lack of other land onto which to extend the campus, the adverse effects of the proliferation of student Houses in Multiple Occupation [HMOs] in Ormskirk, and the significant traffic and parking impacts associated with the previous access arrangements.</p>   |

|  |   |
|--|---|
|  | <p>The development for which the policy provides is already well under way following the grant of planning permission for new student accommodation and a new sports and recreation complex. <b>MM10</b> is necessary to reflect this current position. As part of the development, the tree belts which formed the notional new Green Belt boundary depicted in Local Plan Figure 6.1 have been removed. Accordingly, <b>MM70 &amp; MM71</b> amend that new Green Belt boundary so that it follows the access road created by the current development works. This is a readily-recognisable and continuous feature that is likely to be permanent, as recommended by NPPF paragraph 85. These advantages outweigh the fact that the access road boundary would leave the new University sports building within the Green Belt. The alternative boundary proposed by the University would be significantly less well-defined on the ground.</p> <p>There is no evidence that the University are seeking to expand built development further into the Green Belt than the current planning permission allows for. Instead, the rest of the land enclosed by the campus itself, St Helens Road, Scarth Hill Lane and Ruff Lane is intended for sports fields and recreational land. This position will be safeguarded by the strong protection given to Green Belt land by section 9 of the NPPF.</p> |
| <b>Applications – Very Special Circumstances</b>   |   |
| <b>Example 1 – University of York</b>              |   |
| <b>Proposal</b>                                    | <p>A new campus for the University of York was proposed on green belt land and the application was called in for decision by the SoS.</p> <p>The site comprised 116ha of mainly arable land located on the south-eastern edge of the city and to the east of the university's existing campus. The university had 8,500 full time students and the new campus would increase the total by 5,400. In addition, its expansion would create 2,000 jobs and approximately 2,500 related research jobs. Around 65ha would be developed for the campus with the remainder being developed as a linear park. The proposed buildings would be used for academic teaching, research and research related businesses. A conference centre would also be built together with student accommodation and social facilities.</p>  |
| <b>Local Authority</b>                             | City of York Council (decision deferred to SoS under s77)   |
| <b>Inspector's Report (Inspector H G Rowlands)</b> | <p>Green Belt</p> <ul style="list-style-type: none"> <li>• The development proposed is inappropriate in the Green Belt</li> <li>• The Green Belt around York has not been defined in a Local Plan</li> <li>• The application is not urban sprawl</li> <li>• The site is remote from nearby towns</li> <li>• Safeguarding the countryside from encroachment is contravened. Landscape quality deemed 'ordinary' and new buildings would be designed with sensitivity – <b>contravention is minimised</b></li> </ul> <p>On the Green Belt, whilst there is harm it is contained and limited.</p> <p>Consequences if Planning Permission is refused:</p> <ul style="list-style-type: none"> <li>• No growth and the University will decline</li> <li>• Significant number of jobs foregone and loss of significant capital investment</li> <li>• National economy will suffer with a loss of business growth</li> <li>• Intensifying the use of the current site would not meet the needs of the University</li> <li>• Operate a split site operation is not sustainable or viable</li> </ul> <p>Recommendation: outline planning permission be granted on 20<sup>th</sup> March 2007</p>  |
| <b>Secretary of State Report (Ruth Kelly)</b>      | <p><u>Key Points</u></p> <ul style="list-style-type: none"> <li>• Very special circumstances apply only if there are no suitable alternative means of accommodating the proposed</li> </ul>   |

|   |  |
|---|--|
|   | <p>development on land that is not located within the Green Belt.</p> <ul style="list-style-type: none"> <li>• Educational need + considerable economic benefits to the City (and Region) + absence of alternative sites = very special circumstances (when weighed against the harm caused to the purposes of the Green Belt).</li> <li>• The collection of benefits put forward by the University do not, in themselves, add to the very special circumstances.</li> <li>• Agrees with the Inspector that development would not result in urban sprawl, would not set a precedent for other forms of inappropriate development within the Green Belt and it would be contained within clearly defined physical boundaries.</li> </ul> <p>Summary:</p> <p>The SoS agreed with the parties that the development was inappropriate to a green belt. However, she also accepted that the very special circumstances put forward by the university if it could be proven that <b>its needs could not be met on land not within the green belt</b>. In her opinion it had been demonstrated that no alternative sites existed. The educational need to expand the university together with the considerable economic benefits to the city amounted to the <b>very special circumstances</b> needed to justify the scheme.</p> <p>Decision: Planning permission be granted on 27 June 2007</p>  |
| <b>Example 2 – University of Cambridge</b>      |  |
| <b>Proposal</b>                                 | <p>A highly controversial laboratory at Cambridge University, designed to house monkeys, was called in for decision. The site lay on the outskirts of the built up area and already contained some university research buildings. The university argued that research involving animals was in the national interest. It would allow the university to continue with its internationally recognised work in identifying the causes of disease and developing medical and scientific techniques for combating them.</p> <p>Animal rights supporters claimed that the importance of undertaking experiments on the brains of primates had been overstated. Many medical discoveries had been made in non-primate research laboratories, they argued. They also stated that for a university that once counted Sir Isaac Newton amongst its members, it had shown remarkably little scientific method in its approach to finding an alternative site. Given that the proposed building would be within the green belt, a particularly rigorous approach was justified in assessing whether it was in fact the only realistic alternative.</p> <p>The proposal was for the erection of a building for B1 (b) research use. It proposes a new building of 8,050m<sup>2</sup> and 1,956m<sup>2</sup> of retained floorspace. The existing buildings on site cover 5,606m<sup>2</sup> of which 3,650m<sup>2</sup> would be demolished. If approved, the total floorspace would be 9,771m<sup>2</sup>. A second entrance to Huntingdon Road would be closed off.</p> |
| <b>Local Authority</b>                          | <p>South Cambridgeshire District Council (SCDC)</p> <p>Decision: Refused on 18 March 2002</p> <p>Reasons for Refusal:</p> <ul style="list-style-type: none"> <li>• The proposal is located close to the junction of a major road intersection, namely the A14, M11, A428 and A1307. Cambridgeshire Constabulary on the basis of recent experience of demonstrations against current site's, which involve animal research, has commented that the proposal will result in demonstrations. Also, it is of the view that such demonstrations at this site will result in road blockages and a serious danger to public safety</li> <li>• Whilst SCDC accepts that the proposal is in the national interest, and that this is sufficient to outweigh the harm to the Green Belt, it considers that this site is unacceptable because of the risk to public safety</li> <li>• In coming to this decision regard was had to whether conditions could be used to make the proposal acceptable. However, in discussion with Cambridgeshire Constabulary, it has been concluded that measures to limit the risk to public safety on this site would not be effective.</li> </ul>   |
| <b>Inspector's Report (Inspector J S Nixon)</b> | <p>Appeal made by the University of Cambridge under s78</p> <p>The SoS's inspector found that the proposal was inappropriate development in the green belt. The evidence did not convince</p>  |

|   |   |
|---|---|
|   | <p>him that it was of such public importance to outweigh the harm to the openness of the area. He concluded that allowing the scheme, without more substantial evidence, would leave the planning system open to "abuse." Additionally, he judged that the location would invite a greater use of police resources. It was accessible from the main road network and animal rights activists would be presented with a national stage for their demonstrations. This would harm the amenity enjoyed by local residents and would lead to constant difficulties for the police in controlling the activities of animal rights protestors, many of whom had stated that they would demonstrate outside the facility.</p> <p>Decision: recommended that the appeal be dismissed on 7 March 2003</p>  |
| <b>Secretary of State Report</b>                                | <p>Called-in for decision by SoS. Disagreed with the Inspector's recommendation to dismiss the appeal.</p> <p>However, the SoS, in making his decision, noted that the government's science minister had written to the inquiry, explaining that the government believed the research centre to be nationally important. It would consolidate the UK's position as a global leader, bringing together outstanding scientists who would be able to work in an interdisciplinary environment. He also observed that the science minister had explained why it was important for the country to benefit from the research undertaken by the university. Science and technology, he stated, had a role to play in generating wealth and in improving the quality of life to everybody.</p> <p>The SoS concluded that the proposal was in line with government policy on these matters. If permission were denied, there was a risk that leading scientists would be lost to the university and from the country as a whole. He agreed with the university that dismissing the appeal could possibly result in the end of meaningful biomedical research in Cambridge, so <b>granted permission</b>.</p> <p>Decision: 20 November 2003</p> |
| <b>High Court</b>   | <p>The claimants had argued that in finding that very special circumstances existed to justify the scheme, the SoS had granted permission without limiting the research centre to the type of facility proposed by the university. This was perverse, it was asserted, because the very special circumstances only applied to the animal laboratory and not to any research facility. Additionally, they asserted that the lobby groups opposed to the development had been deprived of a fair hearing, since the SoS's decision had been predetermined. In particular, the government's science minister had made public statements that amounted to interference in the inquiry process. But the court disagreed. It held that the SoS had not made any legal error and had arrived at a judgement based upon the evidence and government policy, which supported research on animals in seeking medical cures for human diseases.</p> <p>The decision was upheld in <i>National Anti-Vivisection Society and Another v SoS 30/07/2004</i>.</p>   |
| <b>Example 3 – St Catherine's College, University of Oxford</b> |   |
| <b>Proposal</b>   | The construction of 6 three-storey buildings providing 132 study bedrooms, 100 seat lecture theatre, seminar rooms and porters lodge, 99 additional cycle stands (497 in total) and 87 car parking spaces, landscaping and associated works. Green Belt site.   |
| <b>Local Authority</b>  | Oxford City Council (decision deferred to SoS under s77)  |
| <b>Inspector's Report (Mr K D Barton)</b>                       | <ul style="list-style-type: none"> <li>• The grant of planning permission would promote the aims of Government transport policy</li> <li>• The proposal would enhance the setting of Grade I listed buildings, provide a suitable landscape complement to the registered gardens, and enhance the character and appearance of the Conservation Area</li> <li>• The scheme would have the benefit of increasing accommodation for students and families and releasing small houses onto the local market</li> <li>• Academic facilities, which could also be used by conferences generating income that would assist in maintaining the existing listed buildings, would be improved, as would security of the College campus.</li> </ul> <p>These factors, together with the lack of any reasonable alternative site, constitute very special circumstances.</p>  |
| <b>Secretary of State Report</b>                                | The SoS agreed with the inspector that the proposals would enhance the setting of the listed building, complement the registered gardens and enhance the character and appearance of the conservation area. The harm to the green belt was  |



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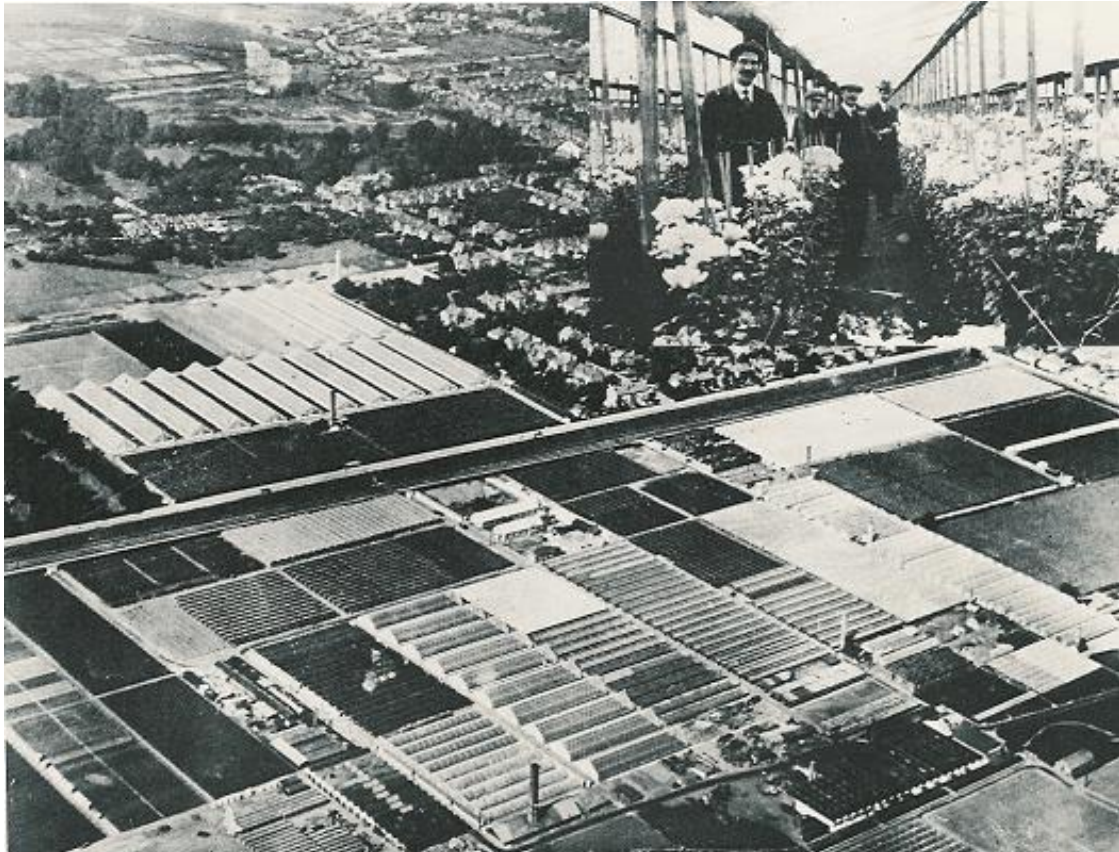
|  |   |
|--|---|
|  | <p>considered to be restricted to a slight reduction in openness. The SoS concluded that the increased student accommodation, reduced numbers of journeys around the town, the making available of housing to the local market, and the enhancement of the conference business, which contributed financially to the maintenance of the listed building, all represented substantial benefits. The SoS concluded that while the proposals were inappropriate development in green belt terms, there were special circumstances of sufficient weight to indicate that <b>permission should be granted</b>.</p> <p>Decision: 18<sup>th</sup> March 2002</p> |
|--|---|

**GVA**  
December 2015.

## Enclosure G

### Historical Land Use Report

---



**Aerial view of part of the Lowe & Shawyer Nurseries in 1929**  
**Cleveland Road and the former railway line runs across**  
**the centre of the photograph**

**BRUNEL UNIVERSITY LONDON**  
**SITE 4**  
**HISTORICAL LAND USE**

**December 2014**

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## **Introduction**

Site 4, which is one of 5 sites owned by Brunel University London, has an area of 30.64 acres / 12.40 hectares. The site lies to the south of site 2 and is bisected by the river Pinn.

The Garden Centre, which forms part of site 4, is leased to the Garden Centre Group. Milton House is also situated on site 4.

A double access gate at the west end of Nursery Lane is kept locked.

## **Nursery and Market Garden**

The University's site 4 was formerly part of the Lowe and Shawyer nursery and Market Garden.

The history of market gardening began in 1868 when Joseph Lowe started a cut flower nursery in Kingston Lane. The business grew and the nursery expanded such that by 1914 George Shawyer was taken into partnership and there were 6 nurseries covering 71 acres in an area bounded by Cowley Road, Hillingdon Road and Royal Lane.

By the mid 1930's the acreage was 200 and the labour force approached 1000. Fourteen boiler houses consuming 6000 tons of fuel per year were needed to heat 35 acres of greenhouses and Artesian wells were bored to boost the water supply.

The nursery kept going until 1958 when the company went into voluntary liquidation.

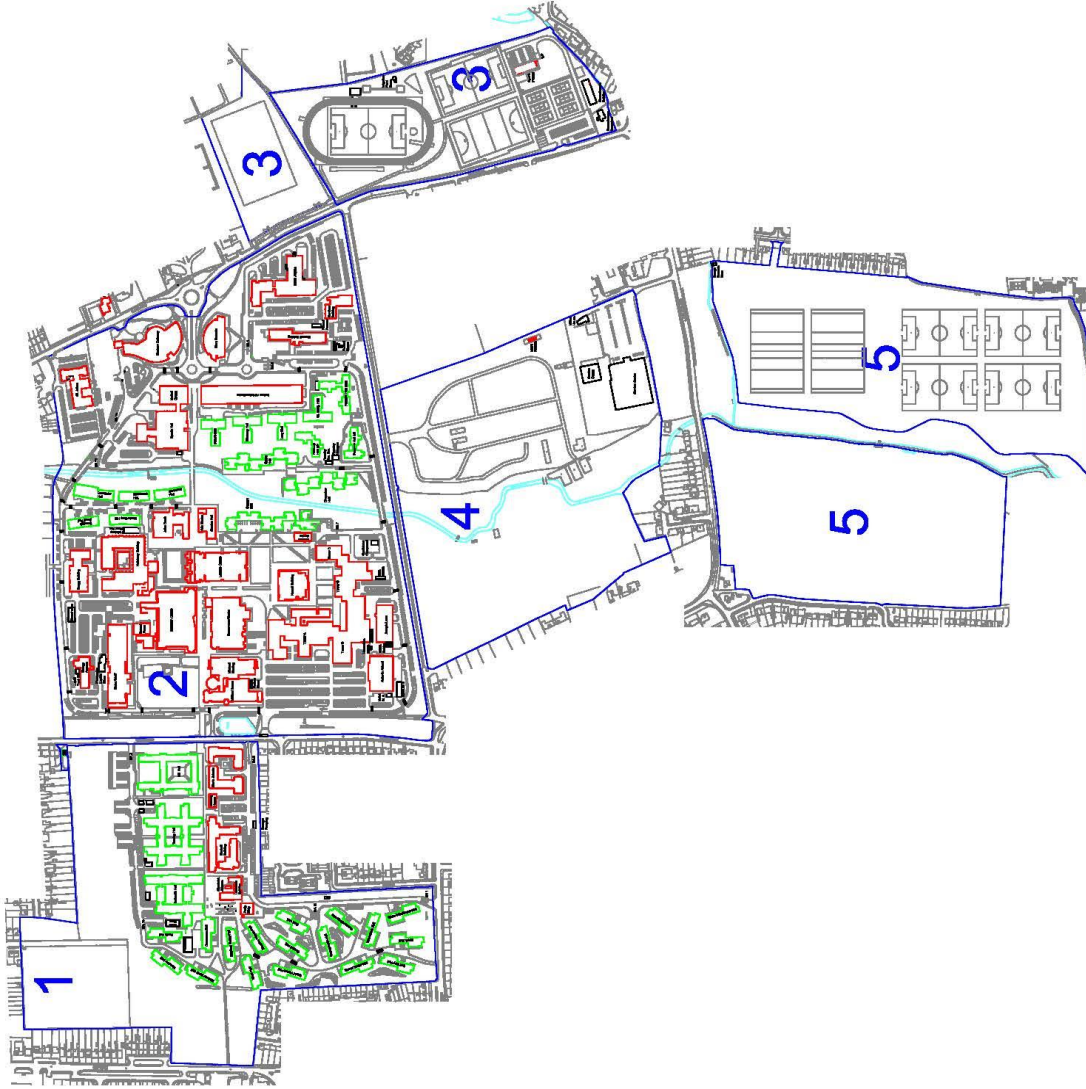


**Notes:**

1. In addition to being used to provide access to the infrastructure, the roads are also used for parking and loading/unloading.
2. The number in parentheses in the table indicates the number of buildings in the site.
3. Dimensions shown on the drawing shall be as indicated. Only vertical or horizontal dimensions shall be used.

**SCHEDULE OF SITE AREAS**

- |               |                  |
|---------------|------------------|
| <b>SITE 1</b> | • 34.03 Acres    |
|               | • 13.78 Hectares |
| <b>SITE 2</b> | • 66.17 Acres    |
|               | • 26.78 Hectares |
| <b>SITE 3</b> | • 19.82 Acres    |
|               | • 8.02 Hectares  |
| <b>SITE 4</b> | • 30.64 Acres    |
|               | • 12.40 Hectares |
| <b>SITE 5</b> | • 42.82 Acres    |
|               | • 17.33 Hectares |



| Site No.     | Area (Acres)  | Area (Hectares) | No. of Buildings |
|--------------|---------------|-----------------|------------------|
| 1            | 34.03         | 13.78           | 1                |
| 2            | 66.17         | 26.78           | 1                |
| 3            | 19.82         | 8.02            | 1                |
| 4            | 30.64         | 12.40           | 1                |
| 5            | 42.82         | 17.33           | 1                |
| <b>Total</b> | <b>193.58</b> | <b>78.30</b>    | <b>5</b>         |

**Brunel University**  
 Uxbridge Campus  
 Uxbridge, Middlesex, UK

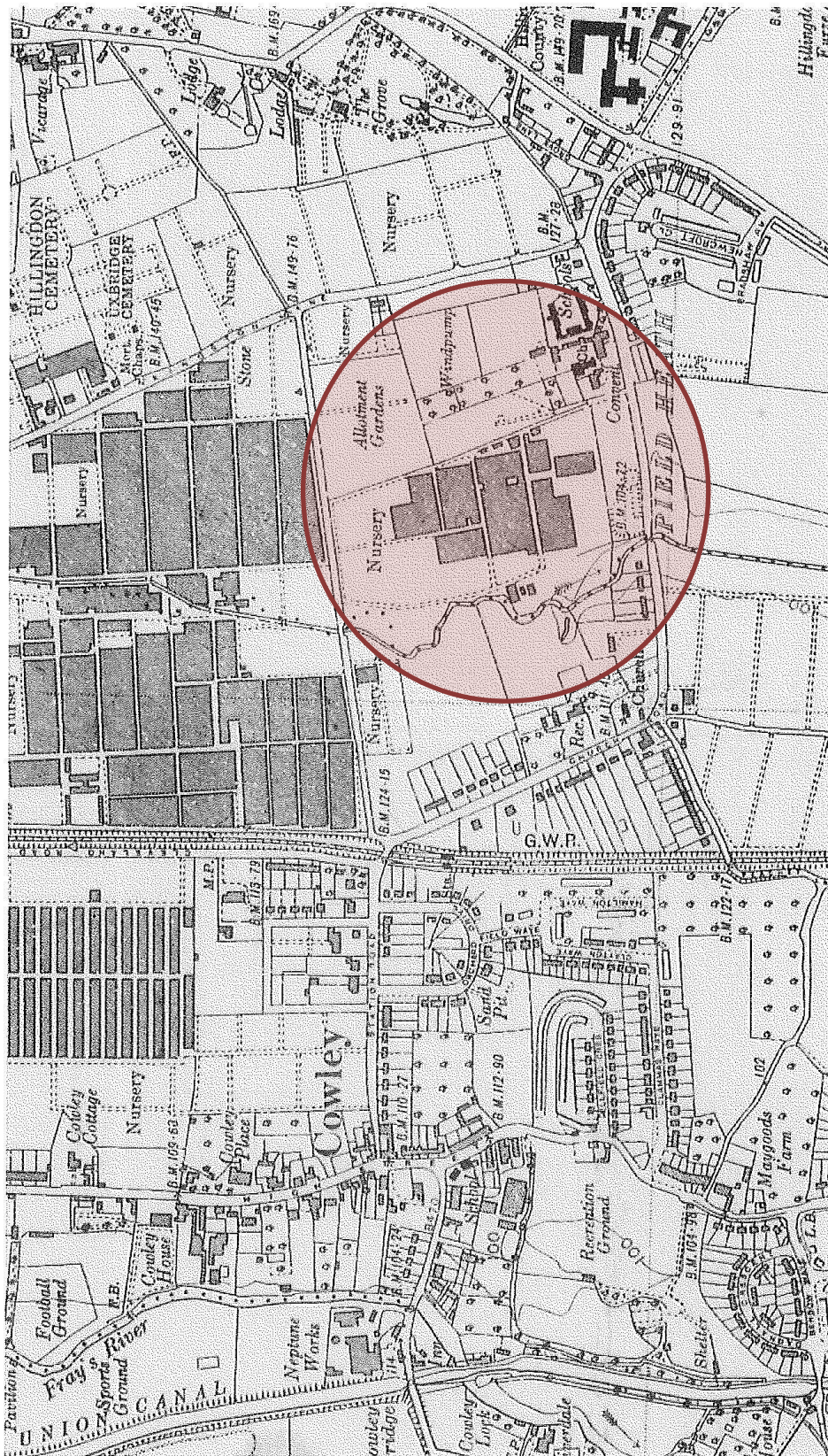
**BRUNEL UNIVERSITY ESTATE**

Uxbridge Campus - All Sites

Scale: 1:1000

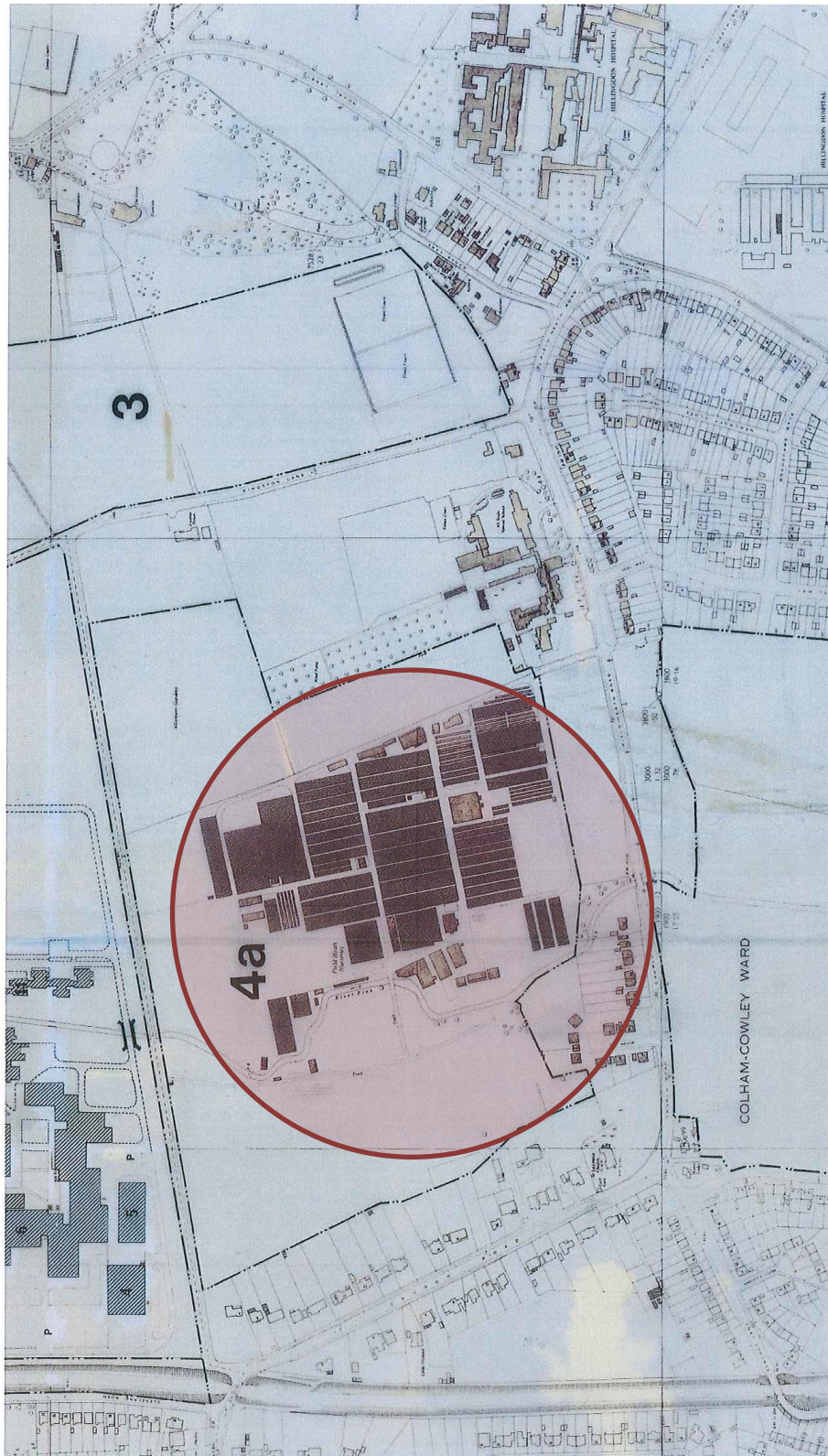
0 50 100 200 METERS





**An extract from a 1938 map**  
**Site 4 highlighted in red with the nurseries**  
**clearly visible**





**An extract from a 1978 map  
Site 4 highlighted in red with the nurseries  
clearly visible**

## **Site 4 Derelict Buildings and Building Foundations**

Gradually the nursery buildings were demolished leaving concrete bases, the Garden Centre and Milton House.

A plan was prepared in 2004 to record the buildings that existed at that time, many of these buildings were structurally unsound and contained asbestos products and for Health and Safety reasons the buildings were demolished.

The building records are shown on the attached plan and photographs.

## **Asbestos**

Inspections were carried out in 2012 as a result of which some asbestos material was removed and safely disposed of.

A plan is attached showing the locations of asbestos removed.

This exercise was hampered by dense undergrowth but every effort was made to identify and remove asbestos containing materials lying on the surface.







Building 1



Building 2



Building 3



Building 4 (Retained)





Building 5



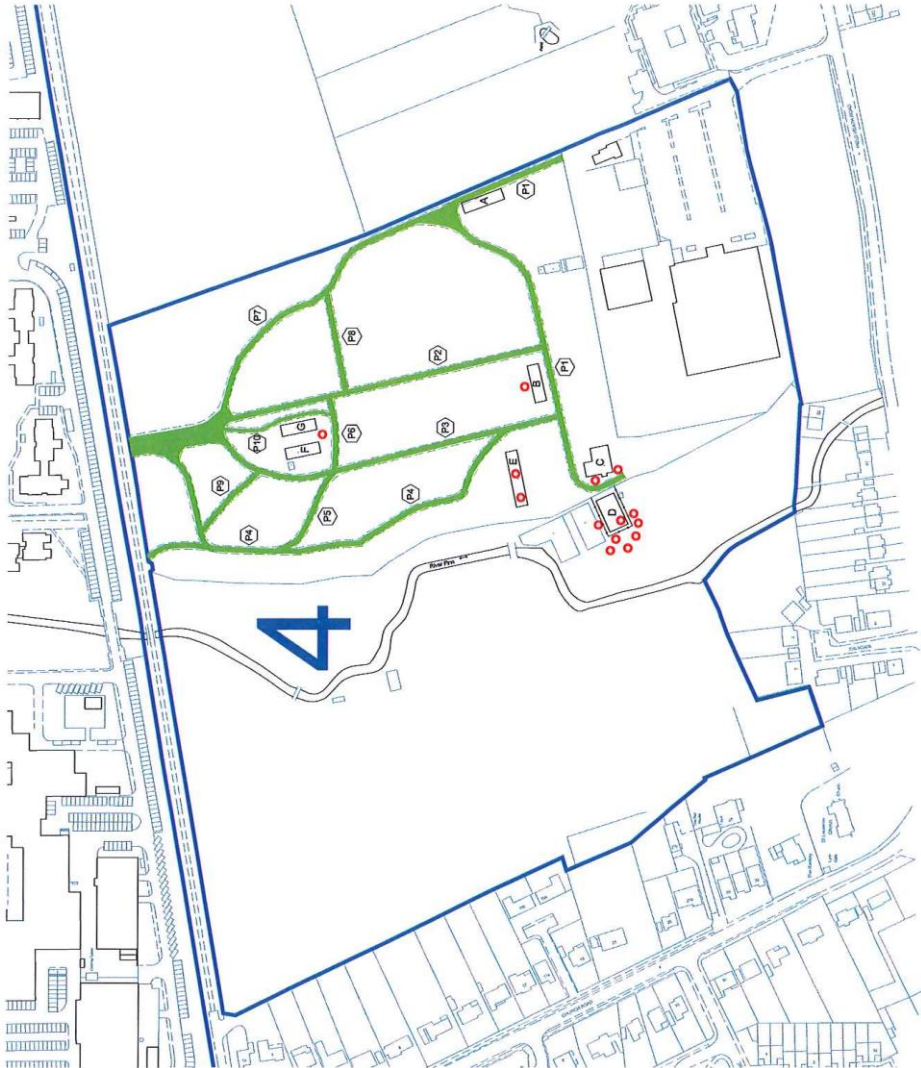
Building 6

**Notes:**

1. In addition to these notes reference shall be made to the specification for the works and all relevant Architectural and specialist drawings.
2. The contractor is responsible for verifying all site setting out dimensions before commencing work.
3. Dimensions shown on this drawing shall not be scaled. Only written or calculated dimensions shall be used.

**Drawing Notes:**

- Indicates pathways
- Pathway No.
- Indicates asbestos cement debris
- A Millen Armes
- B Building rubble
- C Concrete slab
- D Asbestos well concrete slab
- E Building rubble
- F No building found
- G No building found



|   |                                      |                     |       |         |          |
|---|--------------------------------------|---------------------|-------|---------|----------|
| Rev   | Date                                 | Purpose of revision | Drawn | Checked | Approved |
| <p><b>Brunel UNIVERSITY LONDON</b><br/>                 BRUNEL UNIVERSITY<br/>                 BRUNEL UNIVERSITY<br/>                 WILFRED BROWN BUILDING<br/>                 KINGSTON LANE<br/>                 UXTON ROAD<br/>                 MIDDLESEX<br/>                 UB8 3PH<br/>                 TEL: 01895 274000<br/>                 FAX: 01895 259732</p> |                                      |                     |       |         |          |
| <p>Project: BRUNEL UNIVERSITY ESTATE</p>  |                                      |                     |       |         |          |
| <p>Drawing title: SITE 4<br/>                 PATHWAYS AND DEBRIS</p>   |                                      |                     |       |         |          |
| <p>Drawing data</p>   |                                      |                     |       |         |          |
| Drawn By:   | PAW                                  | Checked By:         |       | Date:   | 29.08.12 |
| Scale:  | AS SHOWN ON SITE PATHWAYS AND DEBRIS |                     |       |         |          |
| Drawing Number:   | BU-SITE 4 PATHWAYS AND DEBRIS        |                     |       |         |          |
| Rev   | A                                    |                     |       |         |          |

NOT TO BE REPRODUCED WITHOUT THE EXPRESS PERMISSION OF BRUNEL UNIVERSITY OR THE APPOINTED AGENT. COPYRIGHT 2008

100491024 - Demolished Pathway

**2012 locations of asbestos debris (removed)**

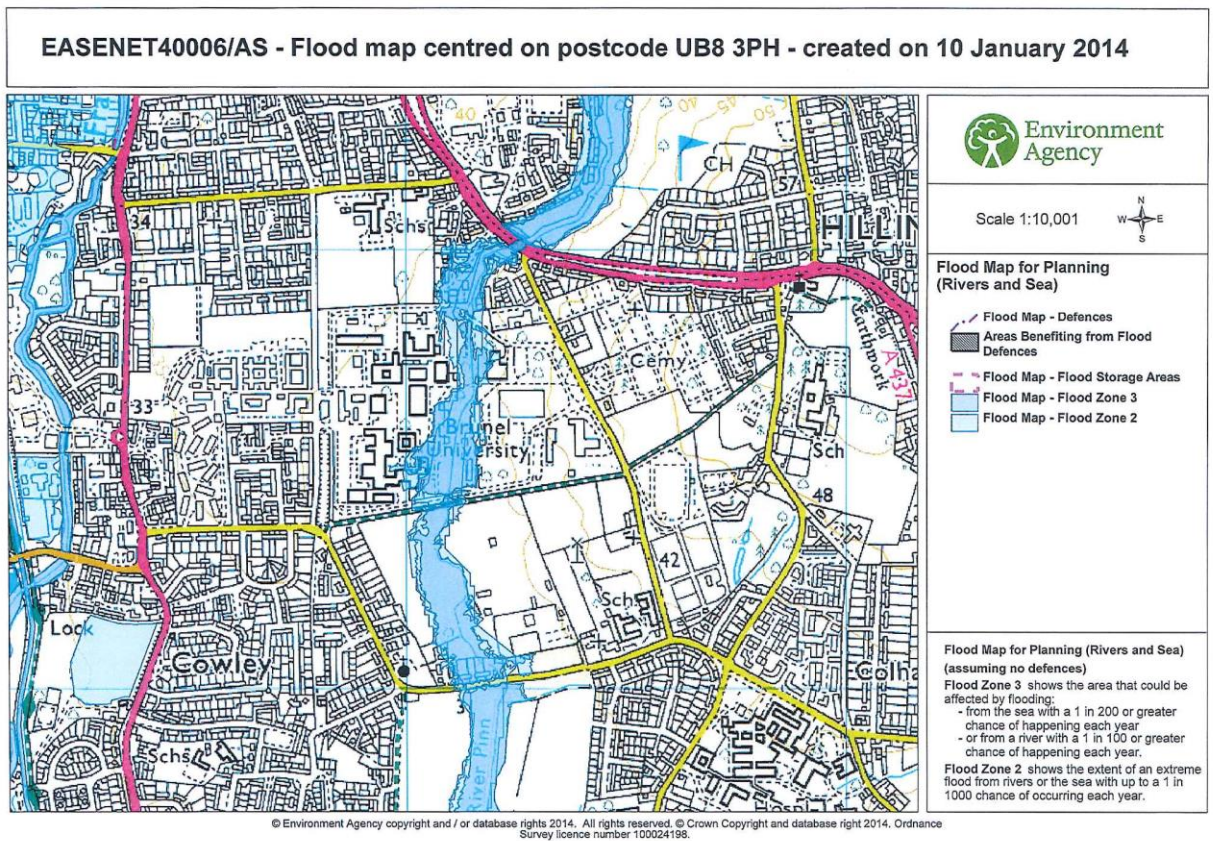


# The River Pinn

The River Pinn passes through Brunel University, entering the campus boundary to the north of Lancaster Hall on site 2 running entirely through site 4.

Flood risk assessment maps are regularly prepared and updated by the Environment Agency.

The extract below is the latest flood map received from the EA in January 2013.



Contact Us: National Customer Contact Centre, PO Box 544, Rotherham, S60 1BY. Tel: 03708 506 506 (Mon-Fri 8-6). Email: [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)



## Topographical Survey

In 2006 a topographical survey was commissioned and produced for site 4.

The following is an extract from the drawing produced.

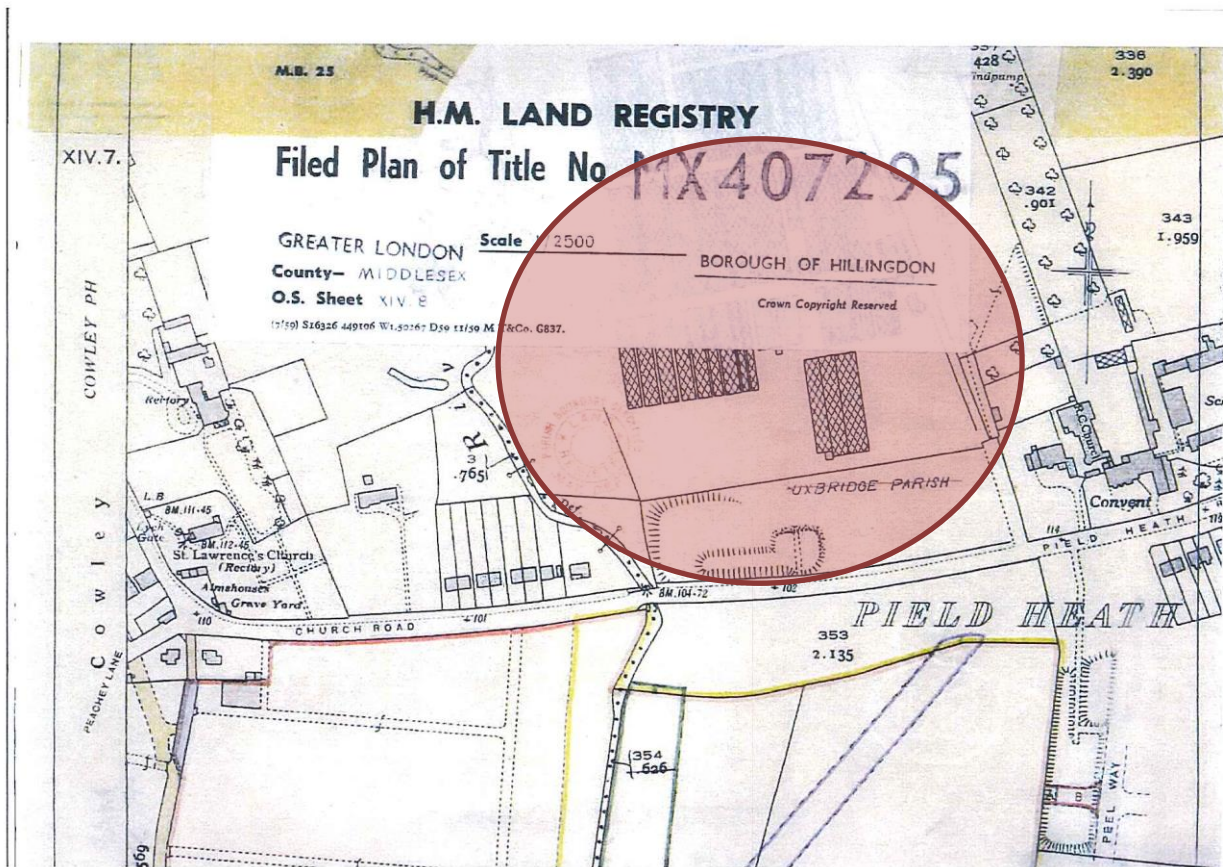
Remnants of the historic buildings, that once existed, have been recorded.



# Land Registry Field Plan

The extract below is from the 1960 land registry title deed for site 5.

It has been included in this report as it indicates-albeit slightly obscured-the historic nursery buildings that existed on site 4.





## Site 4 West Side

The land to the west of the river Pinn on site 4 is a mixture of grass, woodland and hedgerow.

A number of residential properties along Church Road are backing onto the boundary line of this part of site 4.

Below is a photo taken in 2011 from the roof of Tower C looking over the west side grass land towards those properties.





# Aerial View Today - Site 4 Highlighted



# Enclosure H

## Ecological Appraisal

---





UNITED  
BY OUR  
DIFFERENCE



## SITE 4, BRUNEL UNIVERSITY UXBRIDGE

### Preliminary Ecological Appraisal

10/03/2015

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# Quality Management

| Issue/revision | Issue 1                                   | Revision 1 | Revision 2 | Revision 3 |
|----------------|---|------------|------------|------------|
| Remarks        | Final                                     |            |            |            |
| Date           | 10/03/15                                  |            |            |            |
| Prepared by    | H Spray and G Turner                      |            |            |            |
| Signature      |   |            |            |            |
| Checked by     | H Spray                                   |            |            |            |
| Signature      |   |            |            |            |
| Authorised by  | R Donovan                                 |            |            |            |
| Signature      |   |            |            |            |
| Project number | 70009585                                  |            |            |            |
| Report number  |   |            |            |            |
| File reference | Brunel University_<br>Phase 1 Report V1.0 |            |            |            |

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# SITE 4, BRUNEL UNIVERSITY UXBRIDGE

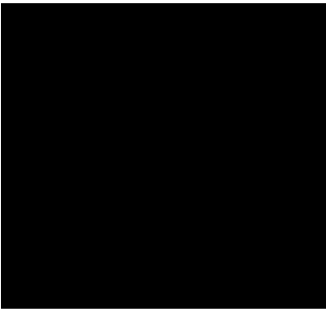
## Preliminary Ecological Appraisal

10/03/2015

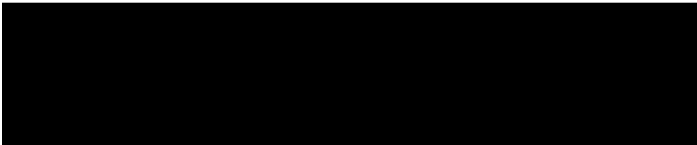
### Client

Brunel University London  
Uxbridge, UB8 3PH

### Consultant



### Registered Address



### WSP Contacts

Hattie Spray

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# 1 Introduction

## 1.1 Project Background

- 1.1.1 The Uxbridge Campus of Brunel University, London includes both built areas and green space to the south of Nursery Lane, Uxbridge. The section of the campus to the south of Nursery Lane is known as Site 4, and is bisected by the River Pinn (see Figure 1).
- 1.1.2 Site 4 was formerly part of the Lowe and Shawyer Nursery and Market Garden which served the cut flower market in the early 20<sup>th</sup> century. The nursery was active until 1958, subsequently buildings have been demolished with the exception of Milton House (immediately to the east of the current Site boundary), and the Garden Centre (immediately to the south). It is located to the south of the main Uxbridge Campus, and surrounded to the west by residential development. Allotments lie to the east of Site 4 and to the south, beyond Church Road, the River Pinn flows through open green space characterised by grassland fields bounded by hedgerows and scrub.
- 1.1.3 At present, Site 4 can be described as having two main areas. To the east of the River Pinn the site encompasses the Bicentennial Gardens. To the west of the River Pinn comprises grassland with scrub present at the margins. The River Pinn at this location is shaded by a corridor of bankside tree and shrub cover, it has an open channel form.
- 1.1.4 Land to the south of Church Road (and Site 4) forms The River Pinn and Manor Farm Site of Borough Importance for Nature Conservation (grade II)(SBINCII), as shown within the Hillingdon Unitary Development Plan 1998 (saved policies 2007). The Local Plan: Part 2, Site Allocations and Designation (Proposed Submission Version, September 2014) includes the proposed extension of The River Pinn and Manor Farm SBINCII to include Site 4.

## 1.2 Aims and Objectives

- 1.2.1 Brunel University London instructed WSP UK Ltd. to complete a preliminary ecological appraisal of Site 4 in February 2015. The aims of the preliminary ecological appraisal were twofold:
- firstly to establish the reasoning for the proposed extension to the River Pinn and Manor Farm SBINCII within the proposed sites allocation document; and
  - secondly, to gather baseline survey data to inform consideration as to whether there is justification for the proposed extension.
- 1.2.2 To achieve the above aims a desk based data review was completed and extended Phase 1 habitat survey completed. The results of these tasks are contained within this report.



---

## 2 Methods

### 2.1 Overview

2.1.1 An extended Phase 1 habitat survey was completed on the 19<sup>th</sup> February 2015 in accordance with standard methods (JNCC, 2010), supplemented by an ecological desk study completed during February 2015 to collate existing biological records relevant to the Site held by third parties. Together the results of these tasks form the basis for preliminary ecological appraisal in line with good practice guidance (CIEEM, 2013).

### 2.2 Desk Study

2.2.1 A desk study exercise was undertaken in February 2015 to review existing ecological baseline information available in the public domain and to obtain information held by relevant third parties. For the purpose of the desk study exercise, the study area was defined as the Site (see Figure 1) with various search radii used in the desk based assessment. This approach is consistent with the CIEEM preliminary ecological appraisal guidelines (CIEEM, 2013).

2.2.2 To provide the baseline data for the study area, the following information was requested from the two record centres; Greenspace information for Greater London (GIGL) and Buckinghamshire and Milton Keynes Record Centre:

- Records of non-statutory sites designated for nature conservation value within 2km of the Site;
- Records of legally protected and notable species within 2km of the Site; and
- Bat records within a 5km radius.

2.2.3 Freely downloadable corporate datasets (available from Natural England) were interrogated for information regarding the presence of statutory designated sites within 2km of the Site and woodland listed on the Ancient Woodland Inventory. This search was extended to 10km for European designated Natura 2000 sites (Special Areas of Conservation (SAC) and Special Protection Areas (SPA) and internationally important wetland sites (designated as Ramsar sites).

2.2.4 The findings of the desk study have been incorporated within this report, and shown on Figures 2-4, with additional information included within Appendices A and B.

### 2.3 Phase 1 Habitat Survey

2.3.1 An extended Phase 1 habitat survey of the Site was conducted following Joint Nature Conservation Committee (JNCC) survey methods (JNCC, 2010) extended to include consideration of habitat suitability for protected species (CIEEM, 2013).

2.3.2 Phase 1 habitat survey is a standard technique for classifying and mapping British habitats where the dominant plant species are recorded and habitats are classified according to their vegetation types. All habitats present within the Site were mapped during the field survey visit, with target notes used to identify features of interest (shown on Figure 5). A description of each habitat type was recorded with an indicative botanical species list gathered and a photo appendix compiled (Appendix C).

---

## 2.4 Dates and Personnel

- 2.4.1 The extended Phase 1 habitat survey was completed on 19th February 2015 by Hattie Spray MCIEEM (Associate Ecologist with WSP UK Ltd.). Hattie has over ten years' experience working as a professional consultant ecologist, and is very familiar with habitat survey methods and classification.
- 2.4.2 The desk based assessment was also completed by Grace Turner, Grad CIEEM and Graduate Ecologist with WSP UK Ltd.

## 2.5 Notes and Limitations

- 2.5.1 Records held by local biological records centres and local recording groups are generally collected on a voluntary basis; therefore, the absence of records does not necessarily demonstrate the absence of species, it may simply indicate a gap in recording coverage, however provide a useful indication of which species are active in an area.
- 2.5.2 The field survey was completed outside of the optimal season for extended Phase 1 habitat surveys, as defined by JNCC (2010); the optimal seasonal period is defined to target periods when key species within botanical habitats are in flower and is generally accepted to be April to September inclusive. Whilst broad habitat types were recorded, at this time of year it is not possible to collect a fully comprehensive botanical species list. This is acknowledged during interpretation of the survey results within this report.

## 3 Results

### 3.1 Desk Study

#### 3.1.1 European Designated Sites

3.1.2 Sections of one European designated site, the 'South West London Water bodies' Special Protection Area (SPA), which is also a Ramsar site, lies within 10km of Site 4. The SPA designation encompasses a number of separate water bodies; most are reservoirs or large lakes. The nearest of which is Wraysbury Reservoir; located approximately 7.4km from Site 4. Qualifying species for the SPA designation include shoveler *Anas clypeata* and gadwall *Anas strepera* overwinter, in addition the Ramsar description acknowledges the wider bird assemblage present in during the autumn and spring periods. The reasons for designation are summarised in Table 1 below.

**Table 1: European designated sites within a 10km radius of the Site**

| Site Name  | Designation | Proximity to Site             | Description  |
|--|-------------|-------------------------------|--|
| South west London Waterbodies<br><br>(Including Wraysbury Reservoir; Sunny Meads; King George Reservoir & Staines Reservoir) | SPA         | 7.4km* S (nearest water body) | <p><b>This site qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:</b></p> <p>Over winter;</p> <ul style="list-style-type: none"> <li>Shoveler <i>Anas clypeata</i>, 1,075 individuals representing at least 2.7% of the wintering Northwestern/Central Europe population (5 year peak mean 1991/2 - 1995/6) .</li> <li>Gadwall <i>Anas strepera</i>, 786 individuals representing at least 2.6% of the wintering Northwestern Europe population (5 year peak mean 1991/2 - 1995/6) (JNCC, 2015).</li> </ul>   |
|  | Ramsar      |                               | <p><b>This Site qualifies for a Ramsar designation due to the presence of internationally important populations of the following bird species:</b></p> <ul style="list-style-type: none"> <li><b>Species with peak counts in spring/ autumn:</b> Northern shoveler <i>Anas clypeata</i> (North-western and central Europe) 397 individuals representing an average of 2.6% of the Great Britain population (5 year peak mean 1998/99- 2002/03).</li> <li><b>Species with peak counts in winter:</b> Gadwall; 487 individuals representing an average of 2.8% of the Great Britain populations (5 year peak mean- 1998/99- 2002/03).</li> </ul> <p><b>The Ramsar site citation also makes reference to a number of other species that are qualifying features of the site, but not primary reasons for its designation.</b></p> <ul style="list-style-type: none"> <li><b>Species with peak counts in spring/ autumn:</b> Great crested grebe <i>Podiceps cristatus</i> (North-western Europe)- 318 individuals representing an average of 2% of the Great Britain population (5 year peak mean 1998/99- 2002/03); Great cormorant <i>Phalacrocorax carbo</i> (North-west Europe)- 318 individuals representing an average of 1.3%of the Great Britain population (5 year peak mean 1998/99- 2002/03); Tufted duck <i>Aythya fuligula</i> (North Western Europe)- 2,731 individuals representing an average of 3% of the Great Britain population (5 year peak mean 1998/99- 2002/03).</li> <li><b>Species with peak counts in winter:</b> Black-necked grebe <i>Podiceps nigricollis</i> (Europe, North Africa)- 2 individuals representing an average of 1.6% of the Great Britain population (5 year peak mean 1998/99- 2002/03); Smew <i>Mergus albellus</i> (North-western and central Europe)- 29 individuals representing an average of 7.8% of the Great Britain population (5 year peak mean 1998/99- 2002/03).</li> </ul> |

### 3.1.3 UK Statutory Designated Sites

3.1.4 There are no UK statutory sites within a 2km search area of Site 4, however there were a number of non-statutory sites (see Table 2 below and Figure 2).

### 3.1.5 Non Statutory Designated Sites

3.1.6 The non-statutory site information returned by GiGL indicates that Site 4 forms part of the River Pinn and Manor Farm SBINCII, the boundary of which was extended in 2005 to include this land. The citation (dated 23/03/2005) which describes the reasons for designation is included in Appendix A for ease of reference.

3.1.7 A total of nine other SINC's and one local site of importance were identified within a 2km radius Site 4 (GiGL Report, 2015). No Notable Road Verges (NRV) were identified within the search radius. The reasons for designation are summarised in Table 2 below and locations shown on Figure 4.

**Table 2: Summary of Non-Statutory Sites within 2km of Site 4**

| Site Name                          | Designation (Map Code)     | Proximity to Site | Description   |
|------------------------------------|----------------------------|-------------------|---|
| Uxbridge and Hillingdon Cemeteries | Borough Grade II (HiBI141) | 214m E            | These two cemeteries contain flower rich grassland with patches of taller grasses and flowers. The gravestones and walls are well vegetated with lichens and bryophytes. There are scattered trees and an area of woodland, with a diversity of woodland birds.   |
| The Grove                          | Borough Grade II (HiBI111) | 548m E            | A sequence of shaded ponds within the nature reserve, surrounded by grassland, scrub patches and woodland. Peacock <i>Aglais io</i> and holly blue <i>Celastrina argiolus</i> butterflies and a number of woodland birds occur here.  |
| Frays River at Uxbridge Moor       | Borough Grade I (HiBI110)  | 769m NW           | This section of the Fray's River flows through urban Uxbridge and Cowley, adjacent to open spaces such as Rockingham Recreation Ground and hold a reasonable diversity of wetland plants and waterfowl. The river forms a valuable wildlife corridor through a built-up area.   |
| London's Canals                    | Metropolitan (M006)        | 1000m W           | London's canals support a wide range of aquatic flora, amongst which are found a number of locally uncommon species. These include species associated with clean, clear water such as narrow-leaved water plantain <i>Alisma lanceolatum</i> and rigid hornwort <i>Ceratophyllum demersum</i> . Many waterside plants also grow on the brickwork and banks of the canal. The canals also support important invertebrate fauna (including dragonflies and damselflies), a diverse fish community and breeding waterfowl. The whole of the Grand Union Canal system in London are included in this single metropolitan site.  |
| River Pinn and Manor Farm Pastures | Borough Grade II (HiBI107) | 1021m S           | A stretch of the River Pinn is bordered on both sides by open grassland, much of which comprises rank grasses, tall herbs and scattered scrub with some sports fields. The river is lined by trees and shrubs, the heavy shading from introduced species (such as Japanese Knotweed <i>Fallopia japonica</i> ; Giant Hogweed <i>Heracleum mantegazzanum</i> and Indian balsam <i>Impatiens glandulifera</i> has led to the death of aquatic plants. Two of the fields to the west are grazed by horses and the rest are infrequently mown. To the north, the former Pield Heath Nursery comprises a number of fenced horse-grazed paddocks on both sides of the river. There is a well-structured patchwork of grassland, tall herbs and ruderal vegetation. Winter flocks of chaffinch <i>Fringilla coelebs</i> and greenfinch <i>Carduelis chloris</i> occur here and public access is restricted to the footpaths. |
| Little Britain                     | Metropolitan (M043)        | 1134m W           | This area of the Colne Valley has a variety of habitats including rivers, scrub, areas of wasteland, woodland and neutral grassland. There are also a number of marginal habitats including wet woodland. Unbranched bur-reed <i>Sparganium emersum</i> and water dock <i>Rumex hydrolapathum</i> both occur in the Frays. A stretch of unimproved floodplain grassland supports a variety of nationally scarce flora. The lakes were originally gravel pits that now attract various breeding and wintering birds.   |
| Hillingdon Court Park              | Local (HiL04)              | 1425m NE          | A large park with plenty of mature trees and small areas of woodland and wetland.   |
| Stockley                           | Borough                    | 1910m SE          | This large, hilly country park contains extensive grassland and other   |

| Site Name   | Designation (Map Code)     | Proximity to Site | Description  |
|---|----------------------------|-------------------|--|
| Park Country Park                                   | Grade II (HiBII12)         |                   | habitats including tall herbs, scrub, trees and hedgerows, much of which has been planted. A large variety of sown wildflowers occur and there is a small pond. The site is good for invertebrates including localised species Roesel's bush-cricket <i>Metrioptera roeselii</i> . Other species include a diversity of butterflies, dragonflies and damselflies.  |
| Uxbridge Common Meadows                             | Borough Grade II (HiBII01) | 1963m N           | The River Pinn meanders through this large area of old meadows, hedgerows and small woods. The river is heavily shaded and runs under the railway which is a good wildlife corridor with a strip of riparian vegetation. Uncommon species include yellow iris <i>Iris pseudacorus</i> and yellow loosestrife <i>Lysmachia vulgaris</i> . The main part of the site comprises grasslands and hedgerows with some woodland along the railway embankment.   |
| Mid Colne Valley                                    | Metropolitan (M045)        | 1990m N           | A section of the Colne Valley with a remarkable range of high-quality wetland habitats. The unimproved wet pastures of Frays Farm Meadows (SSSI and LNR) are managed by the London Wildlife Trust and support uncommon species such as marsh-marigold <i>Caltha palustris</i> and ragged-robin <i>Lychnis flos-cuculi</i> . The site also supports locally declining glow-worm <i>Lampyrus noctiluca</i> and a number of wader birds, harvest mice and water vole <i>Arvicola amphibius</i> .  |
| Home Covert, Lowdham Field and Pole Hill Open Space | Borough Grade II (HiBII52) | 2000m E           | Home Covert is a block of woodland in the north-west of the site, dominated by oak and a number of large trees. The woodland floor is generally rather bare due to high pedestrian usage. Rushes and great willowherb <i>Epilobium hirsutum</i> grow in seasonally wet ditches beside the paths. Purple hairstreak <i>Neozephyrus quercus</i> occur at woodland edges. To the south; Lowdham Field contains moderately species-rich and well-structured grassland. Pole Hill Open Space to the east has a significant network of outgrown hedgerows and seasonally wet ditches along amenity grassland. There is an area of rough grassland with exceptionally rich flora. |
| Uxbridge Ponds                                      | Borough Grade I (HiBI06)   | 2149m N           | Three ponds in Uxbridge support amphibians; two of which are breeding ponds for great crested newts <i>Triturus cristatus</i> (GIGL, 2006 citation updated) with an assemblage of aquatic plants, a number of which are locally scarce. Around the ponds is acid grassland, scattered trees and secondary woodland.  |

### 3.1.8 Ancient Woodland

3.1.9 There were no parcels of ancient woodland identified from the desk study within the 2km search radius of the Site.

### 3.1.10 Habitats of Principal Importance (HPI)<sup>1</sup>

3.1.11 Existing datasets indicate that two habitats of principal importance are located within the boundary of Site 4; these include lowland mixed deciduous woodland and traditional orchards.

### 3.1.12 Legally Protected and Notable Species Records

3.1.13 Records of protected species and species of conservation concern identified within a 2km radius of Site 4 (extended to 5km for bats) are summarised in Table 3 and Table 4 in Appendix B. For the purpose of the desk study, only records dated within the last 10 years have been considered as these are likely to be of more relevance. No records of notable or protected species were identified within the Site boundary itself. In the absence of any exact coordinates; figures showing record

<sup>1</sup> Information on the HPI present within the area determined through review of Biodiversity Action Plan habitats defined within freely available Natural England GIS datasets. The former BAP habitats have been superseded, and now broadly match habitats listed as HPI's in response to the NERC Act 2006.



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distribution were not able to be produced, however distances from Site are detailed in Table 3, Appendix B.

- 3.1.14 The only terrestrial mammal records within the 2km search (excluding bats) were Eurasian badger *Meles meles*. The exact positions of these records are unknown as they were only provided within a 2km resolution from the Site boundary, due to the confidentiality of data. There was also one record returned of a European hedgehog *Erinaceus europaeus*, located just outside the 2km search area of the Site.
- 3.1.15 Bat records were returned from GIGL 2015, these are detailed in Table 3, Appendix B. There were no bat records returned from Buckinghamshire Environmental Record Centre within a 5km radius (BMERC, 2015). A total of seven species were recorded within the 5km search area of the Site; including common pipistrelle *Pipistrellus pipistrellus*; soprano pipistrelle *P. pygmaeus*; Nathusius' pipistrelle *P. nathusii*, serotine *Eptesicus serotinus*, noctule *Nyctalus noctula*, Daubenton's bat *Myotis daubentonii* and the brown long-eared bat *Plecotus auritus*. There were also a couple of unidentified bat *Chiroptera sp.* records, and records grouped as pipistrelle species *Pipistrellus sp.* No specific bat roosts were identified from the data search.
- 3.1.16 There was just one great crested newt *Triturus cristatus* record from 2010 recorded just outside the search radius; 2327m north of Site (GIGL, 2015). Other amphibian records within 2km search area include the common toad *Bufo bufo* for which a record 1296m north of Site 4 occurs. A common lizard *Zootoca vivipara* record was also returned at 1296m north of Site 4.
- 3.1.17 Bird records within 2km of the Site identified a total of 21 notable bird species. Due to the mobile nature of birds, these records have not been mapped; however Table 4, Appendix B, lists the species records returned. Six of these birds are listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended); seven are listed as Red on the Birds of Conservation Concern Red list; and twelve are Amber listed (see Eaton et al, 2009). Six species are listed as species of principal importance (SPI) under provisions of the NERC Act 2006. The majority of records relate to more urban habitats including swift *Apus apus* and the song thrush *Turdus philomelos*. There were also a number of birds of prey; including kestrel *Falco tinnunculus*, hobby *Falco subbuteo* and red kite *Milvus milvus*.
- 3.1.18 There were also a number of protected invertebrate records which were returned from the desk study for a range of species (see Table 3). No records were returned for Site 4 itself or in very close proximity, the nearest records were from 624m to the north. The vast majority of records were of moths and butterflies. The exception is records of stag beetle *Lunecanus cervus*, 1414m north of Site. The closest records were positioned at the same 1km resolution; 624m to the north of the Site. These include the brown argus *Aricia agestis*, the marbled white butterfly *Melanargia galathea subsp.serena* and the small heath butterflies *Coenonympha pamphilus*. The other invertebrate records were all positioned further away to the north and northwest of the Site.
- 3.1.19 Notable protected plants were also recorded within the 2km search radius; the closest of which is bladderwort *Utricularia australis* which was found 486m north east of the Site. Frogbit *Hydrocharis morsus-ranae* (listed as vulnerable under IUCN and County Rare) and three other plants located within the 2km search radius listed as County Scarce, were provided in a 2km resolution so their exact locations and distances from Site remains unknown (See Table 3).

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## 3.2 Extended Phase 1 Habitat Survey

### 3.2.1 Overview

3.2.2 The extended Phase 1 habitat survey confirmed that Site 4 is formed of two distinct areas bisected by the River Pinn; to the east of the river the Bicentennial Gardens lie on the site of the former Lowe and Shawyer Nurseries, and to the west of the river Site 4 comprises grassland which is currently grazed by a horse. Habitats present include scattered trees/semi-natural woodland, dense scrub, semi-natural grassland (bordered by ruderal vegetation), running water and species-poor intact hedgerow. A small porta-cabin building is also present within the Bicentennial Gardens. There is palisade fencing around the area as a whole, and separating the Bicentennial Gardens from the River Pinn corridor.

### 3.2.3 Habitat Descriptions

#### Scattered Broad-leaved Trees / Semi-natural Woodland

3.2.4 Mature trees are present along the River Pinn corridor including crack willow *Salix fragilis*, common alder *Alnus glutinosa* and pedunculate oak *Quercus robur*. In places collections of trees effectively form small parcels of semi-natural woodland; this is particularly the case in the southern section of Site 4 to the west of the River Pinn. In nearly all parts the shrub layer is dominated by bramble *Rubus fruticosus* agg. and ground flora appeared to be sparse, although lord's-and-ladies *Arum maculatum* was identified to the present.

#### Semi-improved Grassland

3.2.5 To the west of the River Pinn, semi-improved grassland is present (see Photograph 9, Appendix C). This area is currently horse grazed, and this has likely reduced the degree of scrub encroachment although dense stands of bramble scrub are present around the margins. The grassland appears to be dominated by false oat grass *Arrhenatherum elatius* with bents *Agrostis* sp., fescues *Festuca* sp. and coarse grasses such as Yorkshire fog *Holcus lanatus* and cock's-foot *Dactylus glomerata* also present. Herb species appear to be lacking, although species typical of enriched grassland such as ribwort plantain *Plantago lanceolata*, creeping buttercup *Ranunculus repens*, ragwort *Senecio* sp., self-heal *Prunella Vulgaris* and teasel *Disacus fullonum* were recorded.

3.2.6 There is evidence of public access to the grassland along the eastern boundary, with piles of green waste present, other debris, small chicken coups and the remains of small fires (see Photographs 10-12, Appendix C).

3.2.7 To the east, coarse grassland around the scrub margins contained similar species (see Photograph 5, Appendix C). Shorter grassland present along footpaths was dominated by perennial rye-grass *Lolium perenne*.

#### Dense Scrub

3.2.8 Dense scrub is present throughout much of the Bicentennial Gardens, which has developed over former building foundations. It is also present along much of the Site perimeter fencing, the edges of the grassland to the west of the River Pinn, and along the river corridor. Shrub and tree species present include birches *Betula* sp., beech *Fagus sylvatica*, pedunculate oak, elder *Sambucus nigra*, hawthorn *Crataegus monogyna* and blackthorn *Prunus spinosa*. Occasional privet *Ligustrum vulgare*, field maple *Acer campestre* and buddleia *Buddleia* spp. are also present within the Bicentennial Gardens. Dense bramble scrub is present throughout much of the area (see Photographs 1 and 3, Appendix C).

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### Running Water

- 3.2.9 The River Pinn flows through the centre of Site 4; see Photographs 6-7 in Appendix C. The channel is open form, and bankside vegetation comprises mature trees including crack willow, common alder. The channel is shaded and both marginal and in-channel vegetation are largely absent. A defunct bridge is present within dense vegetation in the southern section, near to what appear to be the remains of an abstraction facility or similar likely to have been associated with the previous plant nursery.

### Species-poor Intact Hedgerow

- 3.2.10 An outgrown hedgerow borders Site 4 to the north along the south of Nursery Lane. Species include hornbeam *Carpinus betulus*, pedunculate oak and elder. The hedgerow is well established and its form shows that it has previously been laid, however there is little evidence of current management (see Photograph 8, Appendix C). There is a shallow ditch along a proportion of the boundary, and at ground level species including lord's-and-ladies, common nettle *Urtica dioica*, hogweed *Heracleum sphondylium*, cow parsley *Anthriscus sylvestris* and cleavers *Galium aparine* are present. Male fern *Dryopteris filix-mas* was also recorded to be present although only a single specimen was observed.

### Buildings

- 3.2.11 A small porta-cabin is present in the southern section of the Bicentennial Gardens (near to the southern boundary and the Garden Centre), it appears to stand on hard standing foundations (see Photograph 2, Appendix C).

### 3.2.12 Incidental Fauna Records

- 3.2.13 Mammal pathways, most likely created by red fox *Vulpes vulpes* were recorded in the scrub habitat within the Bicentennial Gardens and it is probable that a fox earth is present in the vicinity.

## 3.3 Assessment re Suitability for Protected and/or Notable Species

### Amphibians

- 3.3.1 The Phase 1 habitat survey did not identify the presence of suitable aquatic habitat for amphibians within Site 4. It is possible that ponds occur within residential gardens to the west (not accessed for the purpose of the survey), and within the allotments to the east however this is unknown. In the absence of established aquatic habitat it is unlikely that species such as great crested newt would be present on Site 4, despite the presence of suitable terrestrial habitat. The nearest record for this species is over 2km to the north. It is likely though, that common and widespread amphibian species which have broader habitat tolerances are present. For example common frog *Rana temporaria*, smooth newt *Lissotriton vulgaris* and possibly common toad (which is known to occur 1026m to the north of Site 4).

### Bats

- 3.3.2 Mature trees located along the River Pinn corridor exhibit features with potential to support bat roosts; several mature oak *Quercus* sp. and ash *Fraxinus excelsior* trees have features such as tear-out wounds, split boughs and rot holes which provide suitable habitat for tree roosting bats. The location of these features, in proximity to high quality bat foraging habitat in the form of the River Pinn, increases the potential that they are used by roosting bats. The features were assessed

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individually to have between low and moderate potential to support bat roosts<sup>2</sup>. No trees with potential to support roosting bats were identified within Bicentennial Gardens to the east of the River Pinn, nor located within the more open grassland area to the west of the River Pinn.

- 3.3.3 The combination of habitats present within Site 4 provides suitable foraging habitat for a range of bat species, including generalist species such as common pipistrelle which is likely to be present in surrounding built areas, and more specialist species such as Daubenton's bat and soprano pipistrelle more normally associated with riparian habitat. There are no known records of bat activity on Site or in the immediate vicinity of Site 4; the nearest record held is for soprano pipistrelle 790m to the west.

#### Birds (Breeding)

- 3.3.4 Trees and shrub habitat present within Site 4 provide suitable habitat for a range of common and widespread nesting bird species. Of the notable species known to occur nearby, suitable habitat occurs for nesting bull finch *Pyrrhula pyrrhula* and song thrush, in addition during the winter period thrushes such as fieldfare *Turdus pilaris* and redwing *T. iliacus* are likely to utilise the shrub habitat present. The tussocky grassland to the west of the River Pinn is likely to support a population of small mammals which would form suitable prey of birds such as kestrel.

#### Badger

- 3.3.5 No evidence indicating the presence of badger was identified during the Phase 1 habitat survey. The grassland and scrub present throughout Site 4 provide suitable foraging habitat for this species if present locally.

#### Otter

- 3.3.6 The River Pinn provides a corridor of suitable habitat for otter *Lutra lutra*. Although records of this species were not identified during the desk study, nationally the range of otter continues to expand and there is potential that otter could move through Site 4. This species may create holts, and/or day couches some distance from main river channels and the dense scrub closer to the River Pinn provides suitable habitat for this. If this species is present along the River Pinn catchment, the presence of otter on Site should not be ruled out at this stage.

#### Reptiles

- 3.3.7 Both the parts of Site 4 to the west and east of the River Pinn provide suitable habitat for widespread reptiles. Particularly the margins between grassland areas and adjacent scrub habitat provide suitable basking locations, and both fallen deadwood along the river corridor and building remains (largely to the east of the river) provide shelter required for hibernation. It is considered likely that species such as grass snake would be present on Site 4; the nearest reptile record held by GiGL relates to common lizard recorded 1026m to the north of Site 4. The presence of the River Pinn, increases the probability that reptiles would be present in this area as the river corridor provides a network of suitable habitat linking Site 4 to other larger areas of suitable habitat to the south.

#### Water Vole

- 3.3.8 The section of the River Pinn flowing through Site 4 provides suboptimal habitat for water vole. The channel is largely shaded, therefore although natural bankside material provides suitable burrowing habitat there is limited bankside and in-channel vegetation providing suitable cover and fodder. Water voles are known to be present locally, with records <2km from Site 4 to the north, however it is considered unlikely that this species is present on Site given the nature of the habitat available.

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<sup>2</sup> Note, the extended Phase 1 habitat survey did not entail a full ground level tree inspection to verify the potential for bat roosts to be present and search for evidence of previous use by bats. It did however, assess the potential for suitable habitat to be present.

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## 4 Discussion and Evaluation

### 4.1 Reasoning for the Proposed Extension

- 4.1.1 Central to guidance produced by Defra regarding the selection of local sites is the principle that these sites should *'contain features of substantive nature conservation value and that the purpose of selection is to provide recognition of this value and to help conserve those features by affording the sites an appropriate degree of protection'* (Defra, 2006). The guidelines state that within each local sites system *'one inclusive set of criteria should be produced for the evaluation of all sites, taking account of the variety of interests that may eventually be selected in the suite'*, reference criteria are provided. These should be documented because the basis for selection should be transparent to anyone who wishes to understand the rationale for the decisions made. The guidelines recommend that *'this information should be sent to the site owner, and made available to others who may be interested in a site'*.
- 4.1.2 In London, the London Wildlife Sites Board (LWSB) developed and published a process by which London Boroughs should select and approve SINCs in 2013 (LWSB, 2013) – boroughs are not obliged to follow this process but if another process is used they state that *'it must conform to the policy framework described by national and regional policies'* (including Defra, 2006). Criteria for selection recommended in this document are an updated version of criteria previously contained within The Mayor's Biodiversity Strategy (2002). With respect to SBINCs the advice note states that these should be *'important on a borough perspective...although sites of similar quality may be found elsewhere in London, damage to these sites would mean a significant loss to the borough.'*
- 4.1.3 The Local Plan: Part 2, Site Allocations and Designation (Proposed Submission Version, September 2014) includes the proposed extension of The River Pinn and Manor Farm SBINCII from the original extent designated in 1988, to the extent described in the citation dated 23<sup>rd</sup> February 2005. The review of this site (and others) in 2005 was prompted by the move from the Unitary Development Plan (UDP) to Local Development Framework (LDF); the Greater London Authority (GLA) in combination with the Borough completed the review. The proposed site allocations document states that the review was *'based on field work and updated citations on the flora and fauna supported at sites'*. When approached, both LBHC and GiGL stated that they do not hold survey information or other documentation associated with the GLA review in 2005 beyond the citation included in Appendix A. No ecological survey data is listed within the LDF evidence base at the time of writing<sup>3</sup>.
- 4.1.4 The proposed site allocations document simply confirms the proposed extension boundary, the size (11.6ha) and location centred on TQ 061 814, and that the land supports the following habitat types neutral grassland (semi-improved), secondary woodland, running water, tall herbs, native hedge, scrub, scattered trees, bare soil, and ruderal. The citation for the SBINCII held by GiGL and LBHC provides further description of the habitats present but does not include consideration of these features against selection criteria for non-statutory designated sites.

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<sup>3</sup> See: <https://www.hillingdon.gov.uk/23511> Accessed 4th March 2015.



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## 4.2 Consideration regarding Conservation Value of Site 4

- 4.2.1 In the absence of specific criteria for the designation of non-statutory sites within the London Hillingdon Borough, it is necessary to consider whether Site 4 is accurately represented by the description in the citation for the SBINCII extension, and whether it is of conservation value at the Borough scale.
- 4.2.2 The citation for the extended SBINCII states that *'the area between Church Road and Nursery Lane comprises rough horse-grazed pasture with scrub to the west and rough land to the east, separated by the River Pinn, along with native hedges and scattered trees. Pedunculate oak, hornbeam and ash are present along with bramble, false oat-grass, couch and yarrow. Several species of bird occur including a warbler, long-tailed tit and robin. This is probably valuable habitat for a wide range of taxa, so is included as an extension of Hi BII 07 [River Pinn and Manor Fm SBINCII].*
- 4.2.3 It goes on to state that *'to the north, the defunct Field Heath Nursery comprises a number of pony- and horse- grazed paddocks on both sides of the river. There is a well-structured patchwork of grassland, tall-herbs, ruderals and hedgerow remnants with trees...to the north margin is a broad naturalised track divided from the paddocks by a fragmented and outgrown historically-laid hornbeam/elder hedgerow with the occasional pedunculate oak standard.'*
- 4.2.4 Whilst the track along Nursery Lane remains present, bordered by an outgrown native hedgerow to the south, and grassland to the west of the River Pinn, land to the east of the River Pinn appears to have changed in character since 2005 when the citation was amended. The area which is described in the citation as pony- and horse-grazed paddocks is now the Bicentennial Gardens, and this has been the case since at least 2011 when the Brunel University Biodiversity Action Plan (BAP) was prepared (Brunel University, 2011). The BAP describes Site 4 as *'divided into two main areas by the River Pinn flowing through the middle north to south, the east side consists of the Bicentennial gardens, an open mosaic habitat on previously developed land, while the west side is mainly open meadow. Both areas are fenced off with palisade fencing.'* The record in the Brunel University BAP is broadly consistent with the results of the Phase 1 habitat survey which recorded the gardens as characterised by parcels of scrub, separated by a network of grassed pathways and areas of semi-improved grassland / ruderal vegetation.
- 4.2.5 The Bicentennial Gardens does not support traditional orchard as indicated by the HPI corporate data set held by Natural England (see Figure 3). This data set largely contains information digitised from aerial photographs, and survey data collected during the extended Phase 1 habitat survey is superseded this.
- 4.2.6 Whilst this area provides suitable habitat for a range of taxa (see Section 3.3), the presence or otherwise of these species is largely unknown as no species records are held by GiGL for this area (for protected species and species of conservation concern). Common and widespread bird species have been recorded in this area, however the bird species listed in the citation are generalist species and there is no reason to believe that populations associated with Site 4 are of particular conservation value at the Borough scale.
- 4.2.7 The River Pinn and surrounding habitat corridor is however, clearly of nature conservation value. The river channel and surrounding mature trees provide a range of habitats which are not readily recreated and form a network of semi-natural habitat at the Borough scale. Although there is limited survey data available to support this conclusion, it is reasonable to assume that the section of the river present within Site 4 is used by a range of mobile species including bat species which have been recorded in the vicinity. The immediate river corridor contains running water, secondary woodland and scrub habitats which are listed on the SBINCII citation.

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## 5 Conclusion and Recommendation

- 5.1.1 The River Pinn itself and certain surrounding habitats form a network of semi-natural habitat of conservation value at the Borough scale. This is recognised in the original 1988 citation for the River Pinn and Manor Farm SBINCII, and the presence of other non-statutory designated areas along the river catchment and connecting water courses including the Grand Union Canal (see Figure 4).
- 5.1.2 The justification for the inclusion of Site 4 within the SBINCII designation is however unclear and would appear flawed, especially because the citation for this site describes the site as supporting habitats which in part are no longer present (replaced by the Bicentennial Gardens). The proposed site's allocation plan notes that the proposed extension was informed by *'field work and updated citations on the flora and fauna supported at sites'* however, the results of field work are not held by either Hillingdon Borough Council or GiGL. The extended Phase 1 habitat survey, completed in February 2015, identified habitats including scrub, semi-improved grassland, running water and ruderal vegetation to be present within Site 4. These are habitats listed on the SBINCII citation, however the conservation value of the particular habitat parcels is difficult to evaluate because detailed botanical species lists are not available and there are no records of protected and/or notable species.
- 5.1.3 At present there is no reason to believe that the early successional habitats present within the Bicentennial Gardens, which have established since the nursery buildings and associated access were removed, are of intrinsic nature conservation value. The grassland and scrub habitat types present are readily established and relatively common. Their location in proximity to the existing open green space to the south and the River Pinn increases their potential value to mobile fauna (such as birds and bats). There is however, no survey data available to evaluate the degree to which this habitat is used and hence whether it is of conservation value at the Borough scale for this reason. The citation for the River Pinn and Manor Farm SBINCII notes that the site is designated for the habitats present which support a range of bird species, no reference is specifically made to other species groups.
- 5.1.4 Prior to changes to River Pinn and Manor Farm SBINCII boundary, it is recommended that detailed botanical surveys are completed to verify the conservation value of grassland present to the east of the River Pinn. Whilst this area appears to be botanically species-poor the survey data available was collected during the winter period and therefore may not fully represent the species diversity present. This area may represent lowland meadow which would be of greater intrinsic conservation value, and worthy of designation. At this stage however, there is no clear evidence to support its inclusion within the SBINCII designation.

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## 6 References

### 6.1 Project References

- 6.1.1 Brunel University (2011). Brunel University Biodiversity Action Plan (BAP). Accessible online: [http://www.brunel.ac.uk/\\_data/assets/pdf\\_file/0009/168570/Brunel-University-Biodiversity-Action-Plan.pdf](http://www.brunel.ac.uk/_data/assets/pdf_file/0009/168570/Brunel-University-Biodiversity-Action-Plan.pdf) Accessed: 5<sup>th</sup> March 2015.
- 6.1.2 Greenspace Information For Greater London (GIGL); Data Request (Reference: 'Brunel University'. Completed February, 2015).
- 6.1.3 Buckinghamshire and Milton Keynes Environmental Records Centre (BMERC) Data Request (Reference: 'Brunel University' was completed in February, 2015.)
- 6.1.4 Greater London Authority: SINC designations update document provided (February, 2015).

### 6.2 Technical References

- 6.2.1 CIEEM (Chartered Institute of Ecology and Environmental Management) (2013). *Guidelines for Preliminary Ecological Appraisal*. IEEM, Winchester.
- 6.2.2 Defra (2006). Local Sites: Guidance on their Identification, Selection and Management. Available online: <http://archive.defra.gov.uk/rural/documents/protected/localsites.pdf>. Accessed 4th March 2015.
- 6.2.3 Department for Communities and Local Government (2012). *National Planning Policy Framework*.
- 6.2.4 Eaton MA, Brown AF, Noble DG, Musgrove AJ, Hearn R, Aebischer NJ, Gibbons DW, Evans A and Gregory RD (2009) Birds of Conservation Concern 3: the population status of birds in the United Kingdom, Channel Islands and the Isle of Man. *British Birds* 102, pp296-341
- 6.2.5 HMSO (2006) Natural Environment and Rural Communities Act.
- 6.2.6 HMSO (2010). The Conservation of Habitats and Species Regulations 2010 (as amended) (the Habitat Regulations)
- 6.2.7 HMSO (Her Majesty's Stationary Office) (1981). *Wildlife and Countryside Act* (as amended by the Countryside and Rights of Way Act 2000)
- 6.2.8 Hundt L (2012) Bat Surveys: Good Practice Guidelines, 2nd edition
- 6.2.9 JNCC (Joint Nature Conservation Committee), (2010). Handbook for Phase I habitat survey: A Technique for Environmental Audit
- 6.2.10 JNCC Webpage <http://jncc.defra.gov.uk/page-2051> South West London Waterbodies Citation (Accessed February, 2015).
- 6.2.11 London Borough of Hillingdon (2007). London Borough of Hillingdon Unitary Development Plan (adopted 1998) Saved Policies 27th September 2007. Available online: <http://www.hillingdon.gov.uk/media.jsp?mediaid=10134&filetype=pdf> Accessed 5<sup>th</sup> March 2015.
- 6.2.12 London Borough of Hillingdon (2014). The Local Plan: Part 2, Site Allocations and Designation (Proposed Submission Version, September 2014) Available online: <https://www.hillingdon.gov.uk/media.jsp?mediaid=32151&filetype=pdf>. Accessed 4th March 2015

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- 6.2.13 LWSB (2013). Process for selecting and confirming Sites of Importance for Nature Conservation (SINCs) in Greater London.
- 6.2.14 Mayor of London (2002). Connecting with London's nature The Mayor's Biodiversity Strategy. Available online: [http://legacy.london.gov.uk/mayor/strategies/biodiversity/docs/strat\\_full.pdf](http://legacy.london.gov.uk/mayor/strategies/biodiversity/docs/strat_full.pdf)  
Accessed 4th March 2015:

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## 7 Figures

7.1 Figure 1 - Site Location Plan

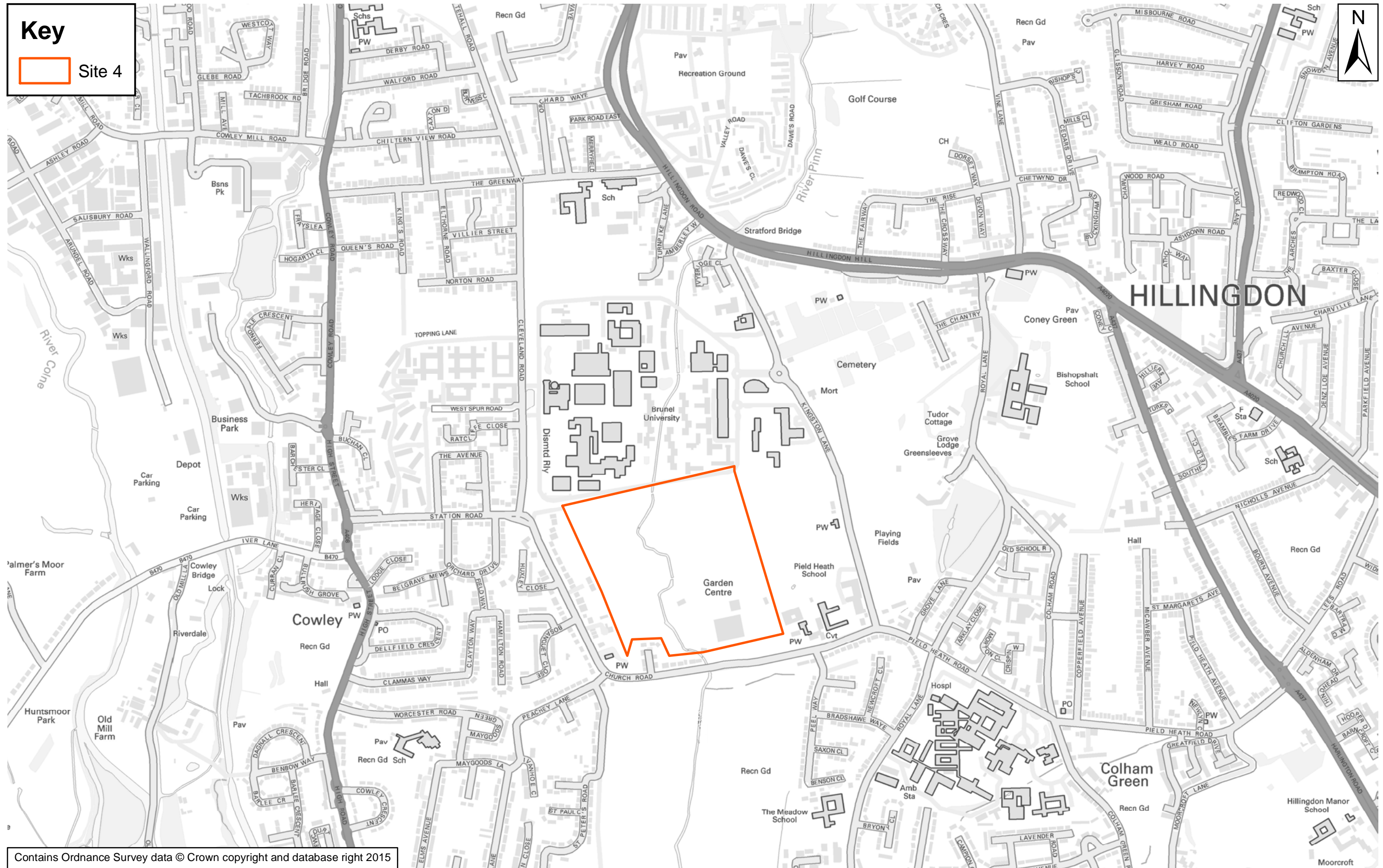
7.2 Figure 2 - European Statutory Designated Sites

7.3 Figure 3 - UK statutory Designated Sites and Habitats of Principal Importance

7.4 Figure 4 – Non Statutory Sites (GiGL)

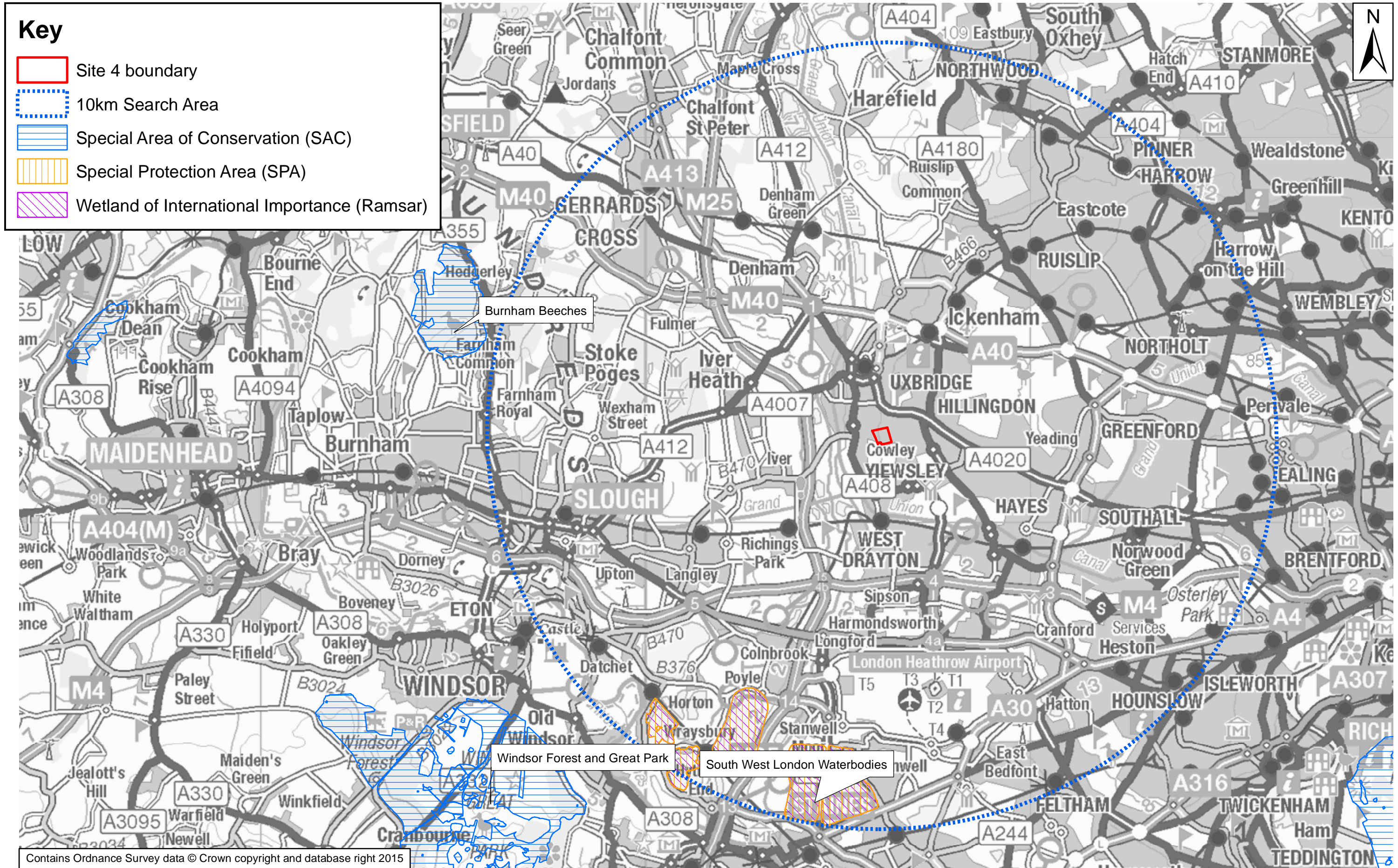
7.5 Figure 5 – Phase 1 Habitat Survey Results





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**Key**

- Survey area
- Scattered Broadleaved Trees
- × Scattered Scrub
- Target Note
- Photo Point
- Running Water
- Hedge with Trees - Species-Poor
- SI SI Neutral Grassland - Semi-Improved
- XXXXXX Scrub - Dense/Continuous
- Building



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## 8 Appendices

### 8.1 Appendix A: River Pinn & Manor Fm SBINCII Citation

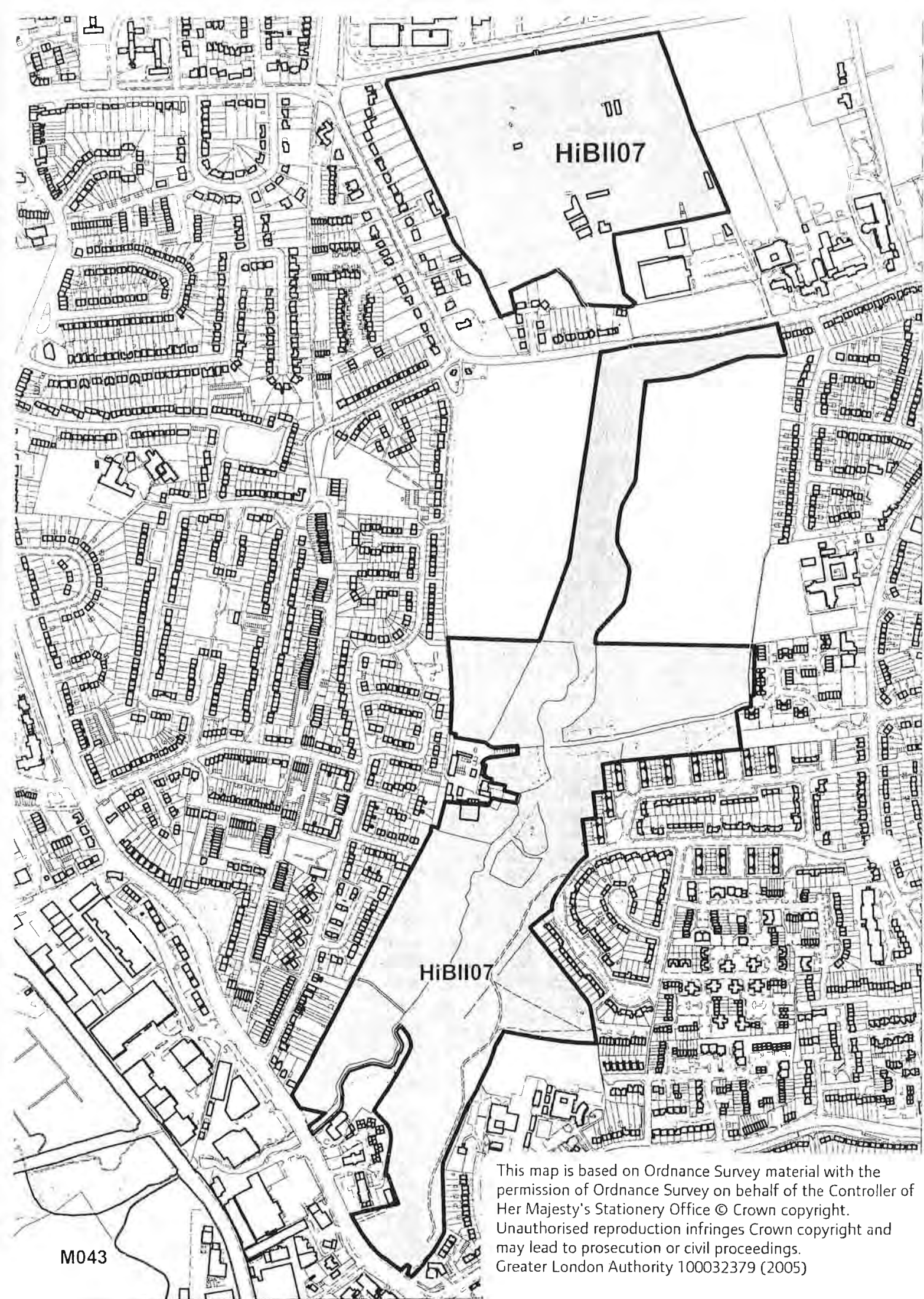
## Site of Importance for Nature Conservation

**Hi BII 07**            **River Pinn and Manor Farm Pastures**  
**Grid ref:**            **TQ 061 814**  
**Area (ha):**          **33.32**  
**Borough:**            **Hillingdon**  
**Site first notified:**    **1/1/88**                    **Boundary last changed:**    **1/2/05**  
**Citation last edited:**    **23/2/05**  
**Habitat:**            **Neutral grassland (semi-improved), secondary woodland, running water, tall herbs, native hedge, scrub, scattered trees, bare soil, ruderal.**

This stretch of the River Pinn is bordered on both sides by open grassland, much of which comprises rank grasses and tall herbs with scattered scrub, although some of it is managed as sports fields. The river is generally lined by trees and shrubs such as alder (*Alnus glutinosa*), crack willow (*Salix fragilis*), ash (*Fraxinus excelsior*), hawthorn (*Crataegus monogyna*) and blackthorn (*Prunus spinosa*) but open areas of the banks are smothered in bramble (*Rubus fruticosus* agg.) and nettle (*Urtica dioica*). The heavy shade and competition has led to a dearth of aquatic and wetland plants except for the introduced species, Japanese knotweed (*Fallopia japonica*), giant hogweed (*Heracleum mantegazzanum*) and Indian balsam (*Impatiens glandulifera*). Two of the fields to the west of the Pinn are grazed by horses and contain false oat-grass (*Arrhenatherum elatius*), bent (*Agrostis* sp.) and yarrow (*Achillea millefolium*). The rest are either mown infrequently or have been left unmanaged for a year or so. These tend to be dominated by false oat-grass, perennial rye-grass (*Lolium perenne*), creeping bent (*Agrostis stolonifera*), red fescue (*Festuca rubra*), etc. with a good range of herbs including teasel (*Dipsacus fullonum*), vetches (*Vicia cracca* and *V. sativa*), autumn hawkbit (*Leontodon autumnalis*), meadow buttercup (*Ranunculus acris*) and horse-radish (*Armoracia rusticana*). The area between Church Road and Nursery Lane comprises rough horse-grazed pasture with scrub to the west and roughland to the east, separated by the River Pinn, along with native hedges and scattered trees. Pedunculate oak (*Quercus robur*), hornbeam (*Carpinus betulus*) and ash are present along with bramble, false oat-grass, couch (*Elytrigia repens*) and yarrow. Several species of bird occur including a warbler, long-tailed tit and robin. This is probably valuable habitat for a wide range of taxa, so is included as an extension of Hi BII 07. The ownership is undetermined, and there is no public access. To the north, the defunct Pield Heath Nursery comprises a number of pony- and horse-grazed paddocks on both sides of the river. There is a well-structured patchwork of grassland, tall-herbs, ruderals and hedgerow remnants with trees. Winter flocks of chaffinch and greenfinch occur here along with dunnoek and wren. To the north margin is a broad naturalised track divided from the paddocks by a fragmented and outgrown historically-laid hornbeam/elder (*Carpinus betulus/Sambucus nigra*) hedgerow with the occasional pedunculate oak standard.

The site extended to include: field to the north of Church Road and south of Nursery Lane; field to the south of Church Road and east of St. Peters Road; former nursery to the north and the naturalised trackway to its north margin.

There is public access across most of the site, some restricted to footpaths, except for the fenced former nursery to the north.



HiB1107

HiB1107

M043

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## 8.2 Appendix B: Desk Study Information

**Table 3: Protected and notable species records identified within a 2km radius of Site 4**

| Common Name               | Latin Name                               | Proximity of Closest Record to Site (m) <sup>4</sup> | No. Records | Status / Protection <sup>5</sup>  |
|---------------------------|--|--|-------------|---|
| <b>Mammals</b>            |  |  |             |   |
| Eurasian Badger           | <i>Meles meles</i>                       | Within 2km*  | 1           | Protection of Badgers Act (1992)  |
| <b>Bats</b>               |  |  |             |   |
| Soprano Pipistrelle       | <i>Pipistrellus pygmaeus</i>             | 1060m NW   | 17          | Habitat Regs (2010), W&CA (1981), NERC (2006) SPI, UKBAP, LBAP              |
| Pipistrelle Species       | <i>Pipistrellus Sp.</i>                  | 1149m N  | 1           | Habitat Regs (2010), W&CA (1981) Schedule 5                                 |
| Brown Long-eared Bat      | <i>Plecotus auritus</i>                  | 1176m N  | 6           | Habitat Regs (2010), W&CA (1981), NERC (2006) SPI, UKBAP, LBAP              |
| Noctule Bat               | <i>Nyctalus noctula</i>                  | 1176m N  | 1           | Habitat Regs (2010), W&CA (1981) Schedule 5, UKBAP, LBAP                    |
| Daubenton's Bat           | <i>Myotis daubentonii</i>                | 1176m N  | 2           | Habitat Regs (2010), W&CA (1981) Schedule 5, LBAP.                          |
| Common Pipistrelle        | <i>Pipistrellus pipistrellus</i>         | 1834m N  | 2           | Habitat Regs (2010), W&CA (1981)  |
| Unidentified Bat          | <i>Myotis Sp.</i>                        | 3653m N  | 1           | Habitat Regs (2010), W&CA (1981) Schedule 5                                 |
| Serotine                  | <i>Eptesicus serotinus</i>               | 3762m N  | 1           | Habitat Regs (2010), W&CA (1981) Schedule 5                                 |
| Nathusius's Pipistrelle   | <i>Pipistrellus nathusii</i>             | 3762m N  | 1           | Habitat Regs (2010), W&CA (1981), LBAP.                                     |
| <b>Reptiles</b>           |  |  |             |   |
| Common Lizard             | <i>Zootoca vivipara</i>                  | 1296m N  | 2           | Schedule 5, W&CA (1981), NERC (2006) SPI, UKBAP (2006), LBAP.               |
| Common Toad               | <i>Bufo bufo</i>                         | 1296m N  | 6           | UKBAP (2006), NERC (2006) SPI   |
| Great Crested Newt        | <i>Triturus cristatus</i>                | 2327m N  | 1           | Schedule 5, W&CA (1981); NERC (2006) SPI, UKBAP (2007) Habitat Regs (2010). |
| <b>Plants<sup>6</sup></b> |  |  |             |   |
| Bladderwort               | <i>Utricularia australis</i>             | 486m NE  | 4           | Local sp. of Cons Concern.  |
| Long-stalked Crane's bill | <i>Geranium columbinum</i>               | 491m SW  | 1           | Local sp. of Cons Concern.  |
| Frogbit                   | <i>Hydrocharis morsus-ranae</i>          | Within 2km resolution                                | 1           | Vulnerable on the IUCN Redlist, County Rare.                                |
| Lesser sea-spurrey        | <i>Spergularia marina</i>                | Within 2km resolution                                | 1           | County Scarce   |
| Hairlike pondweed         | <i>Potamogeton trichoides</i>            | Within 2km resolution                                | 1           | County Scarce   |
| Small pondweed            | <i>Potamogeton berchtoldii</i>           | Within 2km resolution                                | 1           | County Scarce   |
| <b>Invertebrates</b>      |  |  |             |   |
| Brown Argus               | <i>Aricia agestis</i>                    | 624m N   | 1           | Local sp. of Cons Concern.  |
| Marbled White             | <i>Melanargia galathea subsp. serena</i> | 624m N   | 4           | Local sp. of Cons Concern.  |

<sup>4</sup>Considering the nearest record to Site 4 within the study area.

<sup>5</sup> Habitat Regs (2010) = Habitat Regulations, PBA (1992) = Protection of Badgers Act, 1992, NERC (2006) = Natural Environment and Rural Communities Act (2006), HPI = Habitat of Principal Importance, SPI = Species of Principal Importance, W&CA (1981) = Wildlife and Countryside Act (1981), with Schedules listed. IUCN Redlist categories: Rare, VU = vulnerable, NT = near threatened

<sup>6</sup> Plant Records from Gigl and Buckinghamshire Environmental Record Centres

|                           |                                 |          |    |   |
|---------------------------|---------------------------------|----------|----|---|
| Small Heath               | <i>Coenonympha pamphilus</i>    | 624m N   | 1  | NERC 2006, UKBAP, LBAP, Local sp. of Cons Concern, IUCN Redlist- Near Threatened. |
| Blood Vein                | <i>Timandra comae</i>           | 1145m NW | 1  | NERC 2006, UKBAP, LBAP, Local sp. of Cons Concern.                                |
| Brindled Beauty           | <i>Lycia hirtaria</i>           | 1145m NW | 1  | NERC 2006, UKBAP, LBAP, Local sp. of Cons Concern.                                |
| Rustic                    | <i>Hoplodrina blanda</i>        | 1145m NW | 15 | NERC 2006, UKBAP, LBAP, Local sp. of Cons Concern.                                |
| White Ermine              | <i>Spilosoma lubricipeda</i>    | 1145m NW | 4  | NERC 2006, UKBAP, LBAP, Local sp. of Cons Concern.                                |
| Powdered Quaker           | <i>Orthosia gracilis</i>        | 1145m NW | 1  | NERC 2006, UKBAP, LBAP, Local sp. of Cons Concern.                                |
| Shoulder-striped Wainscot | <i>Mythimna comma</i>           | 1145m NW | 2  | NERC 2006, UKBAP, LBAP, Local sp. of Cons Concern.                                |
| Mother Shipton            | <i>Callistege mi</i>            | 1162m N  | 1  | Local sp. of Cons Concern.  |
| Cinnabar                  | <i>Tyria jacobaeae</i>          | 1212m NW | 1  | NERC 2006, UKBAP, LBAP, Local sp. of Cons Concern.                                |
| Bulrush Veneer            | <i>Calamotropha paludella</i>   | 1212m NW | 1  | Nationally Notable B.   |
| Lackey                    | <i>Malacosoma neustria</i>      | 1212m NW | 1  | NERC 2006, UKBAP, LBAP, Local sp. of Cons Concern.                                |
| Barred Hook-tip           | <i>Watsonalla cultraria</i>     | 1212m NW | 1  | Local sp. of Cons Concern.  |
| Shaded Broad-bar          | <i>Scotopteryx chenopodiata</i> | 1212m NW | 1  | NERC 2006, UKBAP, LBAP, Local sp. of Cons Concern.                                |
| Small Phoenix             | <i>Ecliptopera silaceata</i>    | 1212m NW | 1  | NERC 2006, UKBAP, LBAP, Local sp. of Cons Concern.                                |
| Streak                    | <i>Chesias legatella</i>        | 1212m NW | 1  | NERC 2006, UKBAP, LBAP, Local sp. of Cons Concern.                                |
| Rosy Rustic               | <i>Hydraecia micacea</i>        | 1212m NW | 1  | NERC 2006, UKBAP, LBAP, Local sp. of Cons Concern.                                |
| Mottled Rustic            | <i>Caradrina morpheus</i>       | 1212m NW | 1  | NERC 2006, UKBAP, LBAP, Local sp. of Cons Concern.                                |
| Dingy Footman             | <i>Eilema griseola</i>          | 1212m NW | 2  | Local sp. of Cons Concern.  |
| Toadflax Brocade          | <i>Calophasia lunula</i>        | 1212m NW | 1  | Local sp. of Cons Concern.  |
| Deep-brown Dart           | <i>Aporophyla lutulenta</i>     | 1212m NW | 1  | NERC 2006, UKBAP, LBAP, Local sp. of Cons Concern.                                |
| Green-brindled Crescent   | <i>Allophyes oxyacanthae</i>    | 1212m NW | 1  | NERC 2006, UKBAP, LBAP, Local sp. of Cons Concern.                                |
| Beaded Chestnut           | <i>Agrochola lychnidis</i>      | 1212m NW | 1  | NERC 2006, UKBAP, LBAP, Local sp. of Cons Concern.                                |
| Centre-barred Sallow      | <i>Atethmia centrargo</i>       | 1212m NW | 1  | NERC 2006, UKBAP, LBAP, Local sp. of Cons Concern.                                |
| Sallow                    | <i>Xanthia ictertia</i>         | 1212m NW | 1  | NERC 2006, UKBAP, LBAP, Local sp. of Cons Concern.                                |
| Knot Grass                | <i>Acronicta rumicis</i>        | 1212m NW | 1  | NERC 2006, UKBAP, LBAP, Local sp. of Cons Concern.                                |






|              |                           |          |    |   |
|--------------|---------------------------|----------|----|---|
| Large Nutmeg | <i>Apamea anceps</i>      | 1212m NW | 1  | NERC 2006, UKBAP, LBAP, Local sp. of Cons Concern.  |
| Rosy Minor   | <i>Mesoligia literosa</i> | 1212m NW | 1  | NERC 2006, UKBAP, LBAP, Local sp. of Cons Concern.  |
| Stag Beetle  | <i>Luncanus cervus</i>    | 1414m N  | 10 | Habitats & Species Directive; Annex 2, NERC 2006, UKBAP, LBAP, Local sp. of Cons Concern, Nationally Notable B. |

**Table 4: Protected and Notable Bird Species recorded within a 2km radius of Site 4**

| Common Name  | Latin Name                 | Red list | Amber list | Schedule 1 | UK BAP | NERC |
|--------------|----------------------------|----------|------------|------------|--------|------|
| Bullfinch    | <i>Pyrrhula pyrrhula</i>   |          | ✓          |            | ✓      | ✓    |
| Cuckoo       | <i>Cuculus canorus</i>     | ✓        |            |            | ✓      | ✓    |
| Fieldfare    | <i>Turdus pilaris</i>      | ✓        |            | ✓          |        |      |
| Firecrest    | <i>Regulus ignicapilla</i> |          | ✓          | ✓          |        |      |
| Gadwall      | <i>Anas strepera</i>       |          | ✓          |            |        |      |
| Hobby        | <i>Falco subbuteo</i>      |          |            | ✓          |        |      |
| Kingfisher   | <i>Alcedo atthis</i>       |          | ✓          | ✓          |        |      |
| Kestrel      | <i>Falco tinnunculus</i>   |          | ✓          |            |        |      |
| Lapwing      | <i>Vanellus vanellus</i>   | ✓        |            |            | ✓      | ✓    |
| Little Egret | <i>Egretta garzetta</i>    |          | ✓          |            |        |      |
| Meadow Pipit | <i>Anthus pratensis</i>    |          | ✓          |            |        |      |
| Red Kite     | <i>Milvus milvus</i>       |          | ✓          | ✓          |        |      |
| Redwing      | <i>Turdus iliacus</i>      | ✓        |            | ✓          |        |      |
| Skylark      | <i>Alauda arvensis</i>     | ✓        |            |            | ✓      | ✓    |
| Song Thrush  | <i>Turdus philomelos</i>   | ✓        |            |            | ✓      | ✓    |
| Swallow      | <i>Hirundo rustica</i>     |          | ✓          |            |        |      |
| Swift        | <i>Apus apus</i>           |          | ✓          |            |        |      |
| Teal         | <i>Anas crecca</i>         |          | ✓          |            |        |      |
| Turtle Dove  | <i>Streptopelia turtur</i> | ✓        |            |            | ✓      | ✓    |
| Woodcock     | <i>Scolopax rusticola</i>  |          | ✓          |            |        |      |




## 8.3 Appendix C: Site Photographs

Table 5: Photographs of Site 4 (taken 19<sup>th</sup> February, 2015)

| Image   | Description  |
|---|--|
|    | <p>Photograph 1</p> <ul style="list-style-type: none"><li>■ Showing pathways through areas of scrub which have developed above the former nursery foundations. The grass is generally short in these areas and present above compacted substrate / hard standing remaining from the former uses of the land.</li></ul> |
|   | <p>Photograph 2</p> <ul style="list-style-type: none"><li>■ Showing porta cabin present within Bicentennial Gardens near to the boundary fence in the south east. The cabin is boarded up and provides negligible potential for use by nesting birds or roosting bats.</li></ul>                                       |
|  | <p>Photograph 3</p> <ul style="list-style-type: none"><li>■ Showing concrete foundations from previous built structures on Site 4 now overgrown by scrub (birch <i>Betula</i> sp. and beech <i>Fagus sylvatica</i>)</li></ul>  |

| Image   | Description   |
|---|---|
|    | <p>Photograph 4</p> <ul style="list-style-type: none"> <li>Along the southern boundary of the Bicentennial Gardens a series of block walled compartments are present to the north of the boundary fence. These contain piles of debris and in part have become overgrown by bramble scrub.</li> </ul>           |
|   | <p>Photograph 5</p> <ul style="list-style-type: none"> <li>Showing the more open, central, section of the Bicentennial Gardens. Here although the pathways appear to be regularly mown taller grasses and ruderal vegetation are present around the margins grading into the adjacent scrub habitat.</li> </ul> |
|  | <p>Photograph 6</p> <ul style="list-style-type: none"> <li>The River Pinn viewed from Nursery Lane, showing the open channel and semi-natural bank form.</li> </ul>   |

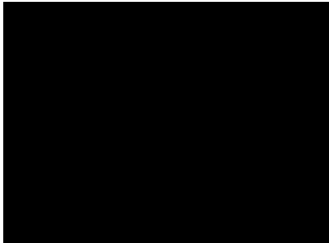


| Image   | Description  |
|---|--|
|    | <p>Photograph 7</p> <ul style="list-style-type: none"> <li>■ Showing River Pinn towards the southern extent of the river which lies within Site 4. In this section it is heavily shaded, a defunct bridge remains present within the tree cover.</li> </ul>                        |
|   | <p>Photograph 8</p> <ul style="list-style-type: none"> <li>■ Showing the species poor, outgrown hedgerow present between Nursery Lane and the grass field to the west of the River Pinn within Site 4.</li> </ul>  |
|  | <p>Photograph 9</p> <ul style="list-style-type: none"> <li>■ Showing the grass field to the west of the River Pinn within Site 4. The field is poached in places because a horse is currently grazing this area. The grass is tussocky and appears otherwise unmanaged.</li> </ul> |

| Image   | Description   |
|---|---|
|    | <p>Photograph 10</p> <ul style="list-style-type: none"> <li>■ Showing debris present near to western boundary with residential properties.</li> </ul>   |
|   | <p>Photograph 11</p> <ul style="list-style-type: none"> <li>■ Showing debris present near western boundary with residential properties and evidence of public access to this area</li> </ul>                                      |
|  | <p>Photograph 12</p> <ul style="list-style-type: none"> <li>■ Showing evidence of previous fire within the grassland area west of the River Pinn, and debris present near western boundary with residential properties</li> </ul> |



WSP UK Ltd



# Enclosure I

## Transport Feasibility Report

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UNITED  
BY OUR  
DIFFERENCE



# BRUNEL UNIVERSITY LONDON

## Transport Feasibility Report

November 2015

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# Quality Management

| Issue/revision | Issue 1  | Revision 1                       | Revision 2 | Revision 3 |
|----------------|--|----------------------------------|------------|------------|
| Remarks        | First Draft  | Revision 1                       |            |            |
| Date           | April 2015   | November 2015                    |            |            |
| Prepared by    | Bryony Vaughan /<br>James Morgan   | Bryony Vaughan /<br>James Morgan |            |            |
| Signature      |  |                                  |            |            |
| Checked by     | Sathish Nama   | Alec Prince                      |            |            |
| Signature      |  |                                  |            |            |
| Authorised by  | Alec Prince  | Alec Prince                      |            |            |
| Signature      |  |                                  |            |            |
| Project number | 70009585   |                                  |            |            |
| File reference | L:\70009585 - Brunel University, Uxbridge\C Documents\Reports\Transport Feasibility Report |                                  |            |            |

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# BRUNEL UNIVERSITY LONDON

## Transport Feasibility Report

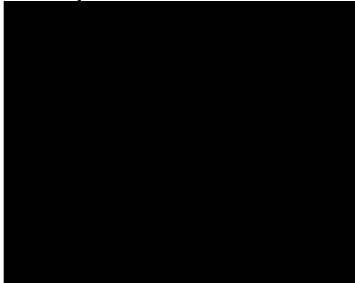
November 2015

### Client

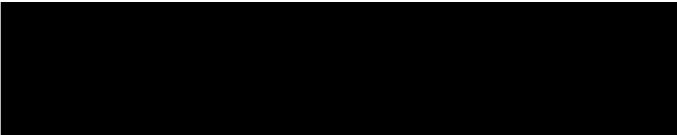
Brunel University

### Consultant

**WSP | Parsons Brinckerhoff**



### Registered Address





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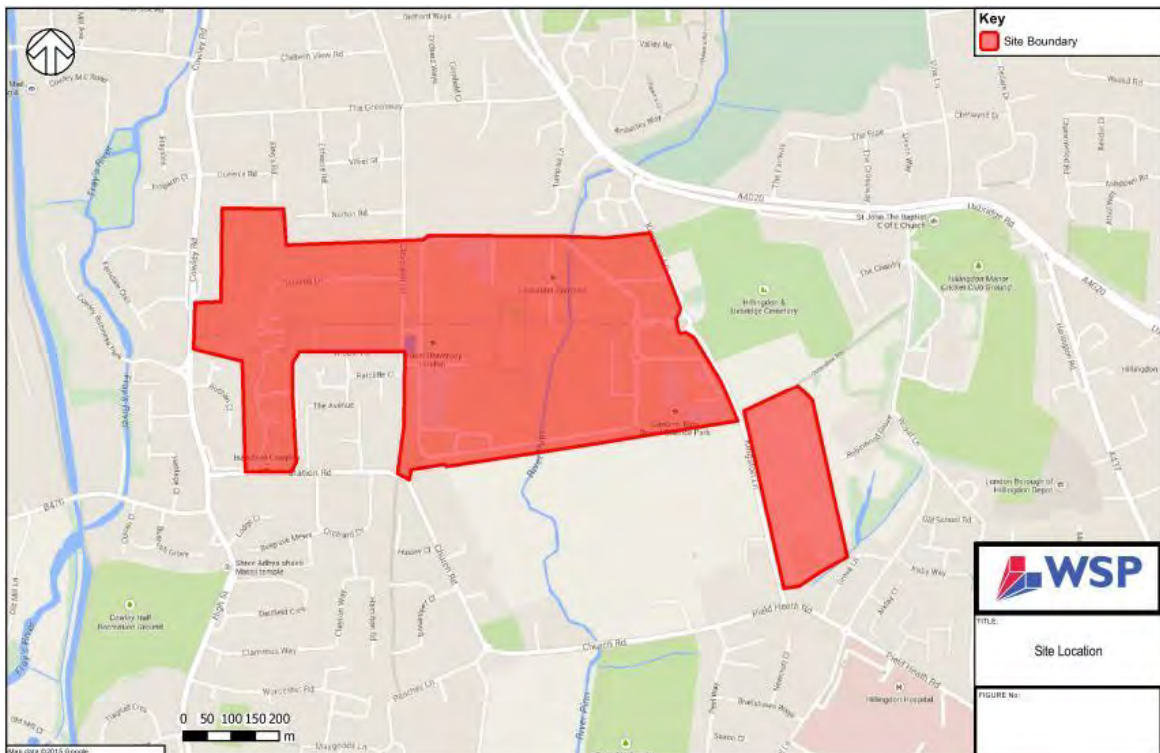
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# 1 Introduction

## 1.1 Appointment

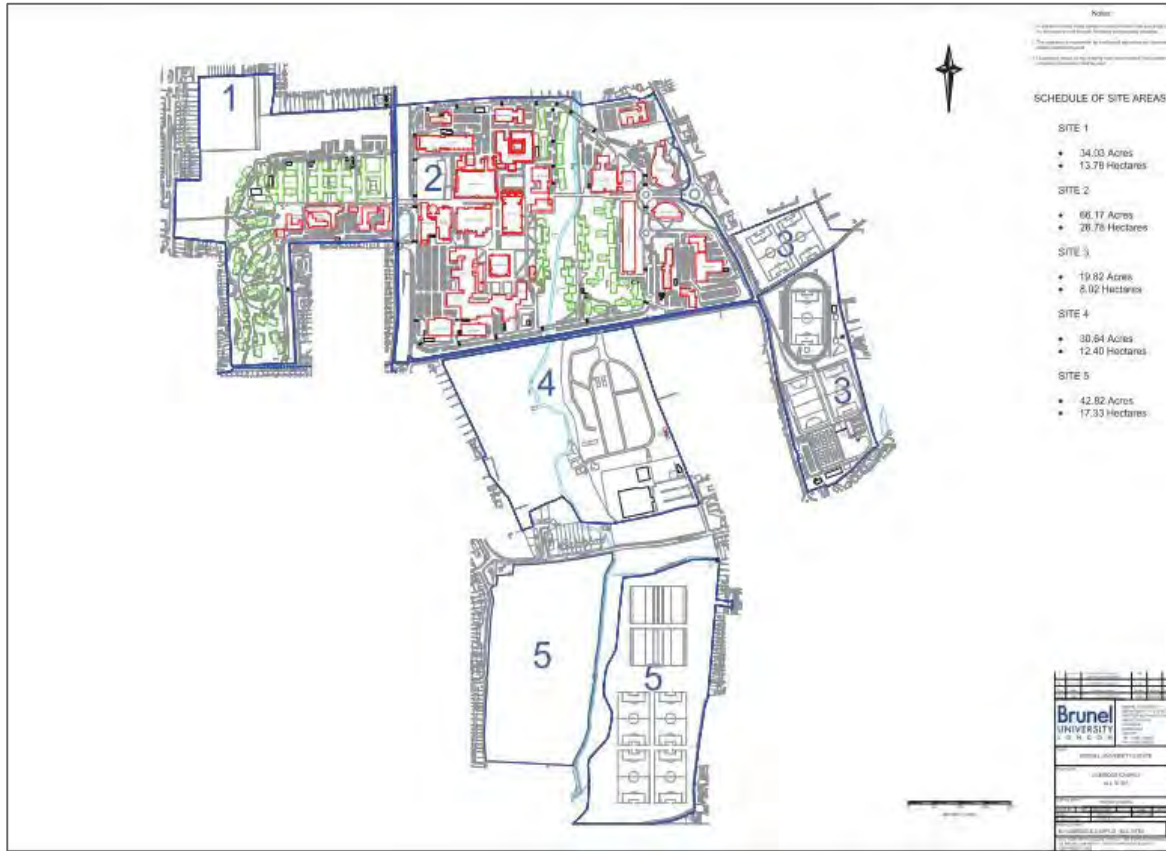
- 1.1.1 WSP | Parsons Brinckerhoff has been commissioned by Brunel University (BU) to provide transport consultancy services and to prepare a Transport Feasibility Report (TFR) to support BU's representations to the emerging Hillingdon Local Plan that promote a review of the Green Belt designations. The location of the site is shown below.

**Figure 1.1: Site Location**



- 1.1.2 GVA Property and Planning Consultants undertook an “Assessment of Development Need” on behalf of BU in January 2014. Their report outlines how much additional floorspace is required to support BU's expansion plans and provides a robust case for Site 4 to be suitable for development.
- 1.1.3 BU operates from a 78 hectare campus located approximately 1km to the south of Uxbridge town centre, within the administrative area of the London Borough of Hillingdon (LBH). The campus is divided into 5 ‘sub-sites’. These are illustrated on the Figure 1.2 overleaf.

**Figure 1.2: Brunel University Campus (Sites 1-5)**



- 1.1.4 Sites 1 and 2 lie either side of Cleveland Road and accommodate the majority of the University's built accommodation. This comprises an intensely developed mix of academic/teaching space, specialist research facilities and student housing (halls of residences) across a site area of around 40 hectares.
- 1.1.5 Site 3 lies to the east of Kingston Lane and Site 5 lies to the south of Church Road. These accommodate the majority of the University's outdoor sports facilities, which include extensive areas of playing fields (site 4 extend to approximately 25 hectares).
- 1.1.6 Site 4 extends to approximately 12.4 hectares and is located immediately to the south of Site 2. Part of the site (approximately 1.6 hectares) accommodates a series of single storey buildings and associated car parking currently used as a garden centre (trading as "Hillingdon Garden Centre). The remainder of the site is unused. The land has been vacant for an extended period of time and is fenced off (there is no public access).
- 1.1.7 This report summarises the key transport related issues relevant to Site 1, 2 and 4 at BU in Hillingdon. As part of the evidence, a high level assessment of transport impacts of both existing development as well as that proposed has been undertaken.

## 1.2 Background

- 1.2.1 BU is a successful education / research institution in the UK and a local economic driver. The University wishes to capitalise on this success and is preparing for a further period of growth. It has a strategic growth plan for the next 5 years which focuses on the significant growth of its research capability (which includes post-graduate study), alongside modest growth of undergraduate

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education. It has furthermore worked up headline details for longer term growth (next 10-15 years) for estates / planning purposes which continues this expansion trend.

- 1.2.2 GVA recently submitted representations to LBH in respect to the consultation on their draft local Plan 'Part 2'. The representations seek the following:
- The allocation of Brunel University's Uxbridge campus (Sites 1, 2, and 4) for higher education / research uses, to include a Green Belt boundary review that removes the Green Belt designation that currently applies to this land. This is in order to account for the University's significant growth plans (development need); and
  - Delete a proposed designation of Site 4 (of the University's Uxbridge campus) as a Nature Conservation Site of Metropolitan or Borough Grade 1 Importance (as this would further constrain the University's ability to develop Site 4).

## 1.3 Planning History

- 1.3.1 In 1990, the University prepared a Masterplan for the Uxbridge campus to cover development requirements up to 2000. This was granted outline planning consent in 1992.
- 1.3.2 The University proceeded to prepare a further Masterplan for Site 1 and 2 in the early 2000's, to guide development over the following 10-15 years. This was granted outline planning consent in 2004.
- 1.3.3 The 2004 Masterplan has now been partially implemented. The table enclosed at **Appendix A** provides an overview of the elements that have been implemented and confirms the elements which remain to be built-out. All of the approved student accommodation (69,840sqm) has been implemented, however a balance of 20,546sqm (43%) of the academic floorspace remains to be implemented.
- 1.3.4 An application was submitted in March 2012 to extend the period in which reserved matters application can be submitted.

## 1.4 Report Purpose

- 1.4.1 The main purpose of this TFR is to provide a robust transport evidence and to:
- Test / confirm the ability of the highway / transport network to support the quantum in principle and form of development proposed (at Sites 1, 2 and 4 of the Uxbridge campus); and
  - To confirm that satisfactory access arrangements can be achieved to Sites 1, 2 and 4 to support the scale / form of development.
- 1.4.2 A robust evidence base will enable an assessment of the transport impacts of both existing development as well as that proposed, and inform sustainable approaches to transport at a plan-making level.
- 1.4.3 Key issues considered in developing the transport evidence base:
- assess the existing situation and likely generation of trips over time by all modes and the impact on the locality;
  - assess the opportunities to support a pattern of development that, where reasonable to do so, facilitates the use of sustainable modes of transport;
  - highlight and promote opportunities to reduce the need for travel where appropriate;
  - identify opportunities to prioritise the use of alternative modes in both existing and new development locations if appropriate;

- 
- consider the cumulative impacts of existing and proposed development on transport networks;
  - assess the quality and capacity of transport infrastructure and its ability to meet forecast demands; and
  - identify the short, medium and long-term transport proposals across all modes; and

1.4.4 The study will form part of the evidence base for the Council's emerging Local Plan Part 2, as well as informing the assessment of current and future planning applications.

## 1.5 Assumptions

1.5.1 This report is based on the following assumptions and qualifications set out below:

- Parking on site will be restrained for both staff and students;
- There will be no increase in car parking spaces within the proposed extended University campus;
- A proportion of the existing car parking spaces from Site 1 and 2 will be relocated to Site 4;
- There will be significant mode shift from single occupancy car driver trips (staff and student) to other sustainable modes of transport;
- No vehicular trips are taken into account from Site 1 (student accommodation) to Site 2 and Site 4; and
- New student accommodation is located on Site 1 adjacent to the existing student accommodation.

## 1.6 Report Structure

1.6.1 This TFR is structured as follows:

- Section 2 – Policy Context;
- Section 3 – Existing Transport & Highway Conditions;
- Section 4 – Brunel University;
- Section 5 – Proposed Development;
- Section 6 – Trip Attraction;
- Section 7 – Proposed Access Strategy;
- Section 8 – Public Transport Strategy; and
- Section 9 – Summary and Conclusion.



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## 2 Policy Context

### 2.1 National Policy

#### **National Planning Policy Framework**

- 2.1.1 The National Planning Policy Framework (NPPF) was adopted in March 2012. The NPPF replaced existing national planning policy guidance and statements, including PPG13 and PPS3, with a single more concise document. The NPPF aims to enable local people and their accountable councils to produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.
- 2.1.2 The NPPF sets out that those developments which generate significant movement should be located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. Developments should be located and designed where practical to (Paragraph 35):
- “Accommodate the efficient delivery of goods and supplies;
  - Give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;
  - Create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians; and avoid street clutter;
  - Incorporate facilities for charging plug-in and other ultra-low emission vehicles; and
  - Consider the needs of people with disabilities by all modes of transport.”

### 2.2 Regional Policy

#### **The London Plan ‘The Spatial Development Strategy for London Consolidated with Alterations Since 2011’ (March 2015)**

- 2.2.1 The London Plan aims to ensure that London’s transport is easy, safe and convenient for everyone, and encourages cycling, walking and use of electric vehicles. The document states that London should be a city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities with an efficient and effective transport system which actively encourages more walking and cycling.
- 2.2.2 The London Plan recognises that transport plays a fundamental role in addressing the whole range of this spatial planning, environmental, economic and social policy priorities. It is critical to the efficient functioning and quality of life of London and its inhabitants, having major effects on places, especially around interchanges and in town centres and on the environment, both within the city itself and more widely.
- 2.2.3 Policy 6.1 Strategic Approach stresses the importance of closer integration of transport and development and hopes to achieve this by inter alia:
- Encouraging patterns of development that reduce the need to travel, especially by car;
  - Supporting development that generates high levels of trips only at locations with high levels of public transport accessibility, either currently or via committed, funded improvements;
  - Supporting measures that encourage shifts to more sustainable modes and appropriate demand management;

- Promoting greater use of low carbon technology so that CO2 and other contributors to global warming are reduced; and
- Promoting walking by ensuring an improved urban realm.

2.2.4 The table below summarises adopted cycling parking standards.

**Table 2.1: Cycle Parking Standards**

| Use Class                       | London Plan (March 2015) Minimum Cycle Parking Standards |                      |
|---------------------------------|--|----------------------|
| <b>C2 Student Accommodation</b> | 1 space per 2 beds                                       | 1 space per 30 staff |
| <b>D2 Sports</b>                | 1 space per 8 staff                                      | 1 space per 100sqm   |

## 2.3 Local Policy

### **Local Plan Part 1 – Development Management Policies: September 2014**

- 2.3.1 LBH's Local Plan Part 1 was adopted in November 2012 (previously the Core Strategy). The key issues within the document are education/ economic development and the green belt.
- 2.3.2 The Local Plan states that policies within Hillingdon will ensure that a high standards of teaching can continue to be provided in these establishments over the period of the Local Plan and that LBH '*will continue its collaborative working arrangements with these institutions during the preparation of the Local Plan and during subsequent monitoring and reviews.*'
- 2.3.3 Site 4 is identified by the Local Plan as a 'Green Chain' which are habitats linked by natural and man-made corridors such as public footpaths, rivers, streams and tree lined streets which all contribute to the green network within the borough.
- 2.3.4 This document refers to the Hillingdon Biking Borough Scoping Report 2010 which sets out the vision for increasing levels of cycling in the borough. Hillingdon is expected to achieve the Mayoral target of 400% increase in cycling by 2026 or sooner.

### **Local Plan Part 2 – Development Management Policies: September 2014**

- 2.3.5 LBH's Local Plan Part 2 was adopted in September 2014 and its purpose is to provide detailed policies to ensure sustainable growth in the borough. Chapter 8 focuses on policies related to all aspect of the transport network.
- 2.3.6 Policy DMT1: Managing Transport Impacts
- Development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner. In order for developments to be acceptable they are required to:
    - i) be accessible by public transport, walking and cycling either from the catchment area that it is likely to draw its employees, customers or visitors from and/or the services and facilities necessary to support the development;
    - ii) maximise safe, convenient and inclusive accessibility to, and from within developments for pedestrians, cyclists and public transport users;
    - iii) provide equal access for all people, including inclusive access for disabled people;
    - iv) adequately address delivery, servicing and drop-off requirements; and
    - v) have no significant adverse transport impacts on the local and wider environment.

- 
- Development proposals will be required to undertake a satisfactory Transport Assessment and Travel Plan (TP) if they meet or exceed the thresholds set out in Table 8.1 and any subsequent update to these thresholds. All major developments that fall below these thresholds will be required to produce a satisfactory Transport Statement and Local Level TP. All these plans should demonstrate how any potential impacts will be mitigated and how such measures will be implemented.

#### 2.3.7 Policy DMT2: Highways Impacts

- Development proposals must be compatible with the safe and efficient movement of the highway and therefore must ensure that:
  - i) and efficient vehicular access to the highway network is provided to the Council's standards;
  - ii) they do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents;
  - iii) safe, secure and convenient access and facilities for cyclists and pedestrian are satisfactorily accommodated in the design of highway and traffic management schemes;
  - iv) impacts on local amenity and congestion are minimised by routing through traffic by the most direct means to the strategic road network, avoiding local distributor and access roads; and
  - v) there are suitable mitigation measures to address any traffic impacts in terms of capacity and functions of existing and committed roads, including along roads or through junctions which are at capacity.

#### 2.3.8 Policy DMT4: Public Transport

- The Council will support and promote the enhancement of public transport facilities, including at key interchanges that address the needs of the Borough. The Council may require developers to mitigate transport impacts from development proposal by improving local public transport facilities and services, which may include:
  - i) improvements to address inclusive access;
  - ii) ensuring that bus stops are conveniently located for passengers;
  - iii) Implementation of bus priority and bus stop accessibility measures;
  - iv) providing for bus route requirements and associated road layouts;
  - v) improvements to the network of services; and
  - vi) improvements to infrastructure to support cycling.
- Public transport measures may be required to be included in the highways layout design where identified in a transport assessment, TP or integral to the acceptability of the proposal.

#### 2.3.9 Policy DMT5: Pedestrians and cyclists

- Development proposals will be required to ensure that safe, direct and inclusive access for pedestrians and cyclists is provided on the site connecting it to the wider network, including:
  - i) The provision of a high quality and safe public realm or interface with the public realm, which facilitates convenient and direct access to the site for pedestrian and cyclists;
  - ii) The provision of well signposted, attractive pedestrians and cycle routes separated from vehicular traffic where possible; and
  - iii) The provision of cycle parking and changing facilities in accordance with Table 2.1 or, in agreement with Council.

- Development proposals located next to or along the Blue Ribbon network will be required to enhance and facilitate inclusive, safe and secure pedestrian and cycle access to the network. Development proposals, by virtue of their design, will be required to complement and enhance local amenity and include passive surveillance to the network.

2.3.10 Policy DMT6: Vehicle Parking

- Development proposals must comply with the parking standards outlined in below in order to facilitate sustainable development and address issues relating to congestion and amenity. Council may agree to vary these requirements when:
  - The variance would not lead to a deleterious impact on street parking provision, congestion or local amenity; and/or
  - A transport appraisal and TP has been approved and parking provision is in accordance with its recommendations.
- All car parks provided for new development will be required to contain conveniently located reserved spaces for wheelchair users and those with restricted mobility in accordance with the Council's Accessible Hillingdon SPD.

2.3.11 The parking standards apply to new buildings, extensions and changes of use for service vehicles, car, motorcycle and bicycle parking. These are summarised below.

**Table 2.2: Maximum Parking Requirements**

| Car and Other Vehicle Parking   | Bicycle Parking            |
|---|----------------------------|
| <b>Student Halls of Residence</b>   |                            |
| On an individual basis using a transport assessment and TP                              | 1 space per student        |
| <b>Further Education Establishment</b>  |                            |
| On an individual basis using a transport assessment and where applicable school TP / TP | 1 per 10 staff or students |
| Where relevant, provision should be made for coach/ bus access and parking              |                            |

2.3.12 In addition to car and bicycle parking spaces, designated blue badge parking bays are required. These are summarised below.

**Table 2.3: Designated Blue Badge Recommended Parking Requirements**

| Building Type     | Provision from the outset                                     |  | Future Provision                   |
|-------------------|---|--|------------------------------------|
|                   | Number of spaces for each employee who is a disabled motorist | Number of spaces for visiting disabled motorists | Number of enlarged standard spaces |
| Workplaces        | One space   | 5% of the total capacity                         | A further 5% of the total capacity |
| Sports Facilities | Determined according to the usage of the sports facility      |  |                                    |

2.3.13 Developments must ensure than 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles.

**Items to be funded by S106 Contributions**

2.3.14 Transportation Measures: needed to make specific development proposals acceptable in planning terms. Site specific matters can include (but are not limited to) highways crossovers to access the site and local road junctions, deceleration and turning lanes, measures to facilitate pedestrian and cyclist access, lighting and street furniture needed to mitigate the impact of a particular development.

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#### **The Hillingdon (speed limit) order 2014**

- 2.3.15 Under Section 90 of the Highways Act 1980 five pairs of speed cushions will be installed along Church Road, Cowley and Pield Heath Road, Hillingdon. The proposed speed cushions are intended to enhance road safety without affecting emergency services and improving the safety of pedestrians. This document is contained in **Appendix B**.

#### **RAF Uxbridge Supplementary Planning Document (January 2009)**

- 2.3.16 This document sets out the council's proposals for how RAF Uxbridge site should be redeveloped in a way that revitalises the local area and provides benefits for residents from across the borough.
- The transport specific issues includes consideration of the need to maintain amenity values and pedestrian and cycle accessibility in the design of the internal main connector roads.

#### **Transport for London Press Release (December 2012)**

- 2.3.17 The TfL press release provides details on the £4,200,000 allocated investment for Hillingdon to advance in transport projects that will benefit the local community. The 2013/14 funding package will finance a range of transport projects in Hillingdon as a result of the Mayor's Transport Policy. This includes £120,000 for bus stop accessibility improvements within Hillingdon, such as raising kerb height, relocating the bus flag and bus shelter, and footway and carriageway resurfacing to ensure bus stops are easy to use and accessible to all.

#### **London Borough of Hillingdon Strategic Infrastructure Plan, March 2013**

- 2.3.18 Strategic Infrastructure Plan (SIP) has been prepared as part of the evidence base for the Local Plan in the response to the National Planning Policy Statement (NPPF). This plan in particular, it looks at the key items of infrastructure required to deliver the Local Plan Part 1, Transport and Connectivity & Education.
- 2.3.19 The key transport and public transport infrastructure proposals identified in SIP are as follows:
- The Highways Agency is proposing to implement a programme of 'Hard Shoulder Running' to address congestion on the M4, as part of the nationwide 'managed Motorways' scheme.
  - Transport for London (TfL) is not proposing any major schemes in the borough; however a programme of maintenance works and junction improvements will take place.
  - The Council will also implement a programme of highway maintenance and improvements. These will be implemented through a number of programmes and capital streams, including Local Implementation Plan (LIP) funding.
  - **Improved public transport interchanges** at Hayes, West Drayton, Heathrow Airport, West Ruislip and Uxbridge;
  - **Fastbus** – Proposals are being promoted with TfL to improve north/south public transport links in the borough.
  - **Crossrail**- The government's proposals for Crossrail are expected to be implemented from 2015 onwards, with the Crossrail route expected to become operational from 2017. The total cost of the project is around £15bn with approximately £300m coming from the Mayor CIL and a further £300m coming from s106 contributions.
  - **Improved Underground Links** – The Council is working with TfL to improve Underground links to and from Uxbridge, particularly upgrades to the Metropolitan Line.
  - **HS2** – The Government has given in principle approval for the construction of a high speed rail link (known as High Speed 2), which will provide fast rail access to and from London and the



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north of England. Public Consultation took place between 28<sup>th</sup> February and 29<sup>th</sup> July 2011 and the Government will be announcing its preferred line of route at the end of 2011.

***Education and Learning – Higher Education***

2.3.20 The key Education and Learning Infrastructure proposals identified in SIP are as follows:

- A significant amount of new development has been delivered at Brunel in recent years, through the University's development Masterplan, which covers the period up to 2014. It is understood that the University will bring forward a new Masterplan, covering the period up to 2021.

# 3 Existing Transport and Highway Conditions

## 3.1 Introduction

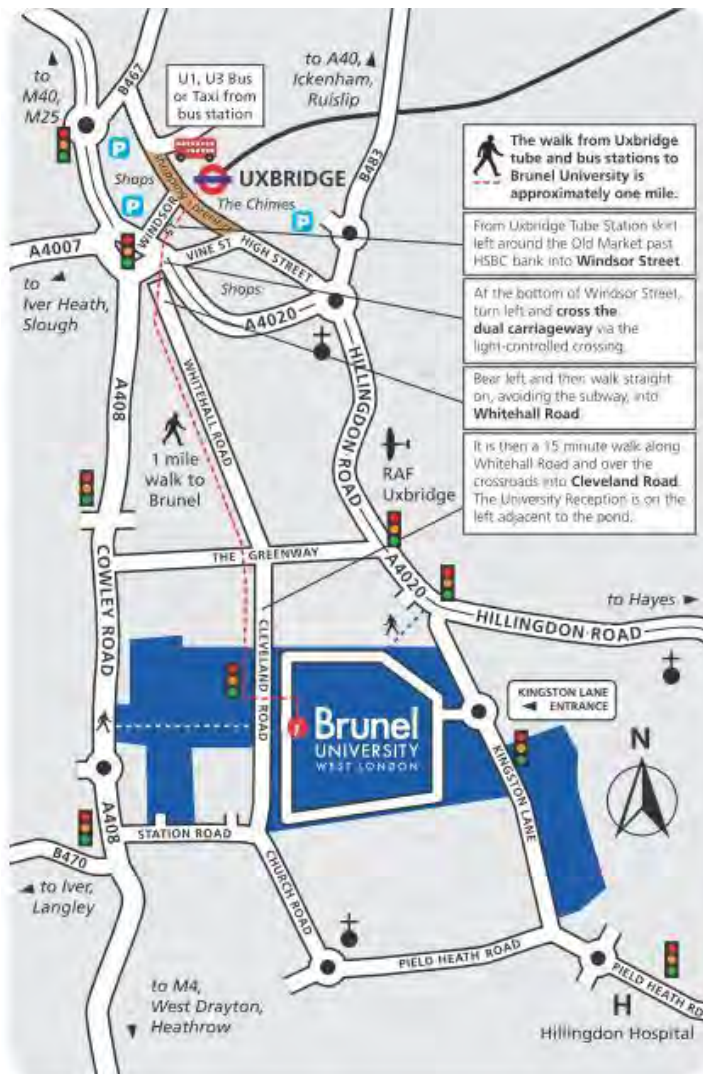
3.1.1 This section reviews the existing transport conditions in the vicinity of the site. More specifically, this chapter provides a description of the site location, a review of the existing walking, cycling and public transport facilities and a description of the existing highway network in the vicinity of the site.

## 3.2 Pedestrian Accessibility

3.2.1 Brunel University is approximately a 20 minute walk from Uxbridge town centre and Uxbridge London Underground station.

3.2.2 Most areas of the site are connected to the central concourse via a number of footpaths. The footpaths are generally of good condition, lit and are mostly overlooked by CCTV. Figure 3.1 below illustrates the pedestrian routes and entrances to the site.

**Figure 3.1: Pedestrian Routes**



3.2.3 The principal east-west pedestrian route through the campus is the only route with a continuous dedicated footway; other east-west routes require pedestrians to use the roadway and/or parking areas. A number of ramps are provided for wheelchair accessibility around the main centre square at the lecture building.

3.2.4 There are a number of pedestrian crossings in close proximity to the site as detailed in the Table 3.1 below. The University zones with pedestrian access points are detailed in **Appendix C**.

**Table 3.1: Pedestrian Access Points**

| Zone | Access to Zones | Access to Bus Routes | Access to Points of Interest              |
|------|-----------------|----------------------|---|
| A    | B, C, D         | U3, U5, 222          | Cleveland Road, Cowley Road, Station Road |
| B    | C, E            | U3                   | Cleveland Road                            |
| C    | A, B, D, E, F   | U3                   | Cleveland Road                            |
| D    | A, C, F         | U3, 222, U5          | Cleveland Road                            |
| E    | B, C, F, G      | A10, U1, U4, U7      | Kingston Lane, Sports Park                |
| F    | C, D, E, G      | -                    | -   |
| G    | E, F            | U1, U4, U7           | Kingston Lane, Sports Park                |

3.2.5 Zone A provides access to bus services U3, U5 and 222, as well as Cleveland Road, Cowley Road and Station Road. Zones B and C provide access to bus service U3 and Cleveland Road. Zone D provides access to bus services U3, 222, U5 and Cleveland Road. Zone E provides access to A10, U1, U4 and U7 bus services, as well as Kingston Lane for the University sports park. Zone F doesn't provide access to any bus services or points or interest, and Zone G provides access to U1, U4 and U7 bus services, as well as the University sports park on Kingston Lane.

3.2.6 The pedestrian network in the vicinity of the site ensures good accessibility on foot to surrounding local facilities and public transport. The isochrones shown on Figure 3.2 overleaf shows the 5, 10, 15, 20, 25 and 30 walking catchment areas from the site assuming a walk speed of 4.8km/hr.

3.2.7 All the surrounding footways are in good condition and have street lighting and all major junctions in the area have pedestrian features such as dropped kerbs and tactile paving. A PERS audit will be completed during the planning application which will detail the quality of each link, crossing, route, public transport waiting area, interchange space and public space.

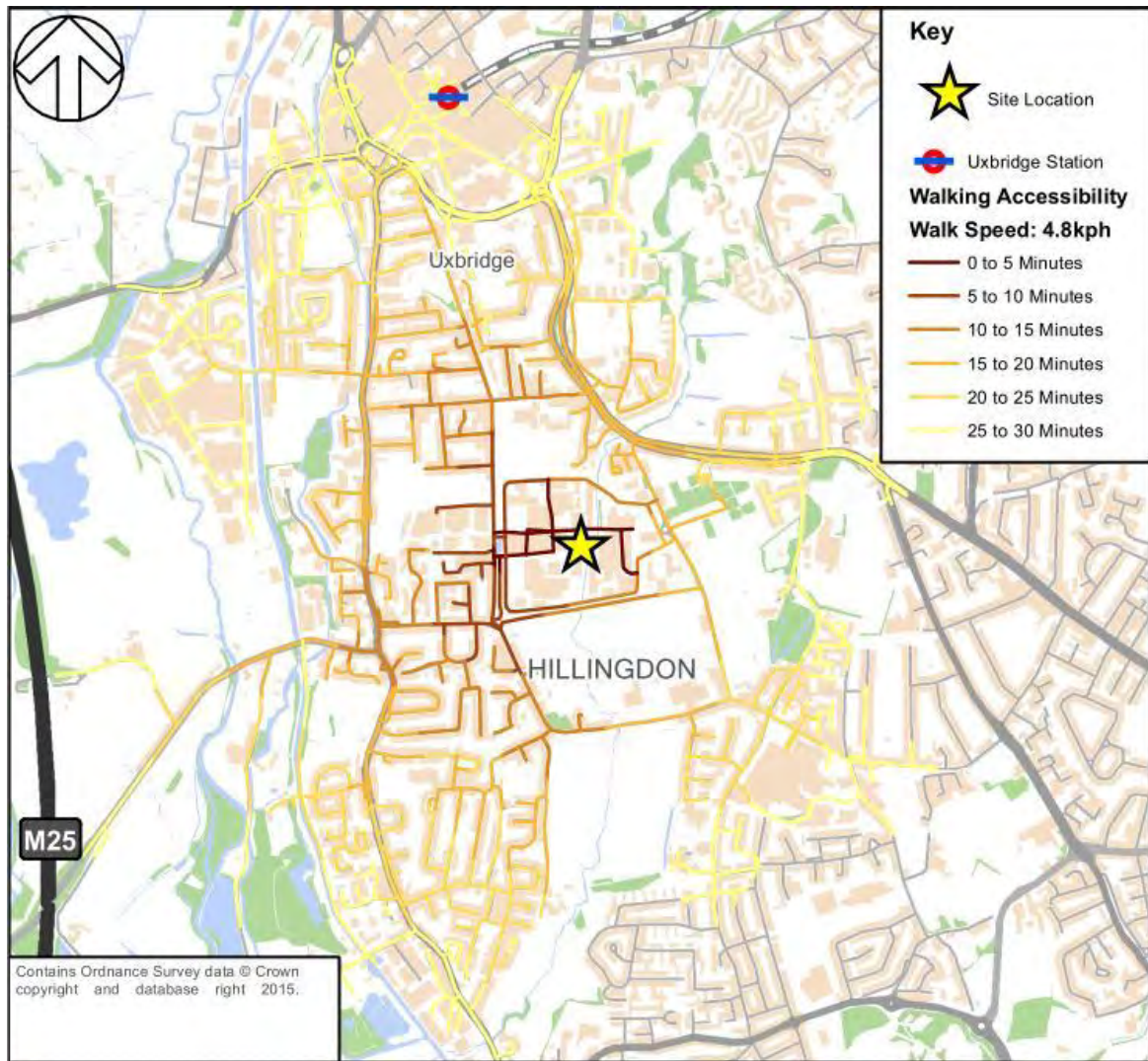


**Cleveland Road**

3.2.8 It is recognised that the most important pedestrian desire lines from the development are those which provide connections to public transport services within the surrounding area.

- 3.2.9 PPG13, which has now been superseded by NPPF, noted in paragraph 75 that walking is the most important mode of travel at the local level and offers the greatest potential to replace short car trips, particularly under 2km (2km is equivalent to a 25 minute walk). This statement remains relevant and has been accepted for many years. A walking distance of 2km is likely to be realistic for people travelling to and from the site.
- 3.2.10 Existing walking isochrones for the immediate vicinity of the site and across the University grounds as a whole are shown below in Figure 3.2.

**Figure 3.2: Walking Accessibility**



**Nursery Lane**

- 3.2.11 Nursery Lane is a pedestrian only route between Station Road and Kingston Lane. This route provides easy access into BU grounds.



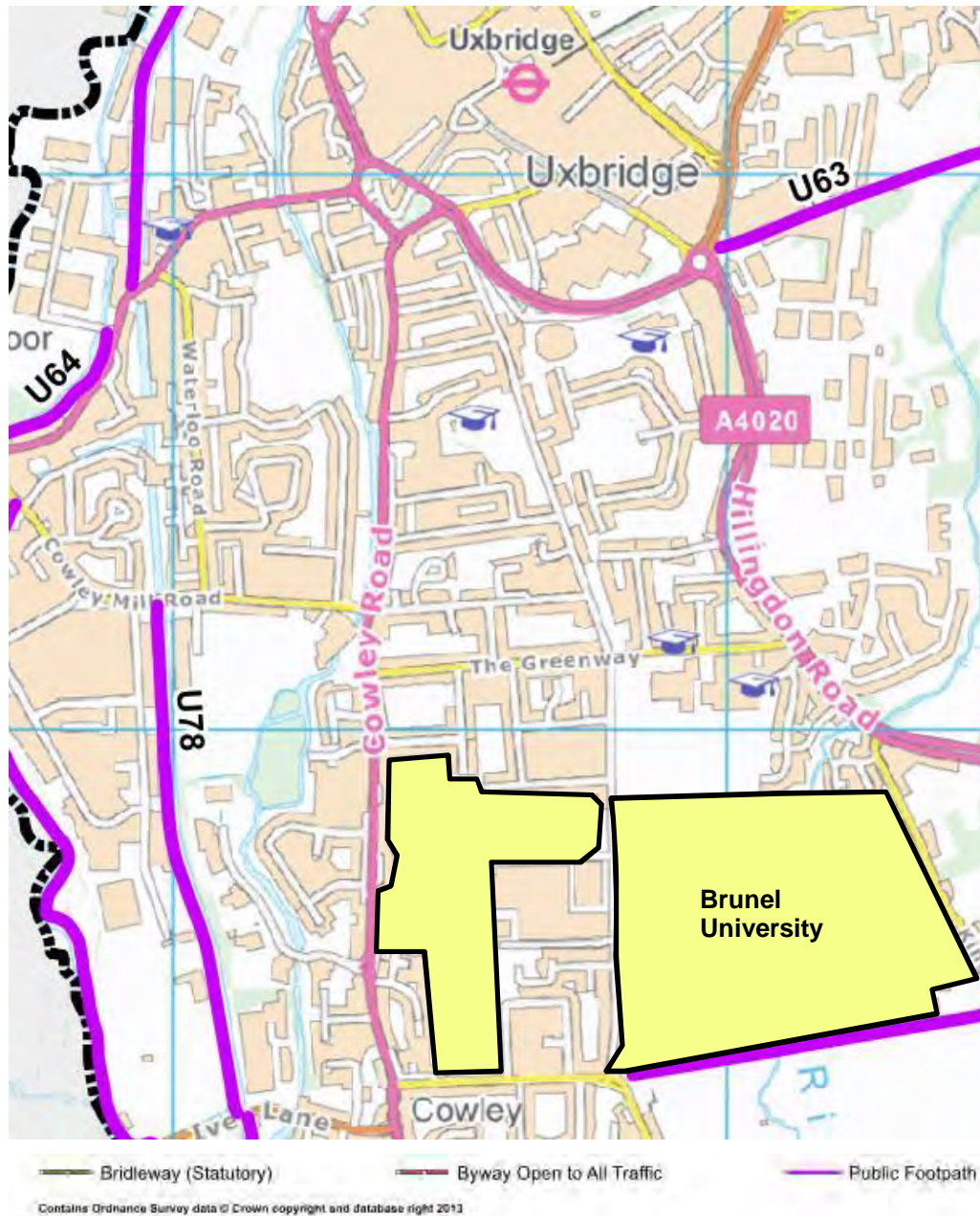


### Nursery Lane

3.2.12 The public footpaths accessible from the site are shown overleaf in Figure 3.3.



Figure 3.3: Public Footpaths



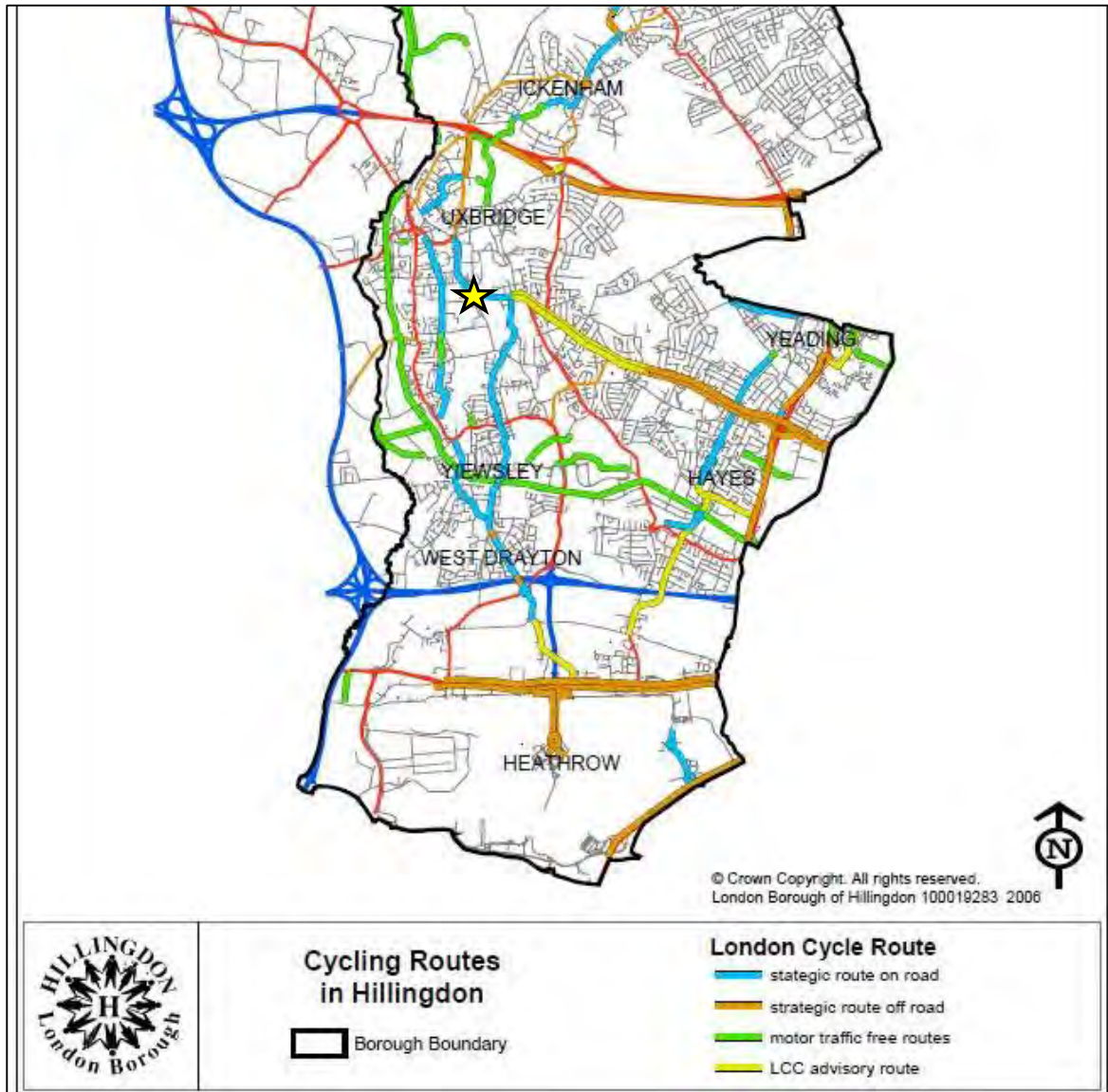
3.2.13 The nearest public footpaths are situated south of the University between Station Road and Kingston Road, and north of the University next to Uxbridge Town Centre leading onto Vine Lane.

### 3.3 Cycle Accessibility

3.3.1 Cycling is a popular and common mode of transport within London, providing a low cost, efficient means of travel. Improvements and upgrades to London's cycle network mean that extensive routes are now in place offering cyclists greater priority along the majority of London's main roads.

3.3.2 The locally designated cycle routes are shown overleaf in Figure 3.4.

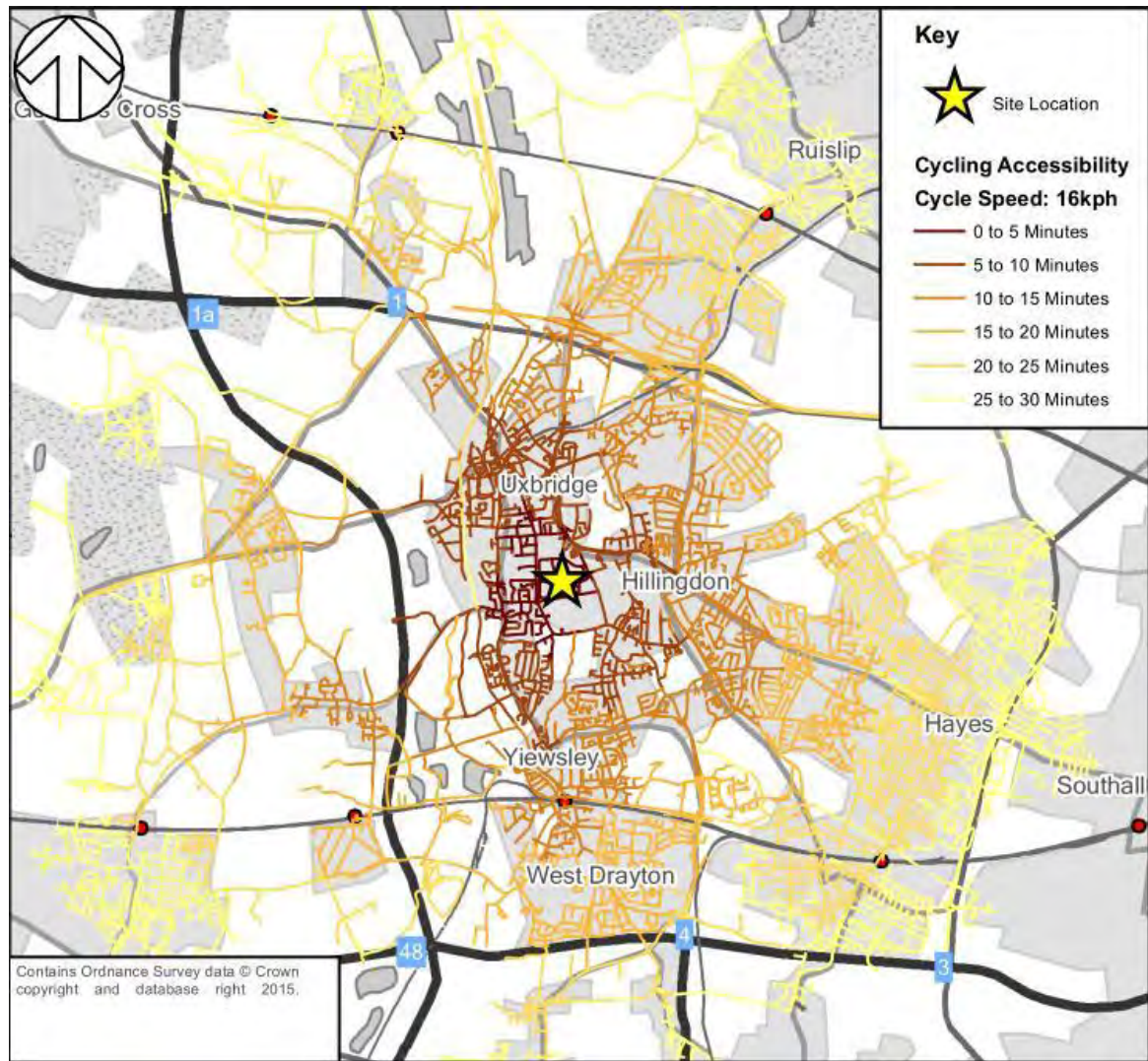
Figure 3.4: Cycle Routes



3.3.3 There are a number of motor traffic free routes within close proximity to the site, stretching from Uxbridge to Yiewsley and Hayes. A 0-30 minute cycle catchment isochrones map is also included in Figure 3.5 overleaf, demonstrating that it is possible to cycle throughout LBH and further afield.



Figure 3.5: Cycle Isochrones



- 3.3.4 The site benefits from being located close to a large number of cycle routes. These consist of routes that occupy both busy and quieter roads, as well as providing connections to the wider cycling network within London. The London Cycle Guides, produced by TfL, provide localised cycling routes in the greater London area. The Local Cycle Guide 6 provides information and routes for Uxbridge and its surrounding area.
- 3.3.5 An extensive network of cycling routes is available in close proximity to the site. Uxbridge Road is part of the London Cycle Network route 39. This road heads south and southwest towards Southall and Hayes.
- 3.3.6 Cycle route 89 provides access to Heathrow and Yiewsley and route 39 provides access to Southall. Both of these routes can be accessed from The Greenway from Cleveland Road as shown overleaf.



### Cycle Routes

3.3.7 Heading north of the University, cyclists are able to connect onto the Sustrans Local Route up to Uxbridge which connects onto Sustrans National Route which continues into Denham Country Park, Harefield and Rickmansworth. South of the University the Sustrans Local Route provides access to West Drayton and Heathrow. Sustrans National Route is also accessed to the West of Uxbridge which continues into Slough and Windsor.

## 3.4 Pedestrian and Cycle Accessibility – Sites 1, 2 and 4

### Pedestrian and Cycle Access

3.4.1 The following paragraphs and figures provide further detail of the existing pedestrian and cycle access points to the university, concentrating on Sites 1 and 2 (which are developed) and Site 4 (which could be developed in the near future). Larger plans are also provided in **Appendix I**.

#### Site 1

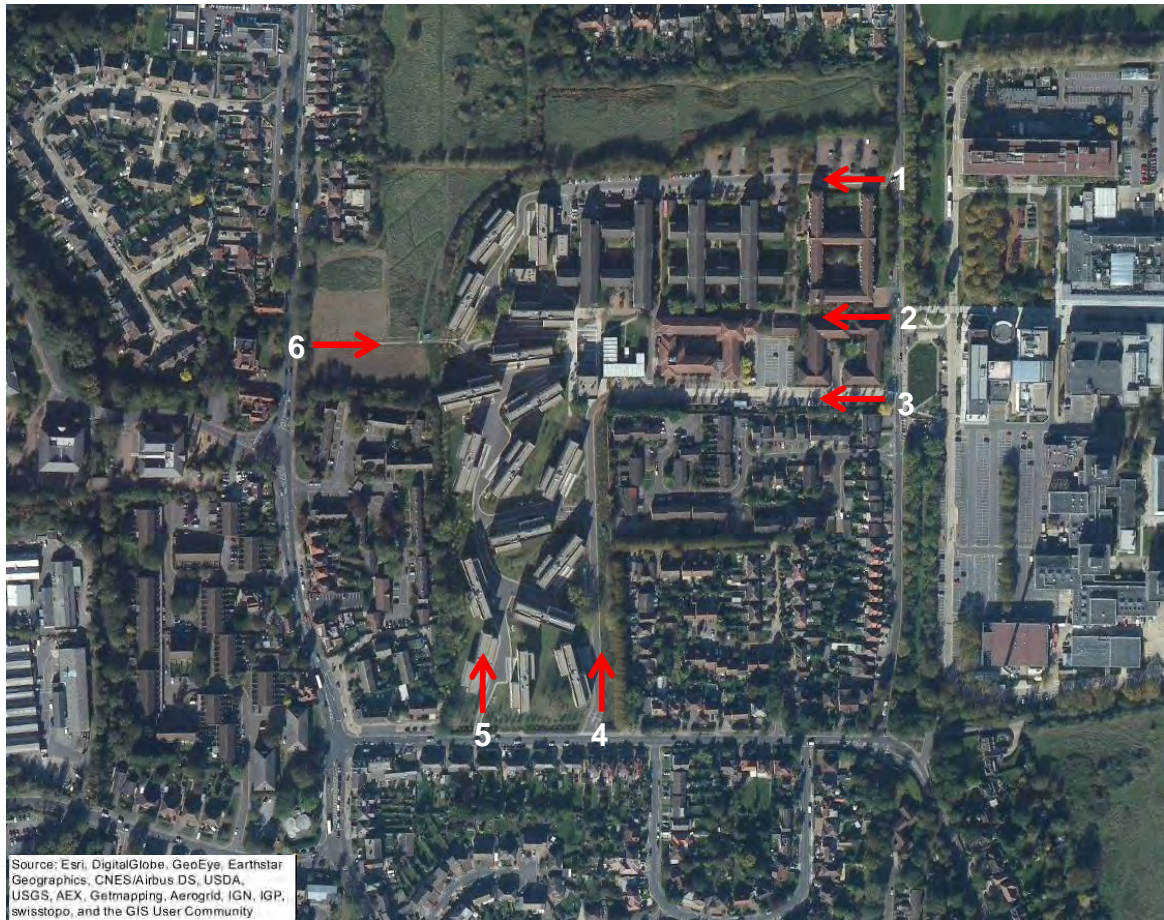
3.4.2 As shown on Figure 3.6, pedestrian and cycle access to Site 1 is currently provided via:

- 1) Topping Lane to the east, which includes a designated footway on its southern side;
- 2) A main pedestrian / cycle walkway, which runs in an east to west direction through the centre of Sites 1 and 2 (crossing Cleveland Road);
- 3) West Spur Road to the east, which includes a designated footway on its northern side.;
- 4) Station Road to the south, via the existing two-way priority junction, which includes footways on its western side;



- 5) Station Road to the south via the existing 'emergency' only access point, which is constructed of shared-surface materials; and
- 6) A designated pedestrian / cycle route, which crosses Cowley Road to the east and links to the main University campus.

**Figure 3.6: Site 1 – Pedestrian and Cycle Access Points**



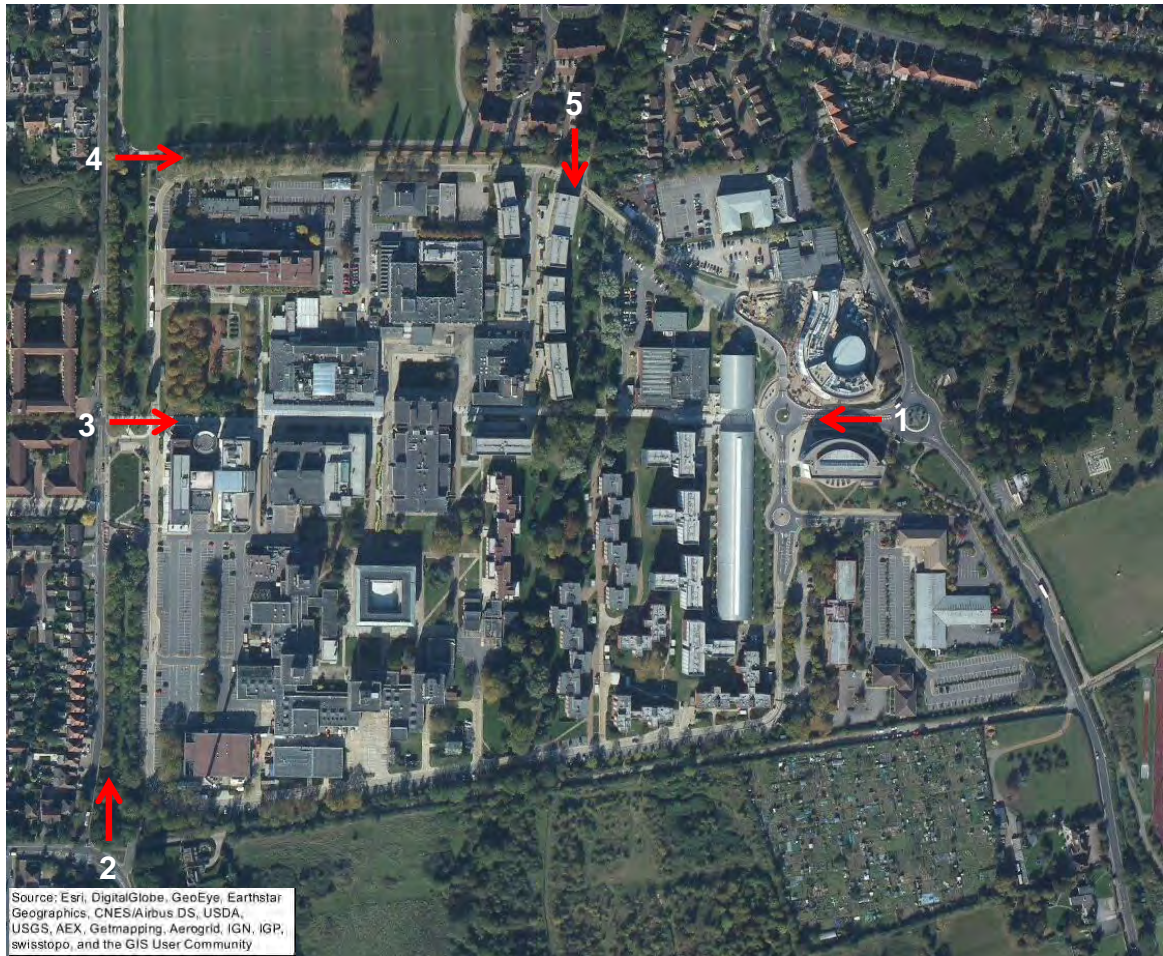
### **Site 2**

3.4.3 As shown on Figure 3.7, pedestrian and cycle access to Site 2 is currently provided via:

- 1) The main vehicular access point from Kingston Lane, which includes designated pedestrian / cycle routes;
- 2) Station Road, at the south-west boundary of the site;
- 3) A main pedestrian / cycle walkway, which runs in an east to west direction through the centre of Sites 1 and 2 (crossing Cleveland Road);
- 4) Cleveland Road, at the north-west boundary of the site; and
- 5) A designated pedestrian footpath provided at the north-east boundary of the site, which runs parallel to the River Penn linking the site to the A4020 Hillingdon Road.



Figure 3.7: Site 2 – Pedestrian and Cycle Access Points



#### Site 4

- 3.4.4 Nursery Lane, which skirts the northern boundary of the site, is designated as a public footpath.
- 3.4.5 No designated pedestrian / cycle access points are currently provided to Hillingdon Garden Centre.

### 3.5 Public Transport Network

#### Bus Accessibility

- 3.5.1 There are a number of London bus routes operating around BU and providing access to a number of key destinations including Uxbridge tube station, Uxbridge town centre and West Drayton railway station. Furthermore bus service A10 runs between Uxbridge and Heathrow Airport with a journey time of approximately 20 minutes. The bus services provide a comprehensive network, serving all main roads around the site and key access points as shown in **Appendix D** (Figure 3.6).

3.5.2 Table 3.2 below provides a summary of London bus services in the vicinity of the site.

**Table 3.2: Local London Bus Services**

| Route | Route Summary   | Frequency (per hour)               |                                  |
|-------|---|------------------------------------|----------------------------------|
|       |   | Mon – Sat                          | Sunday                           |
| 222   | Hounslow – West Drayton – Cowley - Uxbridge                         | 7                                  | 3                                |
| 427   | Acton – Ealing – Hillingdon Road – Uxbridge                         | 7                                  | 6                                |
| 607   | Uxbridge – Southall – Acton – White City                            | 6                                  | 5                                |
| A10   | Heathrow – Hillingdon Road – Uxbridge                               | 4                                  | 2                                |
| U1    | Ruislip – Uxbridge – Kingston Lane – West Drayton                   | 4                                  | 2                                |
| U2    | Uxbridge – Hillingdon Hospital – Kingston Lane                      | 6                                  | 3                                |
| U3    | Heathrow – West Drayton – Cleveland Road – Uxbridge                 | 5                                  | 3                                |
| U4    | Prologis Park – Hayes and Harlington – Brunel University – Uxbridge | 7                                  | 7                                |
| U5    | Hayes and Harlington – Stockley – West Drayton – Uxbridge           | 5                                  | 3                                |
| U7    | Hayes – Hillingdon Hospital – Kingston Lane - Uxbridge              | 2                                  | 2                                |
| N207  | Uxbridge – Southall – Ealing – Shepherd's Bush - Holborn            | (4 per hour between 00:00 – 05:00) | (7 per hour between 00:00-05:00) |
| Total |   | 53                                 | 36                               |

3.5.3 Table 3.2 indicates there are ten London bus routes in the vicinity of the site providing approximately 53 services per hour in either direction. The night bus provides two services per hour between midnight and 4am Sunday night / Monday morning to Thursday night / Friday morning towards Holborn. Friday night / Saturday morning and Saturday night / Sunday morning the night bus provides two services per hour between midnight and 4am. The night bus can be accessed from Uxbridge Station.

3.5.4 Bus services from outside of London, such as to/from Slough, also operate to Uxbridge town centre.

#### **London Underground**

3.5.5 Uxbridge station is an approximate 20 minute walk north of the campus and can be accessed via all of the bus services from the University.

3.5.6 Uxbridge Station provides access to Metropolitan and Piccadilly Lines. There are frequent services throughout the day and a summary of these services is provided in the table below.

**Table 3.3: LUL Services from Uxbridge**

| Line         | Route Description      | Peak Hour Frequency |
|--------------|------------------------|---------------------|
| Piccadilly   | Uxbridge – Cockfosters | 5                   |
| Metropolitan | Uxbridge – Aldgate     | 6                   |

#### **National Rail**

3.5.7 West Drayton is the nearest mainline railway station in the region of 2.5km from the campus. West Drayton provides services to London Paddington and Bristol (via Reading) to the west.

3.5.8 Furthermore, West Ruislip station is around a 20 minute bus journey from the site. West Ruislip provides mainline services to London Marylebone and the Midlands. The table overleaf provides a summary of services from West Drayton and West Ruislip railway stations respectively.

**Table 3.4: Rail Services**

| Line         | Route Description        | Peak Hour Frequency |
|--------------|--------------------------|---------------------|
| West Drayton | Oxford (via Reading)     | 1                   |
|              | Reading (via Maidenhead) | 2                   |
|              | London Paddington        | 4                   |
|              | Banbury                  | 1                   |
| West Ruislip | High Wycombe             | 1                   |
|              | London Marylebone        | 2                   |
|              | Aylesbury                | 1                   |

**Public Transport Accessibility Level (PTAL)**

3.5.9 The Public Transport Accessibility Level (PTAL) methodology has been adopted by the GLA and TfL as a means of quantifying and comparing accessibility by public transport for a given site. The methodology is based on a walk speed of 4.8km/h and considers rail stations within a 12 minute walk (960m) of the site and bus stops within eight minutes' walk (640m). A full PTAL assessment has been undertaken for the site, contained in **Appendix E**, which takes into account the time taken to access the public transport network and includes:

- The walk time to various public transport services
- The average waiting time for each service; and
- The reliability of each service.

3.5.10 An Equivalent Doorstep Frequency (EDF) is calculated for each of the public transport services accessible from the site based on the criteria described above. These individual EDF values are then weighted to provide an accessibility index (AI) value for each service accessible from the site. The sum of the AI's for each mode are then aggregated to provide a single measure of accessibility. The Total AI value is then compared against the PTAL bands given below in Table 3.5.

**Table 3.5: PTAL Bandings**

| PTAL Score | Range of Index (AI) | Description |
|------------|---------------------|-------------|
| 1a         | 0.01 – 2.50         | Very Poor   |
| 1b         | 2.51 – 5.00         | Very Poor   |
| 2          | 5.01 – 10.00        | Poor        |
| 3          | 10.01 – 15.00       | Moderate    |
| 4          | 15.01 – 20.00       | Good        |
| 5          | 20.01 – 25.00       | Very Good   |
| 6a         | 25.01 – 40.00       | Excellent   |
| 6b         | >40.01              | Excellent   |

3.5.11 The exact location of the point of interest can have a considerable bearing on the PTAL score, as the distance to local transport services and the nature of the local walk network will vary from point to point. Table 3.6 below highlights the PTAL for different points of interest around the site based on the TfL PTAL web-based calculator. Full details of the assessments are provided within **Appendix E**.

**Table 3.6: PTAL Points**

| Point of Interest  | Description            | Easting, Northing | PTAL Rating |
|--------------------|------------------------|-------------------|-------------|
| Cleveland Road (S) | Centre of Campus       | 505795, 182613    | 1b          |
| Cleveland Road (N) | Northern site boundary | 505792, 182906    | 2           |
| Kingston Lane      | Eastern site boundary  | 506398, 182670    | 2           |
| Cowley Road        | Western site boundary  | 505326, 182476    | 1b          |
| Station Road       | Southern site boundary | 505714, 182364    | 2           |

3.5.12 The assessment concludes that the site benefits from a 'poor' to 'moderate' accessibility, although it is noted that this is derived from a methodology which depends on access to Underground and rail services to a significant extent. The eastern extent of the site (Kingston Lane) is measured to have the best accessibility due to its proximity to the range of bus services on Hillingdon Road.

3.5.13 However, as is common with GIS based tools, there can be pedestrian only connections that are missed judged from the calculations. A Manual PTAL calculation has therefore been undertaken and is shown in Table 3.7 below. Full details of the assessments are provided within **Appendix F**.

**Table 3.7: Manual PTAL Calculations**

| Point of Interest  | Overall Accessibility Index | PTAL Rating |
|--------------------|-----------------------------|-------------|
| Cleveland Road (S) | 9.45                        | 2           |
| Cleveland Road (N) | 9.58                        | 2           |
| Kingston Lane      | 11.96                       | 3           |
| Cowley Road        | 9.07                        | 2           |
| Station Road       | 10.17                       | 3           |

3.5.14 The manual calculations include Nursery Lane which runs to the south of the University campus, between Station Road and Kingston Lane. Cleveland Road, Cowley Road and Station Road points of interest all have higher PTAL ratings as a result of this calculation.



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## 4 Existing Highway Conditions

### 4.1 Introduction

- 4.1.1 This section describes existing highway conditions in the vicinity of the site, including a description of the local road network and prevailing road safety conditions through a review of Personal Injury Accident (PIA) data.

### 4.2 Highway Network

- 4.2.1 The campus is bounded by Cowley Road to the east, Kingston Lane to the west, Station Road to the south and The Greenway to the north. Cleveland Road intersects the site in a north-south direction between Station Road and The Greenway.

#### **Cowley Road**

- 4.2.2 Cowley Road runs from Uxbridge town centre to West Drayton and provides access onto the M40, north of the site, and M4, south of the site. Cowley Road is single carriageway road which is subject to 30mph limit. Directly opposite the University there is a signalised pedestrian crossing. This is the crossing point which many students and staff would use when gaining access to the site via a pedestrian path.
- 4.2.3 Cowley Road is a key bus route and therefore provides partial double carriageway for bus stops nearby the site. Towards Uxbridge Town Centre Cowley Road is a single carriageway which accommodates two-way traffic. There are a number of resident only parking bays to the north of Cowley Road.



**Cowley Road**

#### **Cleveland Road**

- 4.2.4 Cleveland Road runs from The Greenway to Station Road through the centre of BU. Cleveland Road is single carriageway with pavement provided on only one side of the road, apart from the pedestrian crossings located in the centre of the University. Cleveland Road provides cyclist and pedestrian access to the University, but not vehicle access.



- 4.2.5 As part of the planning conditions for the original consent (planning condition 56), the Cleveland Road access to the University campus (Site 2) was closes to vehicular traffic (excluding emergency vehicles) on Monday 10<sup>th</sup> September 2007. Entry is now via Kingston Lane only.



#### Cleveland Road

- 4.2.6 Cleveland Road is subject to a 20mph road limit. Only one pedestrian crossing is provided on Cleveland Road within the centre of the University. Speed bumps are provided at the southern exit on the approach to Station Road priority junction.

#### The Greenway

- 4.2.7 The Greenway runs from Cowley Road to the A4020, Hillingdon Road and is subject to a 20mph road limit. A zebra crossing is provided on the approach to Cleveland Road providing students and staff with safe pedestrian access to Brunel University. A speed bump is situated near the priority junction to The Greenway when the road reaches 20mph limit.



### The Greenway

#### Kingston Lane

- 4.2.8 Kingston Lane runs from the A4020, Hillingdon Road and Pield Heath Road and is subject to 30mph road limit. Kingston Lane provides the main vehicular access into the University via a three arm roundabout. Kingston Lane is a key bus route and provides access to Hillingdon Hospital on Pield Heath Road to the south and Hillingdon Golf Course to the north. Kingston Lane is single carriageway and provides only one side of the pavement up until the bus layover next to Brunel University Sports Park.



### Kingston Lane

#### Station Road

- 4.2.9 Station Road is a single carriageway road which runs from the A408, High Street onto Church Street. Station Road is subject to 30mph speed limit and has a speed bump before the priority junction onto Cleveland Road.
- 4.2.10 A pedestrian crossing is situated before the signalised junction onto the A408, High Street. There are no further crossing points and therefore staff and students accessing the University by the pedestrian entrances along Station Road, will need to cross at the signalised junction.



### Station Road

4.2.11 The surrounding residential rounds are located within parking zone U5, which is for permit holders only, Monday – Friday 9:00-17:00. These road include:

- Queen's Road;
- King's Road;
- Elthorne Road;
- Villier Street;
- Northon Road;
- Ferndale Crescent;
- Stirling Close;
- Spencer Close;
- Ratcliffe Close;
- Turnpike Lane;
- Frayslea;
- Orchard Way;
- Merryfields;
- Cornfield Close; and
- Alexander Road.

## 4.3 Vehicular Access – Sites 1, 2 and 4

4.3.1 The following paragraphs and figures provide further detail of the existing vehicular access points to the university, concentrating on Sites 1 and 2 (which are developed) and Site 4 (which could be developed in the near future). Larger plans are also provided in **Appendix I**.

4.3.2 ANPR the main car park captures data for ingress and egress of vehicles. This provides automatic access for staff and students who are registered for authorised entry and have an ID card with



proximity access control. There is an intercom with verbal access to security for vehicles which are not registered, or for contractors and visitors to the University.

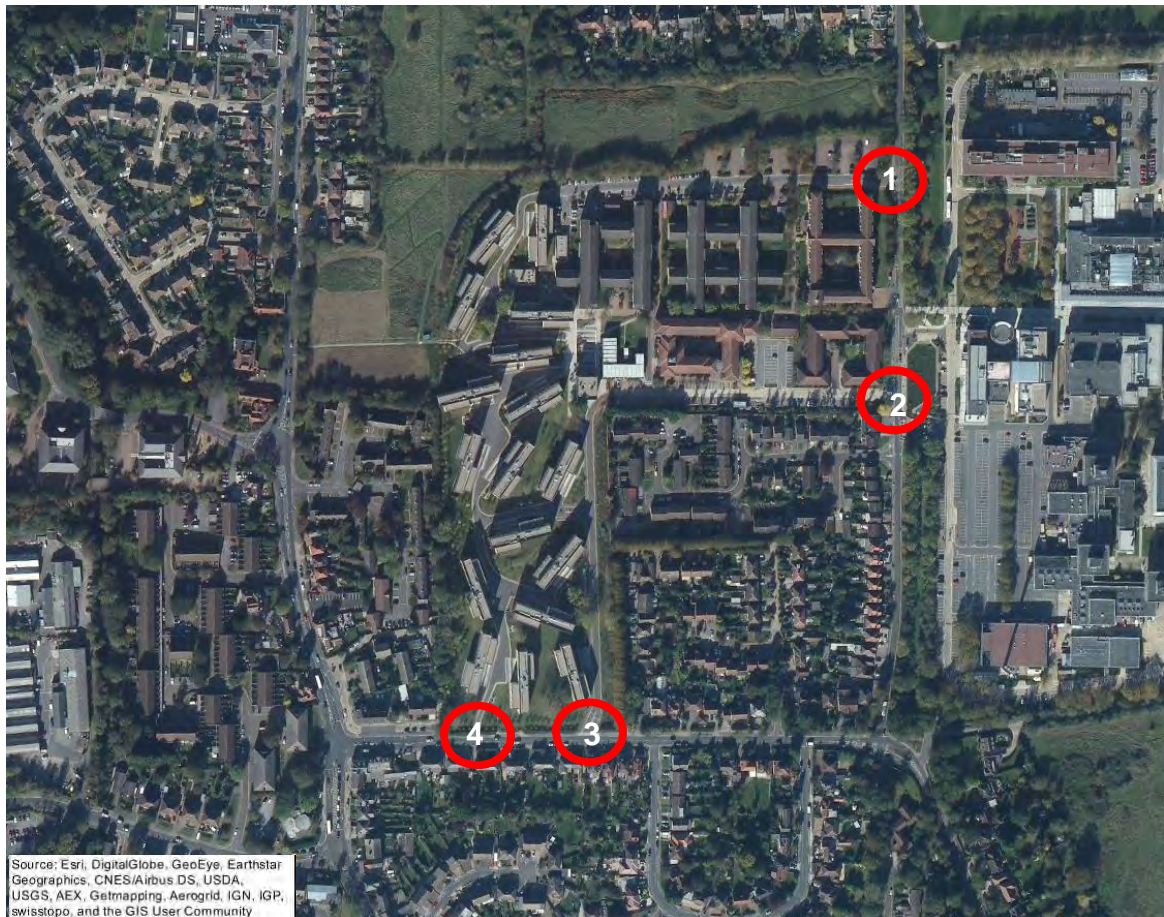
### Site 1

4.3.3 Vehicular access to Site 1 is currently provided via:

- 1) West Spur Road, which forms a priority junction with Cleveland Road to the east. West Spur Road is controlled via a barrier system;
- 2) Topping Lane, which forms a priority junction with Cleveland Road to the east. Topping Lane is controlled via a barrier system;
- 3) A two-way priority access point from Station Road (approximately 50 metres to the west of the emergency access point), which is controlled via a barrier system; and
- 4) A one-way 'emergency only' priority access point from Station Road to the south, which is controlled via droppable bollards.

4.3.4 The existing vehicular access arrangements for Site 1, as detailed above, are illustrated in Figure 4.1 overleaf.

**Figure 4.1: Site 1 – Vehicular Access Points**





## Site 2

4.3.5 As illustrated on Figure 4.2, Vehicular access to Site 2 is currently provided via:

- 1) A four-arm roundabout located to the west, which links BU, Kingston Lane and Hillingdon and Uxbridge Cemetery;
- 2) A two-way priority access point from Cleveland Road to the east, which is currently closed off; and
- 3) A one-way 'emergency only' priority access point from Cleveland Road to the east.

**Figure 4.2: Site 2 – Vehicular Access Points**



## Site 4

4.3.6 With the exception of Hillingdon Garden Centre, Site 4 is currently unused. As illustrated on Figure 4.3, At present vehicular access is provided via:

- 1) A two-way priority access point to Hillingdon Garden Centre from Church Road to the south; and; and
- 2) Nursery Lane to the north, which links Kingston Lane and Church Road. Nursery Lane is a single lane track which provides access to residential dwellings at the north-western boundary of the site and an allotments area to the east of the site. Nursery Lane is designated as a public footpath.



Figure 4.3: Site 4 – Vehicular Access Points



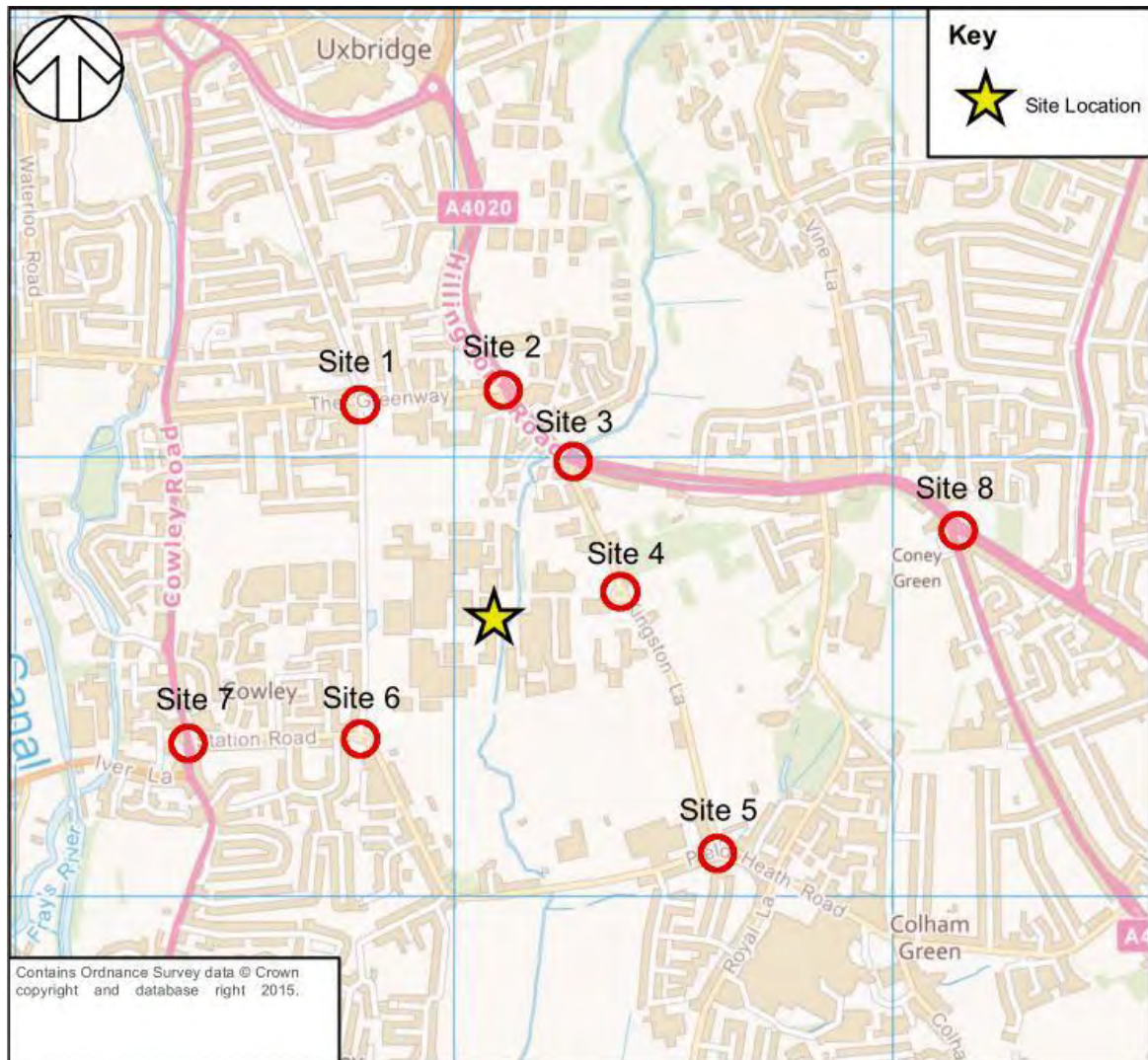
## 4.4 Car clubs

- 4.4.1 BU currently operates a car club with Hertz Connect to provide hire cars on campus which can be booked at very attractive rates. Full details can be found at <http://www.hertzdemand.com>.

## 4.5 Traffic Flows

- 4.5.1 Turning movement counts were carried out on Thursday 12<sup>th</sup> February 2015 by an independent survey company to identify the existing traffic conditions on the local network. The locations of the surveys are shown in Figure 4.4 below. Traffic flow diagrams, which illustrate the 2015 base traffic flows on local highway network, are included at **Appendix G**.

Figure 4.4: Surveyed Junctions



## 4.6 Personal Injury Accident Data

4.6.1 Personal Injury Accident (PIA) records for the area surrounding the site have been obtained from for the 3 year period to the end of September 2014.

### Personal Injury Accidents

4.6.2 The incidents occurring in the vicinity of the site are summarised in **Appendix H**, with the severity displayed.

4.6.3 Potential accident data severity ranges from 'slight' to 'fatal'. A total of 114 accidents were recorded in the vicinity of the site, 14 of which were classed as 'serious' and 100 of which were classed as 'slight'.

4.6.4 According to the PIA records, only one accident occurred at the roundabout at the vehicle access to Brunel University. A vehicle went to brake at the roundabout but hit the accelerator and legs locked; therefore the vehicle veered left off road, hit a pole and flipped onto the roof. The driver of the vehicle lost control and had a physical disability. This accident was classified as 'slight'.

- 
- 4.6.5 According to the PIA records, two accidents occurred on The Greenway/ Cleveland Road, within the centre of the University grounds. The first involved a pedestrian who disobeyed the traffic signal and stepped out into the path of a vehicle causing a collision. The pedestrian failed to look properly and the driver of the vehicle failed to judge the person's path or speed. The second accident involved a vehicle who didn't give way to another and therefore collided. The driver disobeyed the give way sign and failed to look properly. Both of these accidents are classified as 'slight'.

**PIA Summary**

- 4.6.6 It is evident from the accident record that there is no common pattern or trend and the accidents are the fault either of a driver of a vehicle or a pedestrian failed to look properly when crossing. The accidents did not arise due to deficiencies in the highway layout.



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## 5 Brunel University

### 5.1 Introduction

- 5.1.1 This section describes the existing University in terms of its location, use, size, planning history, travel patterns, vehicular, pedestrian and cycle access arrangements, car and cycle parking provision, servicing arrangements, and pick-up / drop-off arrangements. This section also provides an overview of the existing University TP.

### 5.2 Site Location and Description

- 5.2.1 Brunel University (BU) London is a public research University located in Uxbridge, London. It is organised into three colleges and three major research institutes. BU was ranked 7<sup>th</sup> in London and 60<sup>th</sup> in the UK for business and management studies by the Guardian University Guide 2015.
- 5.2.2 The University is 78 hectares in size located to the south of Uxbridge town centre. The campus is divided into 5 'sub-sites'. Sites 1 and 2 are positioned on either side of Cleveland Road and comprises of academic / teaching space, specialist research facilities and student housing across a site of 40 hectares.
- 5.2.3 It has been assumed that Sites 1 and 2 have the capacity to support 74,236sqm of new / refurbished floorspace to replace existing accommodation. Site 1 is located within Flood Zone 1 and Site 2 is located within Food Zone 2/3, therefore the remainder of the existing floorspace is not suitable to reuse. Sites 1 and 2 are designated as Green Belt, however on the basis that they are already developed; it is assumed that intensification will not give rise to any significant impact on the openness of the Green Belt and would therefore be acceptable in the Green Belt policy terms.

### 5.3 Planning History

- 5.3.1 Outline Planning Permission (OPP) (ref: 532/APP/2002/2237) was granted at the University on 19th April 2004 which included;
- “erection of 48,064 m<sup>2</sup> of new academic floor space and 69,840sqm of new student residential accommodation, ancillary floor space and infrastructure, provision of 645 additional car parking spaces, improved access from Kingston Lane, new access from Cowley Road, highway improvements to Cleveland Road, improved pedestrian and cycle routes, landscaping and environmental improvements (involving demolition of 18,600sqm of existing floor space).”*
- 5.3.2 To date, the majority of triggered obligations of the S106 agreement as part of the OPP have been met. This includes a number of highway works and further traffic surveys that confirmed that no further highway works were required to support the development. The recent completion of the Eastern Gateway Building has triggered the financial contribution of £200,000 from the University to be spent by the council solely on bus improvements serving the development. The University are to hold discussions with TfL and LBH to agree how the finances can be used to improve public transport most effectively.
- 5.3.3 The previous application sought approval for a new planning consent (to replace OPP 532/APP/2002/2237) which allows applications for the approval of reserved matters to be submitted to the Local Planning Authority before the expiration of 13 years from the date of the original OPP (i.e. no later than 19<sup>th</sup> April 2017).

## 5.4 Existing Floorspace

5.4.1 Brunel University currently operates from a 78 hectare campus. The existing floorspace is shown in Table 5.1 below.

**Table 5.1: Existing Floorspace**

| Type Of Floorspace    | Existing Floorspace GIA |
|-----------------------|-------------------------|
| Academic and Research | 125,120sqm              |
| Student Residential   | 108,731sqm              |
| <b>Total</b>          | <b>233,851sqm</b>       |

## 5.5 Existing Student and Staff Numbers

5.5.1 The existing student numbers at Brunel University shown in Table 5.2 below.

**Table 5.2: Existing Student Numbers**

| Type of Students                         | Existing Students (Full Time Equivalent) |
|--|--|
| Undergraduate and Undergraduate Students | 10,124                                   |
| <b>Total</b>                             | <b>13,860</b>                            |

5.5.2 The existing staff numbers are shown in Table 5.3 below.

**Table 5.3: Existing Staff Numbers**

| Type of Staff                   |              |
|---------------------------------|--------------|
| Academic and Non-Academic Staff | 2,450        |
| <b>Total</b>                    | <b>2,450</b> |

## 5.6 Existing Travel Patterns

### **Brunel University**

5.6.1 As part of Brunel's on-going monitoring of student and staff travel patterns, student and staff surveys were carried out in 2010 and 2013/14. The results of the 2010 surveys are summarised overleaf in Table 5.4.



**Table 5.4: Travel Survey Results 2010**

| Method of Travel | Students    | Staff       |
|------------------|-------------|-------------|
| Walk             | 30%         | 3%          |
| Cycle            | 4%          | 4%          |
| Bus              | 21%         | 3%          |
| Train            | 6%          | 1%          |
| Tube             | 18%         | 3%          |
| Car Driver       | 17%         | 65%         |
| Car Share        | 3%          | 6%          |
| Other            | 1%          | 0%          |
| No Answer        | -           | 15%         |
| <b>Total</b>     | <b>100%</b> | <b>100%</b> |

- 5.6.2 The 2010 TP surveys show that 17% of students and 65% of staff drove to the University. The surveys also show that 79% of students and 14% of staff travelled to the university by public transport, cycling or walking. Up to 15% of staff did not supply an answer in this travel survey and therefore further trips could be made by single occupancy car drivers.
- 5.6.3 An additional student and staff travel survey was conducted in 2013/14 which displayed more up-to-date travel information for students at Brunel University. These results are detailed in Table 5.5 below.

**Table 5.5: Travel Survey Results 2013/14**

| Method of Travel | Students    | Staff       |
|------------------|-------------|-------------|
| Walk             | 33.3%       | 9.0%        |
| Cycle            | 6.8%        | 4.5%        |
| Bus              | 18.4%       | 9.8%        |
| Train            | 6.0%        | 1.9%        |
| Tube             | 19.2%       | 8.3%        |
| Car Driver       | 12.0%       | 53.3%       |
| Car Share        | 1.7%        | 9.4%        |
| Motorcycle       | 0.4%        | 1.3%        |
| Other            | 2.2%        | 2.5%        |
| <b>Total</b>     | <b>100%</b> | <b>100%</b> |

- 5.6.4 The 2013/14 survey shows the percentage of students and staff driving to University has decreased by 5% and 12% respectively since 2010. In addition, the 2013/14 survey shows that the percentage of students and staff travelling to the University by public transport, cycling and walking has increased by 5% and 20% respectively.
- 5.6.5 A green travel day was organised by WestTrans in-between 2008-2013 to promote sustainable travel through an exhibition in the Student Union area, by providing a number of activities and sustainable travel related promotional materials to those that would attend. One of the main aims of the day was to focus on cycling in an interactive way. This particular day may have contributed to the increase in cycling activity.
- 5.6.6 There are approximately 4,500 students currently living on campus and approximately 9,500 students living off campus.
- 5.6.7 The core and primary arrival times for students and staff are 0815-09:00, and the student influx times fluctuate in the morning between 08:30-10:00. The core and primary departure times for students and staff are 16:30-17:30. Therefore the majority of students and staff will arrive and depart during peak hours.

## Student and Staff Postcode Information

- 5.6.8 Postcode data of term time students and staff at Brunel University has been collected, analysed and presented in a number of GIS maps, detailed in **Appendix K**. The following key statistics can be extracted from the postcode data:
- 36% of the students currently live on campus;
  - 50% of students live in UB8 (which covers all of the University including Uxbridge and Hayes);
  - 98% of students live in the South East;
  - 13% of staff live in UB8; and
  - 90% of staff live in the South East.
- 5.6.9 On this basis it is evident that staff commute further than students, and the majority of staff live outside LB Hillingdon, with a large cluster in Oxford.
- 5.6.10 More than 60% of term time students live within LB Hillingdon, and an additional 38% live within the south east outside of the borough. It is apparent that staff commute further to the West, whereas students have a larger concentration to the East and across London.
- 5.6.11 As 36% of the students live on campus and 50% of the students live in UB8 it is evident that a large majority of the students at the University are not entitled to a parking space, and they can travel more sustainably.
- 5.6.12 Only 13% of the staff live in UB8 and therefore a significant number of staff may require car parking spaces as they travel further than students. However as 90% live in the South East, the commuting distance does not mean that public transport trips to the University are inaccessible, and therefore less staff are able to travel more sustainably without a car.

## Hillingdon

- 5.6.13 For context, the 2011 Census has been interrogated for the wards and census output areas that cover the site. Data for Method of Travel to Work, Car Ownership, and Distance Travelled to Work is summarised to provide baseline data on the local travel characteristics within the surrounding area.
- 5.6.14 The 2011 Workplace Travel to Work Census Data for workplace area E33032157 is show in Table 5.6 below.

**Table 5.6: E33032157 Method of Travel to Work (Workplace Population)**

| Method of Travel | %           |
|------------------|-------------|
| Underground      | 8%          |
| Train            | 3%          |
| Bus              | 11%         |
| Taxi             | 0%          |
| Motorcycle       | 1%          |
| Car Driver       | 53%         |
| Car Passenger    | 3%          |
| Bicycle          | 4%          |
| Walk             | 17%         |
| <b>Total</b>     | <b>100%</b> |

- 5.6.15 The data above highlights the higher percentage of single occupancy car drivers within the output area. However, 43% of those in the area travel by more sustainable modes of transport. The distance travelled to work has also been exported, and is presented in Table 5.7 below.

**Table 5.7: Hillingdon Output Area 015 Distance of Travel to Work**

| Distance of Travel        | %           |
|---------------------------|-------------|
| Less than 2km             | 12%         |
| 2km to less than 5km      | 21%         |
| 5km to less than 10km     | 24%         |
| 10km to less than 20km    | 20%         |
| 20km to less than 30km    | 8%          |
| 30km to less than 40km    | 4%          |
| 40km to less than 60km    | 2%          |
| 60km and over             | 4%          |
| Work mainly at or at home | 3%          |
| No fixed place            | 2%          |
| <b>Total</b>              | <b>100%</b> |

- 5.6.16 The table above shows the highest percentage of people travel between 5km and 10km to get to work. As explained in Chapter 2, 2km is equivalent to a 25 minute walk which is a realistic walking distance for people travelling to and from Brunel University. Therefore at least 12% of the people within the output area could walk to the site.
- 5.6.17 A 20 minute cycle ride is equivalent to 5km and therefore a further 21% could cycle to work. In total 33% could walk or cycle to work. Once the public transport trips are taken into account at least 50% of those working or studying at the University could travel by a more sustainable mode of transport.
- 5.6.18 The car ownership in the area has also been investigated in Table 5.8 below for the Brunel ward within Hillingdon.

**Table 5.8: Brunel Ward Car Ownership**

| No Cars per Household       | %   |
|-----------------------------|-----|
| No cars in household        | 26% |
| 1 car in household          | 44% |
| 2 cars in household         | 23% |
| 3 cars in household         | 5%  |
| 4 or more cars in household | 2%  |

- 5.6.19 Almost half of the households within the output area have at least one car. However, 26% do not have a car at all. Therefore it can be assumed that 26% of households use more sustainable forms of transport. This reinforces the point that additional staff and students within the immediate area could use alternative forms of transport.
- 5.6.20 The London Travel Demand Survey shows Londoner's trips by borough of origin, trips per day and shares by main mode, across an average day from 2011/12 to 2013/14. Table 5.9 below displays the percentage of trips by main mode of transport in Hillingdon.

**Table 5.9: Hillingdon London Travel Demand Survey**

| Mode of Transport | %           |
|-------------------|-------------|
| Underground       | 6%          |
| Rail              | 1%          |
| Bus               | 11%         |
| Taxi              | 1%          |
| Car/ Motorcycle   | 56%         |
| Cycle             | 1%          |
| Walk              | 24%         |
| <b>Total</b>      | <b>100%</b> |

5.6.21 The LTDS data demonstrates that 57% of the population within Hillingdon travel by car, taxi motorcycle, and 43% travel by more sustainable forms of transport.

## 5.7 Existing Car and Cycle Parking Provision

### Car Parking

5.7.1 As the University are committed to reducing carbon emissions, students and staff are encouraged to use alternative modes of travel where possible as stated in the existing University TP (see Section 5.11). In light of this, parking on the campus and in the local area is very restricted. There are currently 1,740 permits for staff and 2,092 for students.

5.7.2 As of September 2014 with the exception of blue badge holders there are no longer facilities for resident students to keep a vehicle on campus. Those who do park on campus without a permit are at risk of receiving a penalty charge.

5.7.3 A car parking survey was undertaken in July 2011 demonstrate that at the end of academic year 2010/11 there were 2,088 car parking spaces on Sites 1 and 2 of the Uxbridge campus. The breakdown of parking spaces on Sites 1 and 2 of the Uxbridge campus is set out in Table 5.10 with the full results of the survey in **Appendix J**. These figures have been taken from a car parking survey which was undertaken in July 2011.

**Table 5.10: Brunel University Parking**

| Parking Type     | Site 1       | Site 2       | Site 3    |
|------------------|--------------|--------------|-----------|
| Staff/ Visitor   | 199          | 811          | 49        |
| Student          | 140          | 478          |           |
| Pay and Display  | 0            |              |           |
| Reserved         | 3            | 59           | 0         |
| Coach Bays       | 0            | 7            | 4         |
| Car Club         | 2            | 4            | 0         |
| Tenants          | 0            | 86           | 0         |
| Disabled         | 46           | 75           | 4         |
| Charging Bays    | 2            | 0            | 0         |
| <b>Total</b>     | <b>392</b>   | <b>1,520</b> | <b>57</b> |
| <b>Sub Total</b> | <b>1,969</b> |              |           |

5.7.4 The majority of parking spaces are allocated to staff and visitors (52%), followed by students (31%).

5.7.5 The majority of parking on Sites 1 and 2 is dedicated for staff and students and is controlled by way of permits. A small number of pay-and-display parking is available primarily for visitors to the University. A map of the parking locations at BU is contained in **Appendix J**.

- 5.7.6 For students to be eligible for a permit they must live more than 2 miles from the campus and be fully enrolled. Students resident on campus are not entitled to a permit unless they hold a valid registered disabled badge, or if they are a sports scholar.
- 5.7.7 At the time of the original consent, the outline planning permission allowed for the provision of 645 additional car parking spaces over and above the 1,953 spaces that existed in 2004 (equating to a total of 2,598 spaces).
- 5.7.8 However, the planning permission was subject to a condition which required the level of car parking to be reduced through time, as per the details set out in Table 5.11.

**Table 5.11: Outline Planning Consent Parking Conditions**

| Year    | Parking Spaces at Beginning of Year | Spaces to be Removed | Max Spaces at End of Year |
|---------|-------------------------------------|----------------------|---------------------------|
| 2008/09 | 2,598                               | 100                  | 2,498                     |
| 2009/10 | 2,498                               | 100                  | 2,398                     |
| 2010/11 | 2,398                               | 100                  | 2,298                     |
| 2011/12 | 2,298                               | 100                  | 2,198                     |
| 2012/13 | 2,198                               | 100                  | 2,098                     |

- 5.7.9 The University have gradually reduced the number of car parking spaces on Sites 1 and 2 in line with the S106 agreement. The 2015 car parking survey demonstrates that at the end of academic year 2014/15 there were 1,969 car parking spaces on the site. This is lower than the maximum number of spaces allowed at this point in time. However, the S106 states that up to 2,088 car parking spaces are permitted at the University.

## 5.8 Existing Servicing Arrangements

### **Site 1**

- 5.8.1 The majority of servicing associated with Site 1 (predominantly student accommodation) is undertaken via the existing access points provided from Station Road and Cleveland Road.

### **Site 2**

- 5.8.2 The majority of servicing associated with Site 2 (main University) is undertaken via the existing access point from Kingston Lane.

### **Site 4**

- 5.8.3 It is considered that the only servicing that is currently undertaken on Site 4 is associated with Hillingdon Garden Centre, which is via the existing access point from Church Road.

## 5.9 Existing Pick-up / Drop-off Arrangements

- 5.9.1 At present, designated pick-up / drop-off points are provided internally within Site 2, which are accessible from Kingston Lane.
- 5.9.2 Any pick-up's / drop-off's associated with Site 1 are undertaken internally within the site, with access provided from Station Road and Cleveland Road.



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## 5.10 Existing University Travel Plan

- 5.10.1 The most up to date TP for Brunel University was produced in March 2011. The TP encourages students, staff and visitors to access the University by a range of transport modes. A number of targets and measures were implemented to decrease the dependency on the car, and improve the use of public transport, cycling and walking when travelling to the University.
- 5.10.2 These measures include a Bicycle User Group for staff and students, a Walking User Group, and a car share database, securing discounts for cyclists and powered two wheelers, as well as a variety of other promotions for existing travel modes.

## 5.11 Existing Student and Staff Incentives

- 5.11.1 There are a number of incentives offered to existing staff and students of BU in order to encourage them to travel more sustainably. These include:
- Employee and student interest free season ticket loan;
  - Employee interest free cycle loan;
  - Student oyster photo card;
  - Recycle-a-bike – a workshop project based in Uxbridge that recycles and refurbishes donated or discarded bikes. They also run cycle maintenance courses and undertake repairs and servicing, and have an organised cycle ride every Saturday; and
  - Car club – staff can become a member of Hertz and students in halls of residence who are not permitted to keep cars on campus can benefit from the scheme.

## 6 Proposed Development

### 6.1 Introduction

- 6.1.1 This section outlines the development proposals and discusses the vehicular, pedestrian and cycle access arrangements, car and cycle parking provision, servicing and refuse collection arrangements, and pick-up and drop-off arrangements.
- 6.1.2 The section also details the likely travel patterns of future students and staff of the University and how these will relate to the University TP.

### 6.2 Development Proposals

- 6.2.1 Brunel University currently operates from a 78 hectare campus. The existing and future floorspace is shown in Table 6.1 below.

**Table 6.1: Existing and Future Floorspace**

| Type Of Floorspace    | Existing Floorspace GIA | Future Floorspace | Total Floorspace  | % Increase |
|-----------------------|-------------------------|-------------------|-------------------|------------|
| Academic and Research | 125,120sqm              | 78,052sqm         | 203,172sqm        | 62%        |
| Student Residential   | 108,731sqm              | 40,500sqm         | 149,231sqm        | 37%        |
| <b>Total</b>          | <b>233,851sqm</b>       | <b>118,552sqm</b> | <b>352,403sqm</b> | <b>51%</b> |

- 6.2.2 The future/ proposed floorspace will increase by 51%, split between academic, research and student residential. The existing and future student numbers are shown in Table 6.2 below.

**Table 6.2: Existing and Future Student Numbers**

| Students                                | Existing Students (Full Time Equivalent) | Future Students in 2022/23 | Total Students | % Increase |
|---|--|----------------------------|----------------|------------|
| Undergraduate and Postgraduate Students | 13,860                                   | 7,631                      | 21,491         | 55%        |
| <b>Total</b>                            | <b>13,860</b>                            | <b>7,631</b>               | <b>21,491</b>  | <b>55%</b> |

- 6.2.3 As well as an increase in floorspace, there is an increase in the number of students and staff. An additional 7,631 students are expected by year 2022/23. The existing and future staff numbers are shown in Table 6.3 below.

**Table 6.3: Existing and Future Staff Numbers**

| Staff                           | Existing 2012-2013 | Future Staff | Total Staff  |
|---------------------------------|--------------------|--------------|--------------|
| Academic and Non-Academic Staff | 2,450              | 1,300        | 3,750        |
| <b>Total</b>                    | <b>2,450</b>       | <b>1,300</b> | <b>3,750</b> |

- 6.2.4 The total number of staff is set to increase by a substantial amount, due to the increase in academic and non-academic staff.

### 6.3 Vehicular Access

- 6.3.1 The proposed vehicular access strategy for Sites 1, 2 and 4 is contained in section 8 of this report.

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- 6.3.2 As per the existing arrangement, vehicular access to the three Sites would be controlled via a barrier system, thus ensuring that the on-site car park is secure and manageable.

## 6.4 Pedestrian and Cycle Access

- 6.4.1 The proposed pedestrian and cycle access strategy for Sites 1, 2 and 4 is provided in section 8 of this report.

## 6.5 Car and Cycle Parking

- 6.5.1 In line with the S106 agreement dated 16<sup>th</sup> April 2004 up to 2088 car parking spaces were consented for the University.
- 6.5.2 As part of the development proposals it is not proposed to provide any additional car parking spaces above that which is already consented at the University.
- 6.5.3 It is assumed that as part of the development proposals a proportion of the existing on-site car parking spaces would be re-distributed across the three Sites. The exact proportion and resultant location of the spaces which would be re-distributed across the three Sites is unknown at this stage; this would be confirmed once the masterplan for the scheme is developed.
- 6.5.4 In the event that an application is submitted by BU, it is envisaged that the following measures could be introduced in order to improve / control access to the proposed car parking spaces on the three Sites:
- A detailed signage strategy (which could include Variable Message Signs (VMS)); and
  - Provision of barrier systems on all existing and proposed access points (as per the existing access arrangements).
- 6.5.5 710 cycle parking spaces are currently located on site and as a result of the increase in students and staff further cycle parking spaces will be provided in line with the local policy. This will encourage students and staff cycling to the University in order to help achieve the Mayoral target of 400% increase in cycling in Hillingdon by 2026.

## 6.6 Servicing and Refuse Collection

- 6.6.1 As part of the development proposals a strategic review would be undertaken to determine the servicing and refuse collection requirements for the University. The existing University opening hours are 09:00-17:00.
- 6.6.2 Environmental management, performance and sustainability is one of the core values of the University, and the University's Strategic Plan 2013 to 2017 obliges the University to provide 'an enabling environment' where the campus infrastructure, facilities, and activities are managed, developed and monitored in an environment-responsible and sustainable manner.
- 6.6.3 The University acknowledges it is responsible for continually improving its environmental performance, preventing pollution and protecting the environment at all levels. This is achieved through our Environmental Management System; our strategies, policies, risk management, procedures, and staff training. The University succeeded in attaining ISO 14001: 2004 accreditation covering all its activities across campus in 2012, and has retained this status to date.

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## 6.7 Pick-up / Drop-off Arrangements

- 6.7.1 As part of the development proposals a strategic review would be undertaken to determine the requirements for new pick-up / drop-off facilities for the University.

## 6.8 Travel Patterns

- 6.8.1 The future travel patterns for students and staff of the University have been determined based on the results of the student and staff surveys which were undertaken in 2013/14 (as detailed in section 6.6 of this report). The existing travel patterns for students and staff of BU are summarised in Table 4.4.
- 6.8.2 In order to calculate the future modal split for students and staff of BU, the following assumptions have been made:
- The additional uses on the site would not generate any additional car driver trips. As such, all car driver trips associated with the additional students / staff at the University has been re-allocated to all other modes of travel; and
  - The future student / staff modal split has been calculated based on an average of the existing and proposed student / staff numbers.
- 6.8.3 The future modal split for students and staff of the University is summarised in the Table 4.5.

## 6.9 Travel Plan

- 6.9.1 An updated TP would be submitted as part of any future planning application(s), particularly since there may be increases in travel as part of the redevelopment of the BU campus, and BU are keen to ensure that this is made up of public transport and active travel. This would again be reliant on car parking polices and management but also on a heavy reliance on information and awareness measures.
- 6.9.2 The following is a list of potential measures which could be considered as part of any future TP supporting the redevelopment proposals:
- Identify key walking and cycling routes, working with the local authority to improve connectivity, lighting and security along these routes;
  - Ensure cycle parking is provided for as part of any redevelopment. Short term and Long Term secured cycle parking should be considered;
  - Incorporation of cycle routes within the campuses, in particular connecting to key destinations and key cycle parking areas;
  - Incorporate showers, lockers and changing facilities into any new buildings, and look for opportunities to retrofit facilities into existing buildings. Discussions with existing cyclists can be helpful in determining the best locations for new facilities, whereas a general analysis of existing locations may also be useful in identifying key gaps;
  - Review and revise existing bus routes to reflect changes in both volume and origin and destination of passengers;
  - Offer and promote the Cycle to Work scheme for staff;
  - Negotiate discounts at local cycle shops for staff and students;
  - Ensure there is comparable pricing between daily car parking charges and daily bus fares, if possible subsidising bus fares to reduce ticket prices for staff and all students;

- 
- Production and promotion of walking / cycling / public transport maps showing routes, distances and times;
  - Create and promote dedicated lift-share groups for staff and students;
  - Create and promoted walking buddy and cycling buddy schemes for staff and students;
  - Take part in local and national events, including 'Walk to Work Week' and 'Bike Week';
  - Hold regular cycle training and cycle maintenance classes for staff and students; and
  - Ensure real-time public transport information is readily available, including at bus stops, online and through portable devices.



# 7 Trip Attraction

## 7.1 Introduction

7.1.1 This section provides a trip generation assessment for all modes of transport for the existing and proposed uses at Brunel University. This section also summarises the likely net trip generation resulting from the development proposals.

## 7.2 Existing Trip Attraction

### Vehicular Trips

7.2.1 The number of vehicular trips which are currently attracted to the University during the morning and evening peak periods has been derived from the 2015 traffic survey data (see section 4.1). The number of surveyed vehicular arrivals and departures are summarised in Table 7.1 below.

**Table 7.1: Existing Surveyed Vehicle Trips**

| Time Period       | Total Vehicle Trips |            |       |
|-------------------|---------------------|------------|-------|
|                   | Arrivals            | Departures | Total |
| AM Peak 0700-0800 | 178                 | 24         | 202   |
| AM Peak 0800-0900 | 496                 | 55         | 551   |
| AM Peak 0900-1000 | 459                 | 90         | 549   |
| PM Peak 1600-1700 | 134                 | 384        | 518   |
| PM Peak 1700-1800 | 122                 | 308        | 430   |
| PM Peak 1800-1900 | 122                 | 240        | 362   |

7.2.2 A vehicular trip rate has been derived for the morning and evening peak period based on the number of vehicular trips that are currently attracted to the University (as highlighted in the table above) and the overall floorspace of the University. For the purposes of this assessment, the overall floorspace is assumed to be 55,280m<sup>2</sup> Gross Floor Area (GFA) (which predominantly includes academic and research buildings). The trips rates are summarised in Table 7.2 below.

**Table 7.2: Existing Trip Rates (per 100m<sup>2</sup>)**

| Time Period       | Vehicle Trip Rate (per 100sqm) |            |       |
|-------------------|--------------------------------|------------|-------|
|                   | Arrivals                       | Departures | Total |
| AM Peak 0700-0800 | 0.32                           | 0.04       | 0.36  |
| AM Peak 0800-0900 | 0.90                           | 0.10       | 1.00  |
| AM Peak 0900-1000 | 0.83                           | 0.16       | 0.99  |
| PM Peak 1600-1700 | 0.24                           | 0.69       | 0.93  |
| PM Peak 1700-1800 | 0.22                           | 0.56       | 0.78  |
| PM Peak 1800-1900 | 0.22                           | 0.43       | 0.65  |

### Multi-Modal Trips

7.2.3 The likely number of multi-modal trips which are currently attracted to the University has been calculated based on the existing number of students and staff which currently attend the University and the existing travel patterns of students and staff of the University (as detailed in section 5.6 of this report).

7.2.4 In order to determine the likely number of AM and PM peak hour trips that could be attracted to the University, a profile has been derived using the 2015 traffic survey data. For the AM peak hour, it is assumed that approximately 31% of all students and staff (5,022) will travel to and from the University. Similarly, for the PM peak hour, it is assumed that approximately 22% of all students and

staff (3517) will travel to and from the University. Furthermore, during the AM peak, it is assumed that 90% of all trips would arrive at the University and 10% of trips would depart the University. Similarly, during the PM peak, it is assumed that 28% of all trips would arrive at the University and 72% of all trips would depart the University.

7.2.5 Based on the above assumptions, the resultant multi-modal trip attraction is summarised in Table 7.3 below.

**Table 7.3: Existing Multi-Modal Trip Generation**

| Mode          | AM Peak (08:00 – 09:00) |            |             | PM Peak (17:00 – 18:00) |             |             |
|---------------|-------------------------|------------|-------------|-------------------------|-------------|-------------|
|               | Arr.                    | Dep.       | 2 Way       | Arr.                    | Dep.        | 2 Way       |
| Car Driver    | 841                     | 93         | 934         | 186                     | 469         | 655         |
| Car Passenger | 132                     | 15         | 147         | 29                      | 74          | 103         |
| Train         | 249                     | 28         | 277         | 55                      | 139         | 194         |
| Underground   | 811                     | 90         | 901         | 179                     | 452         | 631         |
| Bus           | 790                     | 88         | 878         | 174                     | 441         | 615         |
| Walk          | 1370                    | 152        | 1522        | 302                     | 763         | 1065        |
| Cycle         | 298                     | 33         | 331         | 66                      | 166         | 232         |
| Motorcycle    | 9                       | 1          | 10          | 2                       | 5           | 7           |
| Other         | 33                      | 4          | 37          | 7                       | 18          | 25          |
| <b>Total</b>  | <b>4533</b>             | <b>504</b> | <b>5037</b> | <b>1000</b>             | <b>2527</b> | <b>3527</b> |

## 7.3 Proposed Trip Generation

### Vehicular Trips

7.3.1 Up to 2,088 car parking spaces have been consented in the S106 agreement, but no additional parking permits will be provided in the future. As a result there will not be an increase in car trips on the local highway network and therefore it is not considered necessary to carry out any junction capacity assessments.

7.3.2 It is assumed that as part of the development proposals a proportion of the existing on-site car parking spaces will be re-distributed across the three Sites (as discussed in section 7.5). This is discussed in more detail in section 8 of this report.

### Multi-Modal Trips

7.3.3 The likely number of multi-modal trips which could be generated by the University (once redeveloped) has been calculated based on the proposed number of students and staff which currently attend the University and the likely travel patterns of existing and future students and staff of the University (as detailed in section 7.8 of this report).

7.3.4 The multi-modal trip generation is summarised in Table 7.4.

**Table 7.4: Proposed Multi-Modal Trip Generation**

| Mode          | AM Peak (08:00 – 09:00) |            |             | PM Peak (17:00 – 18:00) |             |             |
|---------------|-------------------------|------------|-------------|-------------------------|-------------|-------------|
|               | Arr.                    | Dep.       | 2 Way       | Arr.                    | Dep.        | 2 Way       |
| Car Driver    | 813                     | 90         | 903         | 179                     | 453         | 632         |
| Car Passenger | 234                     | 26         | 260         | 52                      | 130         | 182         |
| Train         | 415                     | 46         | 461         | 92                      | 231         | 323         |
| Underground   | 1358                    | 151        | 1509        | 300                     | 757         | 1057        |
| Bus           | 1325                    | 147        | 1472        | 293                     | 739         | 1032        |
| Walk          | 2285                    | 253        | 2538        | 504                     | 1273        | 1777        |
| Cycle         | 501                     | 56         | 557         | 111                     | 279         | 390         |
| Motorcycle    | 17                      | 2          | 19          | 4                       | 9           | 13          |
| Other         | 59                      | 7          | 66          | 6                       | 15          | 21          |
| <b>Total</b>  | <b>7007</b>             | <b>778</b> | <b>7785</b> | <b>1541</b>             | <b>3886</b> | <b>5427</b> |

## 7.4 Net Difference in Trips

### Vehicular Trips

- 7.4.1 As detailed in section 7.3, the proposals are not expected to generate any additional vehicular trips above that already generate by the existing University site.

### Multi-Modal Trips

- 7.4.2 Comparing the multi-modal trip generation of the existing University site with that of the proposed University site produces the following net change in trip generation.

**Table 7.5: Proposed Multi-Modal Trip Generation**

| Mode          | AM Peak (08:00 – 09:00) |            |             | PM Peak (17:00 – 18:00) |             |             |
|---------------|-------------------------|------------|-------------|-------------------------|-------------|-------------|
|               | Arr.                    | Dep.       | 2 Way       | Arr.                    | Dep.        | 2 Way       |
| Car Driver    | -28                     | -3         | -31         | -7                      | -16         | -23         |
| Car Passenger | 102                     | 11         | 113         | 23                      | 56          | 79          |
| Train         | 166                     | 18         | 184         | 37                      | 92          | 129         |
| Underground   | 547                     | 61         | 608         | 121                     | 305         | 426         |
| Bus           | 535                     | 59         | 594         | 119                     | 298         | 417         |
| Walk          | 915                     | 101        | 1016        | 202                     | 510         | 712         |
| Cycle         | 203                     | 23         | 226         | 45                      | 113         | 158         |
| Motorcycle    | 8                       | 1          | 9           | 2                       | 4           | 6           |
| Other         | 26                      | 3          | 29          | -1                      | -3          | -4          |
| <b>Total</b>  | <b>2474</b>             | <b>274</b> | <b>2748</b> | <b>541</b>              | <b>1359</b> | <b>1900</b> |

## 7.5 Servicing Trips

- 7.5.1 In order to predict the likely number of servicing trips that could be generated by the development proposals we would envisage undertaking surveys of the existing University servicing activity in conjunction with an application being submitted for the site.

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7.5.2 It is envisaged that the following data could be collected from the surveys which could then be used to inform any estimates of future servicing activity:

- Number of servicing trips;
- Type / size of servicing vehicles;
- Arrival and departure times;
- Servicing locations; and
- Service Vehicle Routing

7.5.3 In addition to undertaking surveys, we would also liaise with the existing University management / logistics team to understand whether the University has any management systems in place to control servicing at the existing University.

# 8 Access Strategy

## 8.1 Introduction

8.1.1 This section describes the proposed vehicular, pedestrian and cycle access strategy for Sites 1, 2 and 4. More specifically, this section identifies various options for providing suitable access to the three Sites, along with a description of the opportunities and constraints presented by each option.

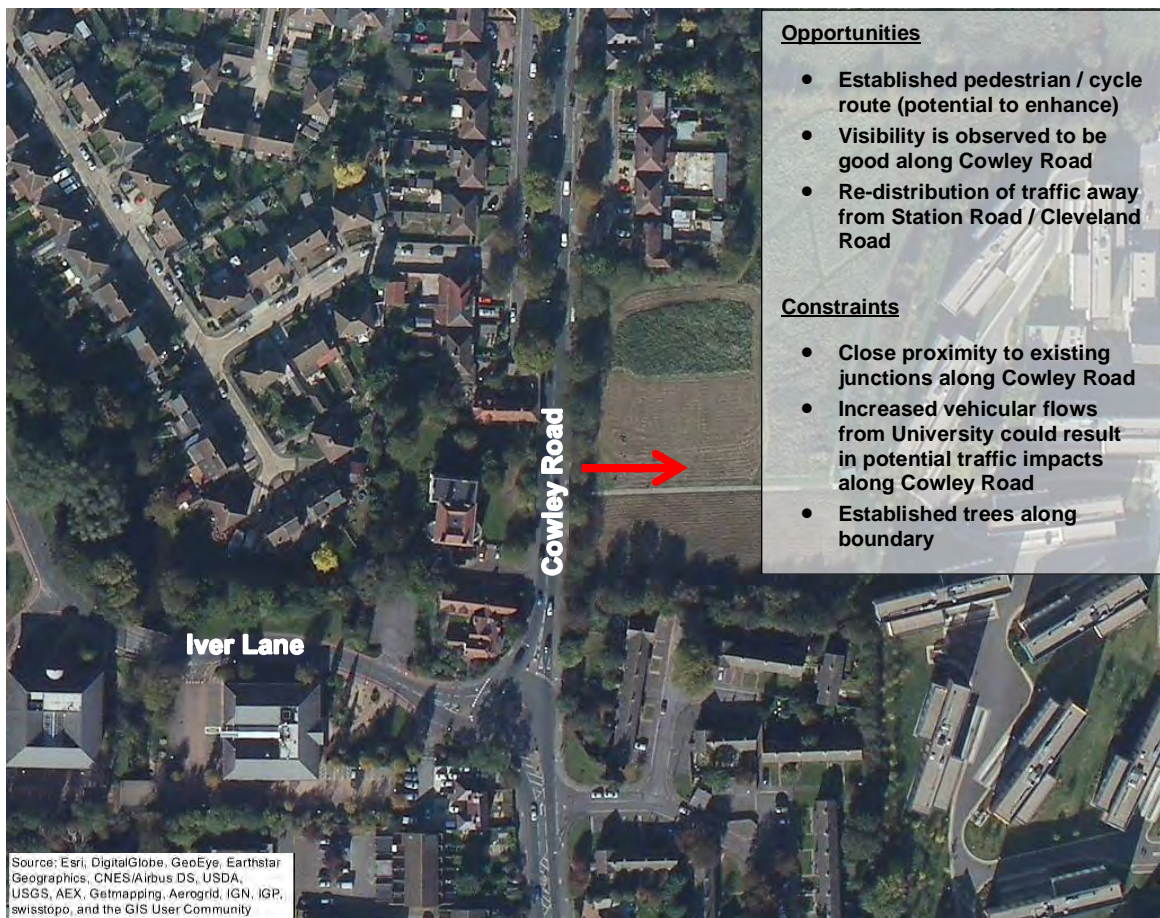
8.1.2 This section also considers the impacts of the proposed vehicular access arrangements on future traffic flows on the local highway network.

## 8.2 Vehicular Access

### Site 1

8.2.1 Vehicular access to Site 1 is currently provided from Cleveland Road and Station Road (see Section 5). In addition to the existing access arrangements, consideration has been given to providing a new vehicular access point from Cowley Road to the west. The opportunities and constraints presented by this option are detailed on Figure 8.1 below.

**Figure 8.1: Site 1 – Cowley Road Potential Vehicular Access Point**





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### **Site 2**

- 8.2.2 The main vehicular access to Site 2 is currently provided from Kingston Lane (see Section 5). Existing vehicular access points are also provided from Cleveland Road, although one access is intended for 'emergency vehicles' only and the other access is closed off.

#### Cleveland Road

- 8.2.3 BU received planning permission in 2003 for the development of academic floorspace, student residential accommodation, and ancillary floorspace at the campus. In conjunction with the planning permission, LBH imposed a condition on the University which required the closure of the existing Cleveland Road access to general traffic. The reasons for the closure of the Cleveland road access to general traffic are unknown.
- 8.2.4 On the basis of the above, it is not considered feasible to re-instate the access to serve any future development on Site 2.

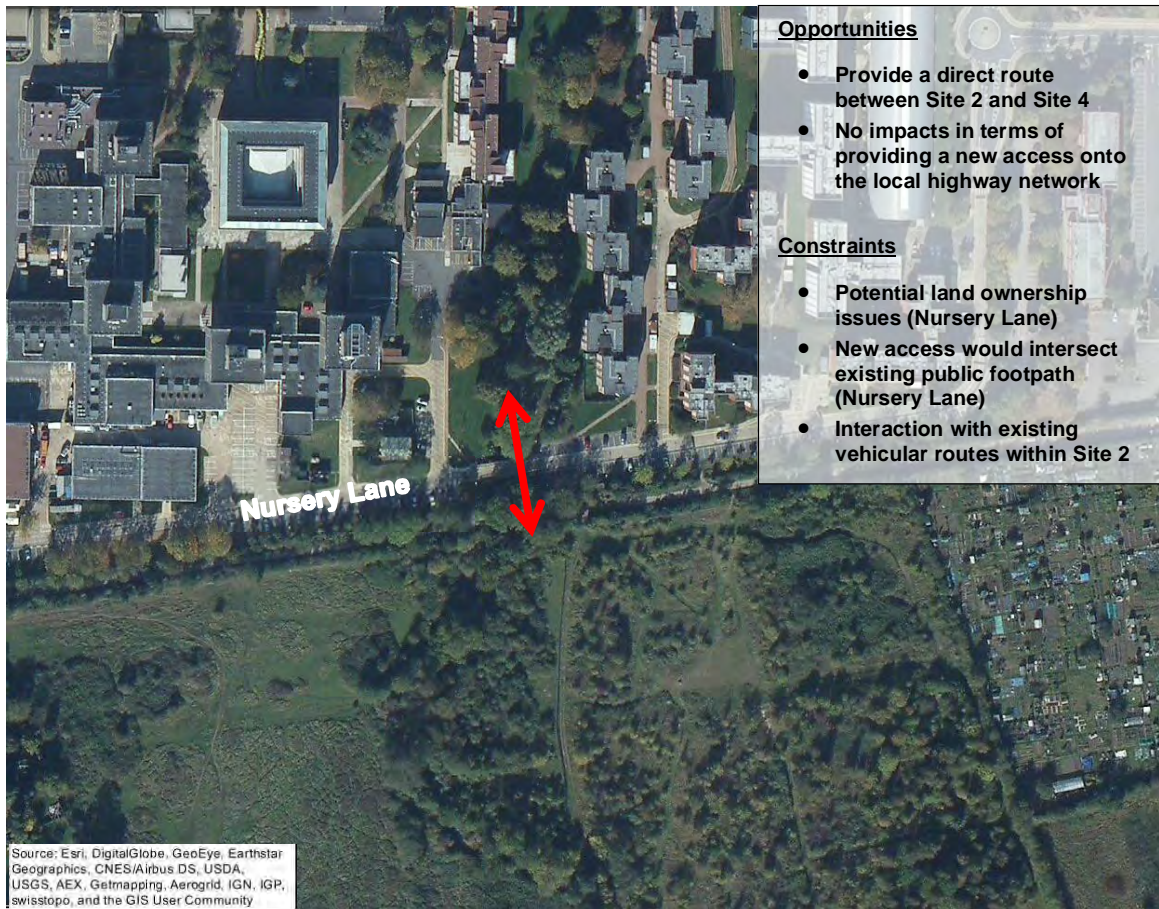
### **Site 4**

- 8.2.5 Hillingdon Garden Centre is accessible via a two-way priority access point from Church Road. In addition, vehicular access to Site 4 is also provided from Nursery Lane via a single track road, which is designated as a public footpath.

#### Internal Link between Site 2 and Site 4

Consideration has been given to providing a new vehicular link between Site 2 and Site 4, via the existing University internal road network. The opportunities and constraints presented by this option are detailed on Figure 8.2 overleaf.

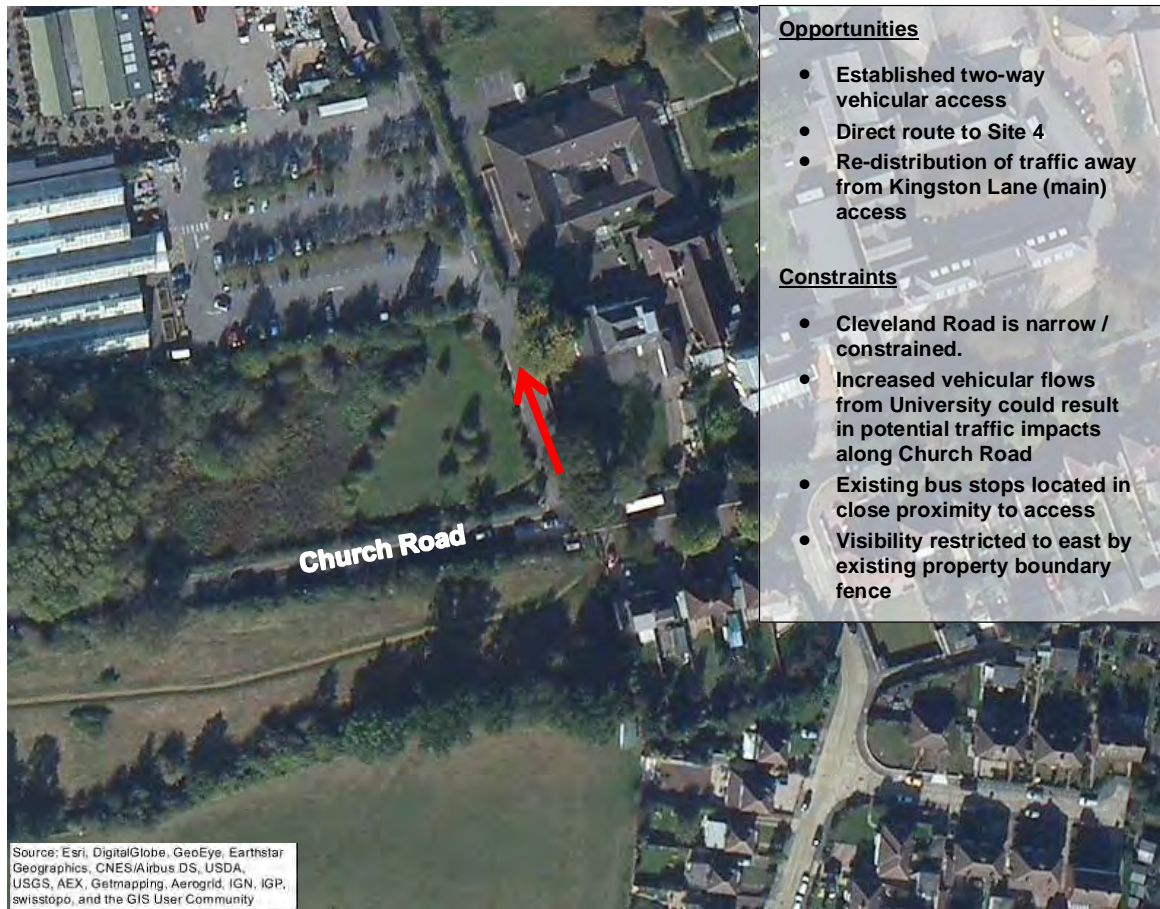
**Figure 8.2: Site 4 – Internal Link Potential Vehicular Access Point**



Church Road / Hillingdon Garden Centre

8.2.6 Consideration has been given to using the existing priority access from Church Road (which currently provides access to Hillingdon Garden Centre) to access Site 4. The opportunities and constraints presented by this option are detailed on Figure 8.3 overleaf.

**Figure 8.3: Site 4 – Church Road Potential Vehicular Access Point**



Nursery Lane

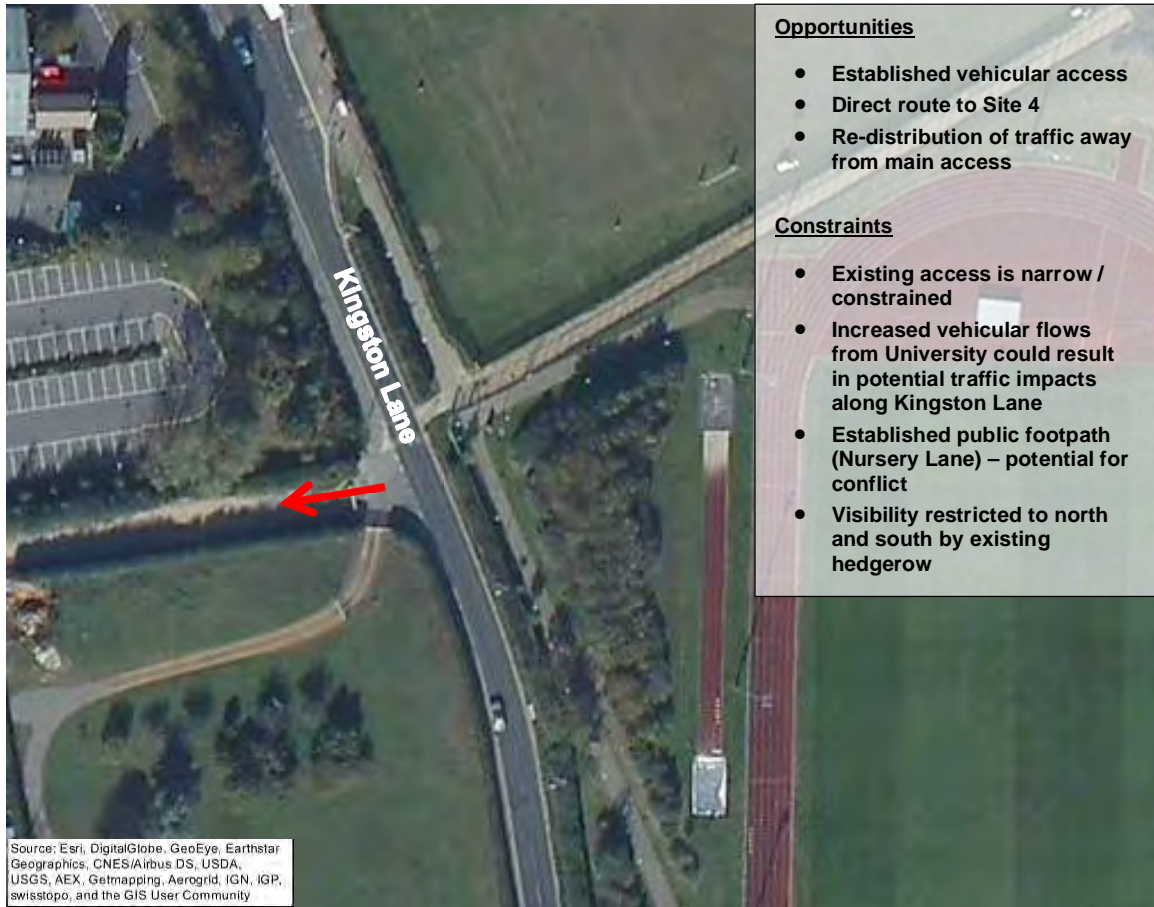
8.2.7 Consideration has been given to using Nursery Lane, via Kingston Lane / Church Road, to access Site 2. The opportunities and constraints presented by this option are detailed on Figure 8.4 and 8.5.



Figure 8.4: Site 4 – Church Road / Nursery Lane Potential Vehicular Access Point



**Figure 8.5: Site 4 – Kingston Lane / Nursery Lane Potential Vehicular Access Point**



### Preferred Vehicular Access Arrangements

8.2.8 The preferred vehicular access arrangements for Sites 1, 2 and 4 are summarised in Table 8.1 below.

**Table 8.1: Summary of Preferred Vehicular Access Arrangements**

| Site   | Preferred Access Arrangements  |
|--------|--|
| Site 1 | West Spur Road, Topping Lane and Station Road (including emergency access from Station Road) existing access points. |
| Site 2 | Kingston Lane (including emergency access from Cleveland Road) existing access points.                               |
| Site 4 | Church Road (Hillingdon Garden Centre) existing access point, new internal link via Site 2                           |

## 8.3 Pedestrian and Cycle Access

8.3.1 A description of the existing pedestrian and cycle access arrangements for Sites 1, 2 and 4 is provided in Section 5 of this report.

8.3.2 A number of options have been considered in terms of providing sufficient pedestrian and cycle access to serve the proposed development. With reference to Sites 1, 2 and 4 each option is described in greater detail in the following sections.



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## **Potential Pedestrian and Cycle Access Options**

### **Site 1**

- 8.3.3 Pedestrian and cycle access to Site 1 is currently provided from and Cleveland Road, Station Road and Cowley Road.
- 8.3.4 Given the scale and likely proposed uses (student accommodation) on Site 1, the existing pedestrian and cycle access arrangements are considered to be sufficient to serve any future development on the site.

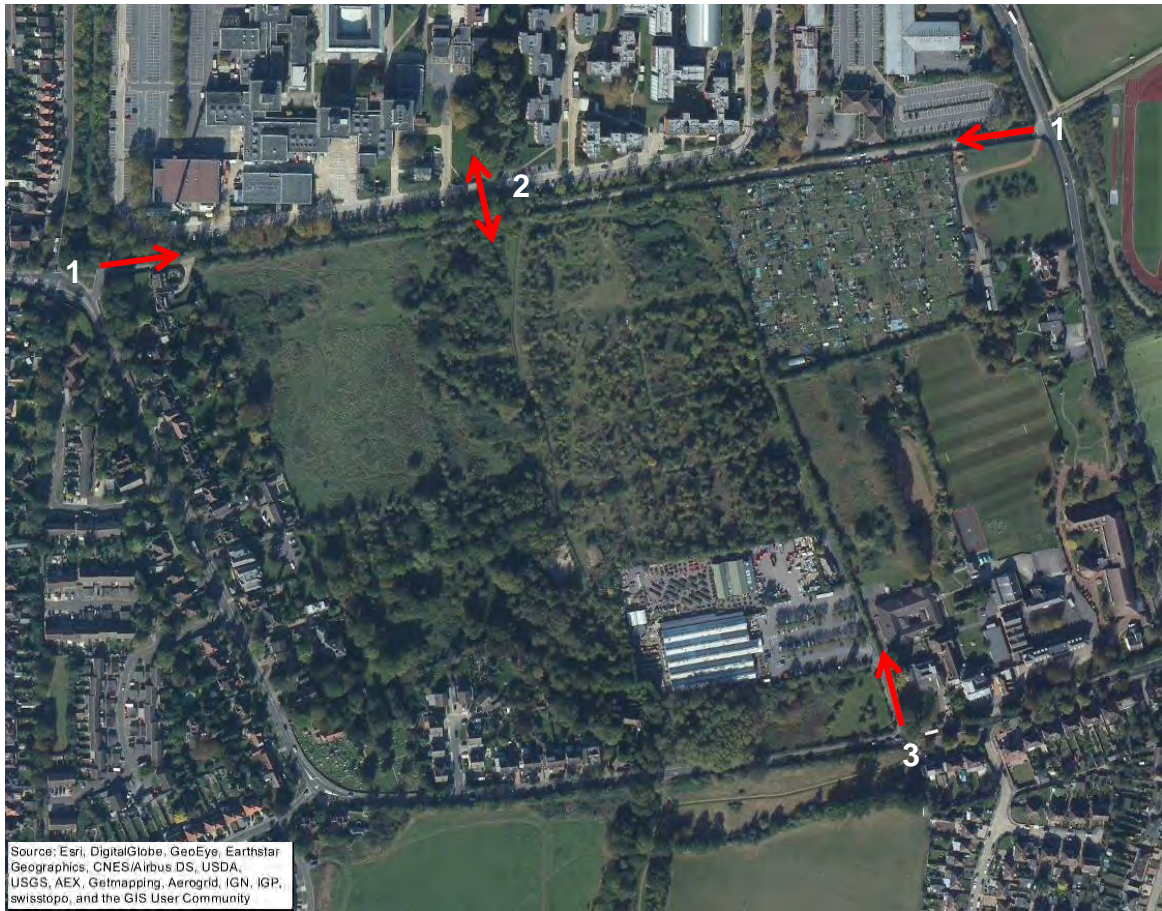
### **Site 2**

- 8.3.5 Pedestrian and cycle access to Site 2 is currently provided from Kingston Lane, Station Road and Cleveland Road. In addition, pedestrian access is provided to the north of Site 2 from the A4020 Hillingdon Road.
- 8.3.6 Given that Site 2 is currently well developed, and any future development is only likely to replace what is currently there, it is considered that the existing pedestrian and cycle access arrangements are sufficient to serve any future development on the site.

### **Site 4**

- 8.3.7 Pedestrian and cycle access to Site 4 is currently provided Nursery Lane, which skirts the northern boundary of the site. No other designated pedestrian and cycle access points are provided.
- 8.3.8 The following options have been considered:
- 1) Upgrade the existing Nursery Lane public footpath;
  - 2) New footways / cycleway provided in conjunction with the new vehicular link between Site 2 and Site 4; and
  - 3) Upgrade the existing Hillingdon Garden Centre access to include new footway / cycleway.
- 8.3.9 The above options are illustrated on Figure 8.6 overleaf.

**Figure 8.6: Site 4 – Potential Pedestrian and Cycle Access Points**



### Preferred Pedestrian and Cycle Access Arrangements

8.3.10 The preferred pedestrian and cycle access arrangements for Sites 1, 2 and 4 are summarised in the table below.

**Table 8.2: Summary of Preferred Pedestrian and Cycle Access Arrangements**

| Site   | Preferred Access Arrangements   |
|--------|---|
| Site 1 | Cleveland Road, Station Road and Cowley Road existing access points.  |
| Site 2 | Kingston Lane, Station Road Cleveland Road and A4020 Hillingdon Road existing access points.  |
| Site 4 | Nursery Lane Public Footpath (to be upgraded), new internal link between Site 2 and Site 4, Hillingdon Garden Centre (to include new footway / cycleway). |

## 8.4 Public Transport Access

### Bus Access

8.4.1 At present BU is served by regular bus services which operate along Kingston Lane and Cleveland Road. In addition, bus services also operate along Church Road, Station Road and Cowley Road. It is understood that no bus services currently enter the University. The University does not operate any shuttle bus services at present.



8.4.2 The proposals seek to redevelop Sites 1, 2 and 4 to provide additional University buildings / student accommodation and associated infrastructure.

8.4.3 Given the current uses that occupy Site 4 (garden centre) and the potential scale and type of development that could be introduced as part of the proposals, it is considered that the existing bus facilities and services would need to be upgraded. As such, the following access options have been considered (with service levels considered in the following chapter).

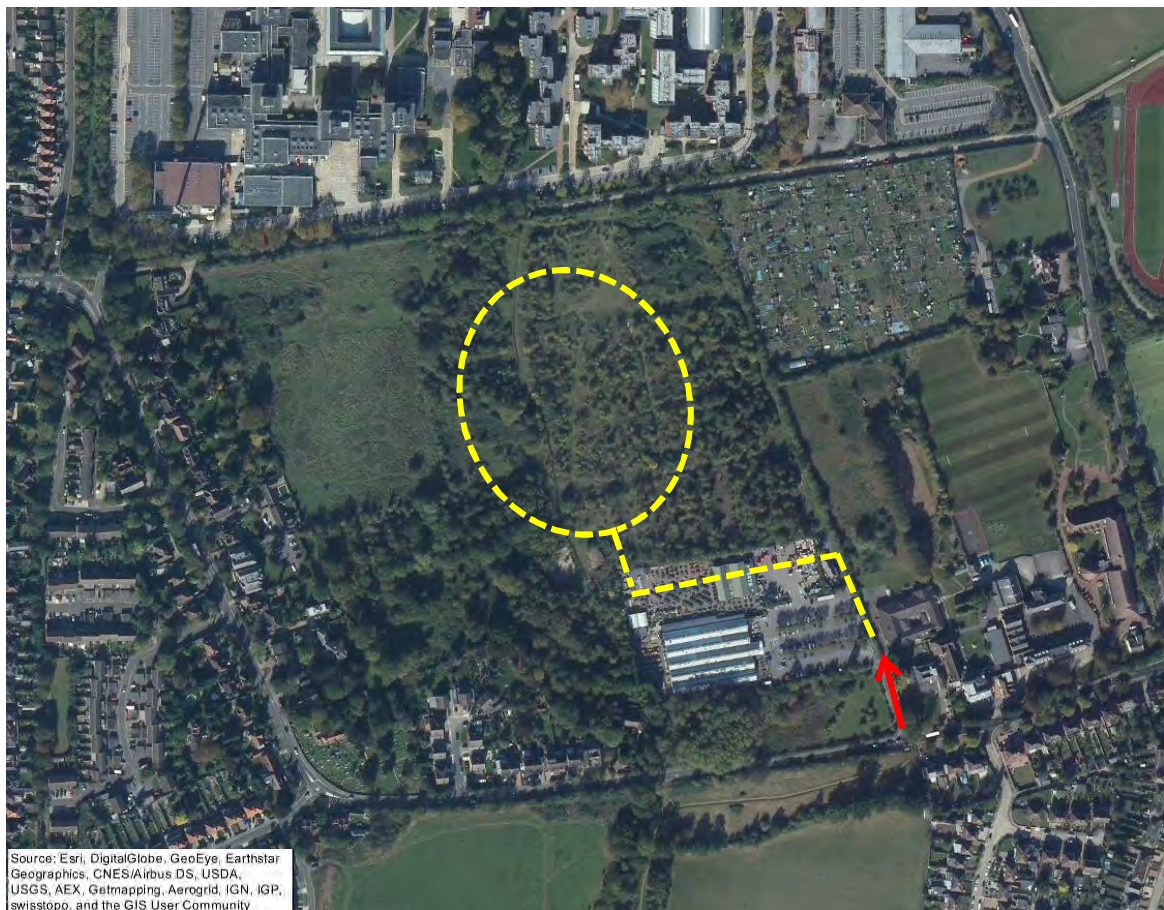
#### Option 1

8.4.4 Consideration has been given to introducing a loop arrangement internally within Site 4. It is envisaged that the new loop arrangement could be served by:

- A new shuttle bus service which would be operated by BU. The shuttle bus would enter and exit the site via Church Road (using the internal loop arrangement); or
- The diversion of existing bus services, which currently operate along Church Road, into Site 4.

8.4.5 The potential loop arrangement is illustrated on Figure 8.7.

**Figure 8.7: Site 4 - Potential Internal Loop Arrangement**



#### Option 2

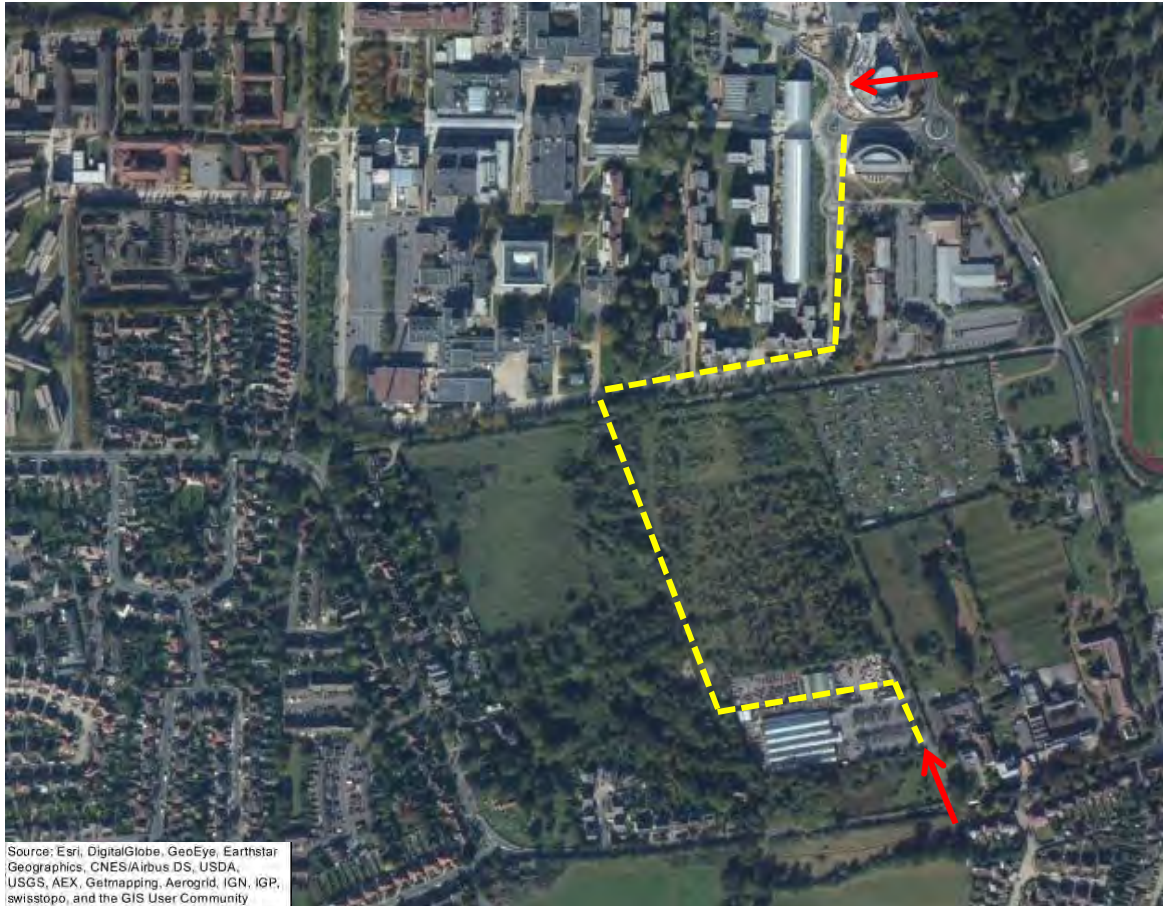
8.4.6 A second option has been considered, which comprises of a new internal bus route through Sites 2 and 4. It is envisaged that the internal bus route could be served by:

- A new shuttle bus service; or

- Existing bus services (Kingston Lane and Church Road) which could be redirected through the site.

8.4.7 The potential internal bus route is illustrated on Figure 8.8.

**Figure 8.8: Site 4 - Potential Internal Bus Route**



### Preferred Option

- 8.4.8 The existing internal roads which currently serve Site 2 have been designed to accommodate cars and possibly small delivery vehicles. In order to accommodate buses, the existing internal roads would require significant upgrading.
- 8.4.9 Given that Sites 1 and 2 are adequately served by a good level of bus services, and that the existing internal roads which serve Site 2 would require significant upgrading to accommodate buses, it is considered that Option 1 (potential loop arrangement) would be best suited to the proposals.
- 8.4.10 Any improvements / alterations to the existing bus facilities and services which operate within the vicinity of the University would be subject to agreement with LBH, TfL (London Buses) and, for routes from outside London, the operator.

### London Underground

- 8.4.11 The nearest London Underground station to BU is Uxbridge station. It is envisaged that Uxbridge station would continue to be used by students and staff of the University.



## National Rail

- 8.4.12 The nearest National Rail station to BU is West Drayton. It is envisaged that West Drayton would continue to be used by students and staff of the University

## 8.5 Vehicular Traffic Impacts

### Network Traffic Flows

- 8.5.1 To understand the change in prevailing traffic flows on the local highway network, a comparison has been made between 2006 traffic survey data (provided by SDG in their Transport Statement, dated December 2006) and the 2015 traffic survey data (used to inform this report). The results of the analysis are presented in the table below.

**Table 8.3: Comparison of network traffic flows (2006 and 2015)**

| Junction  | 2006 Traffic Flows |                 | 2015 Traffic Flows |                 | Percentage Change |                 |
|---|--------------------|-----------------|--------------------|-----------------|-------------------|-----------------|
|   | Weekday AM Peak    | Weekday PM Peak | Weekday AM Peak    | Weekday PM Peak | Weekday AM Peak   | Weekday PM Peak |
| Cleveland Road / The Greenway                     | 1268               | 898             | 1140               | 1032            | +11%              | +12%            |
| Cleveland Road / Station Road                     | 1200               | 1261            | 1244               | 1149            | 0%                | -9%             |
| Kingston Lane / Church Road / Pield Heath Road    | 1073**             | 2657            | 3293               | 3196            | +207%**           | +20%            |
| Kingston Lane / University Site Access            | 944*               | 1041*           | 1209               | 1022            | +28%              | -1%             |
| Kingston Lane / Hillingdon Hill / Hillingdon Road | 1270               | 1039            | 1792               | 1704            | +41%              | +64%            |

\* 2006 Traffic flows derived by combining total turning movements at Kingston Lane / University Site Access junction with entry / exit turning movements at Cleveland Road / University Site Access junction (which was operational during the period in which the 2006 traffic surveys were undertaken)

\*\* 2006 Traffic Flows during AM peak hour at Kingston Lane/ Church Road/ Pield Heath Road junction is an anomaly. 2006 PM flows are more realistic and comparative to 2015 flows.

- 8.5.2 As can be seen from the data above, with the exception of the Cleveland Road / Station Road junction, traffic volumes have increased at all of the junctions across the local highway network in the vicinity of the site over that past nine years.

### Vehicular Traffic Impacts

- 8.5.3 The proposals seek to redevelop Sites 1, 2 and 4 to provide additional University buildings and student accommodation. The proposals will not provide any additional car parking spaces. On this basis, it is considered that the proposals will not generate any additional vehicular trips during the network peak hours. However, it is assumed that as part of the development proposals a proportion of the existing on-site car parking spaces will be re-distributed across the three Sites.
- 8.5.4 Given the likely re-distribution of parking spaces across the three Sites and the introduction of new access points (Sites 2 and 4), it is considered that the distribution patterns of the existing University traffic on the local highway network will change in the future as a result of the proposals.
- 8.5.5 In order to accurately assessed the future traffic movements and resultant impacts on the local highway network, the following assumptions have been made:
- In the future scenario it is assumed that approximately 20% of all traffic entering and exiting the University from Kingston Lane north (via the A4020) will utilise the proposed Church Road access (via Station Road / High Street);



- In the future scenario, it is assumed approximately 60% of all traffic entering and exiting the University from Kingston Lane south (via Pield Heath Road East) will utilise the proposed Church Road access (from Pield Heath Road);
- In the future scenario, it is assumed that all traffic which currently enters and exits the University from Kingston Lane south via Pield Heath Road west will utilise the proposed Church Road access (from Station Road / High Street);
- No background growth has been applied to the baseline 2015 traffic flows. Recent research by LBH (Trends in Vehicular Use in Hillingdon) indicates that traffic volumes on the highway network in LBH have decreased between 2000 and 2008. In addition, recent research by TfL (Traffic Note 1 – Traffic Levels in Greater London 1993 – 2010) indicates that traffic volumes on TfL roads in the LBH have decreased between 1994-1999 (average) and 2010 by 5.2%. On the basis of this research it is considered that traffic volumes would not increase on the LBH road network over the next 10 years and as such no growth should be applied; and
- No committed developments have been taken into consideration at this stage. Should LBH / TfL identify any relative committed developments then these will be reviewed and included as part of any future assessment.

8.5.6 In order to understand the impacts of the proposals on the local highway network, the following scenarios have been assessed:

- 2015 Base Traffic Flows;
- 2026 'Do Nothing' Baseline Traffic Flows (assuming no development occurs on the campus and no traffic growth has been applied); and
- 2026 'Do Something' Baseline Traffic Flows (assuming that the development is completed by 2026, including the introduction of new access arrangements).

8.5.7 The vehicular flows for each of the scenarios is summarised in the table below, with relevant flow diagrams included in **Appendix G**.

**Table 8.4: Comparison of network traffic flows**

| Junction  | 2015 Base Traffic Flows |                 | 2026 Base Traffic Flows (Do Nothing) |                 | Re-distributed 2026 Base Traffic (Do Something) |                 |
|---|-------------------------|-----------------|--------------------------------------|-----------------|---|-----------------|
|   | Weekday AM Peak         | Weekday PM Peak | Weekday AM Peak                      | Weekday PM Peak | Weekday AM Peak                                 | Weekday PM Peak |
| Cleveland Road / The Greenway / Whitehall Road    | 1107                    | 1002            | 1107                                 | 1002            | 1100  | 997             |
| High Street / Station Road                        | 2350                    | 2079            | 2350                                 | 2079            | 2389  | 2114            |
| Cleveland Road / Station Road                     | 1214                    | 1132            | 1214                                 | 1132            | 1280  | 1183            |
| Kingston Lane / Church Road / Pield Heath Road    | 1769                    | 1672            | 1769                                 | 1672            | 1707  | 1613            |
| Kingston Lane / University Site Access            | 1190                    | 1009            | 1190                                 | 1009            | 929   | 813             |
| Uxbridge Road / Harlington Road                   | 3520                    | 3074            | 3520                                 | 3074            | 3499  | 3060            |
| Kingston Lane / Hillingdon Hill / Hillingdon Road | 3261                    | 3147            | 3261                                 | 3147            | 3195  | 3096            |
| The Greenway / Hillingdon Road / Churchill Road   | 3353                    | 3310            | 3353                                 | 3310            | 3308  | 3273            |

8.5.8 The impacts of the proposals are summarised in the table overleaf.

**Table 8.5: Percentage Impact 2026 (Do Nothing compared to Do Something)**

| Junction  | % Impact        |                 |
|---|-----------------|-----------------|
|   | Weekday AM Peak | Weekday PM Peak |
| Cleveland Road / The Greenway / Whitehall Road    | -1%             | 0%              |
| High Street / Station Road                        | +2%             | +2%             |
| Cleveland Road / Station Road                     | +5%             | +5%             |
| Kingston Lane / Church Road / Pield Heath Road    | -4%             | -4%             |
| Kingston Lane / University Site Access            | -22%            | -19%            |
| Uxbridge Road / Harlington Road                   | -1%             | 0%              |
| Kingston Lane / Hillingdon Hill / Hillingdon Road | -2%             | -2%             |
| The Greenway / Hillingdon Road / Churchill Road   | -1%             | -1%             |

**Sensitivity Test**

- 8.5.9 Although it is not considered that baseline traffic on the local highway network will grow over the next ten years, a sensitivity test has been undertaken which assesses the impacts of the development proposals on the local highway with application of growth factors to the baseline traffic.
- 8.5.10 The baseline 2015 traffic flows have been growthed to 2026 (anticipated year of completion of the proposals) using to Tempro NTM locally adjusted growth factors of 17% during AM peak hour and 18% during PM peak hours respectively. The growth factors are included in **Appendix G**.
- 8.5.11 The resultant vehicular flows and resultant impacts are summarised in the tables below and overleaf. Relevant flow diagrams are included in **Appendix G**.

**Table 8.6: Comparison of network traffic flows**

| Junction  | 2015 Base Traffic Flows |                 | 2026 Base Traffic Flows (Do Nothing) |                 | Re-distributed 2026 Base Traffic (Do Something) |                 |
|---|-------------------------|-----------------|--------------------------------------|-----------------|---|-----------------|
|   | Weekday AM Peak         | Weekday PM Peak | Weekday AM Peak                      | Weekday PM Peak | Weekday AM Peak                                 | Weekday PM Peak |
| Cleveland Road / The Greenway / Whitehall Road    | 1107                    | 1002            | 1290                                 | 1179            | 1283  | 1173            |
| High Street / Station Road                        | 2350                    | 2079            | 2746                                 | 2451            | 2784  | 2486            |
| Cleveland Road / Station Road                     | 1214                    | 1132            | 1410                                 | 1330            | 1477  | 1381            |
| Kingston Lane / Church Road / Pield Heath Road    | 1769                    | 11672           | 2034                                 | 1944            | 1971  | 1903            |
| Kingston Lane / University Site Access            | 1190                    | 1009            | 1299                                 | 1114            | 1038  | 918             |
| Uxbridge Road / Harlington Road                   | 3520                    | 3074            | 4104                                 | 3618            | 4083  | 3604            |
| Kingston Lane / Hillingdon Hill / Hillingdon Road | 3261                    | 3147            | 3762                                 | 3671            | 3696  | 3619            |
| The Greenway / Hillingdon Road / Churchill Road   | 3353                    | 3310            | 3888                                 | 3876            | 3843  | 3839            |

- 8.5.12 The impacts of the proposals are summarised in the table overleaf.

**Table 8.7: Percentage Impact 2026 (Do Nothing compared to Do Something)**

| Junction  | % Impact        |                 |
|---|-----------------|-----------------|
|   | Weekday AM Peak | Weekday PM Peak |
| Cleveland Road / The Greenway / Whitehall Road    | -1%             | -1%             |
| High Street / Station Road                        | +2%             | +1%             |
| Cleveland Road / Station Road                     | +5%             | +4%             |
| Kingston Lane / Church Road / Pield Heath Road    | -4%             | -2%             |
| Kingston Lane / University Site Access            | -22%            | -18%            |
| Uxbridge Road / Harlington Road                   | -1%             | 0%              |
| Kingston Lane / Hillingdon Hill / Hillingdon Road | -2%             | +1%             |
| The Greenway / Hillingdon Road / Churchill Road   | -1%             | +1%             |

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## 9 Public Transport Strategy

### 9.1 Introduction

- 9.1.1 Chapter 3 of this Transport and Feasibility Report provides details of the existing public transport network. This network provides a broad base from which to develop services which will facilitate the level of development proposed.
- 9.1.2 This Public Transport Strategy sets out the recommended approach to the provision of a sustainable basis for the increased travel requirements arising from the University's expansion. Given the distance from the site to the nearest Underground and National Rail stations, the primary public transport mode for the immediate vicinity of the site will continue to be bus services, alongside other sustainable transport modes such as walking and cycling.
- 9.1.3 Although seemingly obvious, it is worth reiterating that the site's location at the local and more strategic level is well placed to achieve high mode shares by public transport because:
- While it is located on the edge of the TfL boundary, for the most part it is served by a unified and multi-modal public transport network, with integrated Smartcard ticketing (by means of Oyster®) providing for high-quality and high-frequency services;
  - The recent history of the London bus network in particular is very strong, with the total number of passenger journeys doubling between the mid-1990's and the start of the current decade;
  - The principal target market segment, students, have a relatively high propensity to use public transport based on a number of factors including cost, (reduced) availability of private cars, and large numbers travelling to common destinations; and
  - More locally within the overall site, there is good pedestrian access and therefore all bus services serving the wider site can be used, even if a slightly longer walk is needed to reach the final destination.
- 9.1.4 Taking these principal factors into account, the public transport strategy is based upon the continued development and tailoring of the existing public transport network, rather than the development of bespoke and exclusive University-only bus services. This is consistent with the approach adopted at other universities in London, where the (TfL) public bus network provides the backbone of the services, with staff and student only shuttle buses used to link separated campuses. While the Brunel University campus is distinctly different in terms of its edge of London location, bus services are a sufficiently flexible mode that they can adapt and grow to support the requirements of students, staff and other visitors as development comes on stream and total trip numbers increase.
- 9.1.5 This strategy addresses the 3 principal elements required to deliver sufficient bus services:
- Additional capacity on the existing network;
  - Development of the network in light of the development; and
  - Supporting facilities and infrastructure to support future service levels.

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## 9.2 Background Data

9.2.1 In order to assess the scale of the public transport interventions which will be necessary, it is necessary to consider the increase in student and staff numbers which are expected by the end of the development period and to factor in that car parking space provision will not increase. Consequently, not only will the public transport network need to develop in order to accept current mode share levels, it will also need to reflect a higher mode share (than is currently achieved) for the increased numbers. Chapter 6 provides the calculations which have been used to project future numbers and while the mode share of buses is projected to increase by around 2% (from 20 to 22% of all student trips and from 3 to 5% of all staff trips), the more important figure is to consider the number of trips which this will represent:

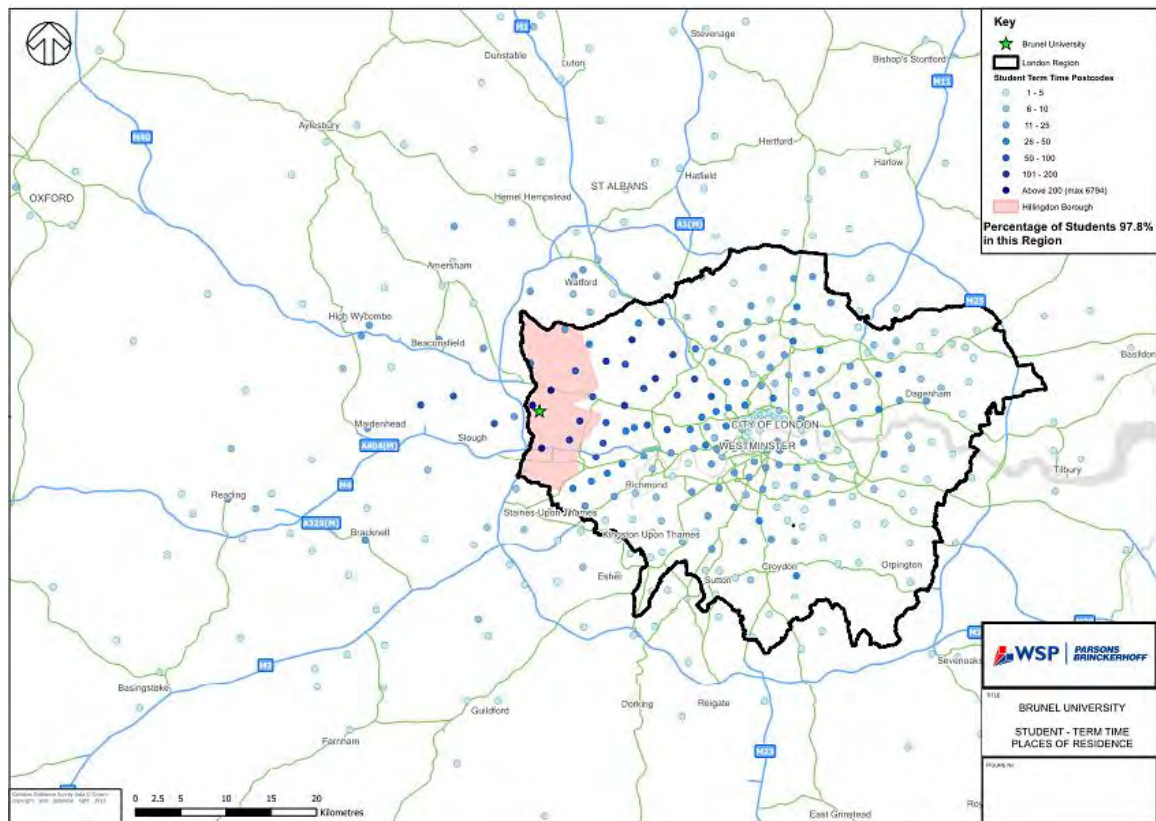
**Table 9-1: Current and future student and staff bus trip numbers**

| Category     | Existing     | Future       | Increase     |            |
|--------------|--------------|--------------|--------------|------------|
| Students     | 2500         | 4,227        | 1,727        | 69%        |
| Staff        | 240          | 452          | 212          | 88%        |
| <b>Total</b> | <b>2,790</b> | <b>4,679</b> | <b>1,889</b> | <b>68%</b> |

9.2.2 In planning for the expansion of the public transport network to support this additional volume of trips, the term time postcodes of current students and home addresses of staff have been reviewed. Chapter 5 sets out the general approach to the processing of the data and in order to examine the implications on public transport, the data has been considered both in the simple geographic distribution and the relative volumes from each postcode. Figure 9-1 shows the distribution of student term time postcodes across London and the South East.

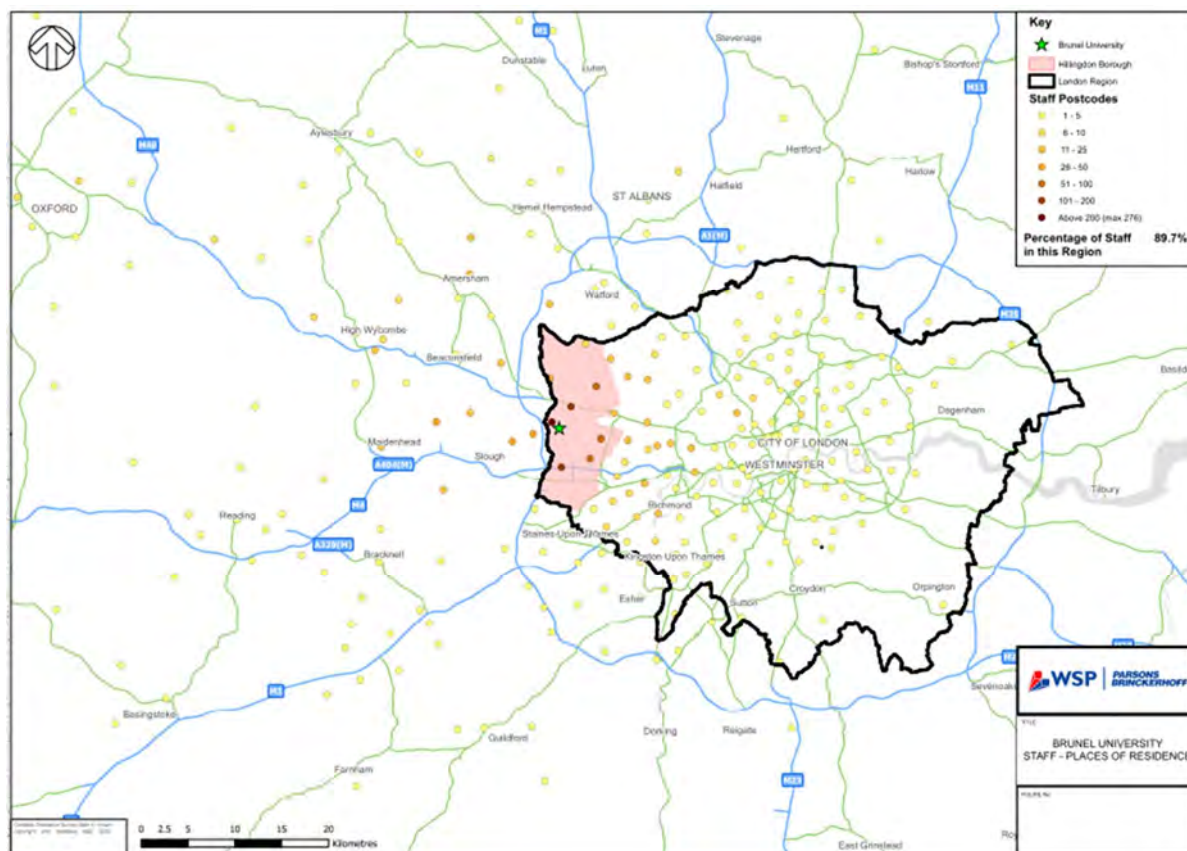


Figure 9-1: Student Term Time Places of Residence



- 9.2.3 As the site is located within postcode UB8, the impact of the student accommodation means that 64% of the plotted postcodes within the area covered by the map shown are within the university's own postcode. The next most popular postcodes are UB7 (to the south of the site), UB10 (to the north, covering Hillingdon and Ickenham) and UB3 (to the south-east, covering Hayes).
- 9.2.4 For staff, the profile of postcode distribution is more dispersed, but still with a high level of local residency.

Figure 9-2: Staff Places of Residence



9.2.5 As with students, postcode UB8 has the greatest number of plots (at 25% of the total shown in the map), with postcodes UB10 and UB7 being the next most popular, albeit in the opposite order to students. All 3 of these postcodes each represent more than 100 plots and therefore account for 53% of the total number of staff.

### 9.3 Additional Capacity on the Existing Network

9.3.1 This high level of local student and staff postcode distribution supports the approach that the first priority of the public transport strategy is to target additional capacity on the existing bus network. This will not only address the needs of those local residents who need to make relatively short trips, with the bus being the main mode of transport, but will also improve access for the next largest group of staff and students who live in other London postcodes (such as the rest of UB and HA) and who use either Underground or national rail services as the main mode, with the bus providing a secondary link in the end to end journey.

9.3.2 TfL's approach to bus service planning is to operate the full length of each route, rather than to have multiple destinations (by having some journeys operate as "short" trips), and therefore the most efficient method of adding additional capacity is to provide it on the routes currently served by single deck vehicles (which could be upgraded to double deck vehicles) and, where greater frequency is appropriate, to increase the frequency of services with the shortest overall journey time, or a combination of both approaches.

9.3.3 In order to balance the needs between linking to key interchanges with Underground and rail, serving the site via multiple points of access and the deployment of capacity only where it is needed, the following illustrates a practical interpretation of this approach:

- U1 – increase the frequency of service from every 15 minutes to a more attractive and minimum ‘turn up and go’ frequency of every 12 minutes. This would require an additional 2 vehicles and would provide an approximate 50% increase in total capacity on the route;
- U3 – increase the vehicle capacity from single deck to double deck vehicles at the current frequency which would not require any additional vehicles but would provide an approximate 55% increase in total capacity on the route; and
- U5 – increase the vehicle capacity from single deck to double deck vehicles at the current frequency, which would not require any additional vehicles but would provide an approximate 55% increase in total capacity on the route.

9.3.4 Given that the peak time of travel for students is typically different than for all bus passengers as a whole, the level of capacity increase illustrated in paragraph 9.3.3 is considered reasonable to address the levels of increase shown in Table 9.1. More detailed data about the off-campus term time places of residence for BU students will enable more accurate and targeted capacity initiatives to be implemented and it is recommended that the methodology for doing so is discussed and reviewed with TfL before, during and after the development has come on stream.

## 9.4 Development of the Network in Light of the Development

9.4.1 In the longer term, developing the existing network to be better tailored to trip patterns serving the University could involve more substantial route changes, particularly on routes operating beyond the TfL boundary, where University-related trips may represent a higher proportion of the total passenger demand on each route.

9.4.2 Within London, TfL’s existing ongoing programme of managing the bus network will determine whether any route changes are required, such as diverting more services to serve the site, changing the terminal points and/or introducing new routes.

9.4.3 It will be particularly relevant for staff, where the distribution of postcodes is more evenly spread than for students, that bus services from outside of London are also reviewed in the longer term. Bus services which could be tailored in terms of routing (to serve the site more directly) and/or benefit from a more radical increase in the number of scheduled journeys include:

- 58 – to/from Slough and Uxbridge via Langley Rail Station – develop more peak-time journeys towards Uxbridge, with potential extension to Brunel University;
- 583 – to/from Slough and Uxbridge via Iver Rail Station – develop a peak-time service towards Uxbridge;

9.4.4 These enhancements are likely to form part of the medium to long term approach to public transport as these corridors will generate the need for a much more bespoke response than the provision of volume on the main routes serving Uxbridge and Hillingdon borough in general.

9.4.5 A further option for the development of the network to serve the bespoke requirements of staff and students would be a shuttle bus service, which could either be open to the public, or could be available only to students and staff. In order to develop the concept further, detailed consideration would need to be given to all aspects of the service including, but not limited to:

- Service – i.e. as above, only for BU or available to the public (and thus part of the TfL network);
- Route – e.g. serving only nearby student residences and thus at very high frequency to maximise convenience or dedicated service to/from key interchanges e.g. Uxbridge town centre and Underground station and/or local rail stations;

- 
- Vehicle size e.g. minibus sized vehicle to better serve side roads not already served directly by public bus services;
  - Schedule – e.g. fully fixed timetable or on-demand at certain off-peak times; and
  - Cost – e.g. provided free to some or all users and/or acceptance of TfL network tickets.

9.4.6 As identified in section 8.4, a shuttle bus could be provided with new, bespoke access as part of the development's future layout and therefore some of these considerations would benefit from being taken into account at an early stage of the development's planning.

## 9.5 Supporting Facilities and Infrastructure to Support Future Service Levels

9.5.1 It has already been identified in paragraph 5.9.2 that the Travel Plan should support the operation and provision of public transport. This should include facilities and infrastructure to support future service levels, such as passenger-focussed items like bus shelters and 'Countdown' real-time information displays at all bus stops which serve the wider site, as well as more operational and highway related matters, like the provision of additional road markings and kerb space to reflect the higher frequency of bus services.

9.5.2 Subject to the adoption of the preferred option for bus access as set out in section 8.4, on-site investment in boarding and alighting facilities and bus turning space would be required.

9.5.3 The potential for existing bus services to be upgraded from single deck to double deck operation should enable services to continue to serve existing stops, without a major requirement to expand the number of marked bus stops and shelters, although this should be kept under review based on the actual flows and distribution of passenger numbers between the different bus services.

## 9.6 Recommendation

9.6.1 BU already benefits from the provision of a comprehensive public bus network around the site, with TfL having a strong track record in expanding and improving the London bus network.

9.6.2 The quantum of the future bus demand lends itself to the continued expansion of scheduled, high frequency and high capacity services, which provide journey opportunities where bus is the main mode of transport and also to integrate with other public transport services at Underground and rail stations.

9.6.3 In the short term, expanding the capacity of the network by means of increasing frequency and vehicle size on existing routes is appropriate and feasible. In the longer term, amending the route and timetable of services and potentially introducing new services is likely to be required to achieve a higher mode share. In both the short and the long term, the provision of supporting infrastructure (e.g. bus stops) will need to be reviewed to ensure the safety and comfort of passengers and the operational reliability and deliverability of services.

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## 10 Summary and Conclusion

### 10.1 Summary

- 10.1.1 WSP has been commissioned by Brunel University (BU) to provide transport consultancy services and also to prepare a TFR to support BU's representations to the emerging LBH Local Plan that promote a review of the Green Belt designations.
- 10.1.2 The University currently has 13,860 students and 2,514 members of staff with a projected increase of 7,641 students and 1,300 members of staff. The existing floorspace is 129,625sqm with a projected increase of 118,552sqm, which is an increase of 95%. The number of parking spaces will increase by 127 to 2,088 car parking spaces.
- 10.1.3 A review of the existing transport and travel conditions at BU has been undertaken. There are currently nine London bus routes in the vicinity of the site providing approximately 46 services per hour. Uxbridge LUL station is an approximate 20 minute walk north of the campus and West Drayton station is in the region of 2.5km away.
- 10.1.4 The assessment of current public transport accessibility is based on a methodology which depends to a significant extent on rail and tube access. The eastern extent of the site (Kingston Lane) is measured to have the best accessibility due to its proximity to the range of bus services on Hillingdon Road. In order to balance the needs between linking to key interchanges with Underground and rail, serving the site via multiple points of access and the deployment of capacity only where it is needed, possible improvements to the existing bus network could be increasing the frequency of service U1 and using double deck buses on services U3 and U5. Taken together, these actions would enable the public bus network to accommodate the increase in passengers.
- 10.1.5 The Public Transport Strategy seeks to build upon the strengths and opportunities of the current network by expanding capacity of existing services in the short-term and identifying possible route network developments in the longer term. This could include the development of a shuttle bus service, tailored to BU, with its precise specification considered in light of the development of the public bus network and physical access to the site.
- 10.1.6 Additionally, the implementation of an updated TP will help to promote the use of sustainable transport and therefore prevent further vehicular demand on the local highway network.

### 10.2 Conclusion

- 10.2.1 The proposed Development change of use:
- Gives students and staff a choice about how they travel. The site is located close to good frequent bus routes, good quality pedestrian and cycle routes and in close proximity to key local facilities;
  - Secure safe and suitable access to the site for all people by sustainable modes; and
  - Provides a level of car parking which is appropriate for the scale of the proposed development.
- 10.2.2 The proposed Permitted Development change of use is therefore considered to be sustainable and appropriate.



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# Appendix A. 2004 Masterplan

Mayor's Office

Mr Karl Dafe  
Major Applications Team  
Planning and Transportation Department  
Hillingdon Council  
Civic Centre  
High Street  
UXBRIDGE  
UB8 1UW



**Date:** 22 October 2003

Dear Mr Dafe,

**Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999; Town & Country Planning (Mayor of London) Order 2000  
Brunel University outline master plan proposals for the Uxbridge campus (532/APP/2002/2237).**

I refer to your letter dated 2 October 2003 informing me that Hillingdon Council is minded to grant planning permission for the above planning application. I refer you also to the notice that I issued on 9 October 2003 under the provisions article 4(1)(b)(I) of the above Order.

Having now considered a report on this case (reference PDU/0300c/02, copy enclosed), I am content to allow Hillingdon Council to determine the case itself, subject to any action that the Secretary of State may take, and do not therefore wish to direct refusal.

The application represents EIA development for the purposes of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999. I have taken the environmental information made available to date into consideration in formulating my decision.

Yours sincerely,



**Ken Livingstone**  
Mayor of London

cc Richard Barnes, London Assembly Constituency Member  
Bob Neill, Chair of London Assembly Planning and Spatial Development Committee  
Andrew Melville, GoL  
Sam Richards, TfL  
Anne Crane, LDA  
Mrs Charlotte Grant, GVA Grimley, [REDACTED]  
[REDACTED]

---

## Appendix B. The Hillingdon Order 2014

LONDON BOROUGH OF HILLINGDON  
SECTION 90 OF THE HIGHWAYS ACT 1980  
SECTION 84 OF THE ROAD TRAFFIC REGULATION ACT 1984  
THE HILLINGDON (SPEED LIMIT) (NO.) ORDER 2014

Notice is hereby given that the Council of the London Borough of Hillingdon intends to:

**1) Under section 90 of the Highways Act 1980, proposes to install pairs of speed cushions 75 mm high, 1.7 metres wide and 3.2 metres long at the following locations:**

CHURCH ROAD, COWLEY

- i) 24.6 metres southwest of The Meads
- ii) Outside No's 37 and 39 Church Road, Cowley
- iii) Outside No 51 Church Road, Cowley

PIELD HEATH ROAD, HILLINGDON

- i) 64.3 metres northeast of No 51 Church Road, Cowley
- ii) 140.6 metres northeast of No 51 Church Road, Cowley.

**2) Under Section 84 of the Road Traffic Regulation Act 1984, proposes to reduce the maximum speed limit from 50 m.p.h. to 30 m.p.h. on a section of Cherry Lane, West Drayton** which lies between the extended northwestern kerbline of Stockley Road and a point in line with the eastern boundary fence of No. 100 Blossom Way.

Plans and the Council's statement of reasons for the proposals can be seen at Yiewsley and West Drayton libraries during library opening hours and by appointment at, Civic Centre, Uxbridge during normal office hours for 21 days following the date on which this notice is published. Further information can be obtained by telephoning Residents Services Directorate on 01895 277879. If you wish to comment on, or object to the proposals please write by 24<sup>th</sup> December 2014, stating grounds for objection and your home address, to Transport and Projects, Residents Services, Civic Centre, Uxbridge, Middlesex UB8 1UW quoting reference 4W/06/CH/12250/02950 .

Dated this 3<sup>rd</sup> day of December 2014

JEAN PALMER,

Deputy Chief Executive & Corporate Director of Residents Services.

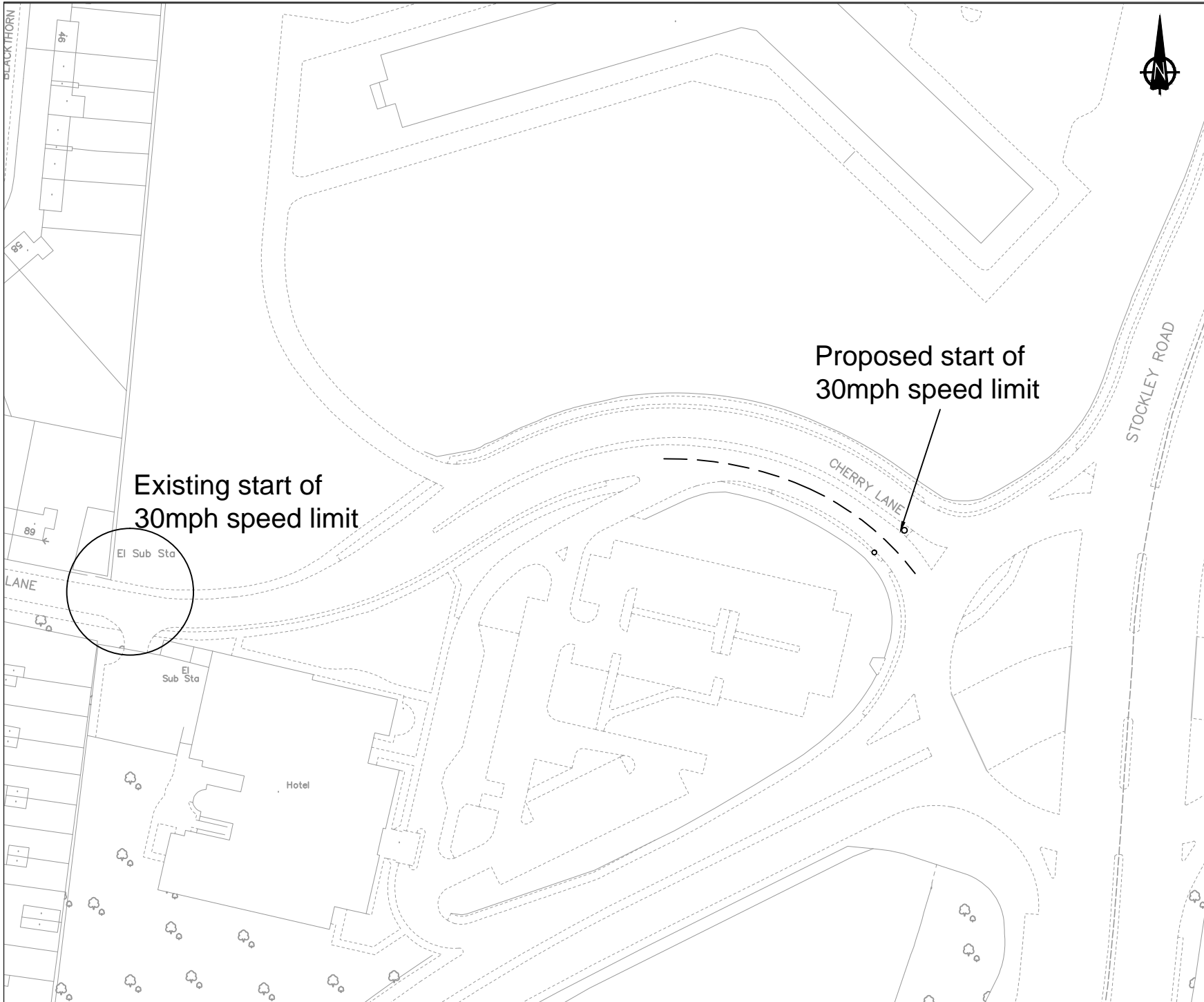
**STATEMENT OF REASONS**

1) The proposed speed cushions are intended to enhance road safety on Pield Heath Road and Church Road without effecting emergency services and improving the safety of pedestrians.

2) The proposed reduction in speed limit is intended to reduce accident risk and promote road safety. The proposal has been agreed by the Cabinet Member for Planning, Transportation & Recycling to proceed to formal consultation.







relocate 30mph /  
50mph speed limit

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London Borough of Hillingdon 100019283 2014



**Project**  
ROAD SAFETY PROGRAMME

**Description**  
Cherry Lane, West Drayton

|                  |                      |           |
|------------------|----------------------|-----------|
| Scale<br>NTS     | Drawn<br>CH 06/14    | Checked   |
| Paper Size<br>A4 | Drawing No.<br>RSPD1 | Rev.<br>A |

LONDON BOROUGH OF HILLINGDON  
THE HILLINGDON (HILLINGDON HOSPITAL) (RESIDENTS ZONE HH)  
(ON STREET PARKING PLACES) ORDER 2012 (AMENDMENT) ORDER 2014  
THE HILLINGDON (WAITING AND LOADING RESTRICTION) (CONSOLIDATION)  
ORDER 1994(AMENDMENT) ORDER 2014  
PROPOSED EXTENSION TO THE HILLINGDON HOSPITAL PARKING MANAGEMENT  
SCHEME IN NEWLYN CLOSE, HILLINGDON

Hillingdon Council gives notice that it intends to make these Orders, which will:

**1. Establish permit parking places** (operational between 9.00am and 5.00pm Monday to Friday) in which a vehicle may be left during the permitted hours if it displays a valid Zone HH permit in Newlyn Close, Hillingdon.

**2. Impose waiting restrictions** in Newlyn Close, Hillingdon operational between 9.00am and 5.00pm Monday to Friday.

**RESIDENTS PERMITS** - £0 - 1st vehicle, all subsequent - £40 per annum

**VISITORS VOUCHERS** First book of 10 per household per annum- free. £5 - per book of 10 thereafter. Copies of the proposed Orders together with full details, a plan and the Council's statement of reasons for the proposals can be seen at Hayes End Library and by appointment at, Civic Centre, Uxbridge during normal office hours until 24<sup>th</sup> December 2014. Further information can be obtained by telephoning Residents Services on 01895 250631. If you wish to comment on, or object to the proposals please write by 24<sup>th</sup> December 2014, stating grounds for objection and your home address to Transport & Projects, Residents Services, Civic Centre, Uxbridge, Middlesex UB8 1UW quoting reference 4W/06/7.25/DH.

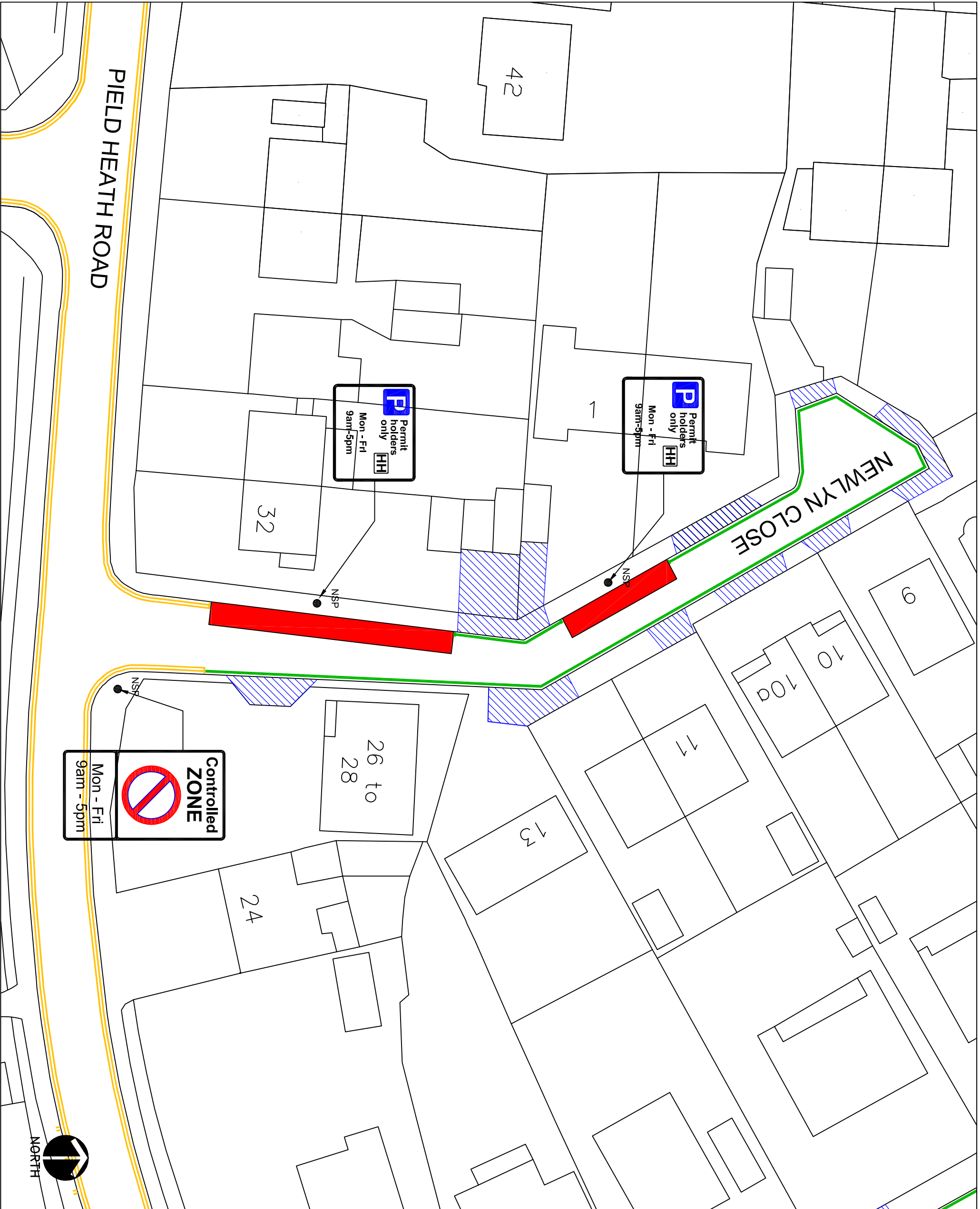
Dated this 3<sup>rd</sup> day of December 2014

JEAN PALMER,

Deputy Chief Executive & Corporate Director of Residents Services.

### **STATEMENT OF REASONS**

The proposals to implement "permit holder only" parking bays (operational Monday - Friday 9am-5pm), is in response to requests from residents of Newlyn Close to restore the balance of parking in favour of residents as shown on the attached plan. Therefore it is recommended to commence statutory consultation to introduce a permit parking scheme in Newlyn Close.



- KEY**
- EXISTING YELLOW LINE
  - SMT
  - PROPOSED SINGLE YELLOW LINE
  - DMU
  - PROPOSED DOUBLE YELLOW LINE
  - CROSSOVER
  - PERMIT HOLDER ONLY
  - NEW SIGNPOST
  - NSP

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 London Borough of Hillingdon 100019283 ©2014

**HILLINGDON**  
 TRANSPORT & PROJECTS  
 RESIDENTS SERVICES DIRECTORATE  
 CMC CENTRE, 4th FLOOR, HIGH STREET, HILLINGDON, URB 10W  
 Tel No. 01895 277009/01895 280970

**Project**  
 NEWLYN CLOSE  
 HILLINGDON

**Description**  
 OPTION 2  
 Proposed Extension to  
 Hillingdon Hospital  
 Parking Management  
 Scheme

|       |     |          |     |       |     |      |          |
|-------|-----|----------|-----|-------|-----|------|----------|
| Scale | NTS | Designed | DAH | Drawn | DAH | Date | Oct 2014 |
|-------|-----|----------|-----|-------|-----|------|----------|



LONDON BOROUGH OF HILLINGDON  
THE HILLINGDON (WAITING AND LOADING RESTRICTION) (CONSOLIDATION) ORDER  
1994(AMENDMENT) ORDER 2014

PROPOSED WAITING RESTRICTIONS AT VARIOUS LOCATIONS

Hillingdon Council gives notice that it intends to make these Orders which will:

1. **Impose 'at any time' waiting restrictions** on the lengths of road set out in the Schedule to this notice.
2. **Impose ' Monday to Friday 11am to Midday' waiting restriction on the following section of Sweetcroft Lane, Uxbridge** - Northwest side, from a point opposite a point 8 metres west of the common boundary of Nos. 71 and 73 Sweetcroft Lane, eastwards for a distance of 28.8 metres.
3. **Impose ' Monday to Saturday 8am to 6.30pm' waiting restriction on the following section of Betam Road, Hayes** - Southeast and southwest side, from a point 9.3 metres southeast of the southeastern flank wall of Wellington House, No. 1 Betam Road to a point in line with the southwestern flank wall of No 15 Adler Industrial Estate, Betam Road.
4. **Remove 2.6 metres of 'at any time' waiting restrictions outside No. 81 Hoylake Crescent, Ickenham.**

Copies of the proposed Orders together with plans and the Council's statement of reasons for the proposals can be seen at Botwell Green, Eastcote, Harlington, Ickenham, Oak Farm, Ruislip Manor and Uxbridge libraries during opening hours and by appointment at the Civic Centre, Uxbridge during normal office hours for 21 days following the date on which this notice is published. Further information can be obtained by telephoning Residents Services Directorate on 01895 277879. If you wish to comment on, or object to the proposals please write by 24<sup>th</sup> December 2014, stating grounds for objection and your home address, to Transport and Projects, Residents Services, Civic Centre, Uxbridge, Middlesex UB8 1UW quoting reference 4W/06/KU/CH/3/12/14/. Dated this 3<sup>rd</sup> day of December 2014.

JEAN PALMER,

Deputy Chief Executive & Corporate Director of Residents Services.

SCHEDULE - WAITING PROHIBITED 'AT ANY TIME'

ASHBURTON ROAD, RUISLIP - Southwest side, from a point 10 metres southeast of the southeastern kerbline of Seaton Gardens to a point 10 metres northwest of the northwestern kerbline of Seaton Gardens.

SEATON GARDENS, RUISLIP

- i) Both sides, from a point in line with the southwestern kerbline of Ashburton Road southwestwards for a distance of 10 metres.
- ii) Northwest side, from a point 10 metres southwest of the southwestern kerbline of Salcombe Way to a point 10 metres northeast of the northeastern kerbline of Salcombe Way.

SALCOMBE WAY, RUISLIP

- i) Both sides, from a point in line with the southeastern kerbline of Hatherleigh Road, southeastwards for a distance of 10 metres.
- ii) Both sides, from a point in line the northwestern kerbline of Seaton Gardens northwestwards for a distance of 10 metres.

HATHERLEIGH ROAD, RUISLIP - Southeast side, from a point 10 metres southwest of the southwestern kerbline of Salcombe Way to a point 10 metres northeast of the northeastern kerbline of Salcombe Way.

GLEBE ROAD, HAYES

- i) Northeast side, from a point 8 metres northwest of the northwestern kerbline of First Avenue to a point 8 metres southeast of the southeastern kerbline of First Avenue.
- ii) Southwest side, from a point 8 metres northwest of the northwestern kerbline of Second Avenue to a point 8 metres southeast of the southeastern kerbline of Second Avenue.



HUNTERS GROVE, HAYES - Northeast side, from a point in line with the common boundary of Nos. 69 and 71 Hunters Grove to a point in line with the common boundary of Nos. 63 and 61 Hunters Grove.

CROSSWAY, HAYES

i) Both sides, from a point in line with the southwestern kerblines of West Walk, southwestwards for a distance of 10 metres

ii) Both sides, from a point in line with the northeastern kerblines of West Walk, northeastwards for a distance of 5 metres

EAST WALK, HAYES - Both sides, from a point in line with the southeastern kerblines of Crossway, southeastwards for a distance of 10 metres.

WEST WALK, HAYES - Both sides, from a point in line with the northwestern kerblines of Crossway, northwestwards for a distance of 10 metres.

MANOR WAY, RUISLIP - Southwest side, from a point 10 metres southeast of the southeastern kerblines of Windmill Way southeastwards to a point 3.3 metres northwest of the common boundary of Nos. 72 & 74 Manor Way.

PRINCES PARK LANE, HAYES - Southeast side, from a point 10 metres northeast of the northeastern kerblines of Princes Park Circle southwestwards to a point 10 metres southwest of the southwestern kerblines of Princes Park Circle.

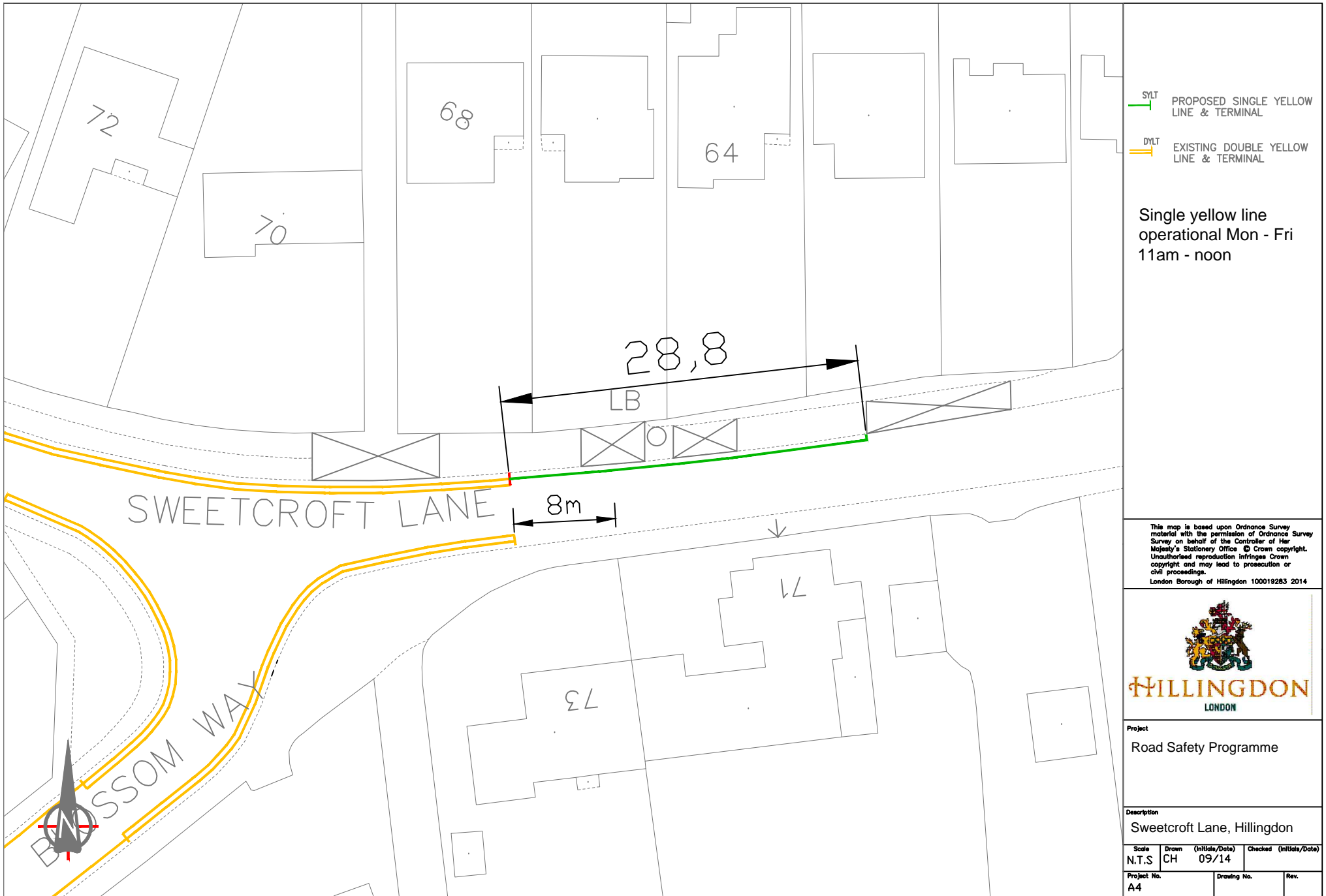
PRINCES PARK CIRCLE, HAYES - Both sides, from the southeastern kerblines of Princes Park Lane southeastwards for a distance of 10 metres.



VILLIER STREET, UXBRIDGE - North side, between a point in line with the western flank wall of Viller Street Auto Repairs Garage and a point 1 metre west of the eastern boundary of No. 33 Viller Street.

YEOMANS ACRE, RUISLIP - Both sides, from a point in line with the northwestern kerblines of Eastcote Road, northwestwards for a distance of 10 metres.

### **STATEMENT OF REASONS**

The proposed installation and removal of waiting restrictions are intended to remove obstructive parking to assist the free flow of traffic and promote road safety. All proposals have been agreed in principle by the Cabinet Member for Planning, Transportation & Recycling to proceed to formal consultation.



-  SYLT PROPOSED SINGLE YELLOW LINE & TERMINAL
-  DYLT EXISTING DOUBLE YELLOW LINE & TERMINAL

Single yellow line  
operational Mon - Fri  
11am - noon

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London Borough of Hillingdon 100018283 2014



**Project**  
Road Safety Programme

**Description**  
Sweetcroft Lane, Hillingdon

| Scale | Drawn (Initials/Date) | Checked (Initials/Date) |
|-------|-----------------------|-------------------------|
| N.T.S | CH 09/14              |                         |



| Project No. | Drawing No. | Rev. |
|-------------|-------------|------|
| A4          |             |      |

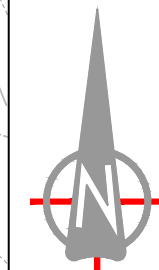
ITEM 14



**Notes:**

Limited waiting restrictions  
Mon - Sat 8am - 6.30pm

-  SYLT PROPOSED SINGLE YELLOW LINE & TERMINAL
-  SYLT EXISTING SINGLE YELLOW LINE & TERMINAL



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**HILLINGDON**  
LONDON

Project

Road Safety Programme

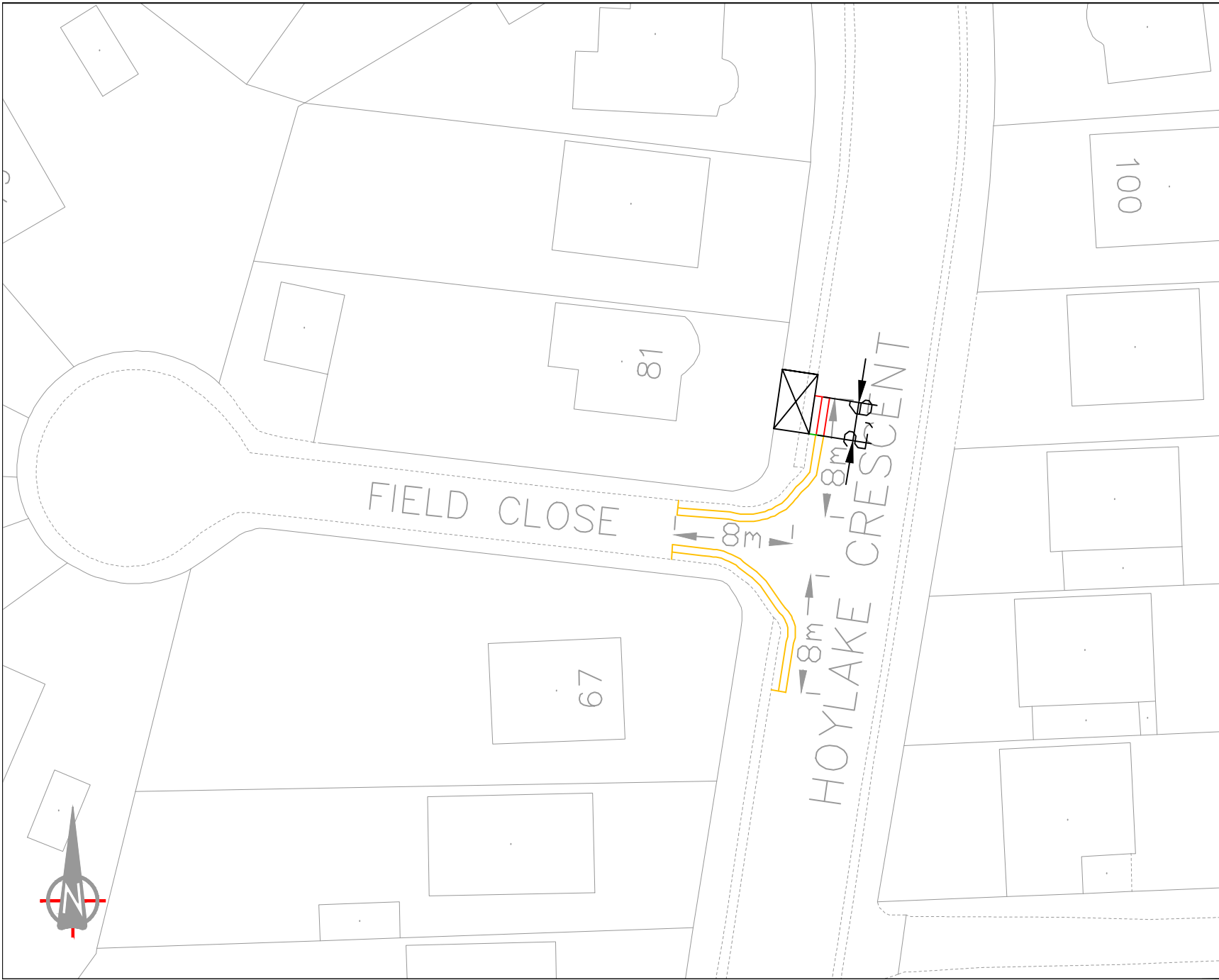
Description

Betam Road, Hayes

|       |                       |                         |
|-------|-----------------------|-------------------------|
| Scale | Drawn (Initials/Date) | Checked (Initials/Date) |
| N.T.S | CH 08/14              |                         |



|             |             |      |
|-------------|-------------|------|
| Project No. | Drawing No. | Rev. |
| A3          | RSP D1      |      |

ITEM 15



Option 2

Key:

-  DYL  
EXISTING DOUBLE YELLOW LINE & TERMINAL
-  DYL  
REMOVE DOUBLE YELLOW LINE & TERMINAL

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**HILLINGDON**  
LONDON

**Project**  
Road Safety Programme

**Description**  
Field Close / Hoylake Crescent, Ickenham

|             |             |                 |         |                 |
|-------------|-------------|-----------------|---------|-----------------|
| Scale       | Drawn       | (Initials/Date) | Checked | (Initials/Date) |
| N.T.S       | CH          | 08/14           |         |                 |
| Project No. | Drawing No. | Rev.            |         |                 |
|             | RSPD1       |                 |         |                 |

ITEM 16



Notes:

 DYLT PROPOSED DOUBLE YELLOW LINE & TERMINAL

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**HILLINGDON**  
LONDON

Project

**ROAD SAFETY PROGRAMME**

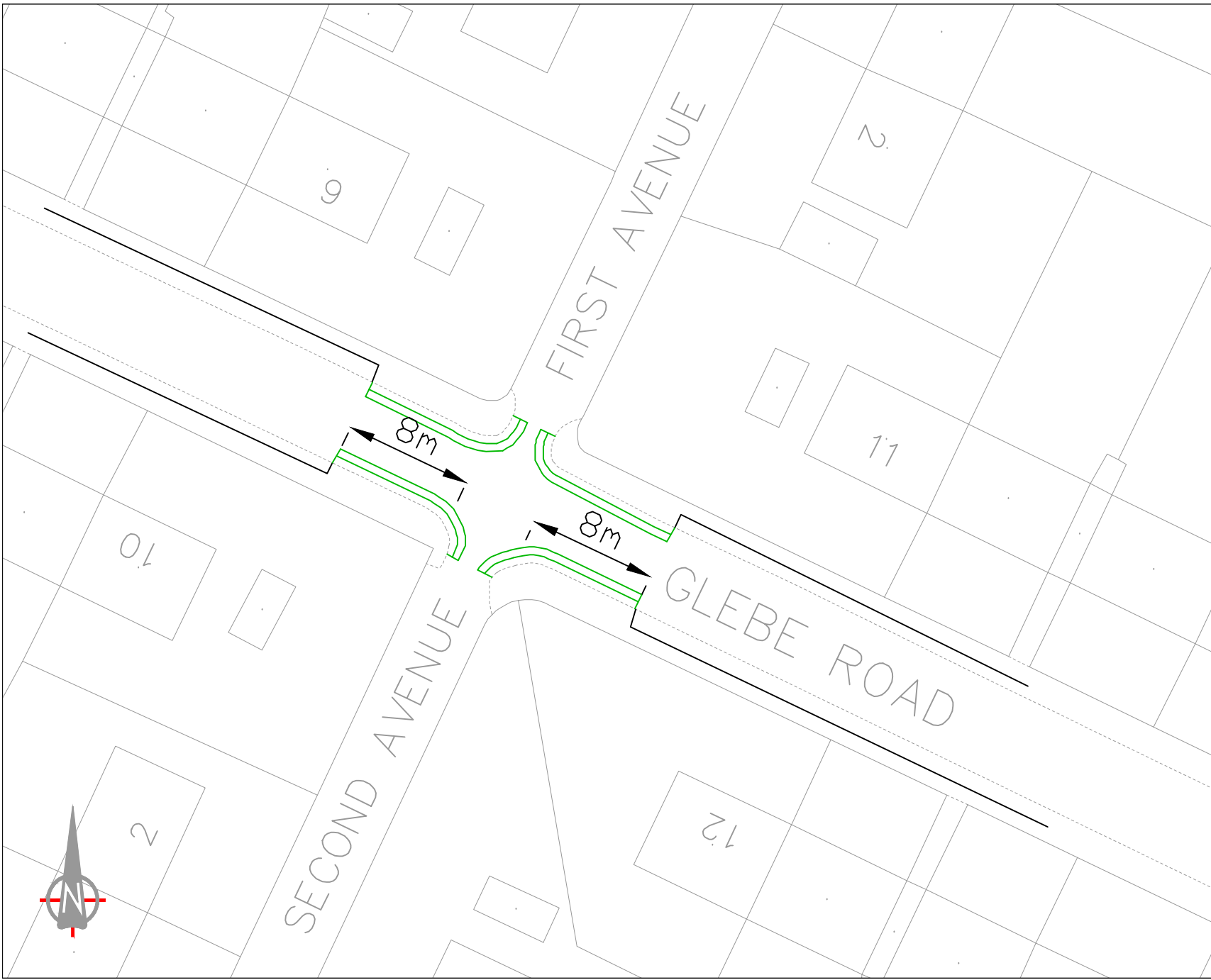
Description  
Seaton Gardens / Salcombe Way /  
Hatherleigh Road / Ashburton Rd, Ruislip

| Scale | Drawn (Initials/Date) | Checked (Initials/Date) |
|-------|-----------------------|-------------------------|
| N.T.S | CH 09/14              |                         |

| Project No. | Drawing No. | Rev. |
|-------------|-------------|------|
| A4          | RSPD1       | A    |

ITEM 1,2,3,& 4





Notes:

 DYL PROPOSED DOUBLE YELLOW LINE & TERMINAL

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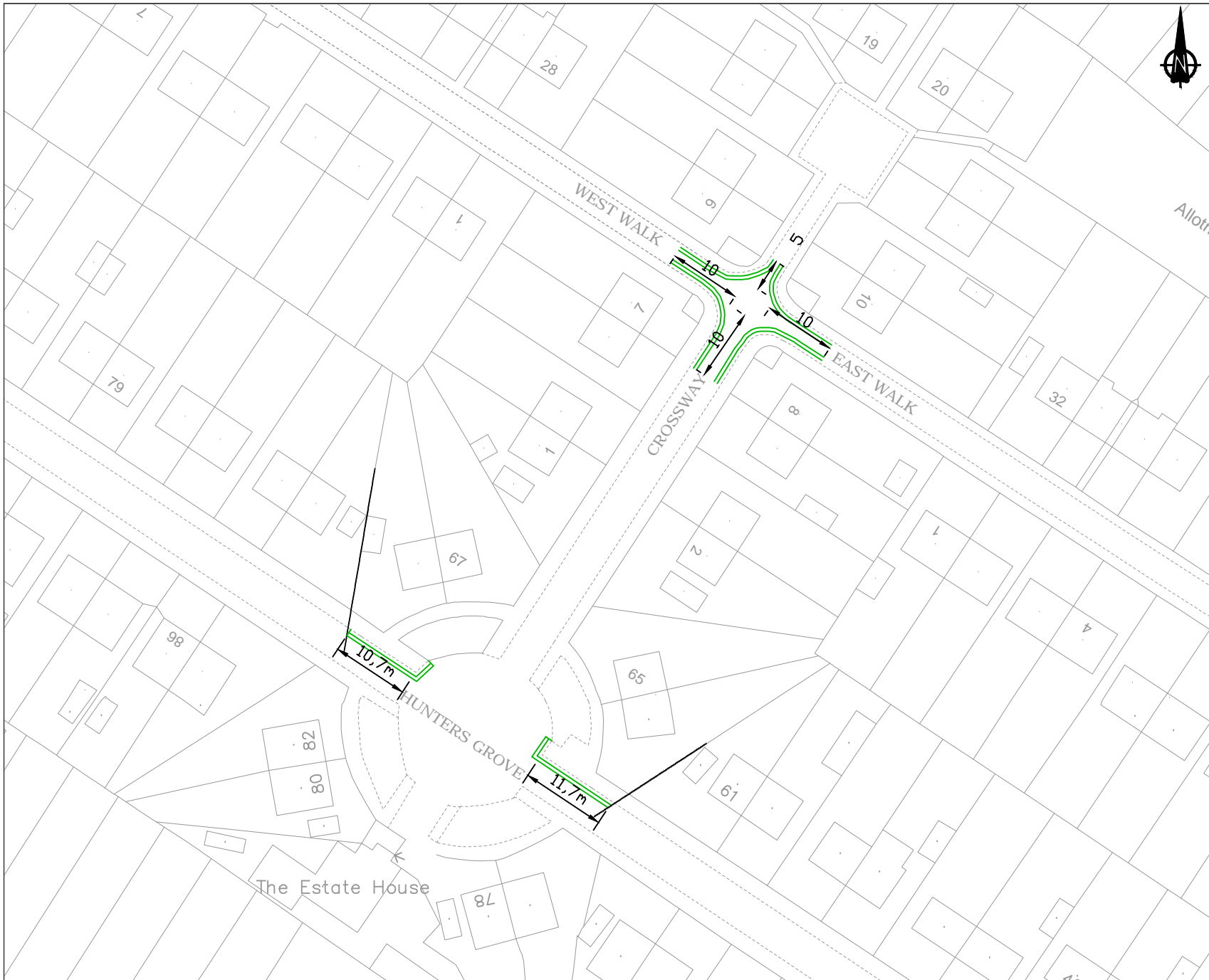



Project  
Road Safety programme

Description  
Glebe Road / First Avenue / Second Ave, Hayes

|             |             |                 |         |                 |
|-------------|-------------|-----------------|---------|-----------------|
| Scale       | Drawn       | (Initials/Date) | Checked | (Initials/Date) |
| N.T.S       | CH          | 09/14           |         |                 |
| Project No. | Drawing No. | Rev.            |         |                 |
| A4          | RSPD1       |                 |         |                 |

ITEM 12



DYLT  
 PROPOSED DOUBLE YELLOW LINE & TERMINAL

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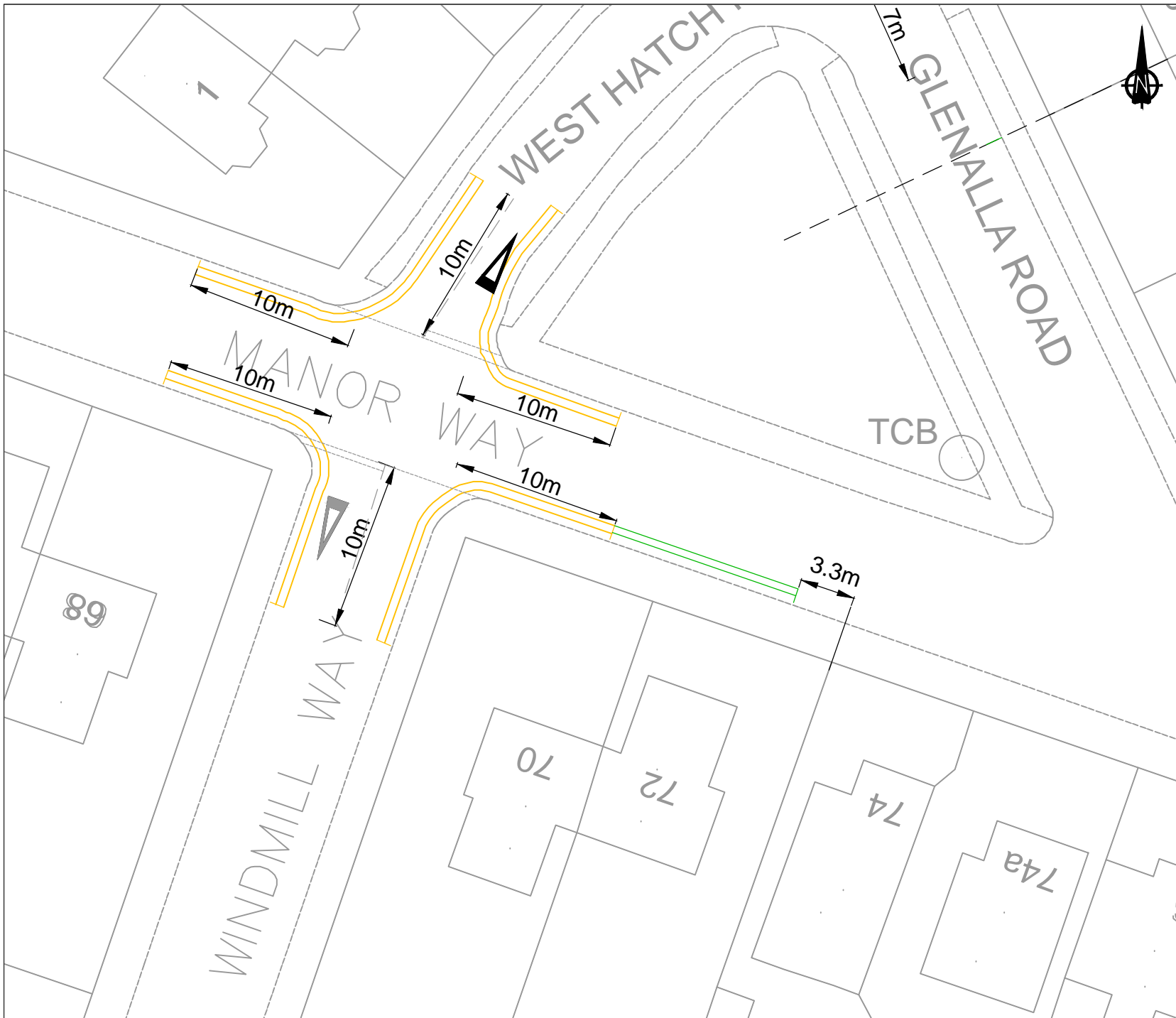


Project  
 ROAD SAFETY PROGRAMME

Description  
 Hunters Grove / Crossway / West Walk / East Walk, Hayes


|                  |                      |           |         |
|------------------|----------------------|-----------|---------|
| Scale<br>N.T.S   | Drawn<br>CH          | 09/14     | Checked |
| Paper Size<br>A4 | Drawing No.<br>RSPD1 | Rev.<br>A |         |

ITEM 8,9,10 & 11



**DYL**  
 EXISTING DOUBLE YELLOW LINE & TERMINAL

**DYL**  
 NEW PROPOSED DOUBLE YELLOW LINE & TERMINAL



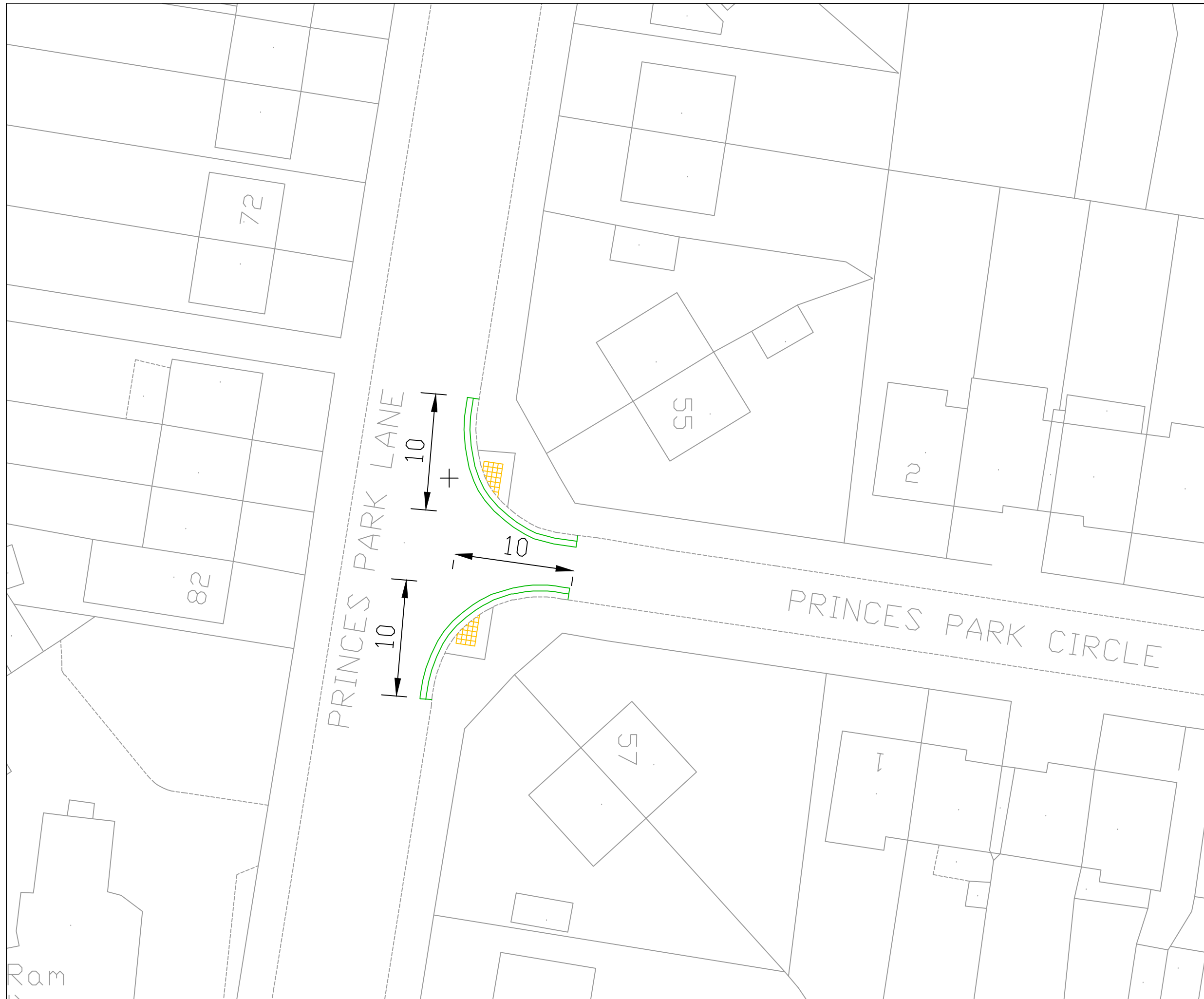
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 Ordnance Survey 100019283




Project  
 ROAD SAFETY PROGRAMME

|  |                      |           |
|--|----------------------|-----------|
| Description<br>Windmill Way / Manor Way, Ruislip |                      |           |
| Scale<br>N.T.S                                   | Drawn<br>CH. 09/14   | Checked   |
| Paper Size<br>A4                                 | Drawing No.<br>RSPD1 | Rev.<br>A |

ITEM 13



NOTES:

-  New dropped kerb and tactile paving
-  DYL Proposed double yellow lines

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**HILLINGDON**  
LONDON

Project  
**ROAD SAFETY PROGRAMME**

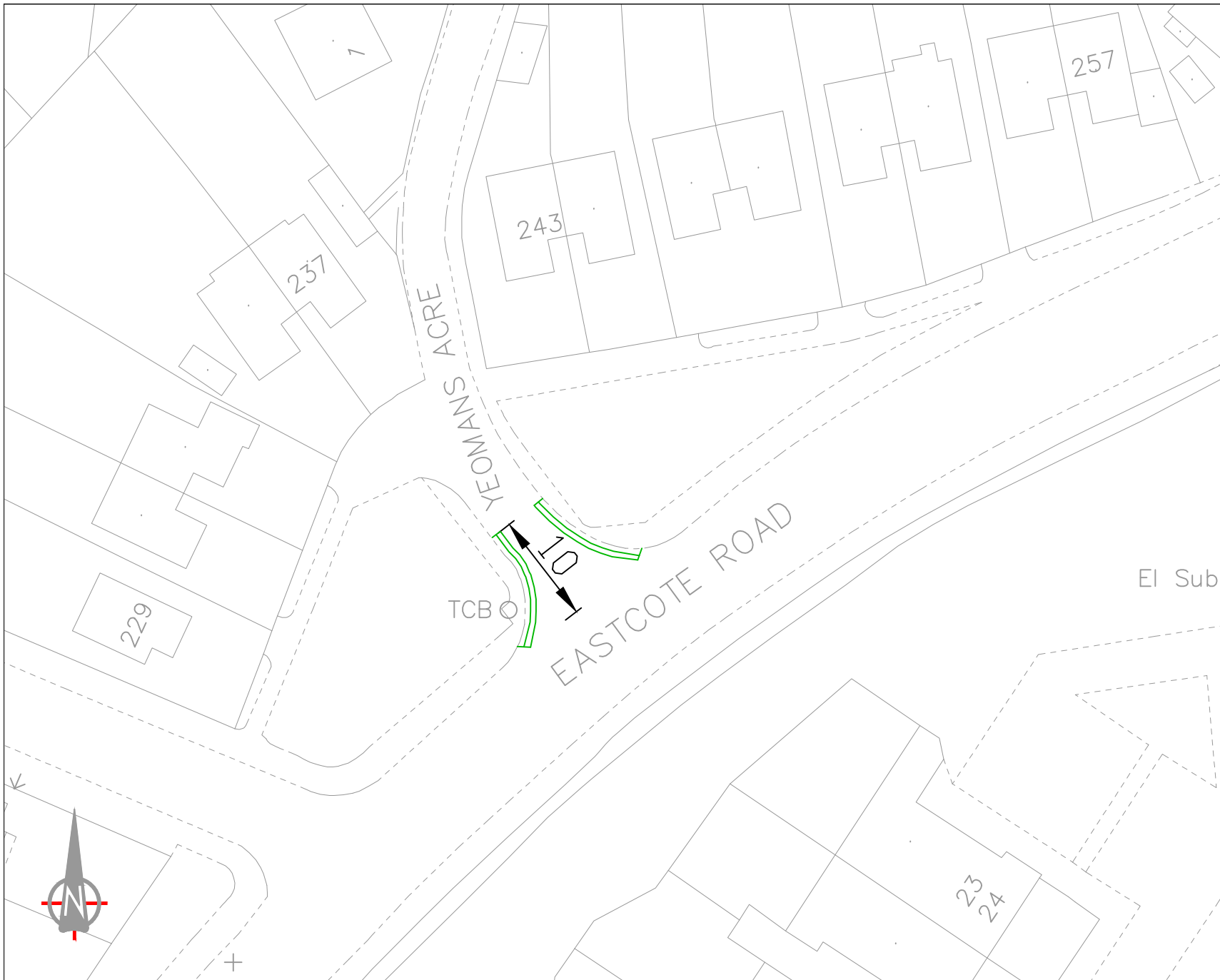
Description  
Princess Park Lane /Princess Park Circle , Hayes

|                   |                      |         |
|-------------------|----------------------|---------|
| Scale<br>N.T.S    | Drawn<br>CG. 09/14   | Checked |
| Project No.<br>A3 | Drawing No.<br>RSPD1 | Rev.    |


ITEM 5 & 6







Notes:

 DYL PROPOSED DOUBLE YELLOW LINE & TERMINAL

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Project  
Road Safety Programme

Description  
Yeomans Acre, Eastcote

|       |       |                 |                         |
|-------|-------|-----------------|-------------------------|
| Scale | Drawn | (Initials/Date) | Checked (Initials/Date) |
| N.T.S | CH    | 10/14           |                         |

|             |             |      |
|-------------|-------------|------|
| Project No. | Drawing No. | Rev. |
| A4          | RSPD2       |      |

ITEM 7

LONDON BOROUGH OF HILLINGDON  
THE HILLINGDON (WAITING AND LOADING RESTRICTION)  
(CONSOLIDATION) ORDER 1994 (AMENDMENT) ORDER 2014  
PROPOSED WAITING RESTRICTIONS STATION ROAD, HAYES

Hillingdon Council gives notice that it intends to make this Order which will **impose 'at any time' waiting restrictions** on the following section of Station Road, Hayes - Both sides, from a point in line with the southern kerbline of North Hyde Road to a point 40 metres south of the southern kerbline of Monmouth Road. A copy of the proposed Order together with plans and the Council's statement of reasons for the proposals can be seen at Harlington Library during opening hours and by appointment at the Civic Centre, Uxbridge during normal office hours for 21 days following the date on which this notice is published. Further information can be obtained by telephoning Residents Services Directorate on 01895 277731. If you wish to comment on, or object to the proposals please write by 24<sup>th</sup> December 2014, stating grounds for objection and your home address, to Transport and Projects, Residents Services, Civic Centre, Uxbridge, Middlesex UB8 1UW quoting reference 4W/06/NB/14810 Dated this 3<sup>rd</sup> day of December 2014.

JEAN PALMER,

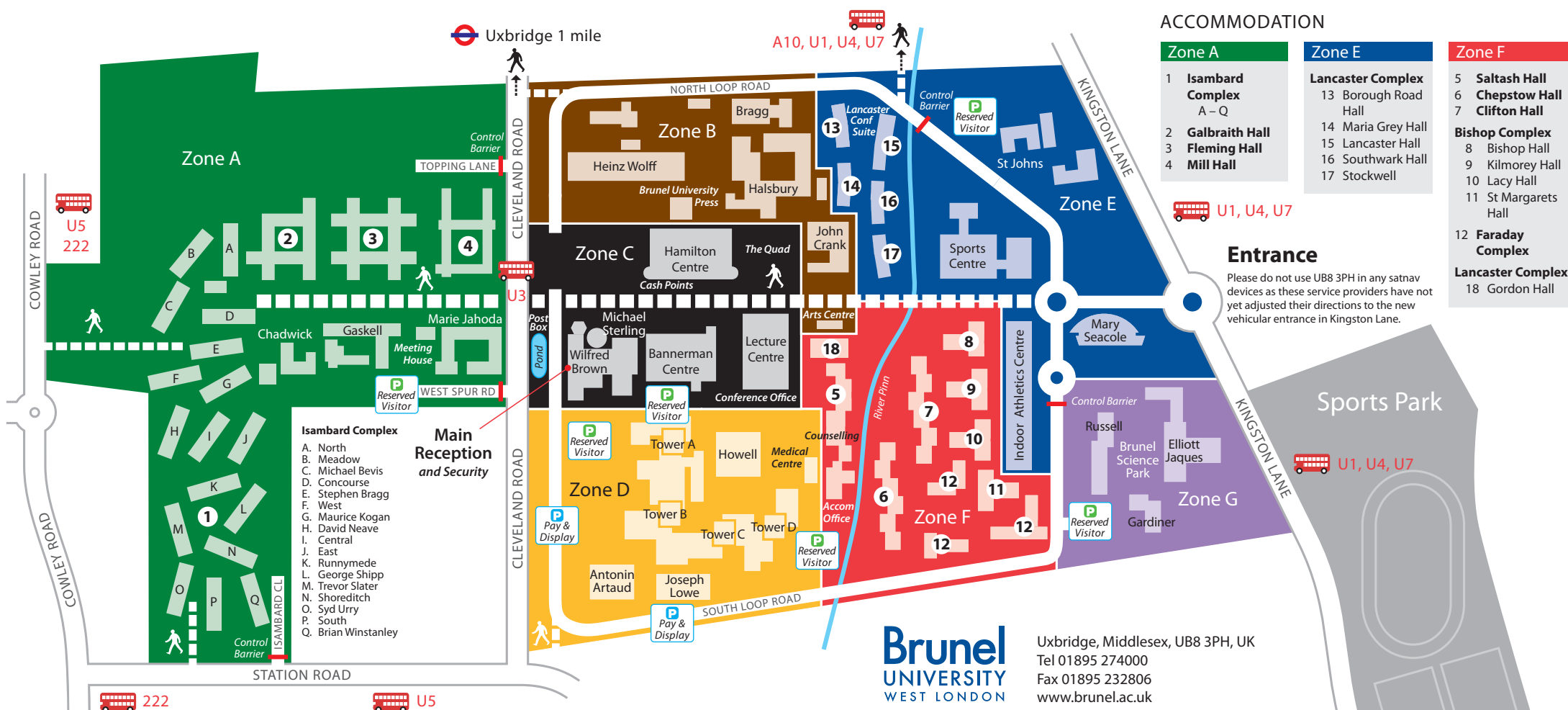
Deputy Chief Executive & Corporate Director of Residents Services.

### **STATEMENT OF REASONS**

The proposed waiting restrictions are intended to prevent obstructive parking along Station Road, Hayes once the construction of the new development has been completed.

---

## Appendix C. Zonal Pedestrian Access Points



**ACCOMMODATION**

| Zone A   | Zone E   | Zone F  |
|--|--|---|
| 1 <b>Isambard Complex</b><br>A – Q                                     | <b>Lancaster Complex</b><br>13 Borough Road Hall<br>14 Maria Grey Hall<br>15 Lancaster Hall<br>16 Southwark Hall<br>17 Stockwell | 5 <b>Saltash Hall</b><br>6 <b>Chepstow Hall</b><br>7 <b>Clifton Hall</b>                          |
| 2 <b>Galbraith Hall</b><br>3 <b>Fleming Hall</b><br>4 <b>Mill Hall</b> |  | <b>Bishop Complex</b><br>8 Bishop Hall<br>9 Kilmorey Hall<br>10 Lacy Hall<br>11 St Margarets Hall |
|  |  | 12 <b>Faraday Complex</b><br><b>Lancaster Complex</b><br>18 Gordon Hall                           |

**Entrance**

Please do not use UB8 3PH in any satnav devices as these service providers have not yet adjusted their directions to the new vehicular entrance in Kingston Lane.

**Brunel UNIVERSITY**  
WEST LONDON

Uxbridge, Middlesex, UB8 3PH, UK  
Tel 01895 274000  
Fax 01895 232806  
www.brunel.ac.uk

**Zone A**

**Chadwick**  
**Gaskell**  
Health Economics  
Research Group  
School of Arts (taught programmes)  
**Marie Jahoda**  
Brunel Law School  
School of Social Sciences (UG, PG and research offices)  
**Meeting House**

**Zone B**

**Arts Centre**  
**Bragg**  
Experimental Techniques Centre  
**Brunel University Press**

**Zone C**

**Halsbury**  
Graduate School  
Institute for the Environment  
School of Sport and Education  
Wolfson Centre  
**Heinz Wolff**  
Biosciences (enquiries)  
Brunel Institute for Bioengineering  
Research Services and Development  
School of Sport and Education  
**John Crank**  
Computer Centre  
Mathematical Sciences (enquiries)

**Zone D**

**Bannerman Centre**  
Assistive Technology Centre  
Cash Office  
Disability and Dyslexia Service  
Job Shop  
Library  
Placement and Careers Student Centre  
West London Assessment Centre  
**Hamilton Centre**  
Brunel Hospitality  
Campus Shops  
Students' Union  
**Lecture Centre**  
Conference Office  
Media Services  
Recital (Roberts) Room  
LTDU

**Zone E**

**Michael Sterling**  
Brunel Business School (taught programmes)  
School of Engineering and Design (PG taught and research programmes)  
**Wilfred Brown**  
Alumni  
Beldam Gallery  
Estates (Operations and Resources)  
Finance  
Marketing  
Registry/Admissions  
Security

**Zone F**

**Antonin Artaud**  
**Howell**  
Howell Theatre (Howell Centre)  
**Joseph Lowe**  
Distribution Centre  
Maintenance  
**Medical Centre**  
**Tower A**  
Brunel Centre for Advanced Solidification Technology  
Design Exhibition Centre  
School of Engineering and Design (UG taught programmes)  
**Tower B**  
BITLab  
**Tower C and D**

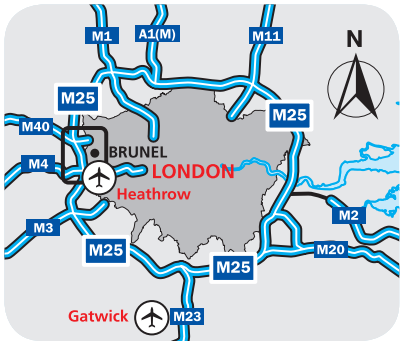
**Zone G**

**Mary Seacole**  
Health and Social Care (enquiries)  
**St Johns**  
Information Systems and Computing (enquiries)  
**Indoor Athletics Centre**  
**Lancaster Conference Suite**  
**Sports Centre**

**Zone H**

**Brunel Science Park**  
**Elliott Jaques**  
Brunel Business School (taught programmes)  
**Gardiner**  
CLEAPSS  
**Russell**  
Brunel International (including LIBT)  
Language Centre  
MBA

Map last updated 12/11/08  
To download the latest version visit  
www.brunel.ac.uk/about/where



## Getting to Brunel University

### BY BUS

**From Heathrow Central:** A10 "Heathrow Fast", every 15 minutes, journey time approx 25 minutes (alight Hillingdon Road and use footpath to campus).

**From Stockley Park:** A10 "Heathrow Fast" as above, journey time approx 10 minutes.

### From West Drayton railway station:

U3 (alight Cleveland Road)  
 U1 (alight Kingston Lane)  
 222 (alight Cowley Road and use path via Zone A, see campus map).

### From Uxbridge (underground) station:

U3 (alight Cleveland Road)  
 U1 (to West Drayton) U4 and U7 (alight Kingston Lane)  
 222 and U5 (alight Cowley Road and use path via Zone A, see campus map).

### BY UNDERGROUND

(Transport for London) For Uxbridge Station take the Metropolitan Line from central London (and Piccadilly Line during peak hours). Then take a taxi, or bus U1, U3, U4 or U7. (Alternatively use the 1-mile walking route shown on the right.)

### BY RAIL

West Drayton (First Great Western Link) is the nearest main-line station (approx 1.5 miles from the campus). Services from London Paddington or the West (Bristol). From West Drayton station take a bus towards Uxbridge: 222 (alight Cowley Road), U5 (alight Station Road), U3 (alight Cleveland Road) or U1 (alight Kingston Lane).

West Ruislip Station (Chiltern Railways) is the main-line service from London Marylebone and the North (Aylesbury, Banbury and Birmingham) and is approximately 4 miles from the campus. From West Ruislip Station



take the U1 bus towards West Drayton, alight Kingston Lane.

### BY ROAD

#### Entry by car is via Kingston Lane only.

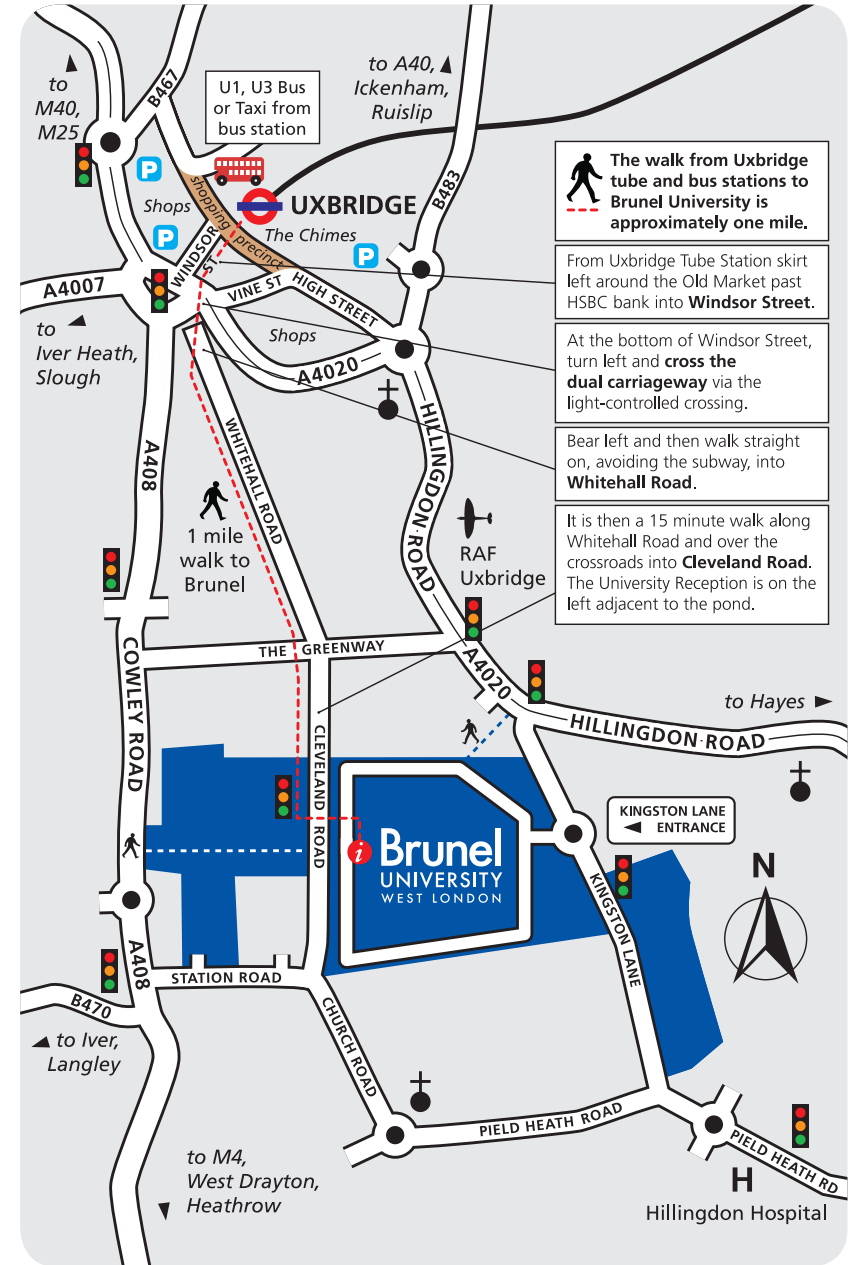
*Please do not use UB8 3PH in any satnav devices as these service providers have not yet adjusted their directions to the new vehicular entrance in Kingston Lane.*

Parking on the Uxbridge Campus and in the local area is very restricted. Barriers control access to the site and all vehicles must display a valid permit. On arrival, visitors may apply for a permit for the day from the main Reception Desk in the Wilfred Brown Building. In addition, pay-and-display parking is available on site near Reception.

**Clamping is in operation for illegally parked vehicles.**

**M4:** Leave M4 at Junction 4 and follow signs to Uxbridge (A408). Straight across first set of traffic lights, continue on A408, crossing four roundabouts. Turn right at the next set of major traffic lights. Continue ahead to next set of lights and, almost immediately, take the right filter lane at second set of traffic lights into Station Road. Continue straight on into Church Road and take the first exit at a mini-roundabout into Pield Heath Road. Turn left into Kingston Lane and left into the University. To reach Reception, follow the ring road clockwise to the western side of the campus.

**A40/M40:** At Swakeleys Roundabout take B483 exit to Uxbridge. Follow signs across two mini-roundabouts. At major roundabout bear left onto A4020 (Brunel sign), straight ahead at the first lights, then



The walk from Uxbridge tube and bus stations to Brunel University is approximately one mile.

From Uxbridge Tube Station skirt left around the Old Market past HSBC bank into Windsor Street.

At the bottom of Windsor Street, turn left and cross the dual carriageway via the light-controlled crossing.

Bear left and then walk straight on, avoiding the subway, into Whitehall Road.

It is then a 15 minute walk along Whitehall Road and over the crossroads into Cleveland Road. The University Reception is on the left adjacent to the pond.

almost immediately take second right filter turn onto Kingston Lane (signposted Brunel). The main entrance to Brunel is right at the next roundabout. Follow signs for Main Reception as you enter the campus.

**M25:** (From North or South) Join M40 or M4 then see above.

### ACCESS BY CAR FOR REGISTERED DISABLED VISITORS

Disabled parking bays are available at various locations around the campus. Please collect a permit from Main Reception, Wilfred Brown Building, on arrival.



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## Appendix D. Bus Route Network

# Buses from Brunel University

## Route finder

### Day buses

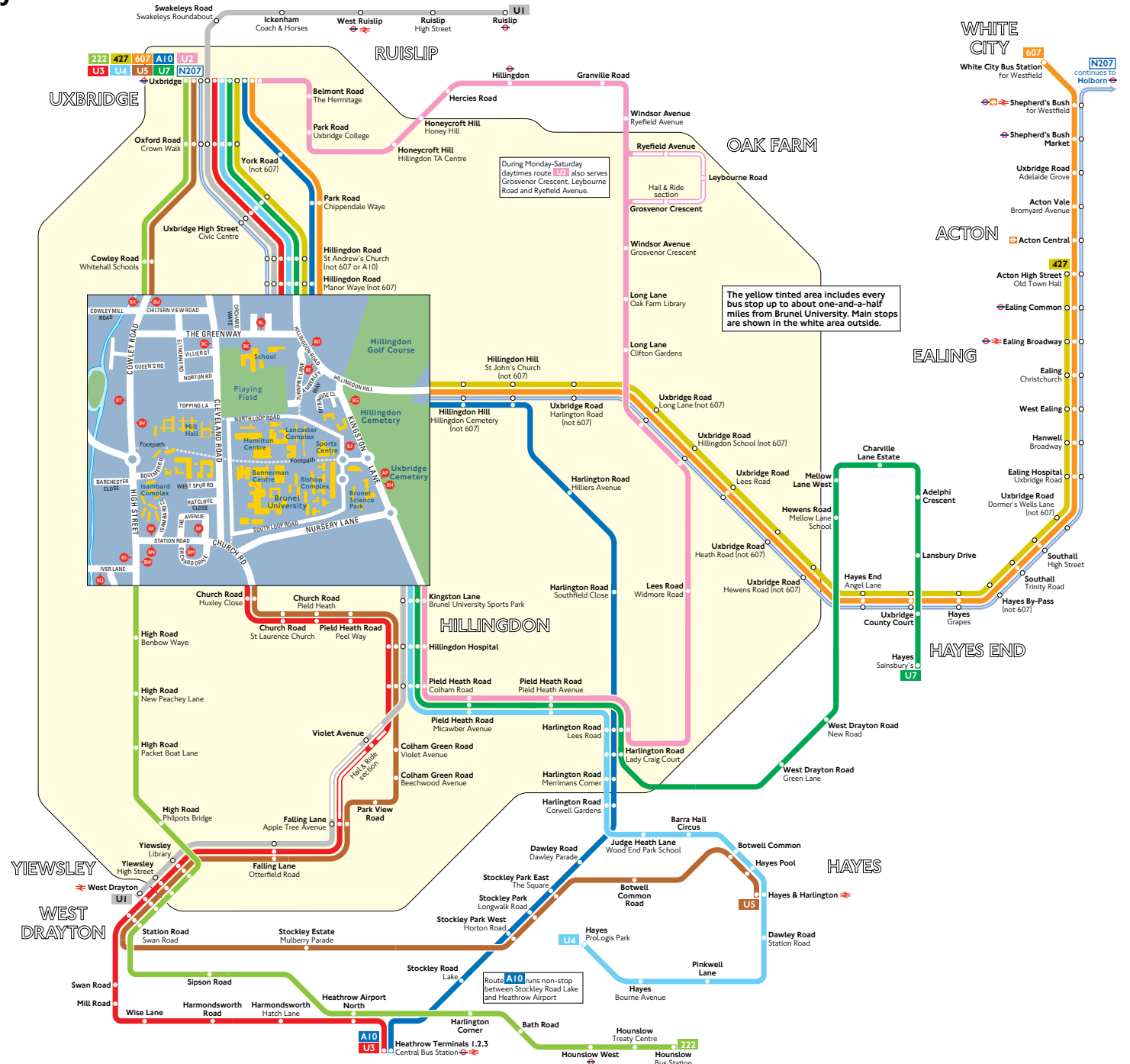
| Bus route | Towards  | Bus stops |
|-----------|----------|-----------|
| 222       | Hounslow |           |
| 427       | Uxbridge |           |
| 607       | Acton    |           |
| A10       | Uxbridge |           |
| U1        | Uxbridge |           |
| U2        | Uxbridge |           |
| U3        | Uxbridge |           |
| U4        | Uxbridge |           |
| U5        | Uxbridge |           |
| U7        | Uxbridge |           |

### Night buses

| Bus route | Towards  | Bus stops |
|-----------|----------|-----------|
| N207      | Holborn  |           |
|           | Uxbridge |           |

### Other buses

| Bus route | Towards                  | Bus stops |
|-----------|--------------------------|-----------|
| 583       | Hedgeley                 |           |
| 724       | Harlow                   |           |
| 740, A40  | Heathrow Terminals 1,2,3 |           |
| A30       | Chesham                  |           |



---

## Appendix E. PTAL Points of Interest

# PTAI Study Report File Details

Date 18/02/2015 11:10

Day of week M-F

Time period AM peak

Walk speed 4.8 kph

Walk file PLSQLTest

POI Name: 505794, 182613

---

## Bus Services

Reliability factor for this mode is 2

Maximum walk time for this mode is 8 minutes

Maximum walk distance for this mode is 640.0 metres

Stop UXBRIDGE HIGH SCHOOL

Walk time to stop from POI is 7.81 minutes

Walk distance to stop from POI is 624.75 metres

Route U3 Direction BACK Frequency 5.0 giving AWT of 6.0 minutes

Route U3 Direction OUT Frequency 5.0 giving AWT of 6.0 minutes

Stop CLEVELAND ROAD

Walk time to stop from POI is 4.0 minutes

Walk distance to stop from POI is 320.27 metres

Route U3 Direction BACK Frequency 5.0 giving AWT of 6.0 minutes

Route U3 Direction OUT Frequency 5.0 giving AWT of 6.0 minutes

Stop BRUNEL UNIVERSITY, CLEVELAND ROAD

Walk time to stop from POI is 0.33 minutes

Walk distance to stop from POI is 26.24 metres

Route U3 Direction BACK Frequency 5.0 giving AWT of 6.0 minutes

Route U3 Direction OUT Frequency 5.0 giving AWT of 6.0 minutes

Stop CHURCH ROAD HUXLEY CLOSE

Walk time to stop from POI is 4.92 minutes

Walk distance to stop from POI is 393.73 metres

Route U3 Direction OUT Frequency 5.0 giving AWT of 6.0 minutes

Route U3 Direction BACK Frequency 5.0 giving AWT of 6.0 minutes

Route U5 Direction OUT Frequency 5.0 giving AWT of 6.0 minutes

Route U5 Direction BACK Frequency 5.0 giving AWT of 6.0 minutes

Stop CHURCH ROAD PEACHEY LANE

Walk time to stop from POI is 7.19 minutes  
Walk distance to stop from POI is 574.85 metres  
Route U3 Direction OUT Frequency 5.0 giving AWT of 6.0 minutes  
Route U3 Direction BACK Frequency 5.0 giving AWT of 6.0 minutes  
Route U5 Direction OUT Frequency 5.0 giving AWT of 6.0 minutes  
Route U5 Direction BACK Frequency 5.0 giving AWT of 6.0 minutes  
Stop STATION ROAD THE AVENUE  
Walk time to stop from POI is 4.54 minutes  
Walk distance to stop from POI is 362.84 metres  
Route U5 Direction BACK Frequency 5.0 giving AWT of 6.0 minutes  
Route U5 Direction OUT Frequency 5.0 giving AWT of 6.0 minutes  
Stop COWLEY STATION ROAD  
Walk time to stop from POI is 7.15 minutes  
Walk distance to stop from POI is 571.98 metres  
Route U5 Direction BACK Frequency 5.0 giving AWT of 6.0 minutes  
Route U5 Direction OUT Frequency 5.0 giving AWT of 6.0 minutes

TATs for this mode

Route U3 Stop BRUNEL UNIVERSITY, CLEVELAND ROAD TAT 8.33 minutes EDF 3.6  
Route U5 Stop STATION ROAD THE AVENUE TAT 12.54 minutes EDF 2.39

Best EDF is 3.6

Half of all other EDFs is 1.2

AI for this mode is 4.8

---

## Underground Services

Reliability factor for this mode is .75  
Maximum walk time for this mode is 12 minutes  
Maximum walk distance for this mode is 960.0 metres

\*\* No stops found within buffer for this POI

---

## Rail Services

Reliability factor for this mode is .75  
Maximum walk time for this mode is 12 minutes  
Maximum walk distance for this mode is 960.0 metres

\*\* No stops found within buffer for this POI



Total AI for this POI is 4.8. X: 505794, Y: 182613.

PTAL Rating is 1b.

# PTAI Study Report File Details

Date 18/02/2015 11:20

Day of week M-F

Time period AM peak

Walk speed 4.8 kph

Walk file PLSQLTest

POI Name: 506399, 182669

---

## Bus Services

Reliability factor for this mode is 2

Maximum walk time for this mode is 8 minutes

Maximum walk distance for this mode is 640.0 metres

Stop HILLINGDON R TURNPIKE LN

Walk time to stop from POI is 6.62 minutes

Walk distance to stop from POI is 529.64 metres

Route U1 Direction BACK Frequency 4.0 giving AWT of 7.5 minutes  
Route U1 Direction OUT Frequency 4.0 giving AWT of 7.5 minutes  
Route U7 Direction BACK Frequency 2.0 giving AWT of 15.0 minutes  
Route U7 Direction OUT Frequency 2.0 giving AWT of 15.0 minutes  
Route U7 Direction OUT Frequency 2.0 giving AWT of 15.0 minutes  
Route U7 Direction BACK Frequency 2.0 giving AWT of 15.0 minutes  
Route A10 Direction OUT Frequency 4.0 giving AWT of 7.5 minutes  
Route A10 Direction BACK Frequency 4.0 giving AWT of 7.5 minutes  
Route U4 Direction OUT Frequency 7.5 giving AWT of 4.0 minutes  
Route U4 Direction BACK Frequency 7.5 giving AWT of 4.0 minutes  
Route 607 Direction BACK Frequency 6.0 giving AWT of 5.0 minutes  
Route 607 Direction OUT Frequency 6.0 giving AWT of 5.0 minutes  
Route 427 Direction BACK Frequency 7.5 giving AWT of 4.0 minutes  
Route 427 Direction BACK Frequency 7.5 giving AWT of 4.0 minutes  
Route 427 Direction OUT Frequency 7.5 giving AWT of 4.0 minutes  
Route 427 Direction OUT Frequency 7.5 giving AWT of 4.0 minutes

Stop KINGSTON LANE, IVYBRIDGE CLOSE

Walk time to stop from POI is 3.44 minutes

Walk distance to stop from POI is 275.12 metres

Route U1 Direction OUT Frequency 4.0 giving AWT of 7.5 minutes

Route U7 Direction OUT Frequency 2.0 giving AWT of 15.0 minutes  
Route U7 Direction OUT Frequency 2.0 giving AWT of 15.0 minutes  
Route U4 Direction BACK Frequency 7.5 giving AWT of 4.0 minutes  
Stop BRUNEL UNIVERSITY, KINGSTON LANE  
Walk time to stop from POI is 0.25 minutes  
Walk distance to stop from POI is 19.79 metres  
Route U1 Direction BACK Frequency 4.0 giving AWT of 7.5 minutes  
Route U1 Direction OUT Frequency 4.0 giving AWT of 7.5 minutes  
Route U2 Direction OUT Frequency 6.0 giving AWT of 5.0 minutes  
Route U2 Direction BACK Frequency 6.0 giving AWT of 5.0 minutes  
Route U7 Direction BACK Frequency 2.0 giving AWT of 15.0 minutes  
Route U7 Direction BACK Frequency 2.0 giving AWT of 15.0 minutes  
Route U7 Direction OUT Frequency 2.0 giving AWT of 15.0 minutes  
Route U7 Direction OUT Frequency 2.0 giving AWT of 15.0 minutes  
Route U4 Direction BACK Frequency 7.5 giving AWT of 4.0 minutes  
Route U4 Direction OUT Frequency 7.5 giving AWT of 4.0 minutes

Stop HILLINGDON H THE FAIRWAY

Walk time to stop from POI is 7.7 minutes

Walk distance to stop from POI is 616.3 metres

Route A10 Direction OUT Frequency 4.0 giving AWT of 7.5 minutes  
Route A10 Direction BACK Frequency 4.0 giving AWT of 7.5 minutes  
Route 607 Direction OUT Frequency 6.0 giving AWT of 5.0 minutes  
Route 607 Direction BACK Frequency 6.0 giving AWT of 5.0 minutes  
Route 427 Direction BACK Frequency 7.5 giving AWT of 4.0 minutes  
Route 427 Direction OUT Frequency 7.5 giving AWT of 4.0 minutes  
Route 427 Direction OUT Frequency 7.5 giving AWT of 4.0 minutes  
Route 427 Direction BACK Frequency 7.5 giving AWT of 4.0 minutes

Stop PIELD HEATH KINGSTON LN

Walk time to stop from POI is 5.5 minutes

Walk distance to stop from POI is 440.12 metres

Route U1 Direction BACK Frequency 4.0 giving AWT of 7.5 minutes  
Route U1 Direction OUT Frequency 4.0 giving AWT of 7.5 minutes  
Route U2 Direction OUT Frequency 6.0 giving AWT of 5.0 minutes  
Route U2 Direction BACK Frequency 6.0 giving AWT of 5.0 minutes  
Route U7 Direction BACK Frequency 2.0 giving AWT of 15.0 minutes  
Route U7 Direction BACK Frequency 2.0 giving AWT of 15.0 minutes  
Route U7 Direction OUT Frequency 2.0 giving AWT of 15.0 minutes  
Route U7 Direction OUT Frequency 2.0 giving AWT of 15.0 minutes  
Route U4 Direction BACK Frequency 7.5 giving AWT of 4.0 minutes  
Route U4 Direction OUT Frequency 7.5 giving AWT of 4.0 minutes

TATs for this mode

Route U1 Stop BRUNEL UNIVERSITY, KINGSTON LANE TAT 9.75 minutes EDF 3.08  
Route U7 Stop BRUNEL UNIVERSITY, KINGSTON LANE TAT 17.25 minutes EDF 1.74  
Route A10 Stop HILLINGDON R TURNPIKE LN TAT 16.12 minutes EDF 1.86  
Route U4 Stop BRUNEL UNIVERSITY, KINGSTON LANE TAT 6.25 minutes EDF 4.8  
Route 607 Stop HILLINGDON R TURNPIKE LN TAT 13.62 minutes EDF 2.2  
Route 427 Stop HILLINGDON R TURNPIKE LN TAT 12.62 minutes EDF 2.38  
Route U2 Stop BRUNEL UNIVERSITY, KINGSTON LANE TAT 7.25 minutes EDF 4.14

Best EDF is 4.8  
Half of all other EDFs is 7.7

AI for this mode is 12.5

---

## Underground Services

Reliability factor for this mode is .75  
Maximum walk time for this mode is 12 minutes  
Maximum walk distance for this mode is 960.0 metres

\*\* No stops found within buffer for this POI

---

## Rail Services

Reliability factor for this mode is .75  
Maximum walk time for this mode is 12 minutes  
Maximum walk distance for this mode is 960.0 metres

\*\* No stops found within buffer for this POI

Total AI for this POI is 12.5. X: 506399, Y: 182669.

PTAL Rating is 3.

# PTAI Study Report File Details

Date 18/02/2015 11:11

Day of week M-F

Time period AM peak

Walk speed 4.8 kph

Walk file PLSQLTest

POI Name: 505792, 182906

---

## Bus Services

Reliability factor for this mode is 2

Maximum walk time for this mode is 8 minutes

Maximum walk distance for this mode is 640.0 metres

Stop HILLINGDON R TURNPIKE LN

Walk time to stop from POI is 7.77 minutes

Walk distance to stop from POI is 621.93 metres

Route U1 Direction BACK Frequency 4.0 giving AWT of 7.5 minutes  
Route U1 Direction OUT Frequency 4.0 giving AWT of 7.5 minutes  
Route U7 Direction BACK Frequency 2.0 giving AWT of 15.0 minutes  
Route U7 Direction OUT Frequency 2.0 giving AWT of 15.0 minutes  
Route U7 Direction OUT Frequency 2.0 giving AWT of 15.0 minutes  
Route U7 Direction BACK Frequency 2.0 giving AWT of 15.0 minutes  
Route A10 Direction OUT Frequency 4.0 giving AWT of 7.5 minutes  
Route A10 Direction BACK Frequency 4.0 giving AWT of 7.5 minutes  
Route U4 Direction OUT Frequency 7.5 giving AWT of 4.0 minutes  
Route U4 Direction BACK Frequency 7.5 giving AWT of 4.0 minutes  
Route 607 Direction BACK Frequency 6.0 giving AWT of 5.0 minutes  
Route 607 Direction OUT Frequency 6.0 giving AWT of 5.0 minutes  
Route 427 Direction BACK Frequency 7.5 giving AWT of 4.0 minutes  
Route 427 Direction BACK Frequency 7.5 giving AWT of 4.0 minutes  
Route 427 Direction OUT Frequency 7.5 giving AWT of 4.0 minutes  
Route 427 Direction OUT Frequency 7.5 giving AWT of 4.0 minutes

Stop UXBRIDGE HIGH SCHOOL

Walk time to stop from POI is 4.14 minutes

Walk distance to stop from POI is 331.5 metres

Route U3 Direction BACK Frequency 5.0 giving AWT of 6.0 minutes



Route U3 Direction OUT Frequency 5.0 giving AWT of 6.0 minutes  
Stop CLEVELAND ROAD  
Walk time to stop from POI is 0.34 minutes  
Walk distance to stop from POI is 27.02 metres  
Route U3 Direction BACK Frequency 5.0 giving AWT of 6.0 minutes  
Route U3 Direction OUT Frequency 5.0 giving AWT of 6.0 minutes  
Stop BRUNEL UNIVERSITY, CLEVELAND ROAD  
Walk time to stop from POI is 3.34 minutes  
Walk distance to stop from POI is 267.01 metres  
Route U3 Direction BACK Frequency 5.0 giving AWT of 6.0 minutes  
Route U3 Direction OUT Frequency 5.0 giving AWT of 6.0 minutes

TATs for this mode

Route U1 Stop HILLINGDON R TURNPIKE LN TAT 17.27 minutes EDF 1.74  
Route U7 Stop HILLINGDON R TURNPIKE LN TAT 24.77 minutes EDF 1.21  
Route A10 Stop HILLINGDON R TURNPIKE LN TAT 17.27 minutes EDF 1.74  
Route U4 Stop HILLINGDON R TURNPIKE LN TAT 13.77 minutes EDF 2.18  
Route 607 Stop HILLINGDON R TURNPIKE LN TAT 14.77 minutes EDF 2.03  
Route 427 Stop HILLINGDON R TURNPIKE LN TAT 13.77 minutes EDF 2.18  
Route U3 Stop CLEVELAND ROAD TAT 8.34 minutes EDF 3.6

Best EDF is 3.6

Half of all other EDFs is 5.54

AI for this mode is 9.13

---

## Underground Services

Reliability factor for this mode is .75  
Maximum walk time for this mode is 12 minutes  
Maximum walk distance for this mode is 960.0 metres

\*\* No stops found within buffer for this POI

---

## Rail Services

Reliability factor for this mode is .75  
Maximum walk time for this mode is 12 minutes  
Maximum walk distance for this mode is 960.0 metres

\*\* No stops found within buffer for this POI

Total AI for this POI is 9.13. X: 505792, Y: 182906.

PTAL Rating is 2.

# PTAI Study Report File Details

Date 18/02/2015 11:18

Day of week M-F

Time period AM peak

Walk speed 4.8 kph

Walk file PLSQLTest

POI Name: 505714, 182363

---

## Bus Services

Reliability factor for this mode is 2

Maximum walk time for this mode is 8 minutes

Maximum walk distance for this mode is 640.0 metres

Stop COWLEY STATION ROAD

Walk time to stop from POI is 4.46 minutes

Walk distance to stop from POI is 356.57 metres

Route 222 Direction OUT Frequency 8.0 giving AWT of 3.75 minutes

Route 222 Direction BACK Frequency 8.0 giving AWT of 3.75 minutes

Route 222 Direction BACK Frequency 8.0 giving AWT of 3.75 minutes

Route 222 Direction OUT Frequency 8.0 giving AWT of 3.75 minutes

Stop BRUNEL UNIVERSITY, CLEVELAND ROAD

Walk time to stop from POI is 4.35 minutes

Walk distance to stop from POI is 347.9 metres

Route U3 Direction BACK Frequency 5.0 giving AWT of 6.0 minutes

Route U3 Direction OUT Frequency 5.0 giving AWT of 6.0 minutes

Stop CHURCH ROAD HUXLEY CLOSE

Walk time to stop from POI is 2.61 minutes

Walk distance to stop from POI is 209.14 metres

Route U3 Direction OUT Frequency 5.0 giving AWT of 6.0 minutes

Route U3 Direction BACK Frequency 5.0 giving AWT of 6.0 minutes

Route U5 Direction OUT Frequency 5.0 giving AWT of 6.0 minutes

Route U5 Direction BACK Frequency 5.0 giving AWT of 6.0 minutes

Stop CHURCH ROAD PEACHEY LANE

Walk time to stop from POI is 4.88 minutes

Walk distance to stop from POI is 390.26 metres

Route U3 Direction OUT Frequency 5.0 giving AWT of 6.0 minutes

Route U3 Direction BACK Frequency 5.0 giving AWT of 6.0 minutes  
Route U5 Direction OUT Frequency 5.0 giving AWT of 6.0 minutes  
Route U5 Direction BACK Frequency 5.0 giving AWT of 6.0 minutes  
Stop STATION ROAD THE AVENUE  
Walk time to stop from POI is 0.46 minutes  
Walk distance to stop from POI is 36.92 metres  
Route U5 Direction BACK Frequency 5.0 giving AWT of 6.0 minutes  
Route U5 Direction OUT Frequency 5.0 giving AWT of 6.0 minutes  
Stop COWLEY STATION ROAD  
Walk time to stop from POI is 3.08 minutes  
Walk distance to stop from POI is 246.06 metres  
Route U5 Direction BACK Frequency 5.0 giving AWT of 6.0 minutes  
Route U5 Direction OUT Frequency 5.0 giving AWT of 6.0 minutes

TATs for this mode

Route 222 Stop COWLEY STATION ROAD TAT 10.21 minutes EDF 2.94  
Route U3 Stop CHURCH ROAD HUXLEY CLOSE TAT 10.61 minutes EDF 2.83  
Route U5 Stop STATION ROAD THE AVENUE TAT 8.46 minutes EDF 3.55

Best EDF is 3.55

Half of all other EDFs is 2.88

AI for this mode is 6.43

---

## Underground Services

Reliability factor for this mode is .75  
Maximum walk time for this mode is 12 minutes  
Maximum walk distance for this mode is 960.0 metres

\*\* No stops found within buffer for this POI

---

## Rail Services

Reliability factor for this mode is .75  
Maximum walk time for this mode is 12 minutes  
Maximum walk distance for this mode is 960.0 metres

\*\* No stops found within buffer for this POI

Total AI for this POI is 6.43. X: 505714, Y: 182363.

PTAL Rating is 2.



# PTAI Study Report File Details

Date 18/02/2015 11:09

Day of week M-F

Time period AM peak

Walk speed 4.8 kph

Walk file PLSQLTest

POI Name: 505326, 182475

---

## Bus Services

Reliability factor for this mode is 2

Maximum walk time for this mode is 8 minutes

Maximum walk distance for this mode is 640.0 metres

Stop HIGH STREET FERNDALE CR

Walk time to stop from POI is 4.3 minutes

Walk distance to stop from POI is 344.12 metres

Route 222 Direction OUT Frequency 8.0 giving AWT of 3.75 minutes

Route 222 Direction OUT Frequency 8.0 giving AWT of 3.75 minutes

Route 222 Direction BACK Frequency 8.0 giving AWT of 3.75 minutes

Route 222 Direction BACK Frequency 8.0 giving AWT of 3.75 minutes

Route U5 Direction OUT Frequency 5.0 giving AWT of 6.0 minutes

Route U5 Direction BACK Frequency 5.0 giving AWT of 6.0 minutes

Stop COWLEY STATION ROAD

Walk time to stop from POI is 2.51 minutes

Walk distance to stop from POI is 200.89 metres

Route 222 Direction OUT Frequency 8.0 giving AWT of 3.75 minutes

Route 222 Direction BACK Frequency 8.0 giving AWT of 3.75 minutes

Route 222 Direction BACK Frequency 8.0 giving AWT of 3.75 minutes

Route 222 Direction OUT Frequency 8.0 giving AWT of 3.75 minutes

Stop STATION ROAD THE AVENUE

Walk time to stop from POI is 5.54 minutes

Walk distance to stop from POI is 442.96 metres

Route U5 Direction BACK Frequency 5.0 giving AWT of 6.0 minutes

Route U5 Direction OUT Frequency 5.0 giving AWT of 6.0 minutes

Stop COWLEY STATION ROAD

Walk time to stop from POI is 2.93 minutes

Walk distance to stop from POI is 234.61 metres  
Route U5 Direction BACK Frequency 5.0 giving AWT of 6.0 minutes  
Route U5 Direction OUT Frequency 5.0 giving AWT of 6.0 minutes

TATs for this mode

Route 222 Stop COWLEY STATION ROAD TAT 8.26 minutes EDF 3.63  
Route U5 Stop COWLEY STATION ROAD TAT 10.93 minutes EDF 2.74

Best EDF is 3.63  
Half of all other EDFs is 1.37

AI for this mode is 5.0

---

## Underground Services

Reliability factor for this mode is .75  
Maximum walk time for this mode is 12 minutes  
Maximum walk distance for this mode is 960.0 metres

\*\* No stops found within buffer for this POI

---

## Rail Services

Reliability factor for this mode is .75  
Maximum walk time for this mode is 12 minutes  
Maximum walk distance for this mode is 960.0 metres

\*\* No stops found within buffer for this POI

Total AI for this POI is 5.0. X: 505326, Y: 182475.

PTAL Rating is 1b.









---

## Appendix F. Manual PTAL Calculation

## Manual PTAL Calculation

| Mode        | Route            | Stop                   | Distance (m) | Walk speed (Meters/Min) | Walk time (mins) | Frequency (per hour) | Weight | Headway (mins) | SWT (mins) | Reliability factor | AWT (mins) | Total access time (mins) | EDF                         | Accessibility index |      |
|-------------|------------------|------------------------|--------------|-------------------------|------------------|----------------------|--------|----------------|------------|--------------------|------------|--------------------------|-----------------------------|---------------------|------|
| BUS         | 222              | Femdale Crescent (BV)  | 1000         | 80                      | 12.50            | 7                    | 0.5    | 8.57           | 4.29       | 2                  | 6.286      | 18.786                   | 1.60                        | 0.80                |      |
|             | 427              | The Greenway (BE)      | 900          | 80                      | 11.25            | 7                    | 0.5    | 8.57           | 4.29       | 2                  | 6.286      | 17.536                   | 1.71                        | 0.86                |      |
|             | 607              | The Greenway (BE)      | 850          | 80                      | 10.63            | 6                    | 0.5    | 10.00          | 5.00       | 2                  | 7.000      | 17.625                   | 1.70                        | 0.85                |      |
|             | A10              | The Greenway (BE)      | 850          | 80                      | 10.63            | 4                    | 0.5    | 15.00          | 7.50       | 2                  | 9.500      | 20.125                   | 1.49                        | 0.75                |      |
|             | U1               | Brunel University (BJ) | 800          | 80                      | 10.00            | 4                    | 0.5    | 15.00          | 7.50       | 2                  | 9.500      | 19.500                   | 1.54                        | 0.77                |      |
|             | U2               | Brunel University (BH) | 1000         | 80                      | 12.50            | 6                    | 0.5    | 10.00          | 5.00       | 2                  | 7.000      | 19.500                   | 1.54                        | 0.77                |      |
|             | U3               | Brunel University (BA) | 50           | 80                      | 0.63             | 5                    | 0.5    | 12.00          | 6.00       | 2                  | 8.000      | 8.625                    | 3.48                        | 1.74                |      |
|             | U5               | Cleveland Road (BP)    | 350          | 80                      | 4.38             | 5                    | 0.5    | 12.00          | 6.00       | 2                  | 8.000      | 12.375                   | 2.42                        | 1.21                |      |
|             | U7               | Brunel University (BJ) | 800          | 80                      | 10.00            | 2                    | 0.5    | 30.00          | 15.00      | 2                  | 17.000     | 27.000                   | 1.11                        | 0.56                |      |
| UNDERGROUND | Uxbridge Station | Uxbridge Station       | 1800         | 80                      | 22.5             | 11                   | 1      | 5.45           | 2.73       | 0.75               | 3.48       | 25.98                    | 1.15                        | 1.15                |      |
|             |                  |                        |              |                         |                  |                      |        |                |            |                    |            |                          | OVERALL ACCESSIBILITY INDEX |                     | 9.45 |
|             |                  |                        |              |                         |                  |                      |        |                |            |                    |            |                          | PTAL                        |                     | 2    |

PTAL Bands:

| PTAL | Range of Index |       | Map Colour  | Description |
|------|----------------|-------|---|-------------|
| 1a   | 0.01           | 2.50  |    | Very Poor   |
| 1b   | 2.51           | 5.00  |    | Very Poor   |
| 2    | 5.01           | 10.00 |   | Poor        |
| 3    | 10.01          | 15.00 |  | Moderate    |
| 4    | 15.01          | 20.00 |  | Good        |
| 5    | 20.01          | 25.00 |  | Very Good   |
| 6a   | 25.01 - 40.00  | 40.00 |  | Excellent   |
| 6b   | 40.01          | +     |  | Excellent   |

## Manual PTAL Calculation

| Mode        | Route            | Stop                   | Distance (m) | alk speed (Meters/Mi) | Walk time (mins) | Frequency (per hour) | Weight | Headway (mins) | SWT (mins) | Reliability factor | AWT (mins) | Total access time (mins) | EDF  | Accessibility index |
|-------------|------------------|------------------------|--------------|-----------------------|------------------|----------------------|--------|----------------|------------|--------------------|------------|--------------------------|------|---------------------|
| BUS         | 222              | Ferndale Crescent (BT) | 900          | 80                    | 11.25            | 7                    | 0.5    | 8.57           | 4.29       | 2                  | 6.286      | 17.536                   | 1.71 | 0.86                |
|             | 427              | The Greenway (BE)      | 600          | 80                    | 7.50             | 7                    | 0.5    | 8.57           | 4.29       | 2                  | 6.286      | 13.786                   | 2.18 | 1.09                |
|             | 607              | The Greenway (BE)      | 650          | 80                    | 8.13             | 6                    | 0.5    | 10.00          | 5.00       | 2                  | 7.000      | 15.125                   | 1.98 | 0.99                |
|             | A10              | The Greenway (BE)      | 650          | 80                    | 8.13             | 4                    | 0.5    | 15.00          | 7.50       | 2                  | 9.500      | 17.625                   | 1.70 | 0.85                |
|             | U1               | Brunel University (BJ) | 1000         | 80                    | 12.50            | 4                    | 0.5    | 15.00          | 7.50       | 2                  | 9.500      | 22.000                   | 1.36 | 0.68                |
|             | U2               | Brunel University (BH) | 800          | 80                    | 10.00            | 6                    | 0.5    | 10.00          | 5.00       | 2                  | 7.000      | 17.000                   | 1.76 | 0.88                |
|             | U3               | Brunel University (BA) | 300          | 80                    | 3.75             | 5                    | 0.5    | 12.00          | 6.00       | 2                  | 8.000      | 11.750                   | 2.55 | 1.28                |
|             | U5               | Cleveland Road (BP)    | 650          | 80                    | 8.13             | 5                    | 0.5    | 12.00          | 6.00       | 2                  | 8.000      | 16.125                   | 1.86 | 0.93                |
|             | U7               | The Greenway (BE)      | 650          | 80                    | 8.13             | 2                    | 0.5    | 30.00          | 15.00      | 2                  | 17.000     | 25.125                   | 1.19 | 0.60                |
| UNDERGROUND | Uxbridge Station | Uxbridge Station       | 1400         | 80                    | 17.5             | 11                   | 1      | 5.45           | 2.73       | 0.75               | 3.48       | 20.98                    | 1.43 | 1.43                |

|                             |      |
|-----------------------------|------|
| OVERALL ACCESSIBILITY INDEX | 9.58 |
|-----------------------------|------|

|      |   |
|------|---|
| PTAL | 2 |
|------|---|

PTAL Bands:

| PTAL | Range of Index |       | Map Colour | Description |
|------|----------------|-------|------------|-------------|
| 1a   | 0.01           | 2.50  | Dark Blue  | Very Poor   |
| 1b   | 2.51           | 5.00  | Blue       | Very Poor   |
| 2    | 5.01           | 10.00 | Cyan       | Poor        |
| 3    | 10.01          | 15.00 | Green      | Moderate    |
| 4    | 15.01          | 20.00 | Yellow     | Good        |
| 5    | 20.01          | 25.00 | Orange     | Very Good   |
| 6a   | 25.01 - 40.00  | 40.00 | Red        | Excellent   |
| 6b   | 40.01          | +     | Dark Red   | Excellent   |



## Manual PTAL Calculation

| Mode        | Route            | Stop                   | Distance (m) | alk speed (Meters/Mi) | Walk time (mins) | Frequency (per hour) | Weight | Headway (mins) | SWT (mins) | Reliability factor | AWT (mins) | Total access time (mins) | EDF  | Accessibility index |
|-------------|------------------|------------------------|--------------|-----------------------|------------------|----------------------|--------|----------------|------------|--------------------|------------|--------------------------|------|---------------------|
| BUS         | 222              | Peel Way (HE)          | 750          | 80                    | 9.38             | 7                    | 0.5    | 8.57           | 4.29       | 2                  | 6.286      | 15.661                   | 1.92 | 0.96                |
|             | 427              | Brunel University (BJ) | 100          | 80                    | 1.25             | 7                    | 0.5    | 8.57           | 4.29       | 2                  | 6.286      | 7.536                    | 3.98 | 1.99                |
|             | 607              | The Greenway (BE)      | 450          | 80                    | 5.63             | 6                    | 0.5    | 10.00          | 5.00       | 2                  | 7.000      | 12.625                   | 2.38 | 1.19                |
|             | A10              | The Greenway (BE)      | 450          | 80                    | 5.63             | 4                    | 0.5    | 15.00          | 7.50       | 2                  | 9.500      | 15.125                   | 1.98 | 0.99                |
|             | U1               | Brunel University (BJ) | 120          | 80                    | 1.50             | 4                    | 0.5    | 15.00          | 7.50       | 2                  | 9.500      | 11.000                   | 2.73 | 1.36                |
|             | U2               | Brunel University (BH) | 50           | 80                    | 0.63             | 6                    | 0.5    | 10.00          | 5.00       | 2                  | 7.000      | 7.625                    | 3.93 | 1.97                |
|             | U3               | Brunel University (BA) | 700          | 80                    | 8.75             | 5                    | 0.5    | 12.00          | 6.00       | 2                  | 8.000      | 16.750                   | 1.79 | 0.90                |
|             | U5               | Cleveland Road (BP)    | 1000         | 80                    | 12.50            | 5                    | 0.5    | 12.00          | 6.00       | 2                  | 8.000      | 20.500                   | 1.46 | 0.73                |
|             | U7               | Brunel University (BJ) | 100          | 80                    | 1.25             | 2                    | 0.5    | 30.00          | 15.00      | 2                  | 17.000     | 18.250                   | 1.64 | 0.82                |
| UNDERGROUND | Uxbridge Station | Uxbridge Station       | 2000         | 80                    | 25               | 11                   | 1      | 5.45           | 2.73       | 0.75               | 3.48       | 28.48                    | 1.05 | 1.05                |

|                             |       |
|-----------------------------|-------|
| OVERALL ACCESSIBILITY INDEX | 11.96 |
|-----------------------------|-------|

|      |   |
|------|---|
| PTAL | 3 |
|------|---|

PTAL Bands:

| PTAL | Range of Index |       | Map Colour   | Description |
|------|----------------|-------|--------------|-------------|
| 1a   | 0.01           | 2.50  | Dark Blue    | Very Poor   |
| 1b   | 2.51           | 5.00  | Blue         | Very Poor   |
| 2    | 5.01           | 10.00 | Cyan         | Poor        |
| 3    | 10.01          | 15.00 | Green        | Moderate    |
| 4    | 15.01          | 20.00 | Yellow-Green | Good        |
| 5    | 20.01          | 25.00 | Yellow       | Very Good   |
| 6a   | 25.01 - 40.00  | 40.00 | Orange       | Excellent   |
| 6b   | 40.01          | +     | Red          | Excellent   |

## Manual PTAL Calculation

| Mode                               | Route       | Stop                               | Distance (m)     | Walk speed (Meters/Min) | Walk time (mins) | Frequency (per hour) | Weight | Headway (mins) | SWT (mins) | Reliability factor | AWT (mins) | Total access time (mins) | EDF         | Accessibility index |
|------------------------------------|-------------|------------------------------------|------------------|-------------------------|------------------|----------------------|--------|----------------|------------|--------------------|------------|--------------------------|-------------|---------------------|
| BUS                                | 222         | Station Road (BR)                  | 190              | 80                      | 2.38             | 7                    | 0.5    | 8.57           | 4.29       | 2                  | 6.286      | 8.661                    | 3.46        | 1.73                |
|                                    | 427         | Brunel University Sports Park (HC) | 1100             | 80                      | 13.75            | 7                    | 0.5    | 8.57           | 4.29       | 2                  | 6.286      | 20.036                   | 1.50        | 0.75                |
|                                    | 607         | The Greenway (BE)                  | 500              | 80                      | 6.25             | 6                    | 0.5    | 10.00          | 5.00       | 2                  | 7.000      | 13.250                   | 2.26        | 1.13                |
|                                    | A10         | The Greenway (BE)                  | 500              | 80                      | 6.25             | 4                    | 0.5    | 15.00          | 7.50       | 2                  | 9.500      | 15.750                   | 1.90        | 0.95                |
|                                    | U1          | Brunel University (BH)             | 1200             | 80                      | 15.00            | 4                    | 0.5    | 15.00          | 7.50       | 2                  | 9.500      | 24.500                   | 1.22        | 0.61                |
|                                    | U2          | Brunel University (BH)             | 1200             | 80                      | 15.00            | 6                    | 0.5    | 10.00          | 5.00       | 2                  | 7.000      | 22.000                   | 1.36        | 0.68                |
|                                    | U3          | Huxley Close                       | 650              | 80                      | 8.13             | 5                    | 0.5    | 12.00          | 6.00       | 2                  | 8.000      | 16.125                   | 1.86        | 0.93                |
|                                    | U5          | Station Road (BR)                  | 190              | 80                      | 15.00            | 5                    | 0.5    | 12.00          | 6.00       | 2                  | 8.000      | 23.000                   | 1.30        | 0.65                |
|                                    | U7          | Brunel University (BH)             | 1200             | 80                      | 15.00            | 2                    | 0.5    | 30.00          | 15.00      | 2                  | 17.000     | 32.000                   | 0.94        | 0.47                |
|                                    | UNDERGROUND | Uxbridge Station                   | Uxbridge Station | 1800                    | 80               | 22.5                 | 11     | 1              | 5.45       | 2.73               | 0.75       | 3.48                     | 25.98       | 1.15                |
| <b>OVERALL ACCESSIBILITY INDEX</b> |             |                                    |                  |                         |                  |                      |        |                |            |                    |            |                          | <b>9.07</b> |                     |
| <b>PTAL</b>                        |             |                                    |                  |                         |                  |                      |        |                |            |                    |            |                          | <b>2</b>    |                     |

PTAL Bands:

| PTAL | Range of Index |       | Map Colour | Description |
|------|----------------|-------|------------|-------------|
| 1a   | 0.01           | 2.50  |            | Very Poor   |
| 1b   | 2.51           | 5.00  |            | Very Poor   |
| 2    | 5.01           | 10.00 |            | Poor        |
| 3    | 10.01          | 15.00 |            | Moderate    |
| 4    | 15.01          | 20.00 |            | Good        |
| 5    | 20.01          | 25.00 |            | Very Good   |
| 6a   | 25.01 - 40.00  | 40.00 |            | Excellent   |
| 6b   | 40.01          | +     |            | Excellent   |

## Manual PTAL Calculation

| Mode                               | Route       | Stop                               | Distance (m)     | Walk speed (Meters/Min) | Walk time (mins) | Frequency (per hour) | Weight | Headway (mins) | SWT (mins) | Reliability factor | AWT (mins) | Total access time (mins) | EDF   | Accessibility index |
|------------------------------------|-------------|------------------------------------|------------------|-------------------------|------------------|----------------------|--------|----------------|------------|--------------------|------------|--------------------------|-------|---------------------|
| BUS                                | 222         | Station Road (BS)                  | 300              | 80                      | 3.75             | 7                    | 0.5    | 8.57           | 4.29       | 2                  | 6.286      | 10.036                   | 2.99  | 1.49                |
|                                    | 427         | Brunel University Sports Park (HC) | 700              | 80                      | 8.75             | 7                    | 0.5    | 8.57           | 4.29       | 2                  | 6.286      | 15.036                   | 2.00  | 1.00                |
|                                    | 607         | The Greenway (BE)                  | 1200             | 80                      | 15.00            | 6                    | 0.5    | 10.00          | 5.00       | 2                  | 7.000      | 22.000                   | 1.36  | 0.68                |
|                                    | A10         | The Greenway (BE)                  | 1200             | 80                      | 15.00            | 4                    | 0.5    | 15.00          | 7.50       | 2                  | 9.500      | 24.500                   | 1.22  | 0.61                |
|                                    | U1          | Brunel University (BH)             | 800              | 80                      | 10.00            | 4                    | 0.5    | 15.00          | 7.50       | 2                  | 9.500      | 19.500                   | 1.54  | 0.77                |
|                                    | U2          | Brunel University (BH)             | 800              | 80                      | 10.00            | 6                    | 0.5    | 10.00          | 5.00       | 2                  | 7.000      | 17.000                   | 1.76  | 0.88                |
|                                    | U3          | Huxley Close                       | 200              | 80                      | 2.50             | 5                    | 0.5    | 12.00          | 6.00       | 2                  | 8.000      | 10.500                   | 2.86  | 1.43                |
|                                    | U5          | Cleveland Road (BP)                | 50               | 80                      | 0.63             | 5                    | 0.5    | 12.00          | 6.00       | 2                  | 8.000      | 8.625                    | 3.48  | 1.74                |
|                                    | U7          | Brunel University (BH)             | 800              | 80                      | 10.00            | 2                    | 0.5    | 30.00          | 15.00      | 2                  | 17.000     | 27.000                   | 1.11  | 0.56                |
|                                    | UNDERGROUND | Uxbridge Station                   | Uxbridge Station | 2100                    | 80               | 26.25                | 11     | 1              | 5.45       | 2.73               | 0.75       | 3.48                     | 29.73 | 1.01                |
| <b>OVERALL ACCESSIBILITY INDEX</b> |             |                                    |                  |                         |                  |                      |        |                |            |                    |            |                          | 10.17 |                     |
| <b>PTAL</b>                        |             |                                    |                  |                         |                  |                      |        |                |            |                    |            |                          | 3     |                     |

PTAL Bands:

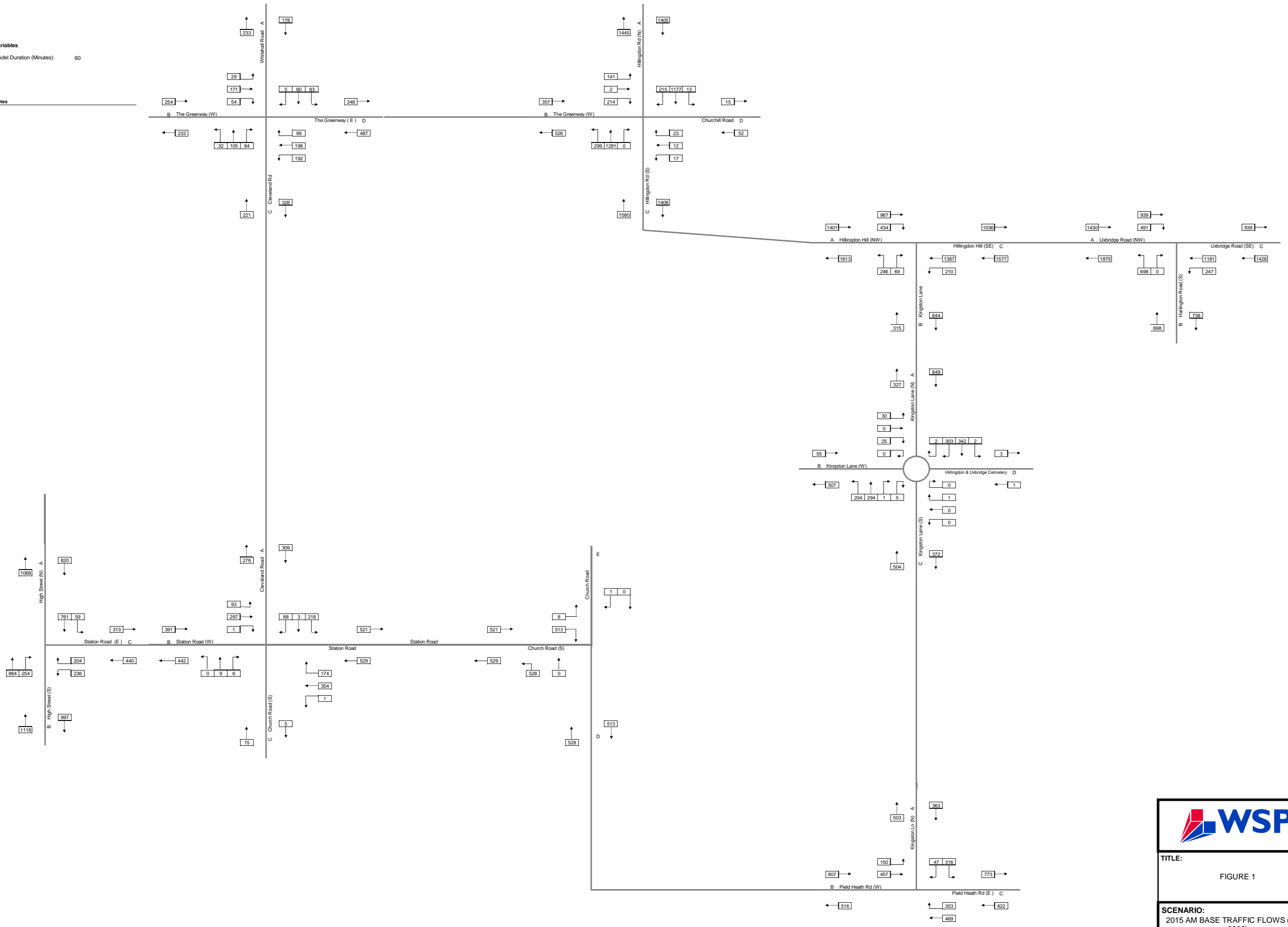

| PTAL | Range of Index |       | Map Colour | Description |
|------|----------------|-------|------------|-------------|
| 1a   | 0.01           | 2.50  | Very Poor  | Very Poor   |
| 1b   | 2.51           | 5.00  | Very Poor  | Very Poor   |
| 2    | 5.01           | 10.00 | Poor       | Poor        |
| 3    | 10.01          | 15.00 | Moderate   | Moderate    |
| 4    | 15.01          | 20.00 | Good       | Good        |
| 5    | 20.01          | 25.00 | Very Good  | Very Good   |
| 6a   | 25.01 - 40.00  | 40.00 | Excellent  | Excellent   |
| 6b   | 40.01          | +     | Excellent  | Excellent   |

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## Appendix G. Traffic Flow Diagrams

**Variables**  
 Model Duration (Minutes): 60

**Notes**

**TITLE:**  
 FIGURE 1

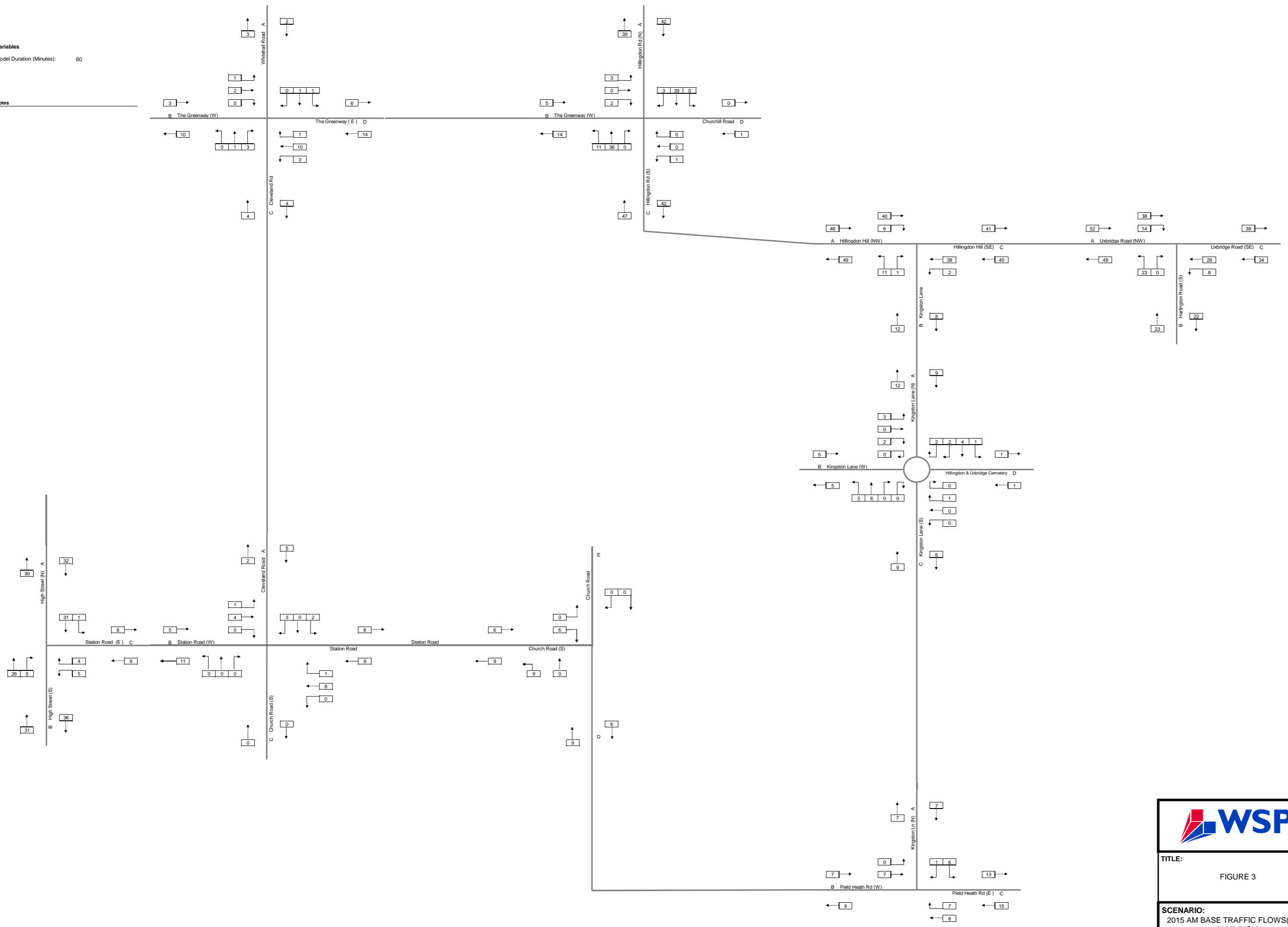

**SCENARIO:**  
 2015 AM BASE TRAFFIC FLOWS (0800-0900)





**Variables**  
 Model Duration (Minutes): 60

**Notes**


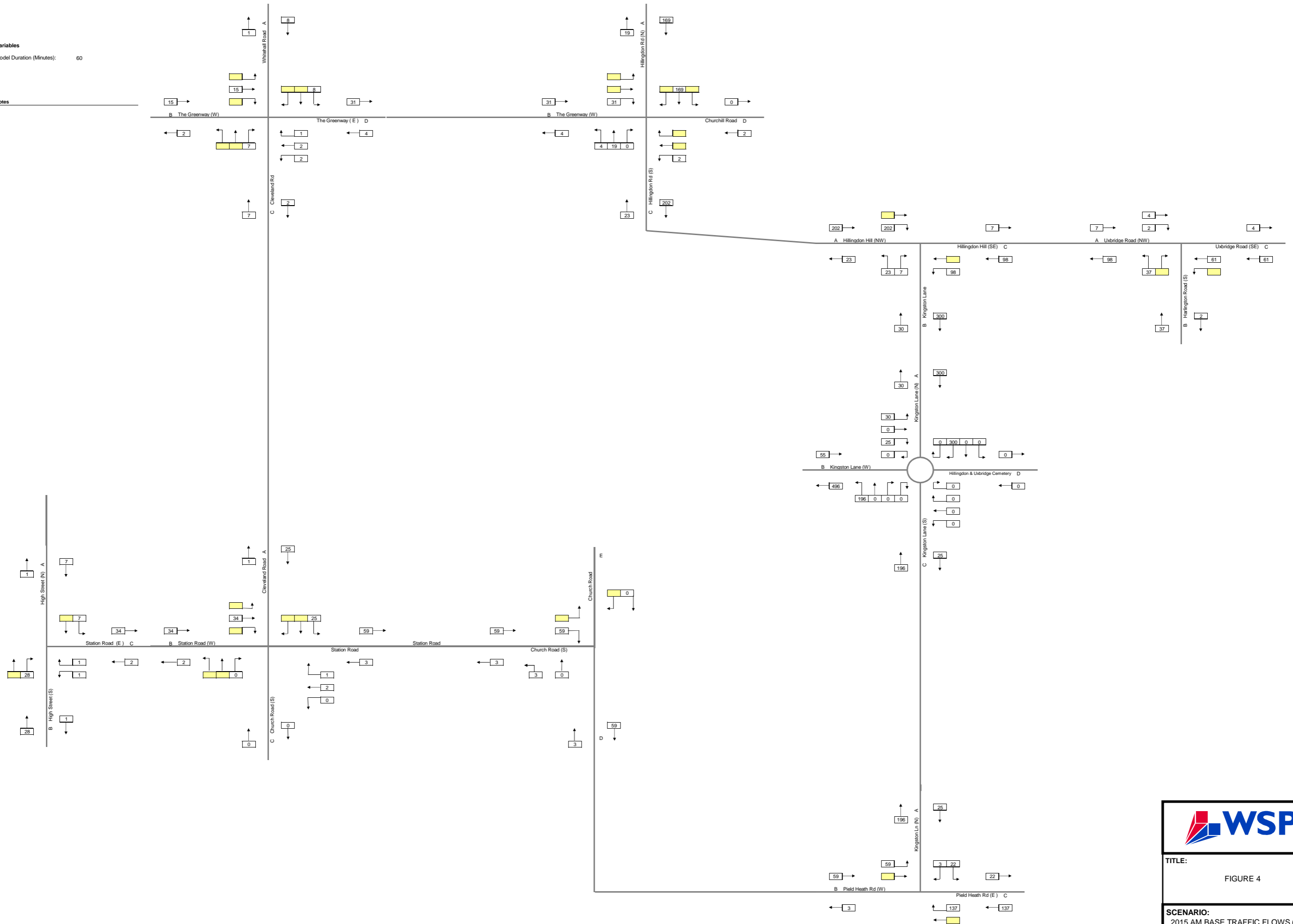



**TITLE:**  
 FIGURE 3

**SCENARIO:**  
 2015 AM BASE TRAFFIC FLOWS(0800-0900) (HGV)

Variables  
Model Duration (Minutes): 60

Notes

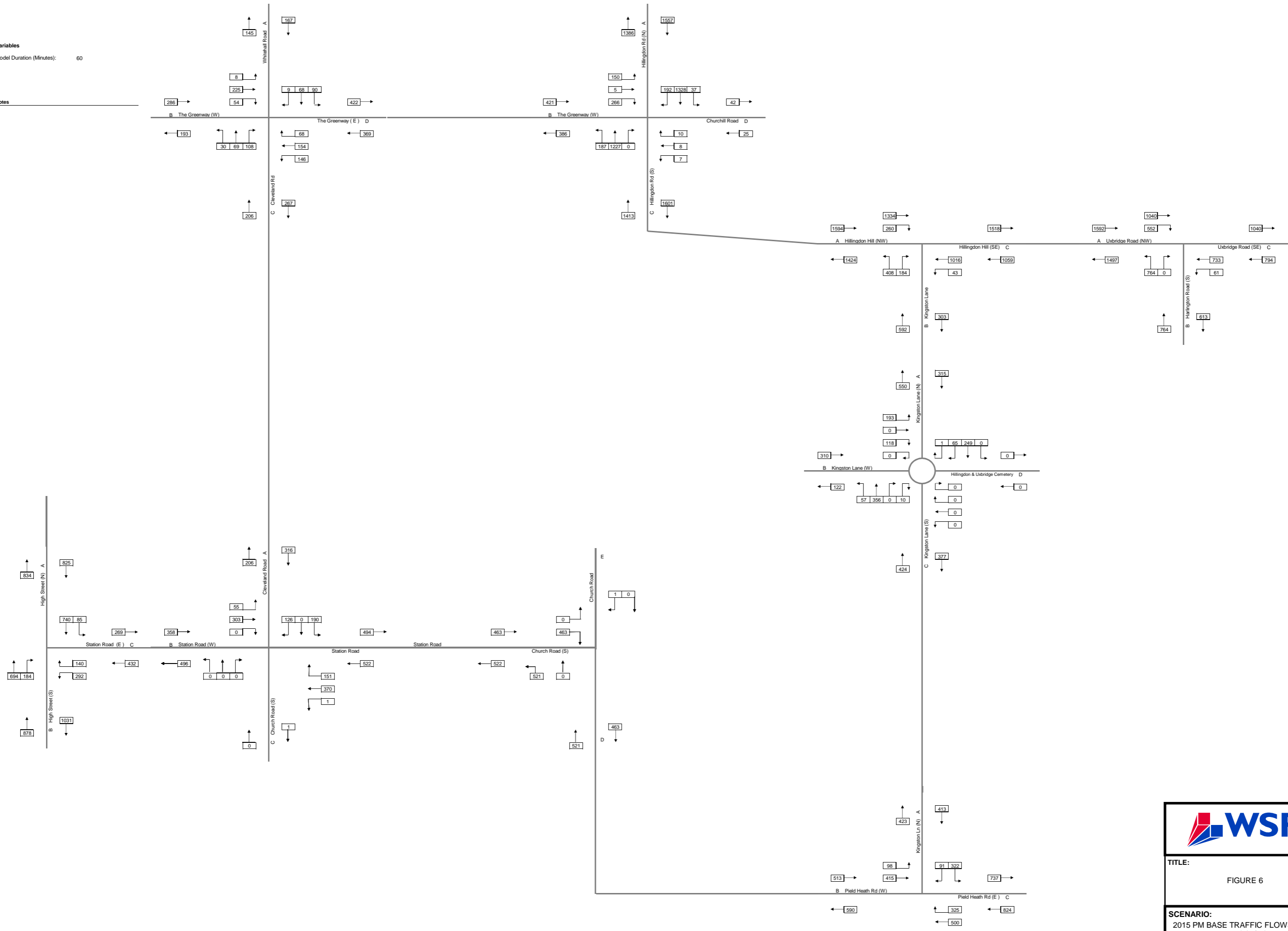



TITLE:  
FIGURE 4

SCENARIO:  
2015 AM BASE TRAFFIC FLOWS (0800-0900) - UNIVERSITY TRAFFIC

**Variables**  
 Model Duration (Minutes): 60

**Notes**


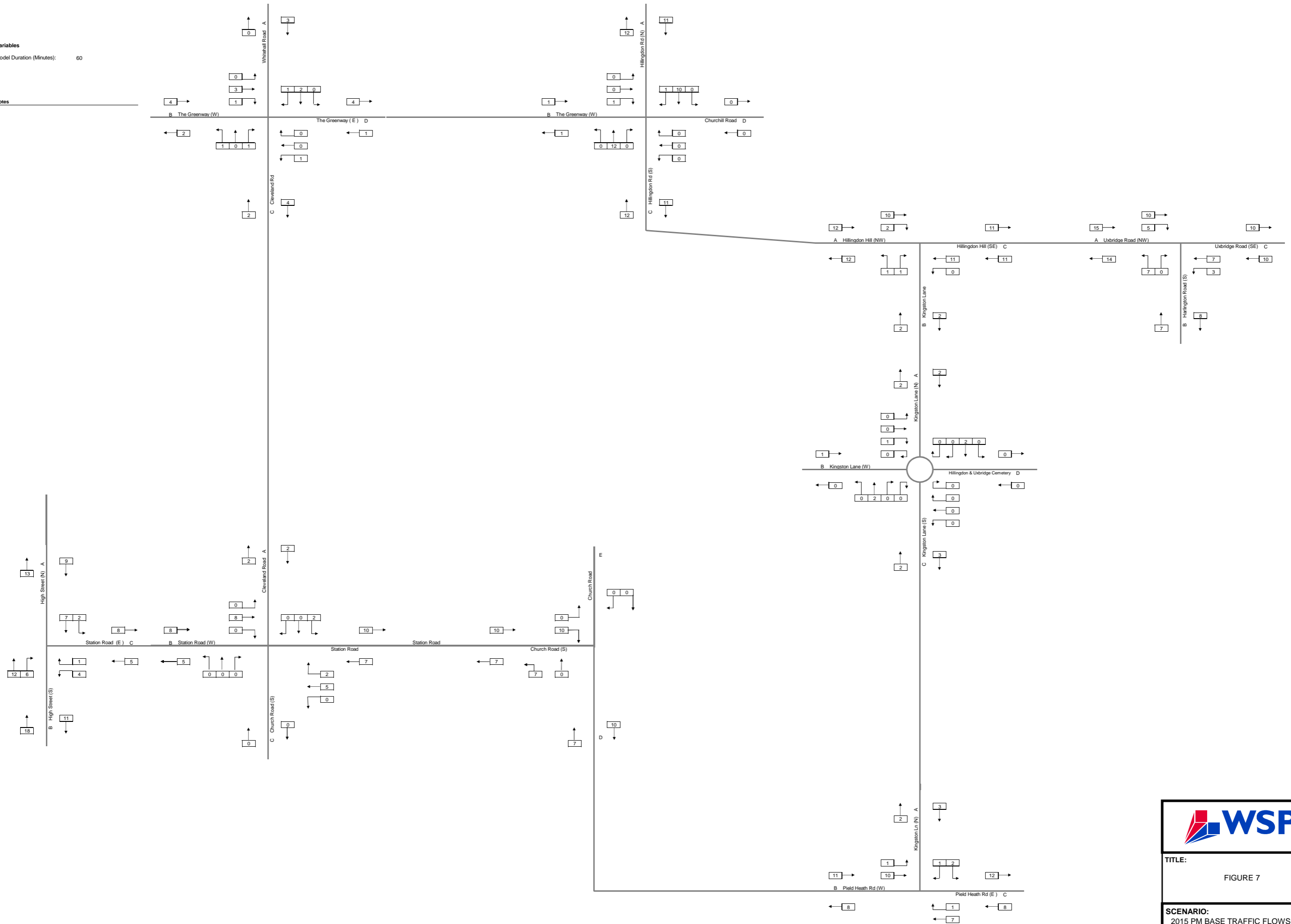



**TITLE:**  
 FIGURE 6

**SCENARIO:**  
 2015 PM BASE TRAFFIC FLOWS (1700-1800) (PCU)

Variables  
Model Duration (Minutes): 60

Notes



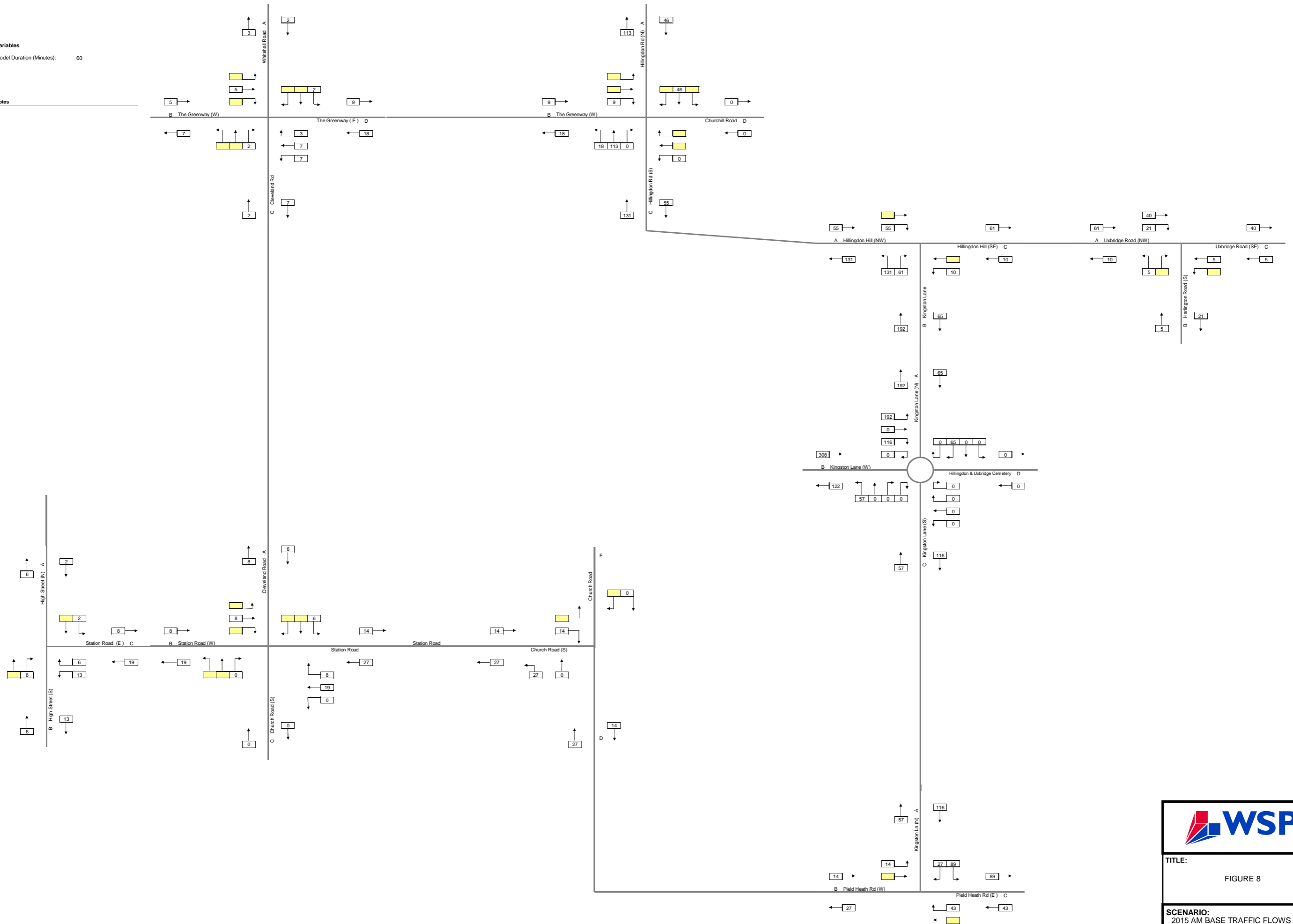

TITLE:  
FIGURE 7

SCENARIO:  
2015 PM BASE TRAFFIC FLOWS(1700-1800) (HGV)



**Variables**  
 Model Duration (Minutes): 60

**Notes**

**TITLE:**  
 FIGURE 8

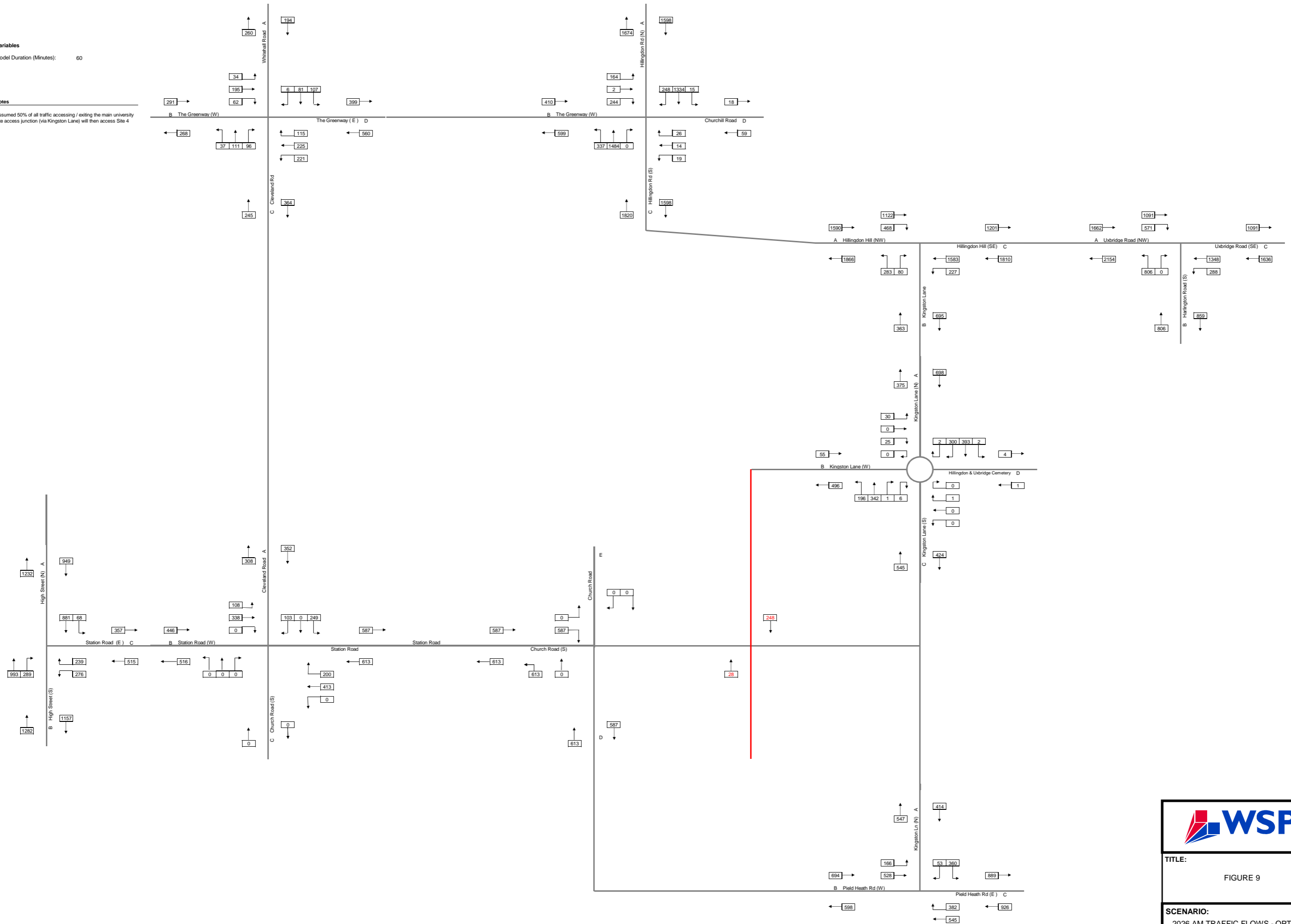

**SCENARIO:**  
 2015 AM BASE TRAFFIC FLOWS (1700-1800) - UNIVERSITY TRAFFIC

**Variables**

Model Duration (Minutes): 60

**Notes**

Assumed 50% of all traffic accessing / exiting the main university site access junction (via Kingston Lane) will then access Site 4

**TITLE:**  
FIGURE 9

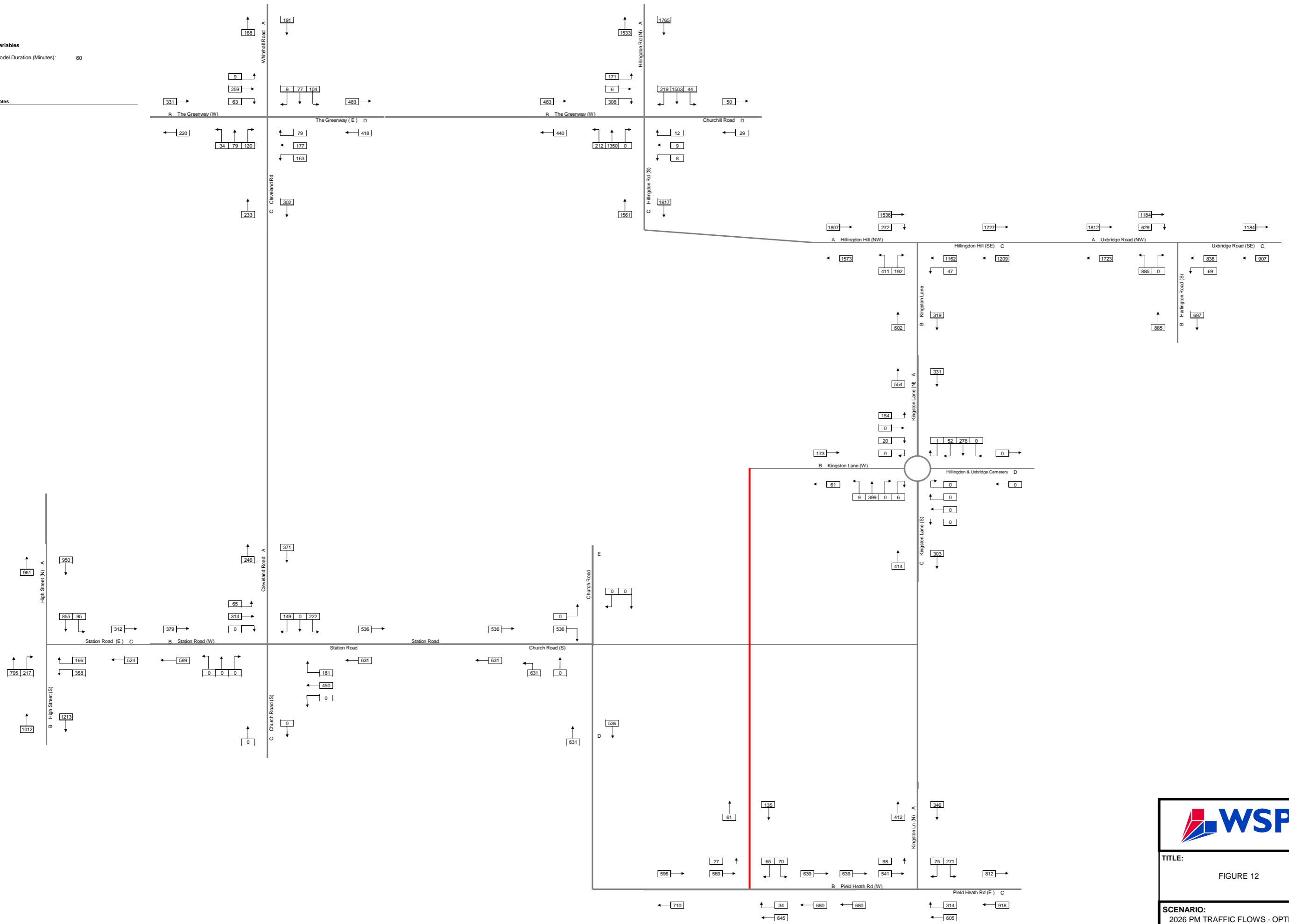

**SCENARIO:**  
2026 AM TRAFFIC FLOWS - OPTION 1





**Variables**  
 Model Duration (Minutes): 60

**Notes**


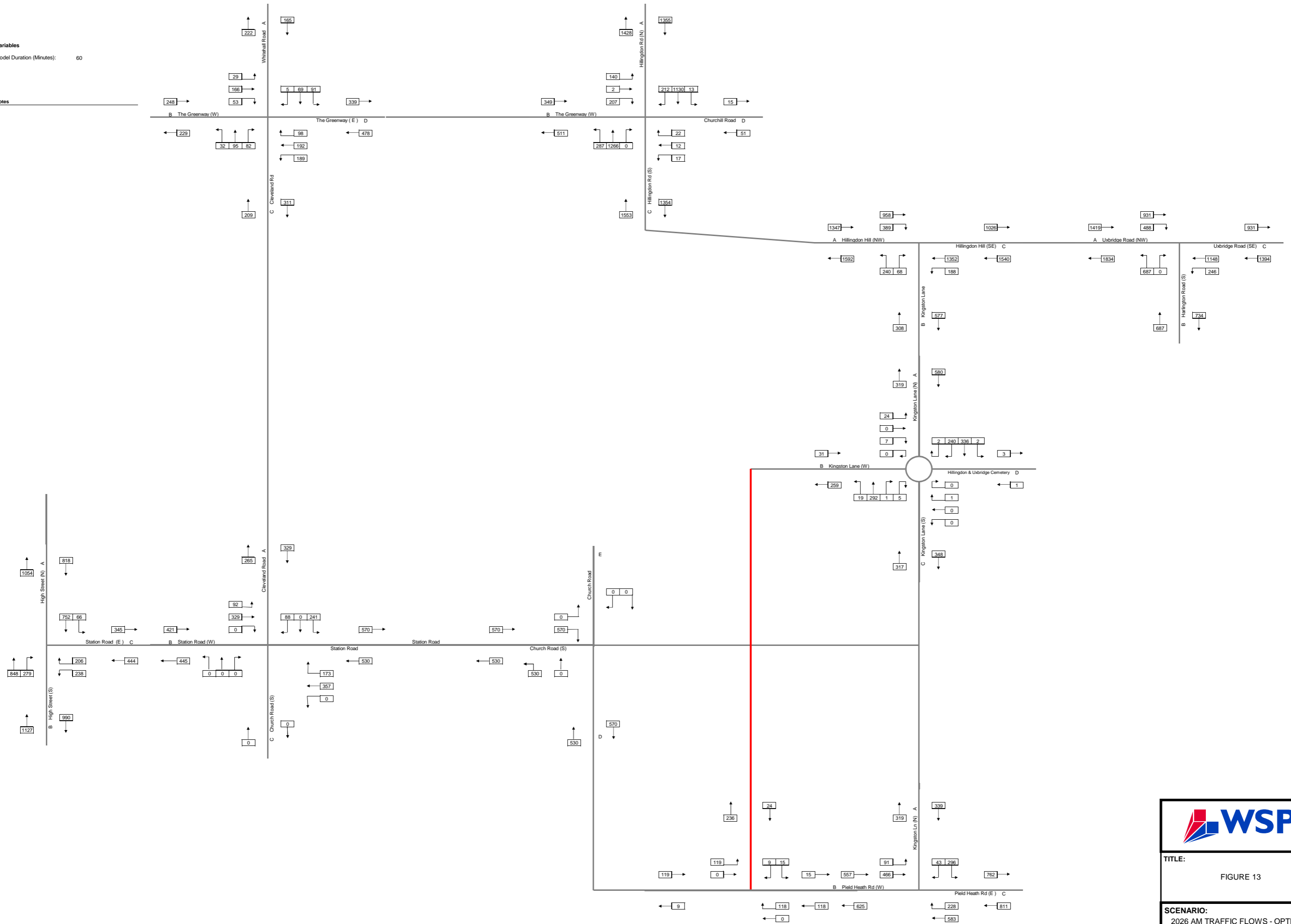
**TITLE:**  
 FIGURE 12

**SCENARIO:**  
 2026 PM TRAFFIC FLOWS - OPTION 2  
 (GROWTHED BASELINE)



Variables  
Model Duration (Minutes): 60

Notes

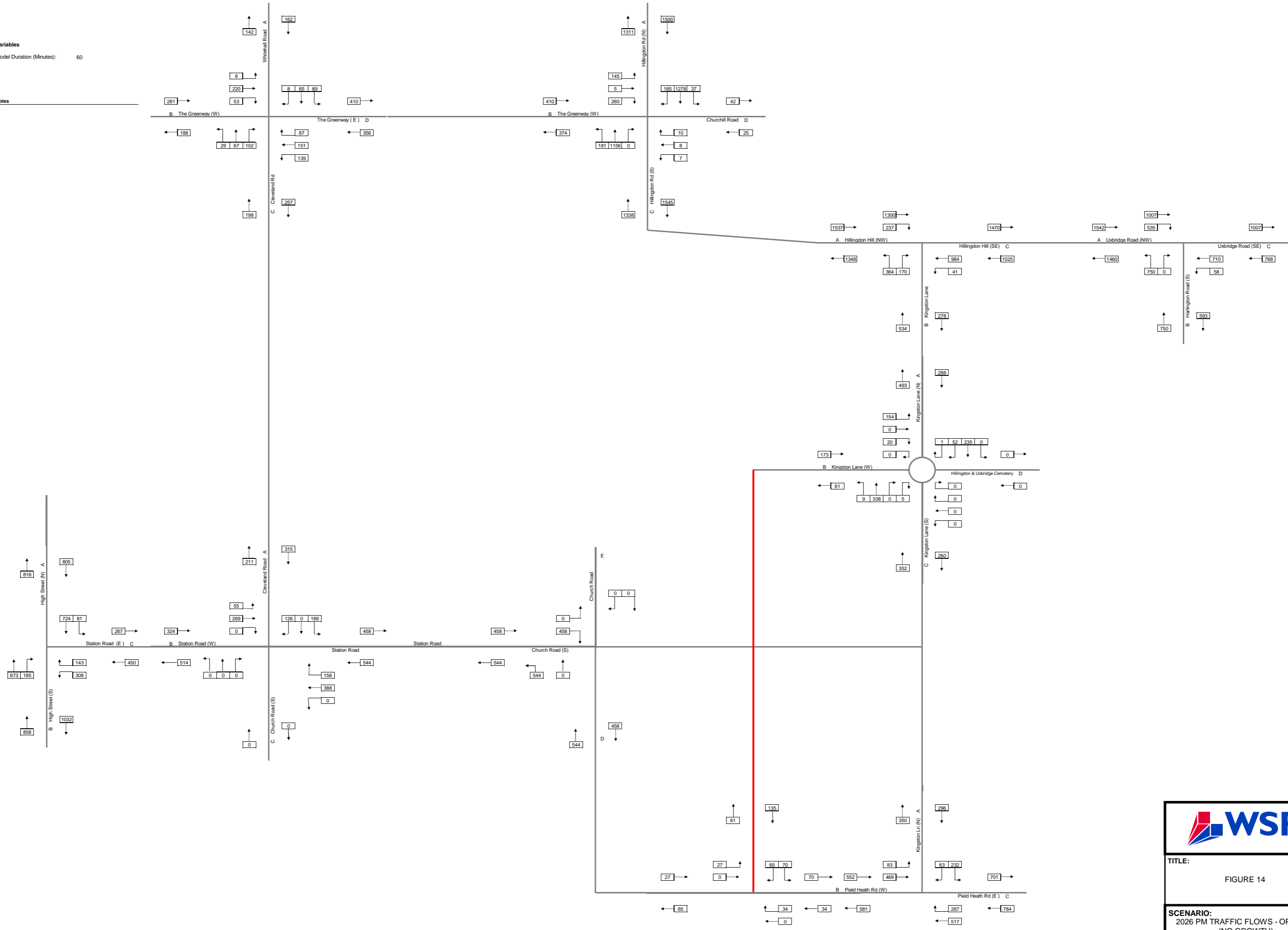



TITLE:  
FIGURE 13

SCENARIO:  
2026 AM TRAFFIC FLOWS - OPTION 2  
(NO GROWTH)

**Variables**  
 Model Duration (Minutes): 60

**Notes**

**TITLE:**  
 FIGURE 14

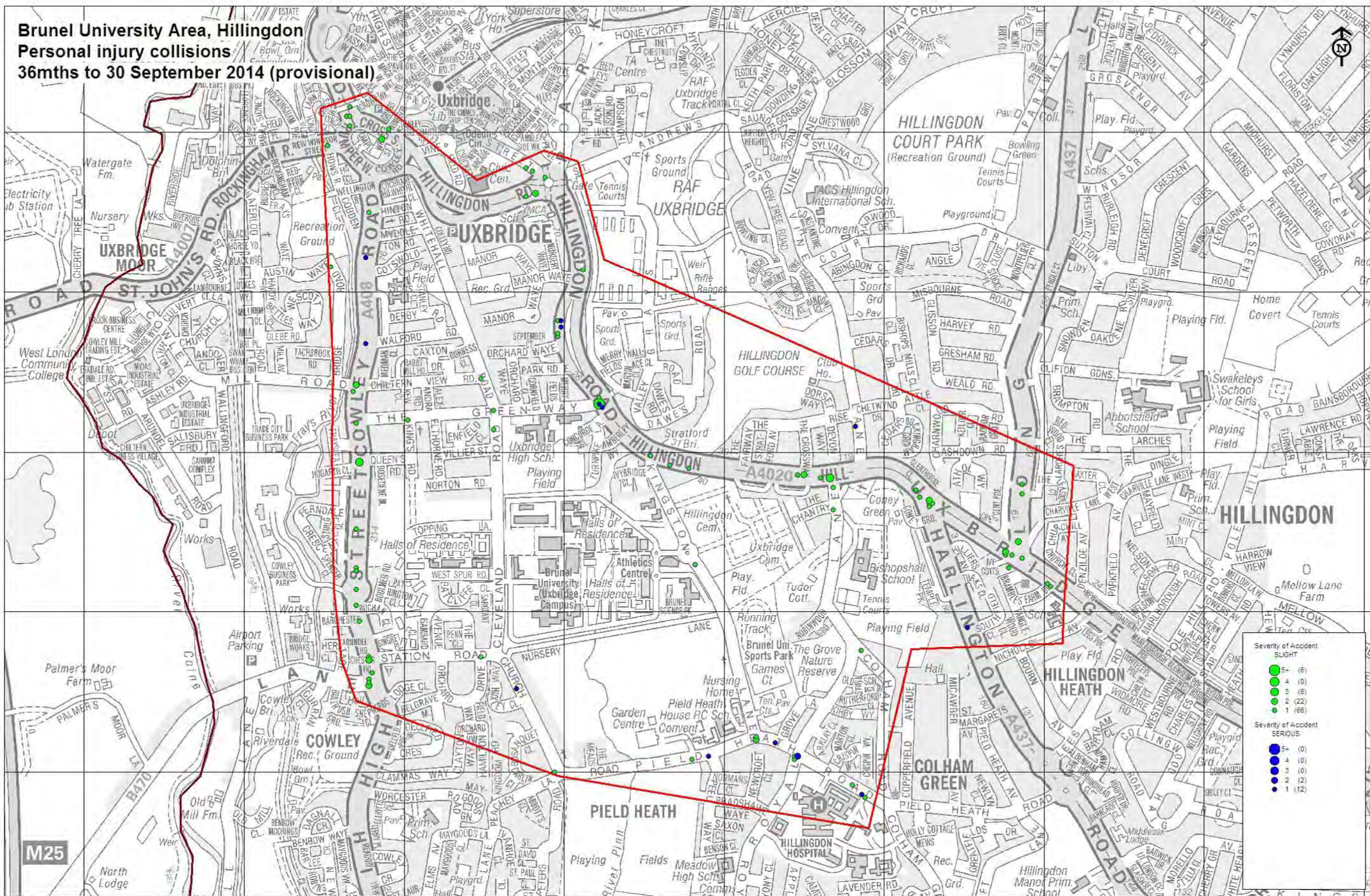
**SCENARIO:**  
 2026 PM TRAFFIC FLOWS - OPTION 2  
 (NO GROWTH)

---

## Appendix H. Personal Injury Accident Data



**Brunel University Area, Hillingdon**  
**Personal injury collisions**  
**36mths to 30 September 2014 (provisional)**



| Severity of Accident SLIGHT  |        |
|------------------------------|--------|
| ● (6)                        | 5- (6) |
| ● (6)                        | 4 (0)  |
| ● (6)                        | 3 (6)  |
| ● (6)                        | 2 (22) |
| ● (6)                        | 1 (88) |
| Severity of Accident SERIOUS |        |
| ● (12)                       | 5- (0) |
| ● (12)                       | 4 (0)  |
| ● (12)                       | 3 (0)  |
| ● (12)                       | 2 (2)  |
| ● (12)                       | 1 (12) |





**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

---

**Summary of Accidents Selected**

| Site Reference and Description (zero accident counts shown in bold) | Date Period        | Accidents |
|---|--------------------|-----------|
| SC01 GIS AREA B26 Brunel University Area (P)                        | 36 MTS TO SEP-2014 | 114       |

*The description of how the accident occurred and the contributory factors are the reporting officer's opinion at the time of reporting and may not be the result of extensive investigation*





**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

1 0111XH30749 THU 01/12/11 19:55 DARK HILLINGDON HILL J/W ROYAL LANE 26 NODE 89 506830 / 182920

POLICE - OVER COU ROAD-WET RAINING DUAL CWY T/STAG JUN GIVE WAY/UNCONT PELICAN OR SIMILAR

V2 PULLED OUT INTO THE SIDE OF V1 (CYCLIST)

CASUALTY 001 (001) (20 Yrs - M UB10) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) PEDAL CYCLE (20 Yrs - M UB10) GOING AHEAD OTHER E TO W JCT MID  
BT - NOT APPLICABLE N/S HIT FIRST

VEHICLE 002 (001) CAR (? Yrs - M UNKN) TURNING LEFT S TO W JCT MID  
BT - DRV NOT CONTACTED FRONT HIT FIRST

V002 A 405 (FAILED TO LOOK PROPERLY)

V002 A 302 (DISOBEYED GIVE WAY OR STOP SIGN OR MARKINGS)

2 0113XH30483 TUE 01/10/13 06:44 DARK UXBRIDGE ROAD J/W ROYAL LANE 26 NODE 89 506830 / 182920

POLICE - AT SCENE ROAD-DRY WEATHER-FINE DUAL CWY T/STAG JUN GIVE WAY/UNCONT PELICAN OR SIMILAR

V1 MOVING OFF FROM JUNCTION COLLIDED WITH V2

CASUALTY 001 (002) (41 Yrs - M UB8) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) CAR (23 Yrs - M SL0) MOVING OFF S TO N JCT MID  
BT - NOT REQUESTED O/S HIT FIRST

VEHICLE 002 (001) PEDAL CYCLE (41 Yrs - M UB8) GOING AHEAD OTHER E TO W JCT MID  
BT - NOT APPLICABLE FRONT HIT FIRST

V001 A 701 (VISION AFFECTED - STATIONARY OR PARKED VEHICLE(S))

V001 A 705 (VISION AFFECTED - DAZZLING HEADLIGHTS)


**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

|  |   |
|--|---|
| SC01 GIS AREA B26 Brunel University Area (P) | 36 MTS TO SEP-2014 SORTED NETWORK ORDER |
|--|---|

|   |             |                    |      |                              |    |         |                 |
|---|-------------|--------------------|------|------------------------------|----|---------|-----------------|
| 3 | 0113XH30541 | MON 11/11/13 20:24 | DARK | UXBRIDGE ROAD J/W ROYAL LANE | 26 | NODE 89 | 506830 / 182920 |
|---|-------------|--------------------|------|------------------------------|----|---------|-----------------|

POLICE - AT SCENE ROAD-WET RAINING DUAL CWY T/STAG JUN GIVE WAY/UNCONT PELICAN OR SIMILAR

V2 TURNED LEFT COLLIDING WITH V1

CASUALTY 001 (001) (41 Yrs - M UB8) SLIGHT DRIVER/RIDER

|         |           |                              |                   |               |                   |         |
|---------|-----------|------------------------------|-------------------|---------------|-------------------|---------|
| VEHICLE | 001 (002) | PEDAL CYCLE (41 Yrs - M UB8) | GOING AHEAD OTHER | E TO W        | COMM TO/FROM WORK | JCT MID |
|         |           | BT - NOT APPLICABLE          |                   | N/S HIT FIRST |                   |         |

|         |           |                        |              |        |                 |         |
|---------|-----------|------------------------|--------------|--------|-----------------|---------|
| VEHICLE | 002 (001) | CAR (? Yrs - U UNKN)   | TURNING LEFT | S TO W | FRONT HIT FIRST | JCT MID |
|         |           | BT - DRV NOT CONTACTED |              |        |                 |         |

V002 A 302 (DISOBEYED GIVE WAY OR STOP SIGN OR MARKINGS)

V002 A 602 (CARELESS/RECKLESS/IN A HURRY)

V001 A 507 (CYCLIST WEARING DARK CLOTHING AT NIGHT)

|   |             |                    |      |                              |    |         |                 |
|---|-------------|--------------------|------|------------------------------|----|---------|-----------------|
| 4 | 0112XH30227 | SAT 24/03/12 23:03 | DARK | HIGH STREET J/W STATION ROAD | 26 | NODE 92 | 505390 / 182350 |
|---|-------------|--------------------|------|------------------------------|----|---------|-----------------|

POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN AUTO SIG PEDN PHASE AT ATS

V2 DISOBEYED ATS AND COLLIDED WITH V2

CASUALTY 001 (001) (36 Yrs - M UB3) SLIGHT DRIVER/RIDER

|         |           |                      |               |        |                 |         |
|---------|-----------|----------------------|---------------|--------|-----------------|---------|
| VEHICLE | 001 (002) | CAR (36 Yrs - M UB3) | TURNING RIGHT | E TO N | FRONT HIT FIRST | JCT MID |
|         |           | BT - NOT REQUESTED   |               |        |                 |         |

|         |           |                        |                   |        |               |         |
|---------|-----------|------------------------|-------------------|--------|---------------|---------|
| VEHICLE | 002 (001) | CAR (? Yrs - U UNKN)   | GOING AHEAD OTHER | N TO S | N/S HIT FIRST | JCT MID |
|         |           | BT - DRV NOT CONTACTED |                   |        |               |         |

V002 A 901 (STOLEN VEHICLE)

V002 A 307 (TRAVELLING TOO FAST FOR CONDITIONS)

V002 A 602 (CARELESS/RECKLESS/IN A HURRY)

|   |             |                    |      |                            |    |         |                 |
|---|-------------|--------------------|------|----------------------------|----|---------|-----------------|
| 5 | 0113XH30002 | FRI 11/01/13 17:38 | DARK | HIGH STREET J/W STATION RD | 26 | NODE 92 | 505390 / 182360 |
|---|-------------|--------------------|------|----------------------------|----|---------|-----------------|

POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN AUTO SIG NO XING FACILITY IN 50M

PED DISOBEYED GREEN ATS FOR TRAFFIC, STEPPING INTO PATH OF V1, CAUSING COLLISION.

CASUALTY 001 (001) (19 Yrs - F UB8) SLIGHT PEDESTRIAN CROSSING ROAD (NOT ON XING) W BOUND FROM DRIVERS N/SIDE

|         |           |                      |                   |               |                   |         |
|---------|-----------|----------------------|-------------------|---------------|-------------------|---------|
| VEHICLE | 001 (000) | CAR (25 Yrs - M UB8) | GOING AHEAD OTHER | N TO S        | COMM TO/FROM WORK | JCT APP |
|         |           | BT - NOT REQUESTED   |                   | N/S HIT FIRST |                   |         |

C001 A 802 (FAILED TO LOOK PROPERLY)

C001 A 808 (CARELESS/RECKLESS/IN A HURRY)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

6 0114XH30637 MON 29/09/14 20:16 DARK HIGH STREET J/W STATION ROAD 26 NODE 92 505390 / 182350  
 POLICE - OVER COU ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN AUTO SIG PEDN PHASE AT ATS ROADWORKS

V2 HIT V1 CAUSING PASSENGER IN V1 TO FALL

CASUALTY 001 (001) (? Yrs - F UNKN) SLIGHT PASSENGER SEATED ON PSV  
 VEHICLE 001 (002) BUS/COACH (59 Yrs - M UB4) MOVING OFF S TO N JNY PART OF WORK JCT MID  
 BT - DRV NOT CONTACTED O/S HIT FIRST

VEHICLE 002 (001) CAR (? Yrs - U UNKN) OVERTAKE MOVE VEH O/S S TO N JCT MID  
 BT - DRV NOT CONTACTED N/S HIT FIRST

V002 A 602 (CARELESS/RECKLESS/IN A HURRY)

7 0112XH30086 FRI 10/02/12 10:11 LIGHT HIGH STREET J.W IVER LANE 26 NODE 93 505390 / 182270  
 POLICE - AT SCENE ROAD-SNOW SNOWING SINGLE CWY T/STAG JUN AUTO SIG PEDN PHASE AT ATS

V1 TURNED RIGHT ACROSS PATH OF ONCOMING V2

CASUALTY 001 (001) (27 Yrs - M SL1) SLIGHT DRIVER/RIDER  
 CASUALTY 002 (001) (43 Yrs - M SL3) SLIGHT PASSENGER BACK SEAT  
 VEHICLE 001 (002) CAR (27 Yrs - M SL1) TURNING RIGHT N TO W JCT MID  
 BT - NOT REQUESTED N/S HIT FIRST

VEHICLE 002 (001) CAR (18 Yrs - M UB7) GOING AHEAD OTHER S TO N JCT MID  
 BT - NOT REQUESTED FRONT HIT FIRST

V001 A 405 (FAILED TO LOOK PROPERLY)

V001 A 602 (CARELESS/RECKLESS/IN A HURRY)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

8 0112XH30749 THU 15/11/12 15:35 LIGHT HIGH STREET J/W IVER LANE 26 NODE 93 505390 / 182290  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M

RIDER ON V2 WAS DISTRACTED AND COLLIDED WITH THE REAR OF V1.

CASUALTY 001 (002) (25 Yrs - M UB8) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) CAR (30 Yrs - F UB7) PARKED P TO P JCT MID  
 BT - NEGATIVE BACK HIT FIRST

VEHICLE 002 (001) PEDAL CYCLE (25 Yrs - M UB8) GOING AHEAD OTHER S TO N JCT MID  
 BT - NOT APPLICABLE FRONT HIT FIRST

V002 A 510 (DISTRACTION OUTSIDE VEHICLE)

V002 A 405 (FAILED TO LOOK PROPERLY)

V002 A 406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED)

9 0114XH30222 MON 07/04/14 22:20 DARK HIGH STREET J/W IVER LANE 26 NODE 93 505390 / 182270  
 POLICE - AT SCENE ROAD-WET RAINING SINGLE CWY T/STAG JUN AUTO SIG NO XING FACILITY IN 50M

V2 TURNED RIGHT ACROSS PATH OF ONCOMING V1, CAUSING COLLISION.

CASUALTY 001 (001) (23 Yrs - M UNKN) SLIGHT DRIVER/RIDER

CASUALTY 002 (002) (29 Yrs - M SL0) SLIGHT DRIVER/RIDER

CASUALTY 003 (001) (19 Yrs - M UB3) SLIGHT PASSENGER FRONT SEAT

VEHICLE 001 (002) CAR (23 Yrs - M UNKN) GOING AHEAD OTHER S TO N JCT MID  
 BT - NOT PROVD (MEDCL REASONS) O/S HIT FIRST

VEHICLE 002 (001) CAR (29 Yrs - M SL0) TURNING RIGHT N TO W JCT MID  
 BT - NOT PROVD (MEDCL REASONS) FRONT HIT FIRST

V002 A 605 (INEXPERIENCED OR LEARNER DRIVER/RIDER)

V002 A 403 (POOR TURN OR MANOEUVRE)

V002 A 405 (FAILED TO LOOK PROPERLY)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

10 0114XH30598 MON 22/09/14 11:07 LIGHT HIGH STREET J/W IVER LANE 26 NODE 93 505390 / 182280  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M  
 V1 STRUCK BY PASSING V2

CASUALTY 001 (001) (92 Yrs - M UB7) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) PEDAL CYCLE (92 Yrs - M UB7) GOING AHEAD OTHER N TO S JCT APP  
 BT - NOT APPLICABLE O/S HIT FIRST

VEHICLE 002 (001) GDS =< 3.5T (26 Yrs - M TW3) OVERTAKE MOVE VEH O/S N TO S JCT APP  
 BT - NOT REQUESTED N/S HIT FIRST

V002 A 407 (PASSING TOO CLOSE TO CYCLIST, HORSE RIDER OR PEDESTRIAN)

11 0112XH30035 SUN 01/01/12 02:30 DARK PIELD HEATH ROAD J/W KINGSTON LANE 26 NODE 99 506600 / 182100  
 POLICE - AT SCENE ROAD-WET RAINING SINGLE CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M  
 V2 PULLED OUT INTO THE SIDE OF V1

CASUALTY 001 (001) (39 Yrs - M UNKN) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) CAR (39 Yrs - M UNKN) GOING AHEAD LEFT BEND SE TO SW JCT MID  
 BT - NOT REQUESTED O/S HIT FIRST

VEHICLE 002 (001) CAR (36 Yrs - M UNKN) TURNING RIGHT N TO SW JCT MID  
 BT - POSITIVE FRONT HIT FIRST

V002 A 501 (IMPAIRED BY ALCOHOL)

V002 A 307 (TRAVELLING TOO FAST FOR CONDITIONS)

V002 A 602 (CARELESS/RECKLESS/IN A HURRY)

V002 A 302 (DISOBEYED GIVE WAY OR STOP SIGN OR MARKINGS)




**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

|  |   |
|--|---|
| SC01 GIS AREA B26 Brunel University Area (P) | 36 MTS TO SEP-2014 SORTED NETWORK ORDER |
|--|---|

|   |            |                 |
|---|------------|-----------------|
| 12 0112XH30187 FRI 16/03/12 21:35 DARK PIELD HEATH ROAD J/W KINGSTON LANE | 26 NODE 99 | 506600 / 182100 |
|---|------------|-----------------|

POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M

V2 DISOBEYED GIVE WAY AND COLLIDED WITH SIDE OF V1

CASUALTY 001 (001) (32 Yrs - M UB1) SLIGHT DRIVER/RIDER

CASUALTY 002 (001) (22 Yrs - M UB8) SLIGHT PASSENGER BACK SEAT

|  |                                 |         |
|--|---------------------------------|---------|
| VEHICLE 001 (002) CAR (32 Yrs - M UB1) | GOING AHEAD RIGHT BEND SW TO SE | JCT MID |
| BT - NOT REQUESTED                     | OVERTURN N/S HIT FIRST          |         |

|  |                       |         |
|--|-----------------------|---------|
| VEHICLE 002 (001) CAR (23 Yrs - M UB8) | TURNING RIGHT N TO NW | JCT MID |
| BT - NEGATIVE                          | FRONT HIT FIRST       |         |

V002 A 302 (DISOBEYED GIVE WAY OR STOP SIGN OR MARKINGS)

V002 A 405 (FAILED TO LOOK PROPERLY)

V002 A 602 (CARELESS/RECKLESS/IN A HURRY)

|  |            |                 |
|--|------------|-----------------|
| 13 0113XH30265 TUE 11/06/13 16:43 LIGHT PIELD HEATH RD J/W KINGSTON LANE | 26 NODE 99 | 506600 / 182110 |
|--|------------|-----------------|

POLICE - OVER COU ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M

AS V1 BEGAN TURNING RIGHT V2 ALSO TURNED RIGHT, COLLIDING WITH O/S OF V1.

CASUALTY 001 (001) (52 Yrs - F SL9) SLIGHT DRIVER/RIDER

|  |  |         |
|--|--|---------|
| VEHICLE 001 (002) CAR (52 Yrs - F SL9) | TURNING RIGHT E TO N COMM TO/FROM WORK | JCT MID |
| BT - DRV NOT CONTACTED                 | O/S HIT FIRST                          |         |

|  |                      |         |
|--|----------------------|---------|
| VEHICLE 002 (001) CAR (? Yrs - U UNKN) | TURNING RIGHT N TO W | JCT MID |
| BT - DRV NOT CONTACTED                 | FRONT HIT FIRST      |         |

V002 A 403 (POOR TURN OR MANOEUVRE)

V002 A 602 (CARELESS/RECKLESS/IN A HURRY)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

**14** 0112TB00152 THU 16/02/12 17:30 DARK FIELD HEATH ROAD J/W ROYAL LANE 26 NODE 110 506730 / 182050  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE ROUNDABOUT MINI GIVE WAY/UNCONT NO XING FACILITY IN 50M

V1 ENTERED ROUNDABOUT AND WAS HIT ON THE OFFSIDE BY CYCLIST

CASUALTY 001 (002) (55 Yrs - M UB10) SERIOUS DRIVER/RIDER

VEHICLE 001 (002) CAR (22 Yrs - M UB8) GOING AHEAD OTHER NW TO SE JCT MID  
 BT - NEGATIVE O/S HIT FIRST

VEHICLE 002 (001) PEDAL CYCLE (55 Yrs - M UB10) GOING AHEAD OTHER SW TO NE JCT MID  
 BT - NOT APPLICABLE FRONT HIT FIRST

V001 A 405 (FAILED TO LOOK PROPERLY)

V002 A 405 (FAILED TO LOOK PROPERLY)

**15** 0112XH30602 FRI 05/10/12 22:00 DARK ROYAL LANE J/W FIELD HEATH ROAD 26 NODE 110 506720 / 182040  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE ROUNDABOUT MINI GIVE WAY/UNCONT NO XING FACILITY IN 50M

V1 MOVED OFF COLLIDING WITH V2 WHO WAS STATIONARY.

CASUALTY 001 (002) (25 Yrs - M UB3) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) CAR (? Yrs - U UNKN) MOVING OFF SE TO NW JCT MID  
 BT - DRV NOT CONTACTED FRONT HIT FIRST

VEHICLE 002 (001) M/C <= 50CC (25 Yrs - M UB3) GOING AHEAD HELD UP SE TO NW JCT MID  
 BT - NOT REQUESTED BACK HIT FIRST

V001 A 405 (FAILED TO LOOK PROPERLY)

V001 A 406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED)


**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

|  |   |
|--|---|
| SC01 GIS AREA B26 Brunel University Area (P) | 36 MTS TO SEP-2014 SORTED NETWORK ORDER |
|--|---|

|  |             |                 |
|--|-------------|-----------------|
| 16 0112XH30748 TUE 20/11/12 22:20 DARK PIELD HEATH ROAD J/W ROYAL LANE | 26 NODE 110 | 506730 / 182050 |
|--|-------------|-----------------|

POLICE - AT SCENE ROAD-WET RAINING ROUNDABOUT MINI GIVE WAY/UNCONT NO XING FACILITY IN 50M

V1 FAILED TO GIVEWAY COLLIDING WITH V2.

CASUALTY 001 (001) (27 Yrs - F NW3) SLIGHT DRIVER/RIDER

|  |                   |                 |         |
|--|-------------------|-----------------|---------|
| VEHICLE 001 (002) CAR (27 Yrs - F NW3) | GOING AHEAD OTHER | SE TO NW        | JCT MID |
| BT - NOT REQUESTED                     |                   | FRONT HIT FIRST |         |

|  |                   |               |         |
|--|-------------------|---------------|---------|
| VEHICLE 002 (001) CAR (22 Yrs - M UB7) | GOING AHEAD OTHER | N TO S        | JCT MID |
| BT - NOT REQUESTED                     |                   | O/S HIT FIRST |         |

V001 A 405 (FAILED TO LOOK PROPERLY)

V001 A 302 (DISOBEYED GIVE WAY OR STOP SIGN OR MARKINGS)

V001 A 406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED)

|  |             |                 |
|--|-------------|-----------------|
| 17 0113XH30087 MON 18/02/13 22:30 DARK PIELD HEATH ROAD J/W ROYAL LANE | 26 NODE 110 | 506730 / 182050 |
|--|-------------|-----------------|

POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY MINI GIVE WAY/UNCONT NO XING FACILITY IN 50M

VEH 1 DID NOT GIVE WAY TO THE RIGHT & VEH 2 WAS APPARANTLY SPEEDING WHEN BOTH CARS COLLIDED ON A MINI ROUNDABOUT

CASUALTY 001 (001) (81 Yrs - M UB8) SERIOUS DRIVER/RIDER

CASUALTY 002 (002) (23 Yrs - M UB1) SERIOUS DRIVER/RIDER

|  |                   |               |         |
|--|-------------------|---------------|---------|
| VEHICLE 001 (002) CAR (81 Yrs - M UB8) | GOING AHEAD OTHER | SE TO NW      | JCT MID |
| BT - NEGATIVE                          |                   | O/S HIT FIRST |         |
| LEFT CWY NEARSIDE                      |                   | HIT TREE      |         |

|  |                   |                 |         |
|--|-------------------|-----------------|---------|
| VEHICLE 002 (001) CAR (23 Yrs - M UB1) | GOING AHEAD OTHER | N TO S          | JCT MID |
| BT - NEGATIVE                          |                   | FRONT HIT FIRST |         |

V001 B 405 (FAILED TO LOOK PROPERLY)

V002 B 406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED)

V002 B 306 (EXCEEDING SPEED LIMIT)

V001 B 302 (DISOBEYED GIVE WAY OR STOP SIGN OR MARKINGS)





**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

20 0113XH30561 THU 21/11/13 14:25 LIGHT COWLEY ROAD J/W COWLEY MILL ROAD 26 NODE 122 505350 / 183210

POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY CROSSROADS AUTO SIG PEDN PHASE AT ATS

V2 TURNED RIGHT COLLIDING WITH V1

CASUALTY 001 (001) (75 Yrs - M UB8) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) CAR (75 Yrs - M UB8) GOING AHEAD OTHER S TO N JCT MID  
BT - NOT REQUESTED O/S HIT FIRST

VEHICLE 002 (001) CAR (49 Yrs - M LU4) TURNING RIGHT N TO W JCT MID  
BT - NOT REQUESTED FRONT HIT FIRST

V002 A 405 (FAILED TO LOOK PROPERLY)

V002 A 602 (CARELESS/RECKLESS/IN A HURRY)

21 0114XH30219 FRI 04/04/14 12:59 LIGHT COWLEY RD J/W COWLEY MILL RD 26 NODE 122 505340 / 183190

POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY CROSSROADS AUTO SIG PEDN PHASE AT ATS

V2 POSSIBLY MANOUEVERED TOWARDS V1. V1 LOST CONTROL, COLLIDING WITH ATS.

CASUALTY 001 (001) (26 Yrs - F UB7) SLIGHT DRIVER/RIDER

VEHICLE 001 (000) CAR (26 Yrs - F UB7) SLOWING OR STOPPING S TO N JCT APP  
BT - NEGATIVE SKIDDED O/S HIT FIRST  
LEFT CWY OFFSIDE HIT BOLLARD HIT RD SIGN/ATS

VEHICLE 002 (000) CAR (23 Yrs - M UNKN) GOING AHEAD OTHER S TO N JCT APP  
BT - NEGATIVE DID NOT IMPACT

V001 A 410 (LOSS OF CONTROL)

V001 A 408 (SUDDEN BRAKING)

V001 A 306 (EXCEEDING SPEED LIMIT)

V001 A 602 (CARELESS/RECKLESS/IN A HURRY)




**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

|  |   |
|--|---|
| SC01 GIS AREA B26 Brunel University Area (P) | 36 MTS TO SEP-2014 SORTED NETWORK ORDER |
|--|---|

|  |             |                 |
|--|-------------|-----------------|
| 22 0111XH30653 MON 07/11/11 12:30 LIGHT COWLEY ROAD J/W THE GREENWAY | 26 NODE 123 | 505350 / 183090 |
|--|-------------|-----------------|

POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M

V1 HAS FAILED TO GIVE WAY AND PULLED OUT INTO JUNCTION INTO PATH OF V2 CAUSING COLLISION.

CASUALTY 001 (002) (33 Yrs - F UB10) SLIGHT DRIVER/RIDER

|   |            |                         |         |
|---|------------|-------------------------|---------|
| VEHICLE 001 (002) CAR (40 Yrs - F UB10) | MOVING OFF | E TO W JNY PART OF WORK | JCT MID |
| BT - NEGATIVE                           |            | FRONT HIT FIRST         |         |

|   |                   |                         |         |
|---|-------------------|-------------------------|---------|
| VEHICLE 002 (001) CAR (33 Yrs - F UB10) | GOING AHEAD OTHER | N TO S JNY PART OF WORK | JCT MID |
| BT - NOT PROVD (MEDCL REASONS)          |                   | N/S HIT FIRST           |         |

V001 A 401 (JUNCTION OVERSHOOT)

V001 A 302 (DISOBEYED GIVE WAY OR STOP SIGN OR MARKINGS)

V001 A 405 (FAILED TO LOOK PROPERLY)

|   |             |                 |
|---|-------------|-----------------|
| 23 0111XH30598 FRI 07/10/11 20:00 DARK HILLINGDON ROAD J/W THE GREENWAY | 26 NODE 124 | 506110 / 183150 |
|---|-------------|-----------------|

POLICE - OVER COU ROAD-DRY WEATHER-FINE DUAL CWY T/STAG JUN AUTO SIG PEDN PHASE AT ATS

V1 TURNED RIGHT ACROSS PATH OF ONCOMING V2

CASUALTY 001 (001) (20 Yrs - F UB8) SLIGHT DRIVER/RIDER

CASUALTY 002 (001) (19 Yrs - F UNKN) SLIGHT PASSENGER FRONT SEAT

|  |               |               |         |
|--|---------------|---------------|---------|
| VEHICLE 001 (002) CAR (20 Yrs - F UB8) | TURNING RIGHT | NW TO SW      | JCT MID |
| BT - DRV NOT CONTACTED                 |               | N/S HIT FIRST |         |

|  |                   |                 |         |
|--|-------------------|-----------------|---------|
| VEHICLE 002 (001) CAR (? Yrs - U UNKN) | GOING AHEAD OTHER | SE TO NW        | JCT MID |
| BT - DRV NOT CONTACTED                 |                   | FRONT HIT FIRST |         |

V001 A 405 (FAILED TO LOOK PROPERLY)

V001 A 602 (CARELESS/RECKLESS/IN A HURRY)

V002 B 301 (DISOBEYED AUTOMATIC TRAFFIC SIGNAL)


**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

24 0111XH30657 MON 07/11/11 19:12 DARK HILLINGDON ROAD J/W THE GREENWAY 26 NODE 124 506110 / 183150

POLICE - AT SCENE ROAD-WET RAINING DUAL CWY T/STAG JUN AUTO SIG PEDN PHASE AT ATS

V1 HAS TURNED RIGHT ACROSS PATH OF ONCOMING SOLO V2 CAUSING COLLISION.

CASUALTY 001 (001) (50 Yrs - F UB8) SLIGHT DRIVER/RIDER

CASUALTY 002 (002) (30 Yrs - M UB10) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) CAR (50 Yrs - F UB8) TURNING RIGHT N TO W JCT MID  
BT - DRV NOT CONTACTED N/S HIT FIRST

VEHICLE 002 (001) M/C > 500CC (30 Yrs - M UB10) GOING AHEAD OTHER S TO N JCT MID  
BT - DRV NOT CONTACTED FRONT HIT FIRST

V001 A 406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED)

V001 A 103 (SLIPPERY ROAD (DUE TO WEATHER))

V002 B 307 (TRAVELLING TOO FAST FOR CONDITIONS)

25 0111XH30769 TUE 20/12/11 11:18 LIGHT HILLINGDON ROAD J/W THE GREENWAY 26 NODE 124 506120 / 183150

POLICE - AT SCENE ROAD-WET WEATHER-FINE SINGLE CWY T/STAG JUN AUTO SIG PEDN PHASE AT ATS

V2 HAS RUSHED THROUGH A GREEN ATS AND COLLIDED WITH THE REAR OF V1 WHO WAS TURNING RIGHT.

CASUALTY 001 (001) (22 Yrs - F LU07) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) CAR (22 Yrs - F LU07) TURNING RIGHT N TO W JCT MID  
BT - DRV NOT CONTACTED BACK HIT FIRST

VEHICLE 002 (001) CAR (23 Yrs - M UB3) TURNING RIGHT N TO W JCT MID  
BT - NEGATIVE FRONT HIT FIRST

V002 A 602 (CARELESS/RECKLESS/IN A HURRY)

V002 A 301 (DISOBEYED AUTOMATIC TRAFFIC SIGNAL)

V002 A 307 (TRAVELLING TOO FAST FOR CONDITIONS)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

26 0111XH30819 FRI 16/12/11 13:30 LIGHT THE GREENWAY J/W HILLINGDON ROAD 26 NODE 124 506100 / 183150

POLICE - OVER COU ROAD-WET RAINING SINGLE CWY T/STAG JUN AUTO SIG PEDN PHASE AT ATS

V1 BRAKED HARD AND WAS HIT IN REAR BY V2

CASUALTY 001 (001) (27 Yrs - F UB5) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) CAR (27 Yrs - F UB5) MOVING OFF W TO E JCT MID  
BT - DRV NOT CONTACTED BACK HIT FIRST

VEHICLE 002 (001) CAR (? Yrs - M UNKN) GOING AHEAD OTHER W TO E JCT MID  
BT - DRV NOT CONTACTED FRONT HIT FIRST

V001 A 408 (SUDDEN BRAKING)

V002 A 405 (FAILED TO LOOK PROPERLY)

27 0112XH30331 TUE 29/05/12 07:45 LIGHT HILLINGDON ROAD J/W THE GREENWAY 26 NODE 124 506110 / 183150

POLICE - AT SCENE ROAD-DRY WEATHER-FINE DUAL CWY T/STAG JUN AUTO SIG PEDN PHASE AT ATS

V1 TURNED RIGHT ACROSS PATH OF ONCOMING UNDERTAKING V2

CASUALTY 001 (001) (21 Yrs - M UB9) SLIGHT DRIVER/RIDER

CASUALTY 002 (002) (44 Yrs - M UB3) SERIOUS DRIVER/RIDER

VEHICLE 001 (002) CAR (21 Yrs - M UB9) TURNING RIGHT NW TO SW JCT MID  
BT - NOT REQUESTED N/S HIT FIRST

VEHICLE 002 (001) M/C > 500CC (44 Yrs - M UB3) GOING AHEAD OTHER SE TO NW JCT MID  
BT - NOT REQUESTED FRONT HIT FIRST

V001 A 405 (FAILED TO LOOK PROPERLY)

V002 B 602 (CARELESS/RECKLESS/IN A HURRY)


**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

28 0112XH30541 SUN 09/09/12 19:00 LIGHT HILLINGDON ROAD J/W THE GREENWAY 26 NODE 124 506110 / 183150  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN AUTO SIG PEDN PHASE AT ATS  
 V2 TURNED RIGHT AND HIT V1

CASUALTY 001 (002) (64 Yrs - M HA7) SLIGHT DRIVER/RIDER

CASUALTY 002 (002) (11 Yrs - M HA7) SLIGHT PASSENGER FRONT SEAT

CASUALTY 003 (001) (17 Yrs - M ) SLIGHT PASSENGER FRONT SEAT

VEHICLE 001 (002) CAR (19 Yrs - M UB9) GOING AHEAD OTHER SE TO NW JCT MID  
 BT - NEGATIVE FRONT HIT FIRST

VEHICLE 002 (001) CAR (64 Yrs - M HA7) TURNING RIGHT SW TO SE JCT MID  
 BT - NEGATIVE O/S HIT FIRST

V002 A 403 (POOR TURN OR MANOEUVRE)

V002 A 405 (FAILED TO LOOK PROPERLY)

29 0112XH30805 FRI 07/12/12 10:35 LIGHT HILLINGDON RD J/W THE GREENWAY 26 NODE 124 506110 / 183150  
 POLICE - AT SCENE ROAD-WET RAINING DUAL CWY CROSSROADS AUTO SIG PEDN PHASE AT ATS  
 V2 TURNED RIGHT, COLLIDING WITH ONCOMING V1.

CASUALTY 001 (001) (47 Yrs - M UB10) SLIGHT DRIVER/RIDER

CASUALTY 002 (001) (43 Yrs - F UB10) SLIGHT PASSENGER FRONT SEAT

CASUALTY 003 (001) (? Yrs - M TN23) SLIGHT PASSENGER BACK SEAT

CASUALTY 004 (001) (? Yrs - F TN23) SLIGHT PASSENGER BACK SEAT

VEHICLE 001 (002) CAR (47 Yrs - M UB10) GOING AHEAD OTHER SE TO NW JCT MID  
 BT - NEGATIVE FRONT HIT FIRST

VEHICLE 002 (001) CAR (20 Yrs - F W3) TURNING RIGHT NW TO W LEAVING MAIN RD  
 BT - NEGATIVE FRONT HIT FIRST

V001 A 401 (JUNCTION OVERSHOOT)

V001 A 405 (FAILED TO LOOK PROPERLY)

V001 A 602 (CARELESS/RECKLESS/IN A HURRY)

V001 B 301 (DISOBEYED AUTOMATIC TRAFFIC SIGNAL)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

**30** 0113XH30029 SAT 19/01/13 06:40 DARK HILLINGDON ROAD J/W THE GREENWAY. 26 NODE 124      506110 / 183150

POLICE - AT SCENE ROAD-FROST/ICE WEATHER-FINE DUAL CWY CROSSROADS AUTO SIG PEDN PHASE AT ATS

V.2 TURNED RIGHT, ACROSS PATH OF ON-COMING V.1, CAUSING COLLISION.

CASUALTY 001 (001) (35 Yrs - M UB10) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) CAR (35 Yrs - M UB10) GOING AHEAD OTHER SE TO NW COMM TO/FROM WORK JCT MID  
 BT - DRV NOT CONTACTED FRONT HIT FIRST  
 LEFT CWY NEARSIDE HIT BOLLARD HIT RD SIGN/ATS

VEHICLE 002 (001) BUS/COACH (24 Yrs - M HA4 ) TURNING RIGHT NW TO W JNY PART OF WORK JCT MID  
 BT - DRV NOT CONTACTED FRONT HIT FIRST

V001 A 105 (DEFECTIVE TRAFFIC SIGNALS)

V002 A 105 (DEFECTIVE TRAFFIC SIGNALS)

V001 B 405 (FAILED TO LOOK PROPERLY)

V002 B 405 (FAILED TO LOOK PROPERLY)

**31** 0113XH30115 SUN 17/03/13 15:07 LIGHT HILLINGDON ROAD J/W THE GREENWAY 26 NODE 124      506100 / 183160

POLICE - AT SCENE ROAD-WET RAINING SINGLE CWY T/STAG JUN AUTO SIG NO XING FACILITY IN 50M

V1 ACCELERATED INSTEAD OF BRAKING AND LOST CONTROL

CASUALTY 001 (001) (48 Yrs - M UB8 ) SLIGHT DRIVER/RIDER

VEHICLE 001 (000) CAR (48 Yrs - M UB8 ) SLOWING OR STOPPING SE TO NW JCT CLEARED  
 BT - NOT REQUESTED FRONT HIT FIRST  
 LEFT CWY NEARSIDE HIT KERB HIT OTH OBJECT

V001 A 405 (FAILED TO LOOK PROPERLY)

V001 B 602 (CARELESS/RECKLESS/IN A HURRY)

V001 A 410 (LOSS OF CONTROL)

**32** 0113XH30477 TUE 17/09/13 20:25 DARK HILLINGDON ROAD J/W THE GREENWAY 26 NODE 124      506120 / 183150

POLICE - AT SCENE ROAD-WET RAINING DUAL CWY CROSSROADS AUTO SIG PEDN PHASE AT ATS

V2 TURNED RIGHT ACROSS PATH V1

CASUALTY 001 (001) (20 Yrs - F UB8 ) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) CAR (20 Yrs - F UB8 ) GOING AHEAD OTHER S TO N JCT MID  
 BT - NEGATIVE FRONT HIT FIRST

VEHICLE 002 (001) CAR (57 Yrs - F UB8 ) TURNING RIGHT N TO W JCT MID  
 BT - NEGATIVE N/S HIT FIRST

V002 A 405 (FAILED TO LOOK PROPERLY)

V002 B 301 (DISOBEYED AUTOMATIC TRAFFIC SIGNAL)

V001 B 307 (TRAVELLING TOO FAST FOR CONDITIONS)





**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

33 0113XH30627 TUE 26/03/13 17:10 LIGHT HILLINGDON ROAD J/W THE GREENWAY. 26 NODE 124 506110 / 183170

POLICE - AT SCENE ROAD-DRY WEATHER-FINE DUAL CWY CROSSROADS AUTO SIG PEDN PHASE AT ATS

AS V.1 MOVED OFF AT A.T.S, A PASSENGER FELL OVER. - [PASSENGER WAS NOT HOLDING ON. (C001)]

CASUALTY 001 (001) (78 Yrs - F S36) SLIGHT PASSENGER STANDING ON PSV

VEHICLE 001 (000) BUS/COACH (61 Yrs - F TW5) MOVING OFF NW TO SE JNY PART OF WORK JCT APP  
BT - DRV NOT CONTACTED DID NOT IMPACT

C001 A 999 (OTHER FACTOR)

V001 A 402 (JUNCTION RESTART)

34 0114XH30184 TUE 14/01/14 13:10 LIGHT NFL HILLINGDON ROAD J/W THE GREENWAY 26 NODE 124 506120 / 183140

POLICE - AT SCENE ROAD-DRY WEATHER-FINE DUAL CWY CROSSROADS AUTO SIG PEDN PHASE AT ATS

V4 HIT REAR OF V3, PUSHING IT INTO REAR OF V2 WHICH THEN HIT V1

CASUALTY 001 (004) (72 Yrs - M UB10) SERIOUS DRIVER/RIDER

VEHICLE 001 (002) CAR (69 Yrs - M UB8) GOING AHEAD HELD UP S TO N JCT APP  
BT - NOT REQUESTED BACK HIT FIRST

VEHICLE 002 (003) CAR (77 Yrs - M UB10) GOING AHEAD HELD UP S TO N JCT APP  
BT - NOT REQUESTED BACK HIT FIRST

VEHICLE 003 (004) CAR (87 Yrs - M UB8) GOING AHEAD HELD UP S TO N JCT APP  
BT - NOT REQUESTED BACK HIT FIRST

VEHICLE 004 (003) CAR (72 Yrs - M UB10) GOING AHEAD OTHER S TO N JCT APP  
BT - NOT REQUESTED FRONT HIT FIRST

V004 A 203 (DEFECTIVE BRAKES)

V004 B 505 (ILLNESS OR DISABILITY, MENTAL OR PHYSICAL)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

**35** 0114XH30284 THU 08/05/14 12:20 LIGHT HILLINGDON ROAD J/W THE GREENWAY 26 NODE 124 506110 / 183150  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE DUAL CWY CROSSROADS AUTO SIG PEDN PHASE AT ATS  
 V2 BRAKED HEAVILY CAUSING REAR WHEEL TO LOCK, V2 THEN HIT REAR V1  
 CASUALTY 001 (002) (18 Yrs - M HA4) SLIGHT DRIVER/RIDER  
 VEHICLE 001 (002) CAR (26 Yrs - F HA7) GOING AHEAD HELD UP S TO N JCT APP  
 BT - NOT REQUESTED BACK HIT FIRST  
 VEHICLE 002 (001) M/C 50-125CC (18 Yrs - M HA4) GOING AHEAD OTHER S TO N JCT APP  
 BT - NOT REQUESTED FRONT HIT FIRST

V002 A 408 (SUDDEN BRAKING)

**36** 0114XH30002 THU 16/01/14 08:30 LIGHT HILLINGDON HILL J/W KINGSTON LANE 26 NODE 126 506270 / 182990  
 POLICE - OVER COU ROAD-DRY WEATHER-FINE DUAL CWY T/STAG JUN AUTO SIG PEDN PHASE AT ATS  
 V1 U-TURNED ACROSS PATH V2  
 CASUALTY 001 (001) (42 Yrs - M UB8) SLIGHT DRIVER/RIDER  
 VEHICLE 001 (002) CAR (42 Yrs - M UB8) U-TURNING E TO E TAKING PUPIL TO/FROM SC JCT MID  
 BT - DRV NOT CONTACTED N/S HIT FIRST  
 VEHICLE 002 (001) CAR (? Yrs - M UNKN) GOING AHEAD OTHER W TO E JCT MID  
 BT - DRV NOT CONTACTED FRONT HIT FIRST

V001 A 403 (POOR TURN OR MANOEUVRE)

V001 A 405 (FAILED TO LOOK PROPERLY)

V001 A 602 (CARELESS/RECKLESS/IN A HURRY)

**37** 0111XH30590 WED 12/10/11 11:37 LIGHT UXBRIDGE ROAD J.W HARLINGTON ROAD 26 NODE 128 507140 / 182850  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE DUAL CWY T/STAG JUN GIVE WAY/UNCONT PEDN PHASE AT ATS  
 V1 DISOBEYED ATS AND COLLIDED WITH PED ON PED CROSSING  
 CASUALTY 001 (001) (17 Yrs - F UB10) SLIGHT PEDESTRIAN CROSSING ROAD ON PED XING SW BOUND FROM DRIVERS N/SIDE  
 VEHICLE 001 (000) CAR (23 Yrs - M UB4) GOING AHEAD OTHER NW TO SE JCT APP  
 BT - NOT REQUESTED FRONT HIT FIRST  
 FOREIGN REG LHD

V001 A 405 (FAILED TO LOOK PROPERLY)

V001 A 602 (CARELESS/RECKLESS/IN A HURRY)

V001 A 301 (DISOBEYED AUTOMATIC TRAFFIC SIGNAL)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

38 0112TB00600 TUE 29/05/12 17:49 LIGHT UXBRIDGE ROAD J/W HARLINGTON ROAD 26 NODE 128 507140 / 182840

POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN AUTO SIG PEDN PHASE AT ATS

V1 BEING CHASED BY POLICE TURNS RIGHT AND COLLIDES HEAD ON WITH V2

CASUALTY 001 (002) (25 Yrs - M UB3) SLIGHT DRIVER/RIDER

CASUALTY 002 (002) (23 Yrs - F UB3) SLIGHT PASSENGER FRONT SEAT

VEHICLE 001 (002) CAR (? Yrs - M UNKN) TURNING RIGHT S TO SE JCT CLEARED  
BT - DRV NOT CONTACTED FRONT HIT FIRST

VEHICLE 002 (001) CAR (25 Yrs - M UB3) HIT KERB SE TO NW JCT APP  
BT - NOT REQUESTED GOING AHEAD OTHER FRONT HIT FIRST

V001 A 902 (VEHICLE IN COURSE OF CRIME)

V001 A 602 (CARELESS/RECKLESS/IN A HURRY)

V001 A 601 (AGGRESSIVE DRIVING)

39 0112XH30680 WED 31/10/12 18:45 LIGHT UXBRIDGE ROAD J/W HARLINGTON ROAD 26 NODE 128 507140 / 182830

POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN AUTO SIG PEDN PHASE AT ATS

V3 WASNT LOOKING PROPLEY AND HIT THE REAR OF V2, V2 HIT V1

CASUALTY 001 (001) (25 Yrs - F UB4) SLIGHT DRIVER/RIDER

VEHICLE 001 (003) CAR (25 Yrs - F UB4) SLOWING OR STOPPING SE TO NW JCT MID  
BT - DRV NOT CONTACTED BACK HIT FIRST

VEHICLE 002 (001) CAR (? Yrs - M ) SLOWING OR STOPPING SE TO NW JCT MID  
BT - DRV NOT CONTACTED BACK HIT FIRST

VEHICLE 003 (001) CAR (? Yrs - M ) GOING AHEAD OTHER SE TO NW JCT MID  
BT - DRV NOT CONTACTED FRONT HIT FIRST

V003 A 308 (FOLLOWING TOO CLOSE)

V003 A 405 (FAILED TO LOOK PROPERLY)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

40 0113XH30390 SAT 31/08/13 14:38 LIGHT UXBRIDGE ROAD J/W HARLINGTON ROAD. 26 NODE 128 507150 / 182840

POLICE - AT SCENE ROAD-DRY WEATHER-FINE DUAL CWY T/STAG JUN AUTO SIG PEDN PHASE AT ATS

V.1 STARTED TO TURN RIGHT, V.2 CUT IN- FRONT OF V.1 & ALSO TURNED RIGHT & BOTH V.S COLLIDED .

CASUALTY 001 (002) (30 Yrs - M UB3) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) CAR (21 Yrs - M UB3) TURNING RIGHT NW TO S JCT APP  
BT - DRV NOT CONTACTED FRONT HIT FIRST

VEHICLE 002 (001) PEDAL CYCLE (30 Yrs - M UB3) TURNING RIGHT NW TO S JCT APP  
BT - NOT APPLICABLE BACK HIT FIRST

V002 A 403 (POOR TURN OR MANOEUVRE)

V002 A 405 (FAILED TO LOOK PROPERLY)

V002 A 406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED)

V002 A 602 (CARELESS/RECKLESS/IN A HURRY)

41 0114XH30197 THU 02/01/14 08:40 LIGHT UXBRIDGE ROAD, JUNCTION WITH HARLINGTON ROAD 26 NODE 128 507140 / 182850

POLICE - AT SCENE ROAD-WET WEATHER-FINE DUAL CWY T/STAG JUN AUTO SIG PEDN PHASE AT ATS

V2 WAS DISTRACTED BY PULLING DOWN HIS SUN VISOR & HIT REAR OF STATIONARY V1 WHICH WAS THEN PUSHED INTO V3

CASUALTY 001 (001) (52 Yrs - F UB5) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) CAR (52 Yrs - F UB5) GOING AHEAD HELD UP NW TO SE JCT APP  
BT - NOT REQUESTED BACK HIT FIRST

VEHICLE 002 (001) GDS =< 3.5T (58 Yrs - M UB8) SLOWING OR STOPPING NW TO SE JCT APP  
BT - NOT REQUESTED FRONT HIT FIRST

VEHICLE 003 (001) CAR (41 Yrs - M UB8) GOING AHEAD HELD UP NW TO SE JCT APP  
BT - DRV NOT CONTACTED BACK HIT FIRST

V002 B 706 (VISION AFFECTED - DAZZLING SUN)

V002 B 308 (FOLLOWING TOO CLOSE)

V002 A 405 (FAILED TO LOOK PROPERLY)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

42 0112XH30307 WED 09/05/12 21:04 DARK UXBRIDGE ROAD J.W LONG LANE 26 NODE 129 507380 / 182680

POLICE - OVER COU ROAD-WET WEATHER-FINE DUAL CWY T/STAG JUN AUTO SIG PEDN PHASE AT ATS

V2 COLLIDED WITH REAR OF STAT V1

CASUALTY 001 (001) (29 Yrs - F UB8) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) CAR (29 Yrs - F UB8) TURNING RIGHT N TO NW JCT CLEARED  
BT - DRV NOT CONTACTED BACK HIT FIRST

VEHICLE 002 (001) CAR (? Yrs - M UNKN) TURNING RIGHT N TO NW JCT CLEARED  
BT - DRV NOT CONTACTED FRONT HIT FIRST

V002 A 307 (TRAVELLING TOO FAST FOR CONDITIONS)

V002 A 405 (FAILED TO LOOK PROPERLY)

43 0112XH30328 FRI 25/05/12 08:40 LIGHT UXBRIDGE ROAD J.W LONG LANE 26 NODE 129 507390 / 182640

POLICE - AT SCENE ROAD-DRY WEATHER-FINE DUAL CWY CROSSROADS AUTO SIG PEDN PHASE AT ATS

V1 TURNED LEFT ACROSS PATH OF V2 (CYCLIST)

CASUALTY 001 (002) (40 Yrs - M UNKN) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) CAR (48 Yrs - M UB7) TURNING LEFT NW TO N JCT MID  
BT - NOT REQUESTED N/S HIT FIRST

VEHICLE 002 (001) PEDAL CYCLE (40 Yrs - M UNKN) OVERTAKING NEARSIDE NW TO SE JCT MID  
BT - NOT APPLICABLE FRONT HIT FIRST

V001 A 405 (FAILED TO LOOK PROPERLY)

V002 A 602 (CARELESS/RECKLESS/IN A HURRY)





**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

44 0112XH30342 WED 13/06/12 14:55 LIGHT NFL - UXBRIDGE ROAD J/W LONG LANE 26 NODE 129 507380 / 182690

POLICE - AT SCENE ROAD-DRY WEATHER-FINE DUAL CWY T/STAG JUN AUTO SIG PEDN PHASE AT ATS

AS V1 AND V2 MOVED OFF, V1 ATTEMPTED TO CHANGE LANES CAUSING COLLISION.

CASUALTY 001 (001) (33 Yrs - F UB7) SLIGHT DRIVER/RIDER

CASUALTY 002 (002) (53 Yrs - F UB4) SLIGHT PASSENGER BACK SEAT

VEHICLE 001 (002) CAR (33 Yrs - F UB7) CHANGE LANE TO LEFT NW TO SE JCT MID  
BT - NOT REQUESTED O/S HIT FIRST

VEHICLE 002 (001) CAR (? Yrs - F UNKN) MOVING OFF NW TO SE JCT MID  
BT - NOT REQUESTED N/S HIT FIRST

V001 A 405 (FAILED TO LOOK PROPERLY)

V001 A 404 (FAILED TO SIGNAL/ MISLEADING SIGNAL)

V001 A 406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED)

45 0112XH30543 SAT 08/09/12 12:15 LIGHT UXBRIDGE ROAD J/W LONG LANE 26 NODE 129 507400 / 182680

POLICE - OVER COU ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN AUTO SIG PEDN PHASE AT ATS

V2 TURNED LEFT WITH NO INDICATOR, V1 HIT V2

CASUALTY 001 (001) (23 Yrs - M UB3) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) PEDAL CYCLE (23 Yrs - M UB3) GOING AHEAD OTHER NW TO SE JCT MID  
BT - NOT APPLICABLE FRONT HIT FIRST

VEHICLE 002 (001) CAR (? Yrs - M ) TURNING LEFT NW TO NE JCT MID  
BT - DRV NOT CONTACTED FRONT HIT FIRST

V002 A 404 (FAILED TO SIGNAL/ MISLEADING SIGNAL)

V002 A 405 (FAILED TO LOOK PROPERLY)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

**46** 0113XH30574 TUE 03/12/13 12:12 LIGHT LONG LANE J/W UXBRIDGE ROAD. 26 NODE 129 507430 / 182670  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN AUTO SIG PEDN PHASE AT ATS  
 V.1 STOPPED AT A.T.S. , V.2 TRAVELLING BEHIND FAILED TO STOP IN TIME & HIT REAR OF V.1.  
 CASUALTY 001 (001) (26 Yrs - F C015) SLIGHT DRIVER/RIDER  
 VEHICLE 001 (002) CAR (26 Yrs - F C015) WAITING TO TURN LEFT N TO SE JNY PART OF WORK JCT APP  
 BT - DRV NOT CONTACTED BACK HIT FIRST  
 VEHICLE 002 (001) CAR (? Yrs - M UNKN) TURNING LEFT N TO SE JCT APP  
 BT - DRV NOT CONTACTED FRONT HIT FIRST  
 V002 A 308 (FOLLOWING TOO CLOSE) V002 A 405 (FAILED TO LOOK PROPERLY)  
 V002 A 406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED) V002 A 602 (CARELESS/RECKLESS/IN A HURRY)

**47** 0112XH30620 SUN 07/10/12 18:00 DARK OXFORD ROAD J/W TRUMPER WAY 26 NODE 145 505330 / 184020  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE DUAL CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M  
 UNCLEAR AT TIME OF REPORTING BUT V1 LOST CONTROL COLLIDING WITH BARRIER.  
 CASUALTY 001 (001) (27 Yrs - M IP1) SLIGHT DRIVER/RIDER  
 VEHICLE 001 (000) CAR (27 Yrs - M IP1) GOING AHEAD OTHER SE TO NW JCT MID  
 BT - NOT REQUESTED O/S HIT FIRST  
 LEFT CWY ONTO CENTRAL RES HIT KERB HIT CENTRAL BAR  
 V001 A 410 (LOSS OF CONTROL) V001 B 307 (TRAVELLING TOO FAST FOR CONDITIONS)  
 V001 B 602 (CARELESS/RECKLESS/IN A HURRY)

**48** 0112XH30483 FRI 20/07/12 15:30 LIGHT HIGH STREET J/W PARK ROAD 26 NODE 147 505940 / 183860  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE ROUNDABOUT ROUNDABOUT GIVE WAY/UNCONT NO XING FACILITY IN 50M  
 V1 DIDNT GIVEWAY AND HIT V2  
 CASUALTY 001 (001) (30 Yrs - M UB4) SLIGHT DRIVER/RIDER  
 CASUALTY 002 (002) (19 Yrs - F UB4) SLIGHT PASSENGER FRONT SEAT  
 VEHICLE 001 (002) CAR (30 Yrs - M UB4) TURNING LEFT NW TO NE JCT MID  
 BT - NEGATIVE O/S HIT FIRST  
 VEHICLE 002 (001) CAR (19 Yrs - F UB10) GOING AHEAD OTHER SW TO NE JCT MID  
 BT - NEGATIVE FRONT HIT FIRST  
 V001 A 302 (DISOBEYED GIVE WAY OR STOP SIGN OR MARKINGS) V001 A 405 (FAILED TO LOOK PROPERLY)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

49 0112XH30202 WED 28/03/12 17:47 LIGHT HILLINGDON HILL J/W THE CROSSWAY 26 LINK 89-126 506750 / 182930

POLICE - AT SCENE ROAD-DRY WEATHER-FINE DUAL CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M

V2 TURNED RIGHT ACROSS PATH OF ONCOMING V1

CASUALTY 001 (001) (24 Yrs - F UB3) SLIGHT DRIVER/RIDER

CASUALTY 002 (001) (7 Yrs - M UNKN) SLIGHT PASSENGER BACK SEAT

Sch Attended : UNKNOWN

CASUALTY 003 (001) (? Yrs - F UNKN) SLIGHT PASSENGER FRONT SEAT

VEHICLE 001 (002) CAR (24 Yrs - F UB3)

GOING AHEAD OTHER

W TO E

JCT MID

BT - NOT REQUESTED

FRONT HIT FIRST

VEHICLE 002 (001) CAR (28 Yrs - M UNKN)

TURNING RIGHT

E TO N

JCT MID

BT - NOT REQUESTED

FRONT HIT FIRST

V002 A 405 (FAILED TO LOOK PROPERLY)

V002 A 701 (VISION AFFECTED - STATIONARY OR PARKED VEHICLE(S))

50 0112XH30263 WED 18/04/12 15:47 LIGHT ROYAL LANE 30M S J/W UXBRIDGE ROAD 26 LINK 89-110 506840 / 182890

POLICE - AT SCENE ROAD-WET RAINING SINGLE CWY NO JUN IN 20M PELICAN OR SIMILAR

V1 LOST CONTROL AND RIDER FELL OFF

CASUALTY 001 (001) (16 Yrs - M UB10) SLIGHT DRIVER/RIDER

JOURNEY TO/FROM SCHOOL

Sch Attended : UNKNOWN

VEHICLE 001 (000) M/C <= 50CC (16 Yrs - M UB10)

GOING AHEAD OTHER

S TO N

BT - NOT REQUESTED

DID NOT IMPACT

V001 A 410 (LOSS OF CONTROL)

U000 A 802 (FAILED TO LOOK PROPERLY)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

51 0112XH30368 MON 18/06/12 17:15 LIGHT UXBRIDGE ROAD 30M W J.W ROYAL LANE 26 LINK 89-126 506800 / 182920

POLICE - OVER COU ROAD-DRY WEATHER-FINE DUAL CWY NO JUN IN 20M NO XING FACILITY IN 50M

V3 CHANGED LANES INTO THE PATH OF V2 V2 BRAKED AND WAS HIT IN REAR BY V1

CASUALTY 001 (001) (22 Yrs - F UB10) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) CAR (22 Yrs - F UB10) SLOWING OR STOPPING E TO W  
BT - DRV NOT CONTACTED FRONT HIT FIRST

VEHICLE 002 (001) CAR (? Yrs - M UB10) SLOWING OR STOPPING E TO W  
BT - DRV NOT CONTACTED BACK HIT FIRST

VEHICLE 003 (000) CAR (? Yrs - F UNKN) CHANGE LANE TO LEFT E TO W  
BT - DRV NOT CONTACTED DID NOT IMPACT

V003 A 405 (FAILED TO LOOK PROPERLY)

V003 A 602 (CARELESS/RECKLESS/IN A HURRY)

V001 A 307 (TRAVELLING TOO FAST FOR CONDITIONS)

52 0112XH30434 FRI 22/06/12 18:25 LIGHT NFL HILLINGDON HILL 130M E J.W KINGSTON LANE 26 LINK 89-126 506390 / 182950

POLICE - AT SCENE ROAD-DRY WEATHER-FINE DUAL CWY NO JUN IN 20M NO XING FACILITY IN 50M

V1 CHANGED LANES INTO SIDE OF V2, V2 LOST CONTROL AND COLLIDED WITH CENTRAL RESERVATION

CASUALTY 001 (001) (39 Yrs - F UB4) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) CAR (39 Yrs - F UB4) GOING AHEAD OTHER SE TO NW  
BT - NOT REQUESTED N/S HIT FIRST

VEHICLE 002 (001) CAR (58 Yrs - F UB3) GOING AHEAD OTHER SE TO NW  
BT - NOT REQUESTED SKID/OVER O/S HIT FIRST  
LEFT CWY ONTO RES/REBOUND HIT CENTRAL BAR

V001 A 405 (FAILED TO LOOK PROPERLY)

V001 A 602 (CARELESS/RECKLESS/IN A HURRY)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

53 0112XH30741 FRI 02/11/12 22:52 DARK HILLINGDON HILL J/W THE CROSSWAY 26 LINK 89-126 506750 / 182930  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY CROSSROADS GIVE WAY/UNCONT NO XING FACILITY IN 50M

V1 ATTEMPTED TO MAKE A U-TURN COLLIDING WITH V2.

CASUALTY 001 (001) (48 Yrs - M UB3) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) CAR (48 Yrs - M UB3) U-TURNING W TO W JCT MID  
 BT - NOT REQUESTED O/S HIT FIRST

VEHICLE 002 (001) CAR (23 Yrs - M UB10) GOING AHEAD OTHER W TO E JCT MID  
 BT - NOT REQUESTED FRONT HIT FIRST

V001 A 405 (FAILED TO LOOK PROPERLY) V002 A 406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED)

V002 B 306 (EXCEEDING SPEED LIMIT)

54 0114XH30138 TUE 11/03/14 12:45 LIGHT ROYAL LANE J/W THE CHANTRY 26 LINK 89-110 506840 / 182820

POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY PRIV DRIVE GIVE WAY/UNCONT NO XING FACILITY IN 50M

V2 TURNED RIGHT INTO PATH OF V1, CAUSING COLLISION.

CASUALTY 001 (001) (57 Yrs - F NW10) SLIGHT DRIVER/RIDER

CASUALTY 002 (002) (18 Yrs - M UB3) SLIGHT PASSENGER BACK SEAT

CASUALTY 003 (002) (17 Yrs - F TW5) SLIGHT PASSENGER BACK SEAT

VEHICLE 001 (002) CAR (57 Yrs - F NW10) GOING AHEAD OTHER N TO S COMM TO/FROM WORK JCT MID  
 BT - NOT REQUESTED N/S HIT FIRST

VEHICLE 002 (001) CAR (19 Yrs - M UB6) TURNING RIGHT E TO N ENTERING MAIN RD  
 BT - NOT REQUESTED FRONT HIT FIRST

V001 A 701 (VISION AFFECTED - STATIONARY OR PARKED VEHICLE(S)) V002 A 701 (VISION AFFECTED - STATIONARY OR PARKED VEHICLE(S))

V002 A 302 (DISOBEYED GIVE WAY OR STOP SIGN OR MARKINGS) V002 A 403 (POOR TURN OR MANOEUVRE)





**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

55 0114XH30225 MON 24/03/14 06:54 LIGHT HILLINGDON HILL 25M WEST J/W THE CROSSWAY 26 LINK 89-126 506730 / 182930  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE DUAL CWY NO JUN IN 20M NO XING FACILITY IN 50M  
 V1 HAD BROKEN DOWN IN OUTSIDE LANE OF DUAL CARRIAGEWAY WHEN IT WAS HIT BY V2

CASUALTY 001 (002) (20 Yrs - M HA4) SLIGHT DRIVER/RIDER  
 VEHICLE 001 (002) CAR (35 Yrs - M UB10) PARKED P TO P  
 BT - NOT REQUESTED BACK HIT FIRST

VEHICLE 002 (001) CAR (20 Yrs - M HA4) GOING AHEAD OTHER W TO E  
 BT - NEGATIVE FRONT HIT FIRST  
 HIT PARKED VEH

V002 A 706 (VISION AFFECTED - DAZZLING SUN) V002 A 701 (VISION AFFECTED - STATIONARY OR PARKED VEHICLE(S))

56 0114XH30265 THU 01/05/14 17:25 LIGHT NFL HILLINGDON HILL 70M EAST J/W KINGSTON LANE 26 LINK 89-126 506330 / 182960  
 POLICE - AT SCENE ROAD-WET RAINING DUAL CWY NO JUN IN 20M NO XING FACILITY IN 50M

V2 PARKED IN PERMITTED SPACE ON MAIN CARRIAGEWAY AND WAS HIT IN REAR BY V1  
 CASUALTY 001 (001) (31 Yrs - M UB3) SLIGHT PASSENGER FRONT SEAT  
 VEHICLE 001 (002) CAR (30 Yrs - M UB3) GOING AHEAD OTHER E TO W  
 BT - NOT REQUESTED FRONT HIT FIRST

VEHICLE 002 (001) CAR (61 Yrs - M UB3) PARKED P TO P  
 BT - NOT REQUESTED BACK HIT FIRST

V001 A 509 (DISTRACTION IN VEHICLE) V001 A 405 (FAILED TO LOOK PROPERLY)

V001 A 602 (CARELESS/RECKLESS/IN A HURRY)

57 0111XH30642 FRI 28/10/11 12:21 LIGHT COWLEY ROAD J/W QUEEN'S ROAD 26 LINK 92-123 505360 / 182970  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M

PED RAN INTO THE ROAD AND INFRONT OF V1  
 CASUALTY 001 (001) (? Yrs - M ) SLIGHT PEDESTRIAN CROSSING ROAD (NOT ON XING) W BOUND FROM DRIVERS N/SIDE  
 VEHICLE 001 (000) CAR (25 Yrs - M ) GOING AHEAD OTHER N TO S JCT MID  
 BT - NEGATIVE FRONT HIT FIRST

C001 A 802 (FAILED TO LOOK PROPERLY) C001 A 808 (CARELESS/RECKLESS/IN A HURRY)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

58 0111XH30691 SUN 13/11/11 12:30 LIGHT COWLEY ROAD 65M NORTH J/W HIGH STREET 26 LINK 92-123 505350 / 182640  
 POLICE - OVER COU ROAD-DRY WEATHER-FINE SINGLE CWY NO JUN IN 20M NO XING FACILITY IN 50M  
 V2 HAS CLOSELY OVERTAKEN CYCLIST V1 CAUSING V1 TO LOSE CONTROL AND RIDER TO FALL FROM BICYCLE.

CASUALTY 001 (001) (? Yrs - M SL0) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) PEDAL CYCLE (? Yrs - M SL0) GOING AHEAD OTHER S TO N  
 BT - NOT APPLICABLE FRONT HIT FIRST

BUSWAY

VEHICLE 002 (001) CAR (? Yrs - F UB7) OVERTAKE MOVE VEH O/S S TO N  
 BT - DRV NOT CONTACTED DID NOT IMPACT

V002 A 407 (PASSING TOO CLOSE TO CYCLIST, HORSE RIDER OR PEDESTRIAN) V001 A 410 (LOSS OF CONTROL)

59 0112XH30087 WED 08/02/12 04:31 DARK STATION ROAD J/W ORCHARD DRIVE 26 LINK 92-99 505740 / 182360  
 POLICE - AT SCENE ROAD-FROST/ICE WEATHER-OTHER SINGLE CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M  
 V1 LOST CONTROL AND LEFT CARRIAGEWAY AND COLLIDED WITH FENCE

CASUALTY 001 (001) (22 Yrs - M UB8) SLIGHT DRIVER/RIDER

CASUALTY 002 (001) (28 Yrs - F SE5) SLIGHT PASSENGER FRONT SEAT

VEHICLE 001 (000) CAR (22 Yrs - M UB8) GOING AHEAD LEFT BEND SE TO W JCT APP  
 BT - NOT REQUESTED FRONT HIT FIRST  
 LEFT CWY NEARSIDE HIT KERB HIT OTH OBJECT

V001 A 410 (LOSS OF CONTROL) V001 A 103 (SLIPPERY ROAD (DUE TO WEATHER))

60 0112XH30495 WED 08/08/12 17:20 LIGHT NFL COWLEY ROAD 58 M N J/W HIGH STREET 26 LINK 92-123 505350 / 182630  
 POLICE - OVER COU ROAD-DRY WEATHER-FINE SINGLE CWY NO JUN IN 20M NO XING FACILITY IN 50M  
 V2 PULLED OUT INFRONT OF V1, V2 HIT V1

CASUALTY 001 (001) (28 Yrs - M UB8) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) PEDAL CYCLE (28 Yrs - M UB8) GOING AHEAD OTHER N TO S  
 BT - NOT APPLICABLE FRONT HIT FIRST

VEHICLE 002 (001) CAR (? Yrs - M ) TURNING LEFT W TO N  
 BT - DRV NOT CONTACTED FRONT HIT FIRST

V002 A 403 (POOR TURN OR MANOEUVRE) V002 A 405 (FAILED TO LOOK PROPERLY)


**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

|  |   |
|--|---|
| SC01 GIS AREA B26 Brunel University Area (P) | 36 MTS TO SEP-2014 SORTED NETWORK ORDER |
|--|---|

|  |                |                 |
|--|----------------|-----------------|
| 61 0112XH30567 TUE 11/09/12 12:00 LIGHT COWLEY ROAD J/W QUEEN'S ROAD | 26 LINK 92-123 | 505360 / 182970 |
|--|----------------|-----------------|

POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY CROSSROADS GIVE WAY/UNCONT NO XING FACILITY IN 50M

V2 STARTED TO PULL OUT AND V1 HIT V2

CASUALTY 001 (002) (23 Yrs - M UB8) SLIGHT DRIVER/RIDER

|  |            |               |         |
|--|------------|---------------|---------|
| VEHICLE 001 (002) GDS =< 3.5T (? Yrs - M ) | MOVING OFF | N TO S        | JCT MID |
| BT - DRV NOT CONTACTED                     |            | O/S HIT FIRST |         |

|  |                   |                 |         |
|--|-------------------|-----------------|---------|
| VEHICLE 002 (001) PEDAL CYCLE (23 Yrs - M UB8) | GOING AHEAD OTHER | N TO S          | JCT MID |
| BT - NOT APPLICABLE                            |                   | FRONT HIT FIRST |         |

V001 A 403 (POOR TURN OR MANOEUVRE)

V001 A 405 (FAILED TO LOOK PROPERLY)

|  |               |                 |
|--|---------------|-----------------|
| 62 0112XH30710 THU 27/09/12 17:50 LIGHT PEACHEY LANE J/W CHURCH ROAD | 26 LINK 92-99 | 505970 / 182000 |
|--|---------------|-----------------|

POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY MINI GIVE WAY/UNCONT NO XING FACILITY IN 50M

V2 REVERSED INTO THE FRONT OF STAT V1

CASUALTY 001 (001) (23 Yrs - M UB1) SLIGHT DRIVER/RIDER

|   |                     |                 |         |
|---|---------------------|-----------------|---------|
| VEHICLE 001 (002) M/C 50-125CC (23 Yrs - M UB1) | GOING AHEAD HELD UP | SW TO NE        | JCT APP |
| BT - NOT REQUESTED                              |                     | FRONT HIT FIRST |         |

|  |           |                |         |
|--|-----------|----------------|---------|
| VEHICLE 002 (001) GDS =< 3.5T (? Yrs - M UNKN) | REVERSING | NE TO SW       | JCT APP |
| BT - DRV NOT CONTACTED                         |           | BACK HIT FIRST |         |

V002 A 405 (FAILED TO LOOK PROPERLY)

V002 A 602 (CARELESS/RECKLESS/IN A HURRY)

|   |                |                 |
|---|----------------|-----------------|
| 63 0112XH30731 FRI 19/10/12 21:35 DARK HIGH STREET J/W BARCHESTER CLOSE | 26 LINK 92-123 | 505360 / 182470 |
|---|----------------|-----------------|

POLICE - OVER COU ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M

V2 PULLED OUT INFRONT OF V1

CASUALTY 001 (001) (? Yrs - M UB1) SLIGHT DRIVER/RIDER

|   |                   |                 |         |
|---|-------------------|-----------------|---------|
| VEHICLE 001 (002) M/C <= 50CC (? Yrs - M UB1) | GOING AHEAD OTHER | S TO N          | JCT MID |
| BT - DRV NOT CONTACTED                        |                   | FRONT HIT FIRST |         |

|                                    |              |               |         |
|------------------------------------|--------------|---------------|---------|
| VEHICLE 002 (001) CAR (? Yrs - M ) | TURNING LEFT | W TO N        | JCT MID |
| BT - DRV NOT CONTACTED             |              | O/S HIT FIRST |         |

V002 A 403 (POOR TURN OR MANOEUVRE)

V002 A 405 (FAILED TO LOOK PROPERLY)


**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

64 0112XH30763 THU 29/11/12 20:17 DARK PIELD HEATH ROAD J/W PEEL WAY 26 LINK 92-99 506450 / 182050

POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M

V1 SWERVED AND FELL FROM BIKE

CASUALTY 001 (001) (19 Yrs - M UB3) SERIOUS DRIVER/RIDER

VEHICLE 001 (000) M/C 50-125CC (19 Yrs - M UB3) GOING AHEAD OTHER NE TO SW JCT MID  
BT - NOT REQUESTED O/S HIT FIRST

V001 A 409 (SWERVED)

V001 A 410 (LOSS OF CONTROL)

65 0112XH30791 MON 17/12/12 13:00 LIGHT COWLEY RD 35M NORTH OF J/W BUCHAN CLOSE 26 LINK 92-123 505350 / 182570

POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY MINI GIVE WAY/UNCONT NO XING FACILITY IN 50M

V2 VEERED INTO PATH OF ONCOMING V1 (PUPIL ON DRIVING LESSON), CAUSING COLLISION. V1 HIT ROUNDABOUT. V2 HIT KERB.

CASUALTY 001 (001) (27 Yrs - F UB7) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) CAR (27 Yrs - F UB7) GOING AHEAD OTHER N TO S JCT MID  
BT - NOT REQUESTED FRONT HIT FIRST  
LEFT CWY AHEAD AT JUNCTN HIT ROUNDABOUT HIT RD SIGN/ATS

VEHICLE 002 (001) CAR (58 Yrs - M UB8) GOING AHEAD OTHER S TO N JCT MID  
BT - NOT REQUESTED FRONT HIT FIRST

HIT KERB

V002 B 509 (DISTRACTION IN VEHICLE)

V002 B 410 (LOSS OF CONTROL)

V002 A 405 (FAILED TO LOOK PROPERLY)

V002 A 305 (ILLEGAL TURN OR DIRECTION OF TRAVEL)

66 0113XH30074 SUN 03/03/13 13:25 LIGHT HIGH STREET J/W BUCHAN CLOSE. 26 LINK 92-123 505350 / 182520

POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M

V.1 TYRE BURST. V.1 LOST CONTROL & CROSSED CARRIAGEWAY & HIT ON-COMING V.2. - [TYRE BURST. (V001)]

CASUALTY 001 (002) (32 Yrs - F UB7) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) CAR (25 Yrs - F UB7) GOING AHEAD OTHER S TO N JCT APP  
BT - DRV NOT CONTACTED SKIDDED O/S HIT FIRST

VEHICLE 002 (001) CAR (32 Yrs - F UB7) GOING AHEAD OTHER N TO S JCT CLEARED  
BT - DRV NOT CONTACTED O/S HIT FIRST

V001 A 409 (SWERVED)

V001 A 410 (LOSS OF CONTROL)

V001 A 999 (OTHER FACTOR)

V001 A 201 (TYRES ILLEGAL, DEFECTIVE OR UNDER INFLATED)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

67 0113XH30079 SUN 24/02/13 01:10 DARK CHURCH ROAD, 85M SOUTH OF J/W STATION ROAD 26 LINK 92-99 505850 / 182260  
 POLICE - AT SCENE ROAD-WET WEATHER-FINE SINGLE CWY NO JUN IN 20M NO XING FACILITY IN 50M

DRIVER OF VEH 1 PASSED OUT AT THE WHEEL & COLLIDED WITH A LAMPOST & HEDGEROW

CASUALTY 001 (001) (57 Yrs - M SL3) SERIOUS DRIVER/RIDER

VEHICLE 001 (000) CAR (57 Yrs - M SL3) GOING AHEAD OTHER S TO N  
 BT - NOT REQUESTED FRONT HIT FIRST  
 LEFT CWY NEARSIDE HIT LAMP POST

V001 A 503 (FATIGUE)

V001 A 505 (ILLNESS OR DISABILITY, MENTAL OR PHYSICAL)

68 0113XH30146 WED 27/03/13 17:20 LIGHT COWLEY ROAD J/W QUEEN'S ROAD 26 LINK 92-123 505360 / 182970  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY CROSSROADS GIVE WAY/UNCONT NO XING FACILITY IN 50M

TRAFFIC STOPPED TO LET VEH 2 OUT OF A JUNCTION, VEH 1 OVERTAKING THIS TRAFFIC FAILED TO NOTICE & HIT VEH 2

CASUALTY 001 (001) (33 Yrs - M IG10) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) M/C 50-125CC (33 Yrs - M IG10) OVERTAKE MOVE VEH O/S N TO S JNY PART OF WORK JCT APP  
 BT - NOT REQUESTED FRONT HIT FIRST

VEHICLE 002 (001) CAR (37 Yrs - F UNKN) TURNING RIGHT E TO N ENTERING MAIN RD  
 BT - NOT REQUESTED O/S HIT FIRST

V001 A 405 (FAILED TO LOOK PROPERLY)

V001 A 406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED)

V001 B 602 (CARELESS/RECKLESS/IN A HURRY)

V001 B 701 (VISION AFFECTED - STATIONARY OR PARKED VEHICLE(S))

69 0113XH30179 MON 29/04/13 13:07 LIGHT HIGH STREET A408, 34M NORTH OF JUNCTION WITH IVER LANE 26 LINK 92-93 505400 / 182310  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY NO JUN IN 20M PELICAN OR SIMILAR

AFTER COMING OUT OF A JUNCTION VEH 1 FAILED TO STOP FOR TRAFFIC AND HIT THE REAR OF VEH 2

CASUALTY 001 (001) (40 Yrs - F UB7) SLIGHT DRIVER/RIDER

CASUALTY 002 (002) (52 Yrs - F UB10) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) CAR (40 Yrs - F UB7) TURNING LEFT E TO S COMM TO/FROM WORK  
 BT - NEGATIVE FRONT HIT FIRST  
 LEFT CWY NEARSIDE HIT RD SIGN/ATS

VEHICLE 002 (001) CAR (52 Yrs - F UB10) WAITING TO TURN RIGHT N TO W COMM TO/FROM WORK  
 BT - NOT PROVD (MEDCL REASONS) BACK HIT FIRST

V001 A 306 (EXCEEDING SPEED LIMIT)

V001 A 403 (POOR TURN OR MANOEUVRE)

V001 A 410 (LOSS OF CONTROL)

V001 A 602 (CARELESS/RECKLESS/IN A HURRY)





**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

70 0113XH30294 WED 26/06/13 16:41 LIGHT PIELD HEATH RD 56M SOUTH WEST OF J/W PEEL WAY 26 LINK 92-99 506400 / 182040  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY PRIV DRIVE GIVE WAY/UNCONT NO XING FACILITY IN 50M  
 V2 OVERTOOK V1 ON O/S AS V1 TURNED RIGHT, CAUSING COLLISION.  
 CASUALTY 001 (002) (32 Yrs - F UB8) SLIGHT DRIVER/RIDER  
 VEHICLE 001 (002) CAR (61 Yrs - F UB8) TURNING RIGHT NE TO N COMM TO/FROM WORK LEAVING MAIN RD  
     BT - NOT REQUESTED O/S HIT FIRST  
     LEFT CWY OFFSIDE HIT KERB  
 VEHICLE 002 (001) CAR (32 Yrs - F UB8) OVERTAKE MOVE VEH O/S NE TO SW JCT MID  
     BT - NOT REQUESTED N/S HIT FIRST  
     LEFT CWY NEAR SIDE HIT TREE  
 V002 A 403 (POOR TURN OR MANOEUVRE) V002 A 406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED)  
 V002 A 405 (FAILED TO LOOK PROPERLY) V002 A 602 (CARELESS/RECKLESS/IN A HURRY)

71 0114XH30169 SUN 19/01/14 12:05 LIGHT COWLEY ROAD, 45 METRES SOUTH OF FERNDAL CRESCENT. 26 LINK 92-123 505350 / 182760  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY NO JUN IN 20M NO XING FACILITY IN 50M  
 V.2 WAS IN STATIONARY TRAFFIC. V.1 TRAVELLING BEHIND FAILED TO STOP & HIT REAR OF V.2.  
 CASUALTY 001 (001) (22 Yrs - F HA6) SLIGHT DRIVER/RIDER  
 CASUALTY 002 (002) (39 Yrs - F UB7) SLIGHT DRIVER/RIDER  
 VEHICLE 001 (002) CAR (22 Yrs - F HA6) GOING AHEAD OTHER S TO N  
     BT - DRV NOT CONTACTED FRONT HIT FIRST  
 VEHICLE 002 (001) CAR (39 Yrs - F UB7) GOING AHEAD HELD UP S TO N  
     BT - DRV NOT CONTACTED BACK HIT FIRST  
 V001 A 405 (FAILED TO LOOK PROPERLY) V001 A 406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED)  
 V001 A 602 (CARELESS/RECKLESS/IN A HURRY)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

**72** 0113TB00074 TUE 01/01/13 03:35 DARK FIELD HEATH ROAD J/W GROVE LANE 26 LINK 99-110 506660 / 182090  
 POLICE - AT SCENE ROAD-WET WEATHER-FINE SINGLE CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M  
 V1 UNKNOWN WHY MOUNTED PAVEMENT AND COLLIDED WITH PED 1 AND 2  
 CASUALTY 001 (001) (19 Yrs - F UNKN) SERIOUS PEDESTRIAN UNKNOWN  
 CASUALTY 002 (001) (20 Yrs - F UNKN) SERIOUS PEDESTRIAN UNKNOWN  
 VEHICLE 001 (000) CAR (? Yrs - U UNKN) GOING AHEAD OTHER SE TO NW JCT CLEARED  
 BT - DRV NOT CONTACTED FRONT HIT FIRST  
 FOOTWAY  
 V001 A 405 (FAILED TO LOOK PROPERLY) V001 A 309 (VEHICLE TRAVELLING ALONG PAVEMENT)  
 V001 B 602 (CARELESS/RECKLESS/IN A HURRY) V001 B 601 (AGGRESSIVE DRIVING)

**73** 0114XH30432 THU 03/07/14 10:20 LIGHT KINGSTON LANE, 325M SE OF J/W IVY BRIDGE CLOSE 26 LINK 99-126 506410 / 182650  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE ROUNDABOUT ROUNDABOUT GIVE WAY/UNCONT NO XING FACILITY IN 50M  
 V1 HAS GONE TO BRAKE BUT HIT ACCELERATOR, V1'S LEG LOCKED, V1 HAS VEERED LEFT OFF ROAD HIT A POLE & FLIPPED ONTO ROOF  
 CASUALTY 001 (001) (86 Yrs - M W5) SLIGHT DRIVER/RIDER  
 VEHICLE 001 (000) CAR (86 Yrs - M W5) TURNING RIGHT NW TO SW COMM TO/FROM WORK JCT APP  
 BT - NOT PROVD (MEDCL REASONS) OVERTURN FRONT HIT FIRST  
 LEFT CWY NEARSIDE HIT KERB HIT OTH OBJECT  
 V001 A 505 (ILLNESS OR DISABILITY, MENTAL OR PHYSICAL) V001 A 410 (LOSS OF CONTROL)

**74** 0111XH30645 WED 26/10/11 14:50 LIGHT FIELD HEATH ROAD 115M N/W COLHAM ROAD 26 LINK 101-110 506900 / 181960  
 POLICE - OVER COU ROAD-DRY WEATHER-FINE SINGLE CWY NO JUN IN 20M NO XING FACILITY IN 50M  
 V2 HAS PULLED OUT ONTO THE MAIN ROAD INTO PATH OF V1 CAUSING COLLISION.  
 CASUALTY 001 (001) (45 Yrs - M UB7) SLIGHT DRIVER/RIDER  
 VEHICLE 001 (002) PEDAL CYCLE (45 Yrs - M UB7) GOING AHEAD OTHER NW TO SE  
 BT - NOT APPLICABLE FRONT HIT FIRST  
 VEHICLE 002 (001) CAR (? Yrs - U UNKN) MOVING OFF N TO S  
 BT - DRV NOT CONTACTED FRONT HIT FIRST  
 V002 A 402 (JUNCTION RESTART) V002 A 405 (FAILED TO LOOK PROPERLY)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

**75** 0113XH30297 THU 04/07/13 19:35 LIGHT PIELD HEATH ROAD, 67M NORTH WEST OF J/W COLHAM GREEN ROAD 26 LINK 101-110 506940 / 181920  
 POLICE - OVER COU ROAD-DRY WEATHER-FINE SINGLE CWY PRIV DRIVE GIVE WAY/UNCONT NO XING FACILITY IN 50M  
 V1 STOPPED TURNING RIGHT TO LET PEDESTRIANS CROSS HOSPITAL ENTRANCE, HE TURNED & DIDN'T SEE C1 HAD ALSO STARTED TO CROSS  
 CASUALTY 001 (001) (66 Yrs - F UNKN) SLIGHT PEDESTRIAN NW BOUND FROM DRIVERS O/SIDE  
 VEHICLE 001 (000) CAR (42 Yrs - M UB7) TURNING RIGHT NW TO SW COMM TO/FROM WORK JCT APP  
 BT - DRV NOT CONTACTED FRONT HIT FIRST

V001 A 706 (VISION AFFECTED - DAZZLING SUN)

V001 A 407 (PASSING TOO CLOSE TO CYCLIST, HORSE RIDER OR PEDESTRIAN)

**76** 0114XH30353 MON 16/06/14 08:47 LIGHT PIELD HEATH ROAD, 83M NW OF J/W COLHAM GREEN ROAD 26 LINK 101-110 506930 / 181930  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY PRIV DRIVE GIVE WAY/UNCONT ZEBRA  
 V1 HAS PASSED OUT AT THE WHEEL ON HER WAY TO THE HOSPITAL, LEFT CARRIAGEWAY N/S, HIT BRICK WALL, PARKED V2 & A BUILDING  
 CASUALTY 001 (001) (31 Yrs - F UB8) SERIOUS DRIVER/RIDER  
 VEHICLE 001 (002) CAR (31 Yrs - F UB8) GOING AHEAD OTHER SE TO NW JCT APP  
 BT - NOT PROVD (MEDCL REASONS) FRONT HIT FIRST  
 LEFT CWY NEARSIDE HIT KERB HIT RD SIGN/ATS  
 VEHICLE 002 (001) CAR (? Yrs - U PARKED) PARKED P TO P JCT APP  
 BT - DRV NOT CONTACTED O/S HIT FIRST

FOOTWAY

V001 A 505 (ILLNESS OR DISABILITY, MENTAL OR PHYSICAL)

V001 B 602 (CARELESS/RECKLESS/IN A HURRY)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

77 0114XH30465 TUE 10/06/14 07:10 LIGHT HARLINGTON RD J/W SOUTHFIELD CLOSE 26 LINK 103-128 507260 / 182450

POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M

V2 COLLIDED WITH REAR OF STAT V1 WHEN OVERTAKING. V2 THEN HIT ONCOMING V3.

CASUALTY 001 (002) (50 Yrs - M UB3) SERIOUS DRIVER/RIDER

CASUALTY 002 (003) (37 Yrs - M WD24) SERIOUS DRIVER/RIDER

VEHICLE 001 (002) CAR (33 Yrs - F UB8 ) GOING AHEAD HELD UP S TO N JNY PART OF WORK JCT CLEARED  
BT - NOT REQUESTED BACK HIT FIRST

VEHICLE 002 (001) CAR (50 Yrs - M UB3 ) OVERTAKE STAT VEH O/S S TO N JNY PART OF WORK JCT CLEARED  
BT - NOT PROVD (MEDCL REASONS) FRONT HIT FIRST

VEHICLE 003 (002) CAR (37 Yrs - M WD24) GOING AHEAD OTHER N TO S JNY PART OF WORK JCT APP  
BT - NOT PROVD (MEDCL REASONS) FRONT HIT FIRST

V002 A 405 (FAILED TO LOOK PROPERLY)

V002 A 306 (EXCEEDING SPEED LIMIT)

V002 A 602 (CARELESS/RECKLESS/IN A HURRY)

V002 A 403 (POOR TURN OR MANOEUVRE)

78 0112XH30445 THU 12/07/12 09:45 LIGHT NEW WINDSOR STREET J/W HOW'S ROAD 26 LINK 119-143 505260 / 183960

POLICE - OVER COU ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M

V2 HIT THE REAR OF V1, V2 WASNT LOOKING PROPLEY WHEN HIT

CASUALTY 001 (001) (48 Yrs - M UB5) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) CAR (48 Yrs - M UB5 ) SLOWING OR STOPPING E TO W JCT MID  
BT - DRV NOT CONTACTED BACK HIT FIRST

VEHICLE 002 (001) CAR (? Yrs - M ) GOING AHEAD OTHER E TO W JCT MID  
BT - DRV NOT CONTACTED FRONT HIT FIRST

V002 A 308 (FOLLOWING TOO CLOSE)

V002 A 405 (FAILED TO LOOK PROPERLY)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

79 0112TB00433 FRI 20/04/12 12:15 LIGHT COWLEY ROAD 56M N OF J/W COTSWOLD CLOSE 26 LINK 122-142 505380 / 183610

POLICE - AT SCENE ROAD-WET RAINING SINGLE CWY NO JUN IN 20M NO XING FACILITY IN 50M

V1 TUNRNEDRIGHT ACROSS PATH OF ONCOMING V2 (SOLO), V2 LOST CONTROL HITTING PARKED V3, DEBRIE THE COLLIDED WITH PARKED V4

CASUALTY 001 (002) (35 Yrs - M TW15) SERIOUS DRIVER/RIDER

VEHICLE 001 (004) CAR (29 Yrs - M NW9) TURNING RIGHT N TO W  
BT - NEGATIVE N/S HIT FIRST

VEHICLE 002 (003) M/C > 500CC (35 Yrs - M TW15) GOING AHEAD OTHER S TO N  
BT - DRV NOT CONTACTED FRONT HIT FIRST

VEHICLE 003 (002) CAR (? Yrs - U UNKN) HIT PARKED VEH PARKED P TO P  
BT - DRV NOT CONTACTED O/S HIT FIRST

VEHICLE 004 (001) CAR (? Yrs - U UNKN) PARKED P TO P  
BT - DRV NOT CONTACTED N/S HIT FIRST

V002 A 410 (LOSS OF CONTROL)

V002 B 103 (SLIPPERY ROAD (DUE TO WEATHER))

V001 A 302 (DISOBEYED GIVE WAY OR STOP SIGN OR MARKINGS)

V001 A 405 (FAILED TO LOOK PROPERLY)

V001 A 602 (CARELESS/RECKLESS/IN A HURRY)

80 0112XH30438 MON 09/07/12 08:00 LIGHT COWLEY ROAD J/W WALFORD ROAD 26 LINK 122-142 505380 / 183340

POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M

PED WALKED INTO THE ROAD AND WAS HIT BY V1, PED DIDNT LOOK AT A.T.S

CASUALTY 001 (001) (30 Yrs - M ) SERIOUS PEDESTRIAN CROSSING ROAD (NOT ON XING) W BOUND FROM DRIVERS N/SIDE

VEHICLE 001 (000) CAR (? Yrs - M ) GOING AHEAD OTHER N TO S JCT MID  
BT - DRV NOT CONTACTED FRONT HIT FIRST

C001 A 804 (WRONG USE OF PEDESTRIAN CROSSING FACILITY)

C001 A 808 (CARELESS/RECKLESS/IN A HURRY)





**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

**81** 0113XH30452 MON 09/09/13 17:10 LIGHT COWLEY ROAD J/W HINTON ROAD 26 LINK 122-142 505390 / 183750  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M  
 V4 HIT REAR OF V3, PUSHING IT INTO REAR OF V2 WHICH THEN HIT V1  
 CASUALTY 001 (004) (69 Yrs - M HA4) SLIGHT DRIVER/RIDER  
 CASUALTY 002 (003) (12 Yrs - M UB8) SLIGHT PASSENGER FRONT SEAT  
 VEHICLE 001 (002) CAR (22 Yrs - M UB8) WAITING TO TURN RIGHT S TO E JCT APP  
 BT - NOT REQUESTED BACK HIT FIRST  
 VEHICLE 002 (003) CAR (32 Yrs - F HA4) GOING AHEAD HELD UP S TO N JCT APP  
 BT - NOT REQUESTED BACK HIT FIRST  
 VEHICLE 003 (004) CAR (36 Yrs - F UB8) SLOWING OR STOPPING S TO N JCT APP  
 BT - NOT REQUESTED BACK HIT FIRST  
 VEHICLE 004 (003) CAR (69 Yrs - M HA4) GOING AHEAD OTHER S TO N JCT APP  
 BT - NOT REQUESTED FRONT HIT FIRST

V004 A 509 (DISTRACTION IN VEHICLE) V004 A 405 (FAILED TO LOOK PROPERLY)  
 V004 A 602 (CARELESS/RECKLESS/IN A HURRY)

**82** 0111XH30761 MON 19/12/11 08:45 LIGHT THE GREENWAY J/W KING'S ROAD 26 LINK 123-124 505510 / 183100

POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M  
 V2 PULLED OUT INFRONT OF V1  
 CASUALTY 001 (001) (30 Yrs - M ) SLIGHT DRIVER/RIDER  
 VEHICLE 001 (002) PEDAL CYCLE (30 Yrs - M ) GOING AHEAD OTHER E TO W JCT MID  
 BT - NOT APPLICABLE FRONT HIT FIRST  
 VEHICLE 002 (001) CAR (? Yrs - M ) TURNING RIGHT S TO E JCT MID  
 BT - DRV NOT CONTACTED FRONT HIT FIRST

V002 A 403 (POOR TURN OR MANOEUVRE) V002 A 405 (FAILED TO LOOK PROPERLY)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

83 0112XH30675 WED 24/10/12 08:07 LIGHT THE GREENWAY J/W WHITEHALL ROAD 26 LINK 123-124 505780 / 183130

POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY CROSSROADS GIVE WAY/UNCONT NO XING FACILITY IN 50M

V2 DIDNT GIVEWAY AND HIT V1

CASUALTY 001 (001) (5 Yrs - M UB8) SLIGHT PASSENGER FRONT SEAT  
 JOURNEY TO/FROM SCHOOL Sch Attended : HAYES PARK SCHOOL

VEHICLE 001 (002) CAR (30 Yrs - F SL3) GOING AHEAD OTHER N TO S JCT MID  
 BT - NEGATIVE FRONT HIT FIRST

VEHICLE 002 (001) CAR (44 Yrs - F UB8) GOING AHEAD OTHER E TO W JCT MID  
 BT - NEGATIVE FRONT HIT FIRST

V002 A 302 (DISOBEYED GIVE WAY OR STOP SIGN OR MARKINGS)

V002 A 405 (FAILED TO LOOK PROPERLY)

84 0111TB01477 WED 26/10/11 17:05 DARK HILLINGDON ROAD 35M. NORTH OF J/W ORCHARD WAYE. 26 LINK 124-147 505980 / 183360

POLICE - AT SCENE ROAD-DRY WEATHER-FINE DUAL CWY NO JUN IN 20M NO XING FACILITY IN 50M

V1 LOSES CONTROL, CLIPS KERB, MOUNTS PAVEMENT AND HITS PEDS.

CASUALTY 001 (001) (18 Yrs - F UB8) SLIGHT PEDESTRIAN ON FOOTPATH - VERGE S BOUND

CASUALTY 002 (001) (19 Yrs - M UB8) SLIGHT PEDESTRIAN ON FOOTPATH - VERGE S BOUND

CASUALTY 003 (001) (19 Yrs - M UB8) SLIGHT PEDESTRIAN ON FOOTPATH - VERGE S BOUND

CASUALTY 004 (001) (29 Yrs - M UNKN) SLIGHT PEDESTRIAN ON FOOTPATH - VERGE S BOUND

VEHICLE 001 (000) CAR (31 Yrs - M HP13) GOING AHEAD OTHER S TO N JNY PART OF WORK  
 BT - NOT REQUESTED FRONT HIT FIRST  
 LEFT CWY NEARSIDE HIT KERB

V001 B 306 (EXCEEDING SPEED LIMIT)

V001 A 410 (LOSS OF CONTROL)

V001 A 602 (CARELESS/RECKLESS/IN A HURRY)

V001 B 509 (DISTRACTION IN VEHICLE)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

**85** 0111XH30655 TUE 08/11/11 14:56 LIGHT NFL: HILLINGDON ROAD 79 M N J/W ORCHARD WAY 26 LINK 124-147 505980 / 183410  
 POLICE - AT SCENE ROAD-WET RAINING DUAL CWY NO JUN IN 20M NO XING FACILITY IN 50M  
 V1 NORTH-BD MAJOR RD LOST CONTROL WHEN U/I VEH CAME ALONGSIDE; V1 COLLIDED O/S KERB, BOUNCED TO N/S PAVEMENT  
 CASUALTY 001 (001) (25 Yrs - M UB10) SLIGHT PEDESTRIAN ON FOOTPATH - VERGE E BOUND  
 CASUALTY 002 (001) (26 Yrs - F WD18) SLIGHT DRIVER/RIDER  
 VEHICLE 001 (000) CAR (26 Yrs - F WD18) GOING AHEAD OTHER S TO N COMM TO/FROM WORK  
 BT - NOT PROVD (MEDCL REASONS) SKIDDED FRONT HIT FIRST  
 LEFT CWY NEARSIDE HIT KERB HIT OTH OBJECT  
 V001 A 406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED) V001 A 603 (NERVOUS/UNCERTAIN/ PANIC)  
 V001 A 408 (SUDDEN BRAKING) V001 A 409 (SWERVED)  
 V001 A 410 (LOSS OF CONTROL)

**86** 0112TB01002 SUN 07/10/12 06:08 DARK HILLINGDON ROAD 87M N OF J/W ORCHARD WAY 26 LINK 124-147 505990 / 183410  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY NO JUN IN 20M NO XING FACILITY IN 50M  
 UNKNOWN WHY V1 LOST CONTROL  
 CASUALTY 001 (001) (27 Yrs - M UB3) SERIOUS PASSENGER FRONT SEAT  
 VEHICLE 001 (000) CAR (30 Yrs - M UB3) GOING AHEAD OTHER S TO N  
 BT - REFUSED TO PROVIDE N/S HIT FIRST  
 V001 B 501 (IMPAIRED BY ALCOHOL) V001 A 410 (LOSS OF CONTROL)  
 V001 B 307 (TRAVELLING TOO FAST FOR CONDITIONS) V001 A 602 (CARELESS/RECKLESS/IN A HURRY)  
 V001 B 601 (AGGRESSIVE DRIVING)

**87** 0113XH30045 MON 28/01/13 17:58 DARK HILLINGDON ROAD, 50 METRES NORTH OF MANOR WAY. 26 LINK 124-147 506060 / 183570  
 POLICE - AT SCENE ROAD-WET WEATHER-FINE DUAL CWY NO JUN IN 20M NO XING FACILITY IN 50M  
 C.1 CROSSED THE ROAD WITHOUT LOOKING AND WAS HIT BY ON-COMING V.1.  
 CASUALTY 001 (001) (69 Yrs - F UNKN) SLIGHT PEDESTRIAN CROSSING ROAD (NOT ON XING) E BOUND FROM DRIVERS O/SIDE  
 VEHICLE 001 (000) CAR (70 Yrs - F SLO) GOING AHEAD OTHER N TO S  
 BT - NEGATIVE O/S HIT FIRST  
 C001 A 802 (FAILED TO LOOK PROPERLY) C001 A 808 (CARELESS/RECKLESS/IN A HURRY)  
 C001 A 809 (PEDESTRIAN WEARING DARK CLOTHING AT NIGHT)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

**88** 0113XH30263 WED 05/06/13 09:00 LIGHT HILLINGDON RD 37M NORTH OF ORCHARD WAY 26 LINK 124-147 505980 / 183370  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE DUAL CWY NO JUN IN 20M NO XING FACILITY IN 50M

V'S 1 AND 2 STOPPED SUDDENLY. V3 HIT V2'S REAR, PUSHING V2 INTO V1.

CASUALTY 001 (001) (42 Yrs - M UB2) SLIGHT DRIVER/RIDER

CASUALTY 002 (002) (35 Yrs - M UB4) SLIGHT DRIVER/RIDER

CASUALTY 003 (003) (20 Yrs - M SE15) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) CAR (42 Yrs - M UB2) SLOWING OR STOPPING S TO N COMM TO/FROM WORK  
 BT - NEGATIVE BACK HIT FIRST

VEHICLE 002 (003) CAR (35 Yrs - M UB4) GOING AHEAD HELD UP S TO N COMM TO/FROM WORK  
 BT - NOT REQUESTED BACK HIT FIRST

VEHICLE 003 (002) GDS =< 3.5T (20 Yrs - M SE15) GOING AHEAD OTHER S TO N COMM TO/FROM WORK  
 BT - NEGATIVE FRONT HIT FIRST

V001 A 408 (SUDDEN BRAKING)

V002 A 408 (SUDDEN BRAKING)

V003 A 308 (FOLLOWING TOO CLOSE)

V002 A 308 (FOLLOWING TOO CLOSE)

**89** 0113XH30455 SAT 05/10/13 11:50 LIGHT HILLINGDON ROAD, 56M NORTH OF JUNCTION WITH ORCHARD WAY 26 LINK 124-147 505990 / 183390

POLICE - AT SCENE ROAD-DRY WEATHER-FINE DUAL CWY NO JUN IN 20M NO XING FACILITY IN 50M

IT APPEARS THAT RIDER OF V1 BANKED TOO MUCH AS HE TOOK A BEND IN THE ROAD, THE FOOT PEG CAUGHT THE ROAD & V1 FELL

CASUALTY 001 (001) (22 Yrs - M UB8) SERIOUS DRIVER/RIDER

VEHICLE 001 (000) M/C > 500CC (22 Yrs - M UB8) GOING AHEAD RIGHT BEND SE TO NE  
 BT - NOT PROVD (MEDCL REASONS) SKIDDED DID NOT IMPACT  
 LEFT CWY NEAR SIDE HIT LAMP POST

V001 B 403 (POOR TURN OR MANOEUVRE)

V001 B 108 (ROAD LAYOUT (EG BEND, HILL, NARROW CARRIAGEWAY))



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

90 0111TB01548 TUE 15/11/11 21:51 DARK VINE STREET 40M S OF J/W THE RISE 26 LINK 127-192 506910 / 183080

POLICE - AT SCENE ROAD-WET WEATHER-FINE SINGLE CWY NO JUN IN 20M NO XING FACILITY IN 50M

PED RAN OUT INTO PATH OF PASSING V1

CASUALTY 001 (001) (21 Yrs - M UB10) SERIOUS PEDESTRIAN CROSSING ROAD (NOT ON XING) W BOUND FROM DRIVERS N/SIDE

VEHICLE 001 (000) GDS =< 3.5T (57 Yrs - M UB10) GOING AHEAD OTHER N TO S JNY PART OF WORK  
BT - NEGATIVE FRONT HIT FIRST

C001 A 805 (DANGEROUS ACTION IN CARRIAGEWAY (EG PLAYING))

C001 A 810 (DISABILITY OR ILLNESS, MENTAL OR PHYSICAL)

C001 A 808 (CARELESS/RECKLESS/IN A HURRY)

C001 A 806 (IMPAIRED BY ALCOHOL)

91 0113XH30433 SUN 15/09/13 22:40 DARK UXBRIDGE ROAD 25M NORTH WEST J/W HARLINGTON ROAD 26 LINK 127-128 507110 / 182860

POLICE - AT SCENE ROAD-WET RAINING DUAL CWY NO JUN IN 20M NO XING FACILITY IN 50M  
ROADWORKS

DRIVER V1 LOST CONTROL, CROSSED CARRIAGEWAY AND HIT ONCOMING V2

CASUALTY 001 (001) (19 Yrs - M UB1) SLIGHT DRIVER/RIDER

CASUALTY 002 (002) (47 Yrs - M UB4) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) CAR (19 Yrs - M UB1) CHANGE LANE TO RIGHT NW TO SE  
BT - NOT REQUESTED SKIDDED BACK HIT FIRST  
LEFT CWY CROSS CENT/RES HIT KERB

VEHICLE 002 (001) BUS/COACH (47 Yrs - M UB4) GOING AHEAD OTHER SE TO NW JNY PART OF WORK  
BT - NOT REQUESTED FRONT HIT FIRST

V001 A 307 (TRAVELLING TOO FAST FOR CONDITIONS)

V001 A 602 (CARELESS/RECKLESS/IN A HURRY)





**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

**92** 0114XH30155 WED 19/03/14 17:05 LIGHT UXBRIDGE ROAD, 50M NORTH WEST OF JUNCTION WITH HARLINGTON ROAD 26 LINK 127-128 507099 / 182882  
 POLICE - AT SCENE ROAD-DRY WEATHER-UNKNOWN DUAL CWY NO JUN IN 20M PEDN PHASE AT ATS

V2 INDICATED & MOVED RIGHT, V1 TRIED TO OVERTAKE & HIT RIGHT ARM OF V2 CAUSING V2 TO FALL

CASUALTY 001 (002) (50 Yrs - M KT1) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) OTH MOT VEH (24 Yrs - M SL4) OVERTAKE MOVE VEH O/S NW TO SE  
 BT - NOT REQUESTED N/S HIT FIRST

VEHICLE 002 (001) PEDAL CYCLE (50 Yrs - M KT1) CHANGE LANE TO RIGHT NW TO SE  
 BT - NOT APPLICABLE O/S HIT FIRST

V002 A 403 (POOR TURN OR MANOEUVRE)

V002 A 407 (PASSING TOO CLOSE TO CYCLIST, HORSE RIDER OR PEDESTRIAN)

V002 A 602 (CARELESS/RECKLESS/IN A HURRY)

**93** 0114XH30204 FRI 28/03/14 08:33 LIGHT UXBRIDGE ROAD 40M NORTH WEST J/W LONG LANE 26 LINK 128-129 507380 / 182690  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE DUAL CWY NO JUN IN 20M NO XING FACILITY IN 50M

V2 HIT REAR V1

CASUALTY 001 (001) (47 Yrs - F UB10) SLIGHT DRIVER/RIDER

CASUALTY 002 (001) (24 Yrs - F UNKN) SLIGHT PASSENGER FRONT SEAT

VEHICLE 001 (002) CAR (47 Yrs - F UB10) GOING AHEAD HELD UP NW TO SE  
 BT - NOT REQUESTED BACK HIT FIRST

VEHICLE 002 (001) CAR (18 Yrs - F NG11) SLOWING OR STOPPING NW TO SE  
 BT - NOT REQUESTED FRONT HIT FIRST

V002 A 406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

94 0111XH30748 WED 07/12/11 19:20 DARK UXBRIDGE ROAD J.W BRAMBLES FARM DRIVE 26 LINK 129-131 507510 / 182590

POLICE - AT SCENE ROAD-DRY FINE/HIGH WINDS DUAL CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M

V5 BRAKED AND WAS HIT IN REAR BY V4, V3 COLLIDED REAR V4, V2 COLLIDED V3, V1 COLLIDED REAR V2

CASUALTY 001 (003) (51 Yrs - F UNKN) SLIGHT DRIVER/RIDER

CASUALTY 002 (005) (28 Yrs - F UNKN) SLIGHT DRIVER/RIDER

CASUALTY 003 (002) (27 Yrs - F UNKN) SLIGHT PASSENGER FRONT SEAT

VEHICLE 001 (002) CAR (44 Yrs - M NN13) SLOWING OR STOPPING SE TO NW JCT MID  
BT - NOT REQUESTED BACK HIT FIRST

VEHICLE 002 (003) CAR (22 Yrs - M UB4) SLOWING OR STOPPING SE TO NW JCT MID  
BT - NOT REQUESTED FRONT HIT FIRST

VEHICLE 003 (004) CAR (51 Yrs - F UNKN) SLOWING OR STOPPING SE TO NW JCT MID  
BT - NOT REQUESTED FRONT HIT FIRST

VEHICLE 004 (005) CAR (50 Yrs - M UNKN) SLOWING OR STOPPING SE TO NW JCT MID  
BT - NOT REQUESTED FRONT HIT FIRST

VEHICLE 005 (004) CAR (28 Yrs - F UNKN) GOING AHEAD HELD UP SE TO NW JCT MID  
BT - NOT REQUESTED FRONT HIT FIRST

V005 A 408 (SUDDEN BRAKING)

V004 A 307 (TRAVELLING TOO FAST FOR CONDITIONS)

V003 A 307 (TRAVELLING TOO FAST FOR CONDITIONS)

V002 A 307 (TRAVELLING TOO FAST FOR CONDITIONS)

V001 A 307 (TRAVELLING TOO FAST FOR CONDITIONS)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

95 0113XH30092 THU 28/02/13 18:35 DARK UXBRIDGE ROAD J/W BRAMBLES FARM DRIVE 26 LINK 129-131 507520 / 182580  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE DUAL CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M  
 VEH 2 BRAKED DUE TO HEAVY TRAFFIC AND VEH 1 COLLIDED INTO THE REAR OF VEH 2

CASUALTY 001 (002) (34 Yrs - M UB08) SLIGHT PASSENGER FRONT SEAT  
 VEHICLE 001 (002) CAR (51 Yrs - M SL09) GOING AHEAD OTHER SE TO NW COMM TO/FROM WORK JCT APP  
 BT - NOT REQUESTED FRONT HIT FIRST

VEHICLE 002 (001) CAR (36 Yrs - M UB08) GOING AHEAD OTHER SE TO NW COMM TO/FROM WORK JCT APP  
 BT - NOT REQUESTED BACK HIT FIRST

V002 B 408 (SUDDEN BRAKING) V002 B 308 (FOLLOWING TOO CLOSE)  
 V001 A 308 (FOLLOWING TOO CLOSE) V001 A 406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED)

96 0113XH30552 FRI 15/11/13 21:45 DARK NFL - LONG LANE, 44M SOUTH OF JUNCTION WITH THE LARCHES 26 LINK 129-152 507430 / 182870  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY NO JUN IN 20M ZEBRA  
 ANIMAL IN CWY (NOT RID-HORSE)

V1 SWERVED & BRAKED SUDDENLY TO AVOID A FOX IN THE ROAD WHICH SHE HIT, V1 WAS THEN HIT IN REAR BY V2  
 CASUALTY 001 (001) (51 Yrs - F HA4) SLIGHT DRIVER/RIDER  
 VEHICLE 001 (002) CAR (51 Yrs - F HA4) GOING AHEAD OTHER N TO S JNY PART OF WORK  
 BT - NOT REQUESTED BACK HIT FIRST

VEHICLE 002 (001) CAR (19 Yrs - M UB8) GOING AHEAD OTHER N TO S  
 BT - NOT REQUESTED HIT ANIMAL (NOT RID-HORSE) FRONT HIT FIRST

V001 A 109 (ANIMAL OR OBJECT IN CARRIAGEWAY) V001 A 408 (SUDDEN BRAKING)  
 V001 A 409 (SWERVED) V001 A 603 (NERVOUS/UNCERTAIN/ PANIC)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

**97** 0114XH30209 TUE 11/03/14 11:20 LIGHT LONG LANE 40M NORTH J/W UXBRIDGE ROAD 26 LINK 129-152 507420 / 182720  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY PRIV DRIVE GIVE WAY/UNCONT NO XING FACILITY IN 50M  
 V1 TURNED LEFT INTO PATH V2

CASUALTY 001 (002) (78 Yrs - M HA4) SLIGHT DRIVER/RIDER  
 VEHICLE 001 (002) CAR (32 Yrs - M UB10) TURNING LEFT E TO S JCT MID  
 BT - NOT REQUESTED FRONT HIT FIRST

VEHICLE 002 (001) M/C 125-500CC (78 Yrs - M HA4) GOING AHEAD OTHER N TO S JCT MID  
 BT - NOT REQUESTED N/S HIT FIRST

V001 B 701 (VISION AFFECTED - STATIONARY OR PARKED VEHICLE(S))      V001 A 405 (FAILED TO LOOK PROPERLY)  
 V001 A 602 (CARELESS/RECKLESS/IN A HURRY)

**98** 0114XH30348 WED 11/06/14 22:15 DARK LONG LANE 39M NORTH J/W UXBRIDGE ROAD 26 LINK 129-152 507420 / 182720

POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY PRIV DRIVE GIVE WAY/UNCONT NO XING FACILITY IN 50M  
 V1 TURNED RIGHT ACROSS PATH V2 WHICH WAS OVERTAKING STATIONARY TRAFFIC ON NEARSIDE

CASUALTY 001 (002) (45 Yrs - F UB8) SLIGHT DRIVER/RIDER  
 CASUALTY 002 (002) (49 Yrs - M UNKN) SLIGHT PASSENGER FRONT SEAT  
 CASUALTY 003 (001) (21 Yrs - M UNKN) SLIGHT PASSENGER FRONT SEAT  
 VEHICLE 001 (002) CAR (25 Yrs - M SL0) TURNING RIGHT S TO E JCT MID  
 BT - NEGATIVE N/S HIT FIRST

VEHICLE 002 (001) CAR (45 Yrs - F UB8) OVERTAKING NEARSIDE N TO S JCT MID  
 BT - POSITIVE FRONT HIT FIRST

V001 A 701 (VISION AFFECTED - STATIONARY OR PARKED VEHICLE(S))      V002 A 501 (IMPAIRED BY ALCOHOL)  
 V002 B 307 (TRAVELLING TOO FAST FOR CONDITIONS)      V002 A 602 (CARELESS/RECKLESS/IN A HURRY)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

99 0114XH30595 TUE 05/08/14 14:49 LIGHT NFL - LONG LANE, J/W THE LARCHES 26 LINK 129-152 507430 / 182900

POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN GIVE WAY/UNCONT PELICAN OR SIMILAR

V1 STATES HE MOVED RIGHT IN SLOW MOVING TRAFFIC TO SEE AHEAD WHEN HE COLLIDED WITH A PEDESTRIAN CROSSING ISLAND

CASUALTY 001 (001) (72 Yrs - M HA1) SLIGHT DRIVER/RIDER

VEHICLE 001 (000) CAR (72 Yrs - M HA1) GOING AHEAD OTHER S TO N JNY PART OF WORK JCT APP  
 BT - NOT REQUESTED FRONT HIT FIRST  
 LEFT CWY OFFSIDE HIT BOLLARD HIT OTH OBJECT

V001 A 405 (FAILED TO LOOK PROPERLY)

V001 A 403 (POOR TURN OR MANOEUVRE)

V001 B 503 (FATIGUE)

V001 A 602 (CARELESS/RECKLESS/IN A HURRY)

100 0111XH30814 WED 28/12/11 14:47 LIGHT CROSS STREET J.W WINDSOR STREET 26 LINK 140-145 505430 / 183980

POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY CROSSROADS GIVE WAY/UNCONT NO XING FACILITY IN 50M

V2 PULLED OUT INTO THE SIDE OF V1

CASUALTY 001 (001) (36 Yrs - F UB3) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) CAR (36 Yrs - F UB3) GOING AHEAD OTHER NW TO SE JCT MID  
 BT - NOT REQUESTED N/S HIT FIRST

VEHICLE 002 (001) M/C > 500CC (67 Yrs - M UB9) TURNING LEFT NE TO SE JCT MID  
 BT - NOT REQUESTED FRONT HIT FIRST

V002 A 302 (DISOBEYED GIVE WAY OR STOP SIGN OR MARKINGS)

V002 A 405 (FAILED TO LOOK PROPERLY)

101 0112XH30376 WED 04/07/12 19:13 LIGHT NFL HILLINGDON ROAD 60 M SW J/W HIGH STREET 26 LINK 140-147 505880 / 183800

POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY NO JUN IN 20M NO XING FACILITY IN 50M

V1 SWERVED LOST CONTROL AND HIT KERB

CASUALTY 001 (001) (? Yrs - F W13) SLIGHT PASSENGER FRONT SEAT

VEHICLE 001 (000) CAR (? Yrs - M UB1) GOING AHEAD OTHER NE TO SW FRONT HIT FIRST  
 BT - NOT REQUESTED HIT KERB

V001 A 409 (SWERVED)

V001 A 410 (LOSS OF CONTROL)




**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

|  |   |
|--|---|
| SC01 GIS AREA B26 Brunel University Area (P) | 36 MTS TO SEP-2014 SORTED NETWORK ORDER |
|--|---|

|  |                 |                 |
|--|-----------------|-----------------|
| 102 0112XH30634 WED 03/10/12 17:35 LIGHT CROSS STREET J/W WINDSOR STREET | 26 LINK 140-145 | 505430 / 183980 |
|--|-----------------|-----------------|

POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY CROSSROADS GIVE WAY/UNCONT NO XING FACILITY IN 50M

V2 PULLED OUT TO QUICK AND HIT V1

CASUALTY 001 (002) (? Yrs - M ) SLIGHT DRIVER/RIDER

|                       |                  |                   |                 |         |
|-----------------------|------------------|-------------------|-----------------|---------|
| VEHICLE 001 (002) CAR | (? Yrs - M HA5 ) | GOING AHEAD OTHER | NW TO SE        | JCT MID |
| BT - NOT REQUESTED    |                  |                   | FRONT HIT FIRST |         |

|                                 |              |                   |                 |         |
|---------------------------------|--------------|-------------------|-----------------|---------|
| VEHICLE 002 (001) M/C 125-500CC | (? Yrs - M ) | GOING AHEAD OTHER | NE TO SW        | JCT MID |
| BT - DRV NOT CONTACTED          |              |                   | FRONT HIT FIRST |         |

V002 A 401 (JUNCTION OVERSHOOT)

V002 A 406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED)

|   |                 |                 |
|---|-----------------|-----------------|
| 103 0113XH30469 TUE 08/10/13 12:53 LIGHT HILLINGDON ROAD 30M WEST J/W HIGH STREET | 26 LINK 140-147 | 505910 / 183810 |
|---|-----------------|-----------------|

POLICE - AT SCENE ROAD-DRY WEATHER-FINE DUAL CWY NO JUN IN 20M NO XING FACILITY IN 50M

V2 HIT REAR V1

CASUALTY 001 (001) (43 Yrs - F UB4 ) SLIGHT DRIVER/RIDER

|                       |                   |                     |        |                |
|-----------------------|-------------------|---------------------|--------|----------------|
| VEHICLE 001 (002) CAR | (43 Yrs - F UB4 ) | GOING AHEAD HELD UP | W TO E | BACK HIT FIRST |
| BT - NOT REQUESTED    |                   |                     |        |                |

|                        |                  |                   |        |                 |
|------------------------|------------------|-------------------|--------|-----------------|
| VEHICLE 002 (001) CAR  | (? Yrs - M UNKN) | GOING AHEAD OTHER | W TO E | FRONT HIT FIRST |
| BT - DRV NOT CONTACTED |                  |                   |        |                 |

V002 A 406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED)

V002 A 602 (CARELESS/RECKLESS/IN A HURRY)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

**104** 0114XH30412 FRI 20/06/14 09:14 LIGHT HILLINGDON ROAD 24M SW OF HIGH STREET 26 LINK 140-147 505910 / 183810  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE DUAL CWY NO JUN IN 20M NO XING FACILITY IN 50M

V2 WENT INTO THE BACK OF V1

CASUALTY 001 (001) (43 Yrs - F UB3) SLIGHT DRIVER/RIDER

CASUALTY 002 (001) (42 Yrs - F UB3) SLIGHT PASSENGER FRONT SEAT

VEHICLE 001 (000) CAR (43 Yrs - F UB3) SLOWING OR STOPPING SW TO NE  
 BT - NOT REQUESTED BACK HIT FIRST

VEHICLE 002 (000) CAR (36 Yrs - F UB4) GOING AHEAD OTHER SW TO NE  
 BT - NOT REQUESTED FRONT HIT FIRST

V002 A 308 (FOLLOWING TOO CLOSE)

**105** 0113XH30019 FRI 11/01/13 22:02 DARK OXFORD RD 68M NORTH OF J/W CROSS STREET 26 LINK 145-160 505330 / 184080  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE DUAL CWY NO JUN IN 20M NO XING FACILITY IN 50M

V1 PUTTING ROOF DOWN, SWERVED AND LOST CONTROL. V1 COLLIDED WITH A LAMP POST AND A BUS STOP.

CASUALTY 001 (001) (37 Yrs - M UNKN) SLIGHT DRIVER/RIDER

VEHICLE 001 (000) CAR (37 Yrs - M UNKN) GOING AHEAD OTHER N TO S  
 BT - NEGATIVE SKIDDED O/S HIT FIRST  
 LEFT CWY NEARSIDE HIT KERB HIT LAMP POST

V001 A 410 (LOSS OF CONTROL)

V001 A 409 (SWERVED)

V001 A 306 (EXCEEDING SPEED LIMIT)

V001 A 509 (DISTRACTION IN VEHICLE)

**106** 0113XH30348 TUE 06/08/13 13:05 LIGHT OXFORD ROAD, 48 METRES NORTH OF TRUMPER WAY. 26 LINK 145-160 505320 / 184050  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY NO JUN IN 20M PELICAN OR SIMILAR

C.1 CROSSED THE ROAD, IN PATH OF ON-COMING V.1. V.1 HIT PED.

CASUALTY 001 (001) (17 Yrs - F UB10) SLIGHT PEDESTRIAN CROSSING ROAD ON PED XING E BOUND FROM DRIVERS N/SIDE

VEHICLE 001 (000) CAR (32 Yrs - F SL3) GOING AHEAD OTHER SE TO NW JNY PART OF WORK  
 BT - DRV NOT CONTACTED FRONT HIT FIRST

C001 A 802 (FAILED TO LOOK PROPERLY)

C001 A 804 (WRONG USE OF PEDESTRIAN CROSSING FACILITY)

C001 A 808 (CARELESS/RECKLESS/IN A HURRY)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

**107** 0114XH30589 THU 25/09/14 07:40 LIGHT OXFORD ROAD 50M NORTH J/W TRUMPER WAY 26 LINK 145-160 505330 / 184050  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE DUAL CWY NO JUN IN 20M NO XING FACILITY IN 50M  
 V1 CHANGED LANE HITTING V2

CASUALTY 001 (001) (35 Yrs - M UB7) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) PEDAL CYCLE (35 Yrs - M UB7) CHANGE LANE TO RIGHT S TO N  
 BT - NOT APPLICABLE O/S HIT FIRST

VEHICLE 002 (001) CAR (52 Yrs - M TW19) GOING AHEAD OTHER S TO N  
 BT - NEGATIVE N/S HIT FIRST

V001 A 403 (POOR TURN OR MANOEUVRE)

V001 A 405 (FAILED TO LOOK PROPERLY)

V001 A 602 (CARELESS/RECKLESS/IN A HURRY)

**108** 0112TB00392 THU 05/04/12 17:10 LIGHT NFL- HIGH STREET 59M NW OF J/W HILLINGDON ROAD 26 LINK 146-147 505900 / 183880

POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY NO JUN IN 20M NO XING FACILITY IN 50M  
 V1 BEING CHASED BY V3 AND V4 (EMERGENCY VEHICLES) V1 MOUNTS PAVEMENT AND COLLIDED WITH STAT V2 ADN PED

CASUALTY 001 (001) (58 Yrs - M WD3) SLIGHT PEDESTRIAN UNKNOWN

VEHICLE 001 (004) CAR (? Yrs - M UNKN) GOING AHEAD OTHER NW TO SE  
 BT - DRV NOT CONTACTED FRONT HIT FIRST  
 LEFT CWY NEARSIDE HIT KERB HIT LAMP POST FOOTWAY

VEHICLE 002 (003) CAR (31 Yrs - M SL3) GOING AHEAD HELD UP NW TO SE JNY PART OF WORK  
 BT - NOT REQUESTED BACK HIT FIRST

VEHICLE 003 (002) CAR (51 Yrs - M UNKN) GOING AHEAD OTHER NW TO SE JNY PART OF WORK  
 BT - NOT REQUESTED DID NOT IMPACT

VEHICLE 004 (001) CAR (? Yrs - M UNKN) GOING AHEAD OTHER NW TO SE JNY PART OF WORK  
 BT - NOT REQUESTED DID NOT IMPACT

V003 A 903 (EMERGENCY VEHICLE ON CALL)

V004 A 903 (EMERGENCY VEHICLE ON CALL)

V001 A 902 (VEHICLE IN COURSE OF CRIME)

V001 A 601 (AGGRESSIVE DRIVING)

V001 A 602 (CARELESS/RECKLESS/IN A HURRY)

V001 A 309 (VEHICLE TRAVELLING ALONG PAVEMENT)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

**109** 0113XH30130 WED 20/03/13 11:21 LIGHT HIGH STREET 74M NORTH WEST OF J/W PARK RD 26 LINK 146-147 505880 / 183890  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY PRIV DRIVE GIVE WAY/UNCONT NO XING FACILITY IN 50M  
 PED STEPPED INTO PATH OF REVERSING V1, CAUSING COLLISION.

CASUALTY 001 (001) (37 Yrs - F UNKN) SLIGHT PEDESTRIAN CROSSING ROAD (NOT ON XING) SW BOUND FROM DRIVERS N/SIDE  
 VEHICLE 001 (000) GDS =< 3.5T (29 Yrs - M UB3) REVERSING SE TO SW JNY PART OF WORK LEAVING MAIN RD  
 BT - NEGATIVE BACK HIT FIRST

V001 A 403 (POOR TURN OR MANOEUVRE)      V001 A 405 (FAILED TO LOOK PROPERLY)  
 C001 A 802 (FAILED TO LOOK PROPERLY)      C001 A 808 (CARELESS/RECKLESS/IN A HURRY)

**110** 0114XH30294 THU 15/05/14 02:05 DARK NFL WINDSOR STREET 27M NORTH EAST J/W CROSS STREET 26 CELL 505000/184000 505452 / 184010  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY NO JUN IN 20M NO XING FACILITY IN 50M  
 DETAILS NOT KNOWN AT TIME OF REPORTING

CASUALTY 001 (001) (27 Yrs - M UB7) SLIGHT PEDESTRIAN CROSSING ROAD (NOT ON XING) UNKNOWN  
 VEHICLE 001 (000) CAR (? Yrs - U UNKN) GOING AHEAD OTHER S TO N FRONT HIT FIRST  
 BT - DRV NOT CONTACTED

C001 A 806 (IMPAIRED BY ALCOHOL)

**111** 0114XH30548 FRI 29/08/14 13:40 LIGHT AUSTIN WAYE, 63M NW OF J/W BRIDGE ROAD 26 CELL 505000/183500 505270 / 183580  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY NO JUN IN 20M NO XING FACILITY IN 50M  
 IT APPEARS V1 & V2 HAVE NOT KEPT TO THIER SIDE OF THE ROAD WHEN TAKING A BEND IN THE ROAD CAUSING BOTH TO COLLIDE

CASUALTY 001 (002) (37 Yrs - M UB8) SLIGHT DRIVER/RIDER  
 VEHICLE 001 (002) GDS =< 3.5T (38 Yrs - M UB8) GOING AHEAD RIGHT BEND SW TO SE JNY PART OF WORK O/S HIT FIRST  
 BT - NOT REQUESTED  
 VEHICLE 002 (001) PEDAL CYCLE (37 Yrs - M UB8) GOING AHEAD LEFT BEND SE TO SW COMM TO/FROM WORK FRONT HIT FIRST  
 BT - NOT APPLICABLE

V001 A 703 (VISION AFFECTED - ROAD LAYOUT (EG. BEND, WINDING ROAD, HILL CREST))      V002 A 703 (VISION AFFECTED - ROAD LAYOUT (EG. BEND, WINDING ROAD, HILL CREST))  
 V001 A 403 (POOR TURN OR MANOEUVRE)      V002 A 403 (POOR TURN OR MANOEUVRE)



**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P) 36 MTS TO SEP-2014 SORTED NETWORK ORDER

112 0111XH30650 THU 20/10/11 15:00 LIGHT CLEVELAND ROAD 55M SOUTH J/W THE GREENWAY 26 CELL 505500/183000 505780 / 183070  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY NO JUN IN 20M PELICAN OR SIMILAR  
 PED HAS DISOBEYED RED ATS AND STEPPED OUT INTO PATH OF V1 CAUSING COLLISION.

CASUALTY 001 (001) (18 Yrs - M UB8) SLIGHT PEDESTRIAN CROSSING ROAD ON PED XING E BOUND FROM DRIVERS N/SIDE  
 VEHICLE 001 (000) CAR (34 Yrs - M UB8) GOING AHEAD OTHER S TO N  
 BT - DRV NOT CONTACTED N/S HIT FIRST

C001 A 804 (WRONG USE OF PEDESTRIAN CROSSING FACILITY) C001 A 802 (FAILED TO LOOK PROPERLY)  
 V001 A 406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED)

113 0112XH30615 WED 17/10/12 20:55 DARK WHITEHALL ROAD J/W CHILTERN VIEW ROAD 26 CELL 505500/183000 505740 / 183230  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M  
 V2 TURNED RIGHT ACROSS THE PATH OF V1 CAUSING COLLISION.

CASUALTY 001 (001) (41 Yrs - M UB5) SLIGHT DRIVER/RIDER  
 VEHICLE 001 (002) PEDAL CYCLE (41 Yrs - M UB5) GOING AHEAD OTHER S TO N JCT MID  
 BT - NOT APPLICABLE FRONT HIT FIRST  
 VEHICLE 002 (001) CAR (22 Yrs - M UB5) TURNING RIGHT N TO W JCT MID  
 BT - NEGATIVE N/S HIT FIRST

V002 A 406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED) V002 A 405 (FAILED TO LOOK PROPERLY)

114 0111XH30670 SAT 29/10/11 10:50 LIGHT COLHAM ROAD 30M SOUTH EAST J/W ROYAL LANE 26 CELL 506500/182000 506929 / 182379  
 POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY NO JUN IN 20M NO XING FACILITY IN 50M  
 DRV V1 WHO WAS NOT WEARING HIS GLASSES MISJUDGED HIS RIGHT TURN & COLLIDED WITH PARKED V2

CASUALTY 001 (001) (15 Yrs - F UNKN) SLIGHT PASSENGER BACK SEAT  
 Sch Attended : N/K  
 VEHICLE 001 (002) CAR (46 Yrs - M UNKN) GOING AHEAD RIGHT BEND SW TO SE O/S HIT FIRST  
 BT - NEGATIVE  
 VEHICLE 002 (001) CAR (? Yrs - U UNKN) PARKED P TO P O/S HIT FIRST  
 BT - DRV NOT CONTACTED

V001 A 504 (UNCORRECTED, DEFECTIVE EYESIGHT) V001 A 602 (CARELESS/RECKLESS/IN A HURRY)  
 V001 A 410 (LOSS OF CONTROL) V001 A 406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED)





**Brunel University Area, Hillingdon - personal injury collisions - 36mths to 30 September 2014 (provisional)**

SC01 GIS AREA B26 Brunel University Area (P)

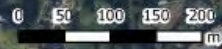
36 MTS TO SEP-2014 SORTED NETWORK ORDER

End of Accidents for SC01 GIS AREA B26 Brunel University Area (P)

End of Report

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# Appendix I. Existing Access Arrangement



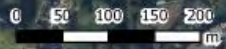
- Site 1**
- 1) Topping Lane
  - 2) Main pedestrian / cycle walkway
  - 3) West Spur Road
  - 4) Station Road
  - 5) Station Road (emergency access)
  - 6) Cowley Road
- Site 2**
- 7) Kingston Lane
  - 8) Station Road
  - 9) Cleveland Road
  - 10) Designated footpath
- Site 4**
- 11) Nursery Lane
-  Established Pedestrian / Cycle Route  
 Public Footpath (U67 / U68)  
 Indicative Site Boundary



TITLE:  
Brunel University

FIGURE No:  
Existing Pedestrian and Cycle Access Arrangements





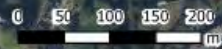
- Site 1**
- 1) West Spur Road
  - 2) Topping Lane
  - 3) Station Road
  - 4) Station Road (emergency access)
- Site 2**
- 5) Kingston Lane
  - 6) Cleveland Road (closed off / emergency access)
- Site 4**
- 7) Church Road (existing Hillingdon Garden Centre access)
- Existing single lane track / public footpath
- Indicative Site Boundary



TITLE:  
Brunel University

FIGURE NO:  
Existing Vehicular Access Arrangements





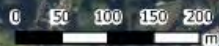
- Site 1**
    - 1) Topping Lane
    - 2) Main pedestrian / cycle walkway
    - 3) West Spur Road
    - 4) Station Road
    - 5) Station Road (emergency access)
    - 6) Cowley Road
  - Site 2**
    - 7) Kingston Lane
    - 8) Station Road
    - 9) Cleveland Road
    - 10) Designated footpath
  - Site 4**
    - 11) Nursery Lane
    - 12) Internal link between Site 2 and Site 4
    - 13) Church Road (existing Hillingdon Garden Centre access)
- Potential New Pedestrian / Cycle Link
- Indicative Site Boundary



TITLE:  
Brunel University

FIGURE NO:  
Potential Pedestrian and Cycle Access Arrangements





- Site 1**
- 1) West Spur Road
  - 2) Topping Lane
  - 3) Station Road
  - 4) Station Road (emergency access)

- Site 2**
- 5) Kingston Lane
  - 6) Cleveland Road (emergency access)

- Site 4**
- 7) Church Road (existing Hillingdon Garden Centre access)
  - 8) Internal link between Site 2 and Site 4

- Potential New Vehicular Link
- Indicative Site Boundary



TITLE:  
Brunel University

FIGURE No:  
Potential Vehicular Access Arrangements

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## Appendix J. Existing Car and Cycle Parking Provision



## CAR PARKING SPACES

OCTOBER 2015

### SITE 1

|                 |     |
|-----------------|-----|
| • Disabled      | 46  |
| • Charging Bays | 2   |
| • Reserved      | 3   |
| • Staff         | 199 |
| • Student       | 140 |
| • Car Club      | 2   |
| • TOTAL         | 392 |

### SITE 2

|                           |      |
|---------------------------|------|
| • Disabled                | 75   |
| • Car Club                | 4    |
| • Coach Bays              | 7    |
| • Reserved                | 59   |
| • Staff                   | 811  |
| • Tenants                 | 86   |
| • Students                | 386  |
| • Student/Pay and Display | 92   |
| • TOTAL                   | 1516 |

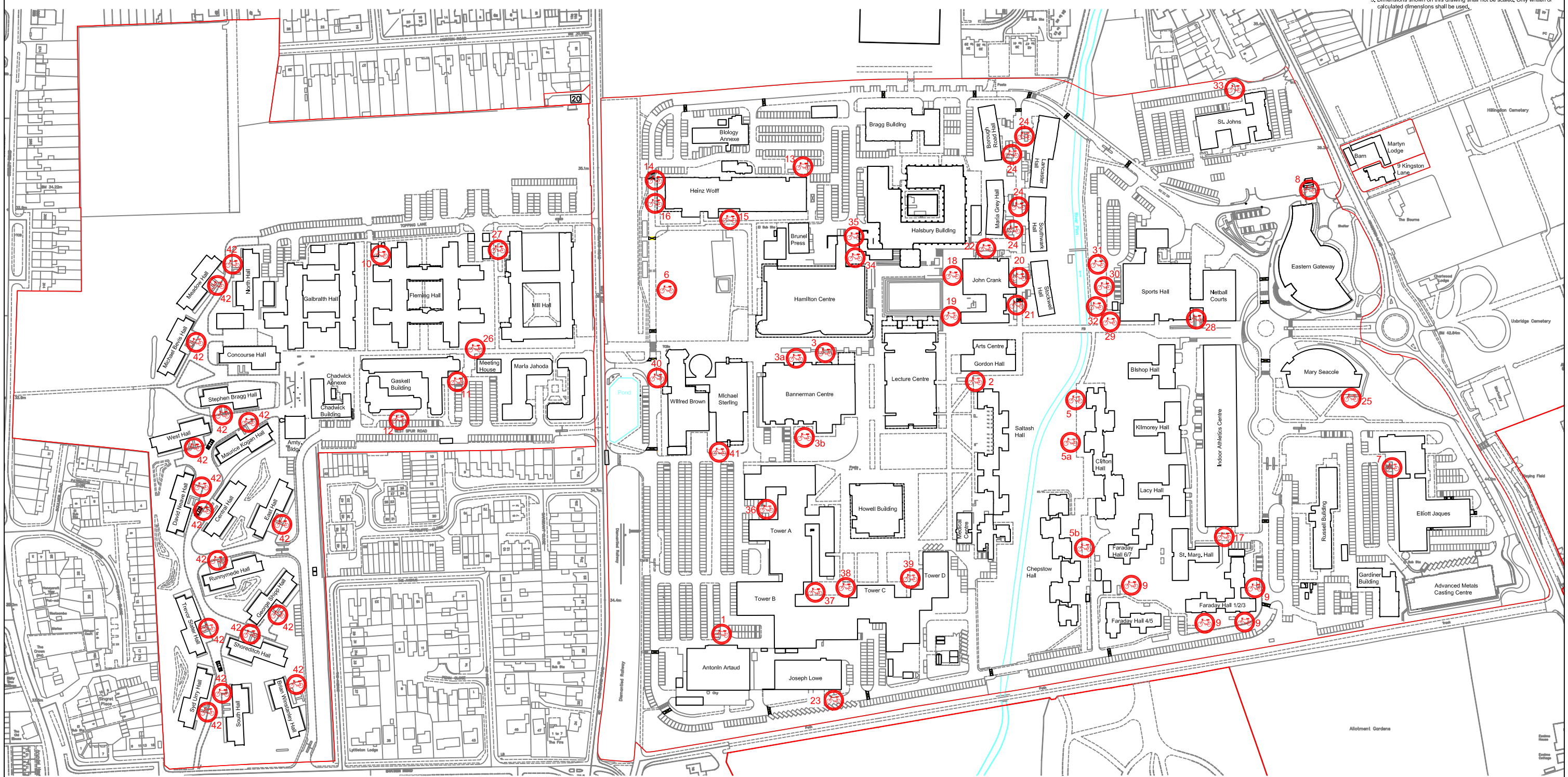
### SITE 3

|                                 |    |
|---------------------------------|----|
| • Coach Bays                    | 4  |
| • Disabled                      | 4  |
| • Staff/Student/Pay and Display | 49 |
| • TOTAL                         | 57 |

GRAND TOTAL 1965

Notes:

1. In addition to these notes reference shall be made to the specification for the works and all relevant Architects and specialist drawings.
2. The contractor is responsible for verifying all site setting out dimensions before commencing work.
3. Dimensions shown on this drawing shall not be scaled. Only written or calculated dimensions shall be used.



CYCLE STORAGE FACILITIES  
Capacities (x2) and Type (Rack) indicated



|    |                         |            |     |
|----|-------------------------|------------|-----|
| 1  | ANTONIN ARTAUD          | Shelter    | x8  |
| 2  | ARTS CENTRE             | Shelter    | x10 |
| 3  | BANNERMAN CENTRE        | Rack       | x40 |
| 3a | BANNERMAN CENTRE        | Rack       | x14 |
| 3b | BANNERMAN CENTRE        | Shelter    | x20 |
| 5  | CLIFTON HALL            | Shelter    | x26 |
| 5a | CLIFTON HALL            | Rack       | x4  |
| 5b | CHEPSTOW HALL           | Rack       | x4  |
| 6  | CRANK GARDEN            | Shelter    | x26 |
| 7  | ELLIOTT JAQUES          | Shelter    | x10 |
| 8  | EASTERN GATEWAY         | Store      | x18 |
| 9  | FARADAY HALL            | Residences | x40 |
| 10 | FLEMING HALL            | Shelter    | x26 |
| 11 | GASKELL BUILDING        | Shelter    | x10 |
| 12 | GASKELL BUILDING        | Rack       | x15 |
| 13 | HEINZ WOLFF             | Shelter    | x10 |
| 14 | HEINZ WOLFF             | Lockable   | x20 |
| 15 | HEINZ WOLFF             | Rack       | x15 |
| 16 | HEINZ WOLFF             | Rack       | x12 |
| 17 | INDOOR ATHLETICS CENTRE | Shelter    | x10 |
| 18 | JOHN CRANK              | Shelter    | x18 |
| 19 | JOHN CRANK              | Rack       | x16 |
| 20 | JOHN CRANK              | Rack       | x32 |
| 21 | JOHN CRANK              | Lockable   | x6  |
| 22 | JOHN CRANK              | Shelter    | x14 |
| 23 | JOSEPH LOWE             | Shelter    | x10 |
| 24 | LANCASTER COMPLEX       | Residences | x24 |
| 25 | MARY SEACOLE            | Shelter    | x18 |
| 26 | MEETING HOUSE           | Shelter    | x22 |
| 27 | MILL HALL               | Residences | x24 |

|    |                        |            |      |
|----|------------------------|------------|------|
| 28 | NETBALL HALL           | Rack       | x30  |
| 29 | SPORTS CENTRE          | Shelter    | x12  |
| 30 | SPORTS CENTRE          | Shelter    | x10  |
| 31 | SPORTS CENTRE          | Shelter    | x10  |
| 32 | SPORTS CENTRE          | Lockable   | x6   |
| 33 | ST. JOHNS              | Shelter    | x24  |
| 34 | HAMILTON CENTRE        | Rack       | x8   |
| 35 | HAMILTON CENTRE        | Shelter    | x10  |
| 36 | TOWER A                | Rack       | x8   |
| 37 | TOWER B                | Rack       | x8   |
| 38 | TOWER C                | Rack       | x8   |
| 39 | TOWER D                | Rack       | x8   |
| 40 | WILFRED BROWN BUILDING | Rack       | x5   |
| 41 | WILFRED BROWN BUILDING | Shelter    | x24  |
| 42 | ISAMBARD COMPLEX       | Int. Store | x16* |

(\*6 per store)

| Rev | Date     | Purpose of revision      | PAID | Down | Checked | Approved |
|-----|----------|--------------------------|------|------|---------|----------|
| F   | 22.07.15 | CAMPUS FOOTPRINT UPDATED |      |      |         |          |

BRUNEL University London  
ESTATES DEPARTMENT  
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TEL: 01895 274000

Project: BRUNEL UNIVERSITY ESTATE

Drawing title: UXBRIDGE CAMPUS SITES 1 & 2 CYCLE STORAGE FACILITIES

Drawing status: FOR INFORMATION

Drawn By: PAD Checked By: Date: 22.07.15

Scale: 1:2000 @ All Project Ref No:

Drawing Name: UXBRIDGE CAMPUS

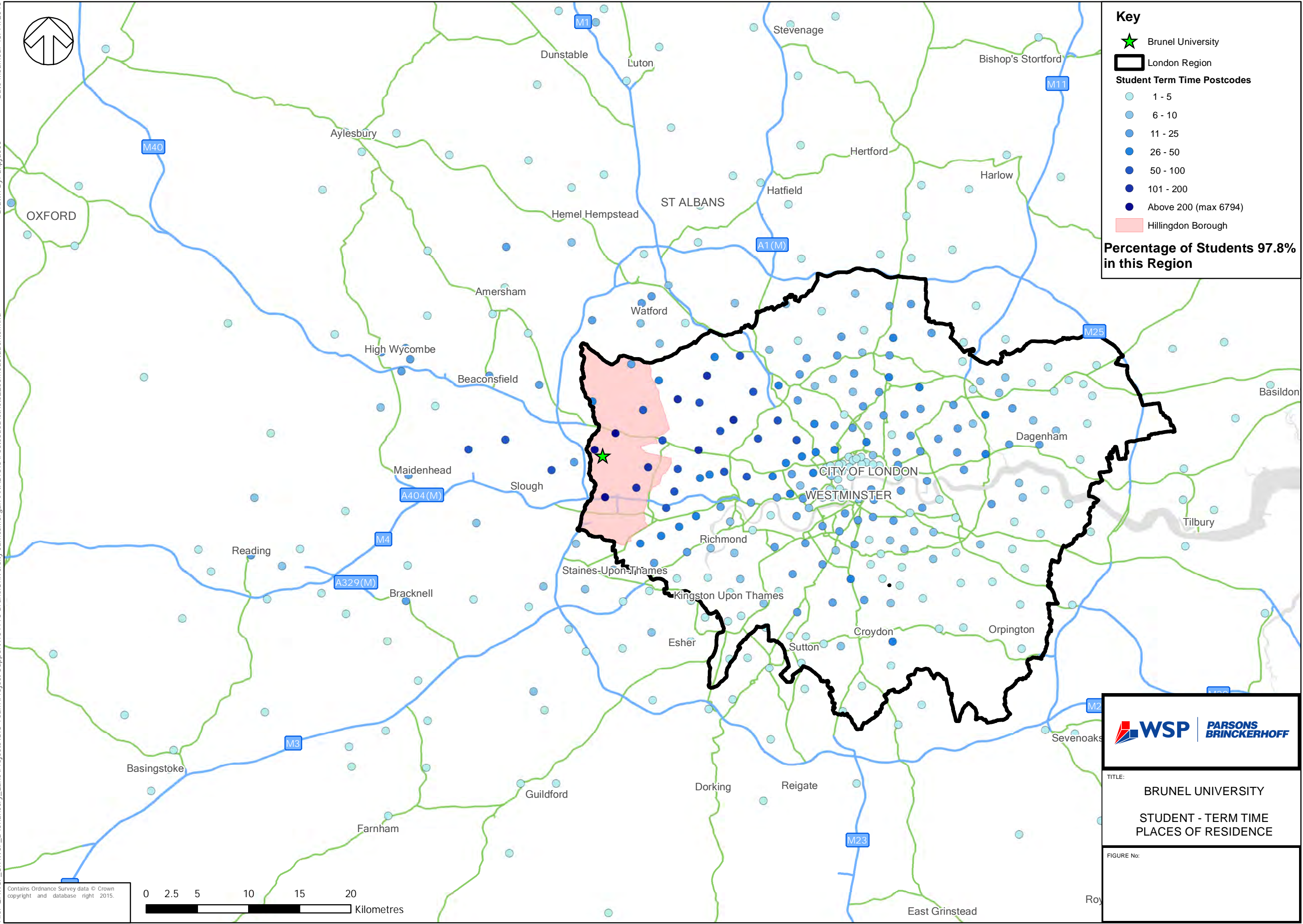
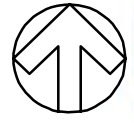
Drawing number: BU-CYCLE STORAGE FACILITIES

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## Appendix K. GIS Postcode Analysis





**Key**

- Brunel University
- London Region

**Student Term Time Postcodes**

- 1 - 5
- 6 - 10
- 11 - 25
- 26 - 50
- 50 - 100
- 101 - 200
- Above 200 (max 6794)

Hillingdon Borough

**Percentage of Students 97.8% in this Region**

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TITLE:  
**BRUNEL UNIVERSITY**  
**STUDENT - TERM TIME**  
**PLACES OF RESIDENCE**

FIGURE No:

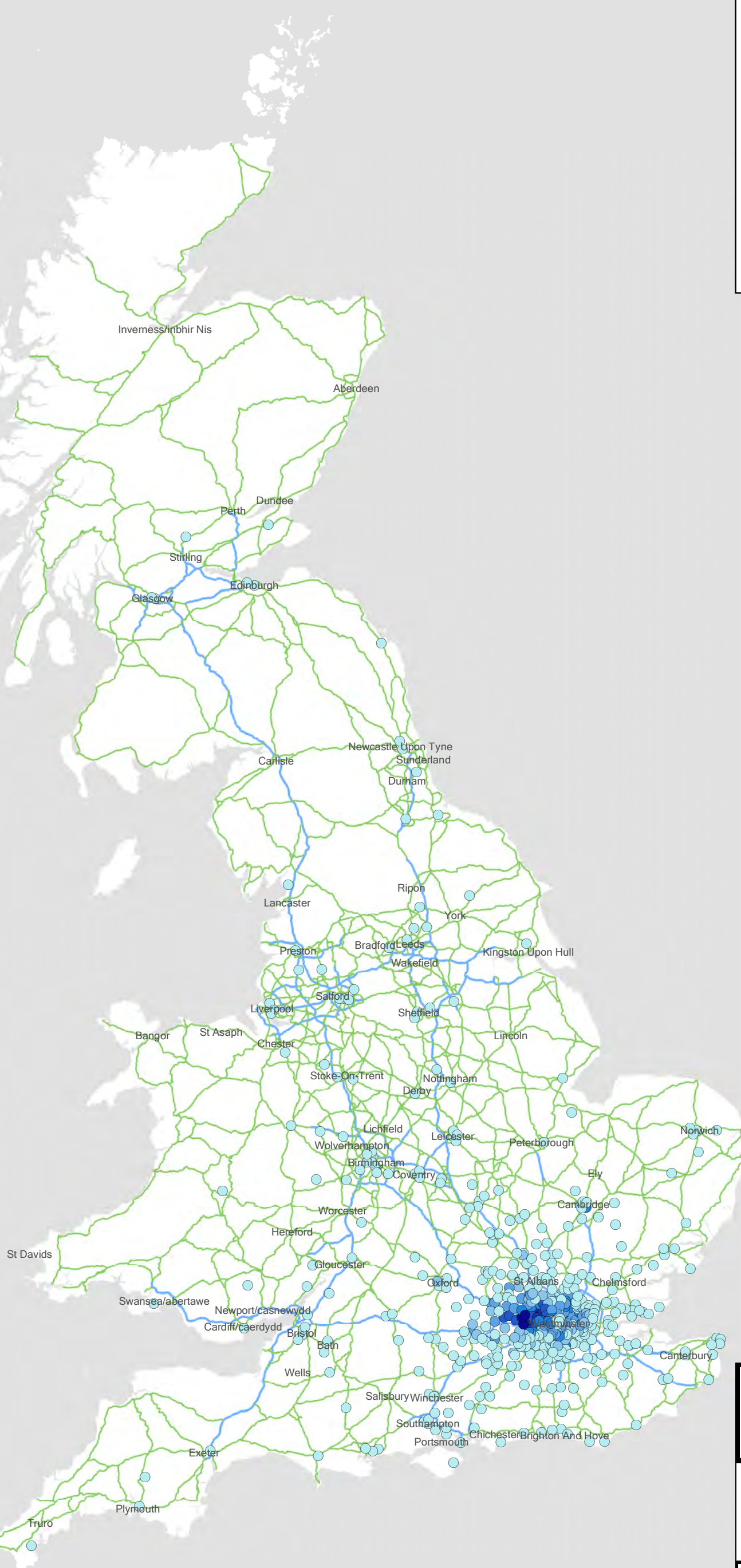




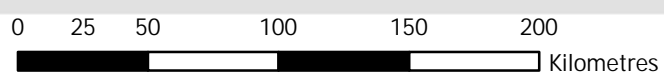
### Key

#### Student Term Time Postcodes

- 1 - 5
- 6 - 10
- 11 - 25
- 26 - 50
- 50 - 100
- 101 - 200
- Above 200 (max 6794)



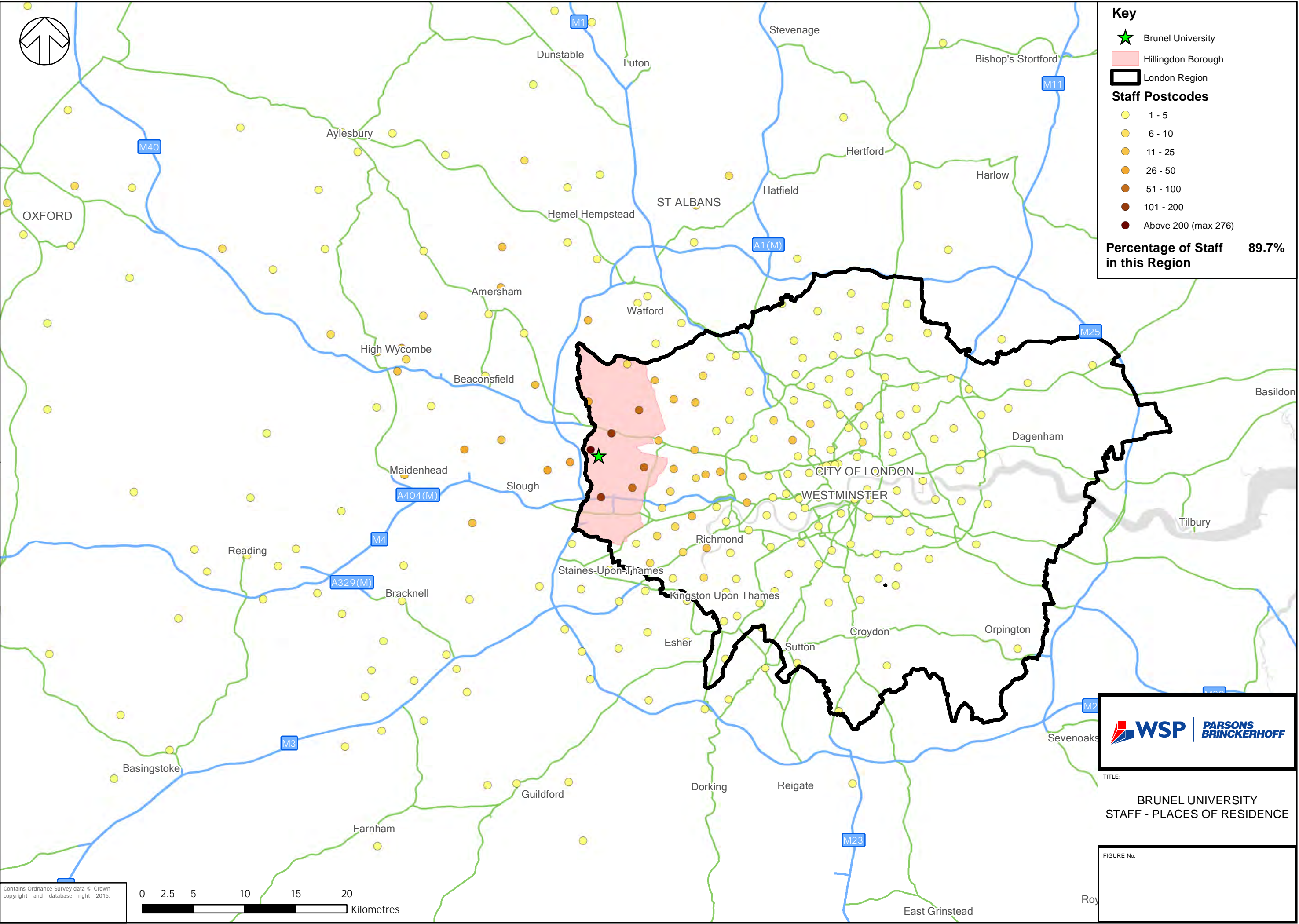
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TITLE:  
**BRUNEL UNIVERSITY  
STUDENT - TERM TIME  
PLACES OF RESIDENCE**

FIGURE No:





**Key**

- Brunel University
- Hillingdon Borough
- London Region

**Staff Postcodes**

- 1 - 5
- 6 - 10
- 11 - 25
- 26 - 50
- 51 - 100
- 101 - 200
- Above 200 (max 276)

**Percentage of Staff in this Region** **89.7%**

TITLE:  
**BRUNEL UNIVERSITY  
STAFF - PLACES OF RESIDENCE**

FIGURE No:

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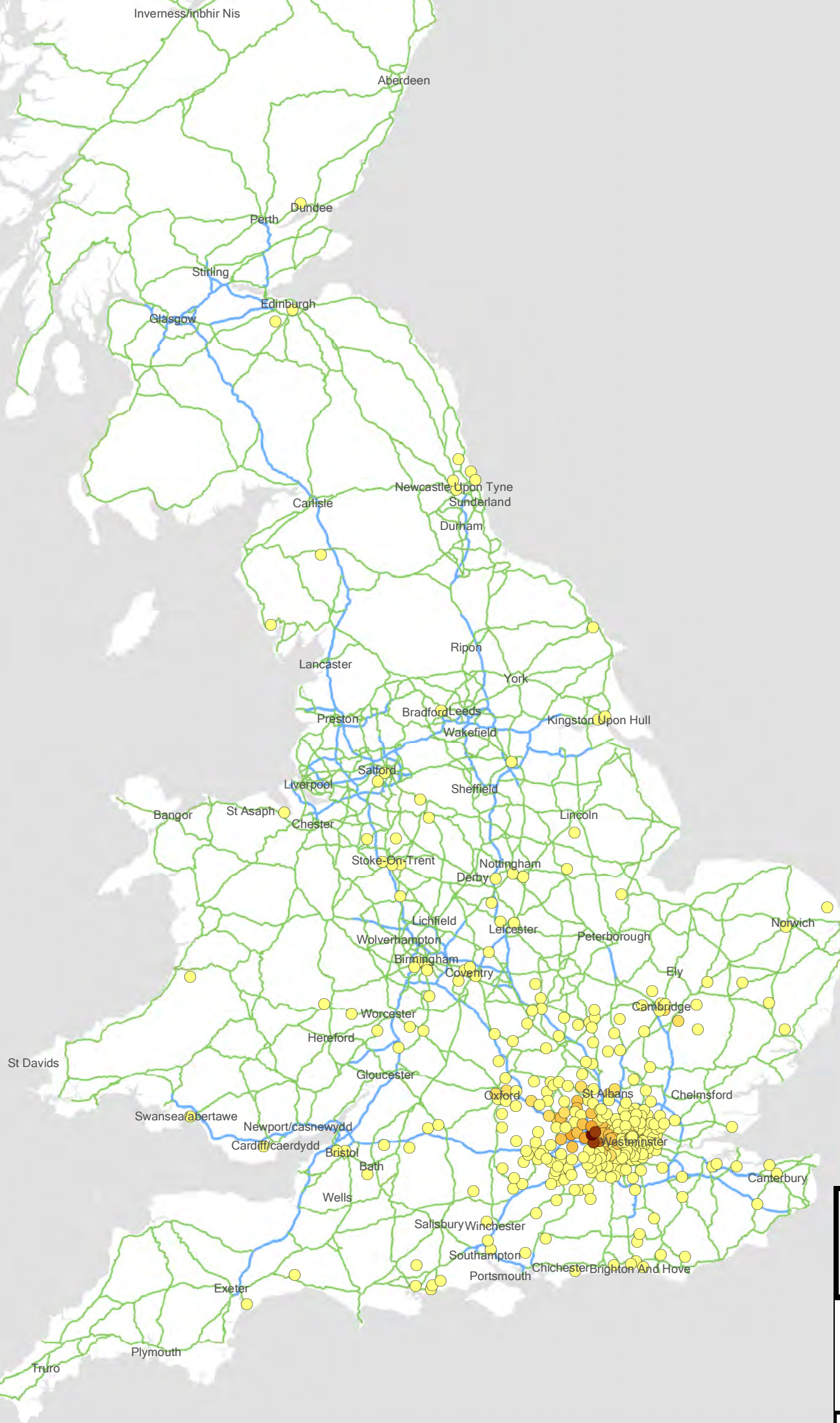




### Key

#### Staff Postcodes

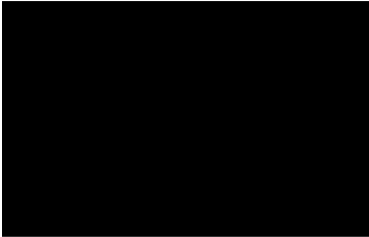
- 1 - 5
- 6 - 10
- 11 - 25
- 26 - 50
- 51 - 100
- 101 - 200
- Above 200 (max 276)



TITLE:  
**BRUNEL UNIVERSITY**  
**STAFF - PLACES OF RESIDENCE**

FIGURE No:

WSP UK Limited



UNITED  
BY OUR  
DIFFERENCE





## Enclosure J

### Economic Impact Report

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**BiGGAR Economics**

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# Economic Impact of Brunel University London

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A report to



4<sup>th</sup> September 2015

**BiGGAR Economics**



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## EXECUTIVE SUMMARY

Brunel University London is a campus-based university located in Hillingdon, West London. With approximately 14,000 students, around 2,000 staff and an annual turnover of £192 million Brunel University London is a major source of economic activity in the Borough of Hillingdon.

Brunel University London is focused on "*addressing society's challenges*" and is doing this through an emphasis on an integrated approach to teaching, research and business collaboration. Together these activities generate an economic impact.

The quantitative impacts considered in this report are: *core operations* – including direct employment and expenditure on goods and services; *students* – including student expenditure, part-time work, volunteering, student placements and graduate productivity; *tourism impacts* – including visits from friends and family to students and conference attendees; and *knowledge transfer impacts* – including consultancy, contract research, commercialisation and new company formation.

In 2013/14 Brunel University London generated an estimated:

- £212.6 million GVA and supported 2,512 jobs in the London Borough of Hillingdon;
- £504.5 million GVA and 5,908 supported jobs in London; and
- £785.4 million GVA and 10,407 supported jobs in the UK.

Each £1 GVA directly generated by the University generates a total economic impact of £6.60 GVA for the UK economy. For every job directly created by the University five jobs are supported throughout the UK economy.

In addition to the considerable quantifiable GVA and job impacts, the University has delivered further qualitative economic and community/social benefits. These include benefits to the local labour market, adding value to the third sector in Hillingdon, strengthening tourism infrastructure and driving initiatives to support the local and regional community.

Brunel University London is an “anchor institution” within its community. It is delivering on the needs of the regional economy and for local people, at the same time as providing world leading research, delivering innovative and meaningful business collaborations with multi-nationals and local small and medium sized enterprises alike, and providing focussed employability experience to its students. Together these activities deliver quantifiable economic benefits at a local and national level as well as a wide range of qualitative economic and social benefits in Hillingdon and across West London.

# 1. INTRODUCTION

This report presents the findings of an economic impact study of Brunel University London undertaken by BiGGAR Economics in autumn 2015.

## 1.1 Brunel University London

Brunel University London is a campus-based university located in Hillingdon, West London. With approximately 14,000 students, around 1,970 staff and an annual turnover of £192 million Brunel is a major source of economic activity in the Borough of Hillingdon.

The University is organised into three colleges and three research institutes:

- College of Engineering, Design and Physical Sciences;
- College of Business, Arts and Social Sciences;
- College of Health and Life Sciences;
- Institute of Energy Futures;
- Institute of Environment, Health and Societies; and
- Institute of Materials and Manufacturing.

## 1.2 Impact Approach

The approach in this study aims to demonstrate how the activities of Brunel University London create benefits and impacts for the economy. Wherever possible these impacts have been quantified. Quantifiable impacts are expressed in terms of:

- Gross Value Added (GVA), which measures the monetary contribution of an organisation or individual to the economy; and
- employment, which is measured in the total number of jobs supported.

It takes account of impacts elsewhere in the supply chain (multiplier impact) and impacts that occurs outside the study area (leakage).

The study areas considered are:

- London Borough of Hillingdon – this is defined by Hillingdon Council's geography;
- London – the region of London; and
- the UK.

The quantitative impacts considered in this report include:

- core operations – including direct employment and expenditure on goods and services;



- students – including student expenditure, part-time work, volunteering, student placements and graduate productivity;
- tourism impacts – including visits from friends and family to students and conference attendees; and
- knowledge transfer impacts – including consultancy, contract research, commercialisation and new company formation.

It is important to highlight that monetary figures cannot fully capture the total value of the activity undertaken by Brunel University London. Although GVA is one of the most widely used measures of economic performance it does have important limitations that are widely recognised by economists and policy makers. One of the most important of these is that GVA only measures economic production but does not capture the effect that this has on people's well-being.

The quantifiable impacts described in this report therefore represent only a snapshot of the total contribution that Brunel University London makes to the local, regional and national economies. For this reason this report also highlights examples of how Brunel University London contributes to the well-being of individuals and groups both locally and around the world and discusses these qualitatively.

### **1.3 Report Structure**

The remainder of this report is structured as follows:

- chapter two describes the economic context in which Brunel University London operates and provides further detail about the University itself;
- chapter three quantifies the core operational impacts of Brunel University London arising from the University's expenditure on supplies, staff expenditure and the impact of capital projects;
- chapter four quantifies the impacts generated by the University's students, through their expenditure, part-time employment, volunteering and undertaking student placements;
- chapter five describes the various ways in which the University commercialises its research and supports businesses;
- chapter six discusses how the University supports the visitor economy by attracting additional visitors;
- chapter seven describes the additional value added to the UK economy by graduates from Brunel University London;
- chapter eight discusses wider impacts of Brunel University London, such as the health impacts arising from research undertaken at the University and wider community benefits;
- chapter nine summarises the current quantifiable impacts of Brunel University London and draws together the main conclusions of the report; and
- the technical appendix describes in detail how each of the economic impacts considered were estimated.

## 2. CONTEXT

This chapter describes the socio-economic context in which Brunel University London operates and provides background to the University.

### 2.1 Socio-economic Context

#### 2.1.1 Population

The population of the Borough of Hillingdon is approximately 293,000 and accounts for 3% of the population of the wider London region. Hillingdon has a population demographic which is similar to London as a whole, with a higher proportion of working age people and young people aged under 15 than the UK average. The area also has a significantly lower proportion of people over the age of 65.

Table 2.1 – Population of Study Areas

|            | Hillingdon | London    | UK         |
|------------|------------|-----------|------------|
| Population | 292,700    | 8,538,700 | 64,596,800 |

Source: ONS (2015), *Mid-Year Population Estimates 2014*.

#### 2.1.2 Economic Indicators

The unemployment rate in Hillingdon is slightly higher (6.7%) than the UK average (6.4%) but lower than the rate for London as a whole (7.1%). Hillingdon has an economic activity rate which is below London but in line with the UK average.

There is a lower proportion of the working age population in Hillingdon claiming Job Seekers Allowance than both London and the UK as a whole and average annual income is around £4,000 higher in Hillingdon than the average across the UK.

Table 2.2 – Economic Indicators

|  | Hillingdon | London  | UK      |
|--|------------|---------|---------|
| Unemployment Rate*                             | 6.7%       | 7.1%    | 6.4%    |
| Economic Activity Rate*                        | 77.1%      | 76.7%   | 77.2%   |
| Claimant Count (% of working age population)** | 1.4        | 1.9     | 1.8     |
| Average Annual Income***                       | £31,229    | £32,781 | £27,195 |

Source: \*ONS (2015), *Annual Population Survey Jan 2014- Dec 2014*. \*\*ONS (2015), *Claimant Count June 2015*. \*\*\*ONS (2015), *Annual Survey of Hours and Earnings 2014*.

The industries that are most important for employment in Hillingdon are shown in Table 2.3 alongside their relative proportions for London and the UK as a whole. This indicates that the largest source of employment in Hillingdon is the transport and storage sector. This is primarily due to the presence of Heathrow Airport within the Borough of Hillingdon.

The second largest sector of employment is the business administration and support services sector, which accounts for 12.7% of employment in Hillingdon, a

higher proportion than both London and the UK as a whole. The professional, scientific and technical sector also has a large presence in Hillingdon, accounting for 8.6% of jobs, many of which will be attributable to the presence of Brunel University London.

Table 2.3 – Key Employment Sectors

|  | Hillingdon | London | UK   |
|--|------------|--------|------|
| Transport & storage                          | 26.7%      | 4.6%   | 4.4% |
| Business administration and support services | 12.7%      | 10.1%  | 8.2% |
| Professional, scientific and technical       | 8.6%       | 14.0%  | 8.0% |
| Accommodation & food services                | 8.0%       | 7.5%   | 7.0% |

Source: ONS (2014), *Business Register and Employment Survey, 2013*.

### 2.1.3 Education and Skills

Qualification levels of those aged 16-64 for each of the study areas are shown in Table 2.4. The table indicates that 9.5% of the population of Hillingdon have no qualifications, in line with the UK average, but higher than the average across London.

Almost 40% of Hillingdon's working age population are educated to degree level, below London (49%) but higher than the UK average (35%).

Table 2.4 – Qualification Levels: % of 16-64 Population

|                                  | Hillingdon | London | UK    |
|----------------------------------|------------|--------|-------|
| No NVQ Qualifications            | 9.5%       | 7.8%   | 9.0%  |
| NVQ 1+ (1-4 GCSEs or equivalent) | 81.4%      | 84.2%  | 84.8% |
| NVQ 2+ (5+ GCSEs or equivalent)  | 69.7%      | 76.4%  | 73.1% |
| NVQ 3+ (A-Levels or equivalent)  | 56.4%      | 64.7%  | 56.5% |
| NVQ 4+ (Degree or equivalent)    | 39.8%      | 49.1%  | 35.8% |

ONS (2015), *Annual Survey of Hours and Earnings 2014*.

## 2.2 Brunel University London

Brunel University London is a campus-based university located in Hillingdon, West London that had 14,000 students in 2013/14.

The University's origins can be traced to Acton Technical College, which split into two in 1957. The new Brunel College of Technology (named after Isambard Kingdom Brunel, the British engineer) was dedicated to the education of chartered engineers. The College was awarded a Royal Charter in 1966, granting it university status. Brunel University London's traditional fields remained engineering, science, technology, social science and management. Subsequent mergers with Shoreditch College of Education and the West London Institute of Higher Education allowed Brunel University London to add expertise in new

subject areas such as performing arts, humanities, geography, education, health, social work, sport sciences and business.

The University's aim has always been to combine academic rigour with the practical, entrepreneurial and imaginative approach pioneered by the University's namesake Isambard Kingdom Brunel. Its mission, as stated in its Strategic Plan<sup>1</sup>, is therefore to: *'create knowledge and advance understanding, and equip versatile graduates with the confidence to apply what they have learnt for the benefit of society.'*

Brunel University London is well placed in terms of rankings. The Times Higher Education 100 Under 50 is a ranking of the top 100 universities in the world under 50 years old and Brunel is placed 25<sup>th</sup> in these rankings. As well as teaching and research excellence, Brunel University London provides a high-quality all round student experience. The 2014 National Student Survey, which surveys final year students across all higher education institutions in the UK, found that Brunel University London had an overall satisfaction score of 89%, placing it 27<sup>th</sup> overall for student satisfaction out of 154 institutions.

### 2.2.1 Funding

In the year ending July 2014 the total income of Brunel University London was £192 million. As might be expected the main component of the University's income was comprised of tuition fees and education contracts, which represented 51% of total income. A breakdown of Brunel University London's income by main source is provided in Table 2.5

Table 2.5 – Brunel University London income by source, year ending 31<sup>st</sup> July 2014

| Source                               | Amount (millions) |
|--------------------------------------|-------------------|
| Tuition fees and education contracts | £98.1             |
| Other income                         | £40.3             |
| Funding body grants                  | £32.0             |
| Research grants and contracts        | £21.6             |
| Endowment and investment income      | £0.5              |
| <b>Total</b>                         | <b>£192.4</b>     |

Source: Brunel University London Financial Statements 2013-14

### 2.2.2 Student Participation Rates

Student participation rates provide an indicator of how successful a higher education institution is in attracting students from diverse backgrounds.

The statistics are based on young (aged under 21), full-time undergraduate entrants in 2013/14. As the table below indicates Brunel University London performs very well in terms of participation rates, with 94.8% of its full time first-degree entrants from state schools, and 42.1% from deprived backgrounds.

The statistics use benchmarks to allow for comparison between institutions and the higher education sector as a whole. The benchmarks take into account factors that contribute to the differences between institutions such as subject of study,

<sup>1</sup> Brunel University London (2012), Strategic Plan 2012-2017.

qualifications on entry and age on entry. Brunel University London's performance in all of the indicators is significantly better than its benchmark indicating a high participation rate of under-represented groups in higher education at the University.

---

Table 2.6 – Participation Rates

|   | Indicator | Benchmark |
|---|-----------|-----------|
| % from state schools or colleges                  | 94.8%     | 92.5%     |
| % from NS-SEC (socio-economic) classes 4, 5, 6, 7 | 42.1%     | 35.1%     |

Source: HESA UKPIs 2013/14



### 3. CORE ECONOMIC IMPACTS

The core economic impacts associated with the University are those that occur through the day-to-day operations of the organisation and include:

- direct impacts – these are the impacts resulting from the University’s income and employment;
- supplier impact – the impact of the University purchasing goods and services, which increases the turnover of those businesses and supports jobs in its supply chain.
- staff spending impact – staff spending their wages increases the turnover of businesses in the economy, which generates wealth and supports employment; and
- impact of capital spending – expenditure on capital projects supports additional economic activity in businesses in the wider economy, particularly in the construction sector.

The key assumptions required to estimate the impact of this activity are given in Table 3.1.

Table 3.1 – Key Assumptions for the Core Impact 2013/14

|  | Value   | Source   |
|--|---------|--|
| Income   | £192.4m | Financial Statements 2013/14   |
| Staff – Headcount                              | 2,153   | Brunel University London HR  |
| Staff – Full time equivalents (ftes)           | 1,965   | Brunel University London HR  |
| % living in LB of Hillingdon                   | 37%     | Brunel University London HR  |
| % living in London                             | 71%     |  |
| % living in UK                                 | 100%    |  |
| Expenditure on wages                           | £80.1m  | Brunel University London   |
| Expenditure on goods and services              | £67.0m  | Financial Statements 2013/14   |
| % purchased from LB of Hillingdon              | 12%     | BiGGAR Economics<br>Assumption based on Oxford<br>Economics, 'The Economic<br>Impact of the University of West<br>London'. |
| % purchased from London                        | 58%     |  |
| % purchased from UK                            | 97%     |  |
| Average annual capital expenditure (2009-2019) | £22.7m  | Brunel University London   |
| % capital suppliers from LB of Hillingdon      | 7%      | Brunel University London   |
| % capital suppliers from London                | 12%     |  |
| % capital suppliers from UK                    | 99%     |  |

### 3.1 Economic Impact

Using the key assumptions described in Table 3.1, it was estimated that the University's core activities in 2013/14 supported economic activity with a value estimated at £128.9 million GVA and 965 jobs in the London Borough of Hillingdon, £182.6 million GVA and 3,081 jobs in London and £269.1 million GVA and 5,707 jobs in the UK as a whole.

A breakdown of this impact is provided below and the method used to derive this is described in the Technical Appendix.

Table 3.2 – Core Economic Impact 2013/14

|                          | Hillingdon   | London       | UK           |
|--------------------------|--------------|--------------|--------------|
| <b>GVA (£m)</b>          |              |              |              |
| Direct                   | 119.6        | 119.6        | 119.6        |
| Supplier Spending        | 4.8          | 33.1         | 60.1         |
| Staff Spending           | 3.6          | 27.6         | 68.8         |
| Capital Spending         | 0.8          | 2.3          | 20.6         |
| <b>Total GVA</b>         | <b>128.9</b> | <b>182.6</b> | <b>269.1</b> |
| <b>Employment (jobs)</b> |              |              |              |
| Direct                   | 728          | 1,389        | 1,965        |
| Supplier Spending        | 141          | 1,001        | 1,832        |
| Staff Spending           | 83           | 654          | 1,639        |
| Capital Spending         | 13           | 37           | 270          |
| <b>Total Employment</b>  | <b>965</b>   | <b>3,081</b> | <b>5,707</b> |

### 3.2 Local Benefits from Core Operations

The impact arising from Brunel University London's core operations, as described above, includes significant localised impacts. The University's third party contracts include a catering contract with Sodexo, which employs 120 people on site, along with a cleaning contract that can have 80 to 150 employees on site depending on the time of year. The cleaning contract, worth £8 million over five years has recently been let to a local company, allowing the local economy to benefit from University operations.

While the economic impacts of these contracts are captured in the supplier impact, the scale of the additional employment on-site is worthy of note as these contracts provide jobs directly within the local labour market.

## 4. STUDENT ACTIVITY IMPACTS

### 4.1 Student Population

In 2013/14 Brunel University London had a student population of 14,000 full time, part time and distance learning students, of which 70% were undergraduates and the remaining were postgraduate students.

The vast majority (90%) of Brunel University London’s students were studying full time with the University and this report only considers the economic impact of these 12,915 students. These students support economic impact through their spending, part-time work, volunteering and through undertaking placements.

Table 4.1 shows the profile of undergraduate and postgraduate students studying with Brunel University London in 2013/14.

Table 4.1 – Student Profile, 2013/14

|                       | Full time     | Part time  | Distance learners | Total         |
|-----------------------|---------------|------------|-------------------|---------------|
| Undergraduate         | 9,806         | 241        | 0                 | 10,047        |
| Taught Postgraduate   | 2,369         | 495        | 420               | 3,284         |
| Research Postgraduate | 740           | 231        | 0                 | 971           |
| <b>Total</b>          | <b>12,915</b> | <b>967</b> | <b>420</b>        | <b>14,302</b> |

Source: Brunel University London

In 2013/14, there were more than 4,000 international students studying on campus at Brunel University, around 31% of the University's student population. The vast majority of these students were overseas students from outside the EU.

Table 4.2 – International Students, 2013/14

|                        | EU (excluding UK) | Outside EU | Total |
|------------------------|-------------------|------------|-------|
| International Students | 887               | 3,536      | 4,423 |

Source: Brunel University London

### 4.2 Impacts From Students

The impacts associated with Brunel University London’s students include:

- student spending impacts – students have an impact on the economy through their spending in the same way that staff have an impact through the spend of their wages;
- students’ part-time work – without students some businesses would not have the additional labour they require to increase their economic impact;
- student volunteering – data provided by Brunel University London indicates that 432 students volunteered 10,402 hours between them in 2013/14; and
- student placements – almost 1,400 students at Brunel University London undertook work placements, 52% of which lasted for a year.

A key impact of students is their increased productivity from obtaining an undergraduate or postgraduate degree. This is considered in Chapter 7.

The key assumptions required to estimate the impact of Brunel University London’s students are given in Table 4.3 below.

Table 4.3 – Key Assumptions for Student Impact 2013/14

|   | Value    | Source   |
|---|----------|--|
| Full-time students  | 12,915   | Brunel University London   |
| Undergraduate   | 9,806    | Brunel University London   |
| Taught Postgraduate   | 2,369    |  |
| Research Postgraduate   | 740      |  |
| % living in LB of Hillingdon  | 48%      | BiGGAR Economics calculation based on data provided by Brunel University London              |
| % living in London  | 66%      |  |
| % living in UK  | 100%     |  |
| Annual spend by students living in London                                       | £12,921  | Department for Business Innovation and Skills, Student Income and Expenditure Survey 2011/12 |
| Proportion of full-time students who work                                       | 57%      | Endsleigh Insurance and National Union of Students Survey 2013                               |
| Proportion of student part-time workers that are additional to the labour force | 64%      | BiGGAR Economics Assumption  |
| Proportion of employed students who work for Brunel University London           | 8%       | Brunel University London   |
| Number of students who volunteer  | 432      | Brunel University London   |
| Average number of hours volunteered per year                                    | 24 hours |  |
| Total number of placements (minimum of 12 weeks long)                           | 1,397    | Brunel University London   |
| Number of year-long placements  | 730      |  |
| Productivity as a % of worker productivity                                      | 33%      | BiGGAR Economics Assumption  |

The method for deriving estimates for the economic impacts of Brunel University London’s students discussed in this chapter is described in the Technical Appendix. This used the key assumptions in Table 4.3 to estimate the values in Table 4.4.

Using the assumptions described in Table 4.3 it was estimated that in 2013/14 students at Brunel University London supported economic activity with an estimated value of £48.2 million GVA in the London Borough of Hillingdon, £97.5 million GVA in London and £163.7 million GVA in the UK as a whole through their spending, part-time work, volunteering and placements. Students also supported an estimated 1,331 jobs in the London Borough of Hillingdon, 2,432 jobs in

London and 3,991 jobs in the UK as a whole. These impacts are summarised in Table 4.4.

Table 4.4 – Impact Supported by Students 2013/14

|                          | Hillingdon   | London       | UK           |
|--------------------------|--------------|--------------|--------------|
| <b>GVA (£m)</b>          |              |              |              |
| Student Spending         | 17.6         | 45.2         | 80.2         |
| Student Part-time Work   | 19.5         | 31.4         | 49.5         |
| Student Volunteering     | 0.04         | 0.06         | 0.09         |
| Student Placements       | 11.1         | 20.8         | 33.9         |
| <b>Total GVA</b>         | <b>48.2</b>  | <b>97.5</b>  | <b>163.7</b> |
| <b>Employment (jobs)</b> |              |              |              |
| Student Spending         | 349          | 840          | 1,482        |
| Student Part-time Work   | 802          | 1,242        | 1,934        |
| Student Volunteering     | -            | -            | -            |
| Student Placements       | 180          | 350          | 574          |
| <b>Total Employment</b>  | <b>1,331</b> | <b>2,432</b> | <b>3,991</b> |

### 4.3 Enriching the student experience – employment, volunteering and employability

Student work, volunteering and placements are a particular feature of Brunel University London.

The University's Placement and Careers Centre (PCC), part of the Professional Development Centre, plays a central role in stimulating employment opportunities and contributing to the local labour market. The PCC Job Shop provides access to hundreds of part-time and temporary vacancies both on campus and in the local area, through its vacancy listings. This also provides a valuable service to local employers, improving their opportunities to fill vacancies, reducing the likelihood of costly unfilled vacancies and helping to ensure the operation of an effective local labour market.

The PCC Job Shop advertises roles in business, IT, finance, media, creative industries and many more sectors. Roles on campus often offer flexible working hours or are event based, enabling students to find working solutions that enhance their student experience at Brunel. The University also runs workshops and a Part-Time Jobs Fair to help students with part-time job applications and job searching.

Student volunteering is taken seriously at Brunel, with a structured and resourced approach to matching students to volunteering opportunities. This is supported by the Brunel Volunteers website, which advertises vacancies and provides advice and support to volunteer. Student volunteering provides a dual benefit, adding to students' skills and employability, while providing a valuable resource for local third sector organisations. The University works alongside voluntary groups,



charities and other not-for-profit organisations in the Hillingdon and London area. It provides organisations with students eager to volunteer, and also assistance and collaboration on community events. It should be noted that the University also encourages staff to volunteer. As part of Brunel's commitment to staff development and the local community, the University operates an employer-supported volunteering scheme, which allows permanent staff thirty-six hours a year to volunteer with organisations in Hillingdon.

During 2013/14, 432 Brunel Volunteers completed 10,402 hours of volunteering in the local community. Beneficiaries of the work of Brunel Volunteers included WRVS, Northwood School, Age UK Hillingdon, Different Strokes and Hillingdon Women's Centre. An example of the type of activities supported by Brunel Volunteers is the Maths Mentoring Scheme, where volunteers with a mathematics background have been providing maths tutoring to students at Northwood School.

Although students are not paid for this work it still adds value to the economy by enabling local charitable organisations to undertake additional activity that they may not be able to fund otherwise. In doing so this creates important partnerships and links with the local community. In addition, there will be wider benefits arising from the volunteering activities themselves. Volunteering benefits service users by improving their wellbeing, which can have a further impact by resulting in cost savings in health and social services. Student volunteering not only provides valuable support to local charities but also helps to enhance future career prospects for students by providing students with the opportunity to gain valuable skills.

In line with the University's mission to equip graduates to be able to apply what they have learnt, one of Brunel University London's distinctive features is the inclusion of work experience in many of its degree programmes. All students at the University are encouraged to undertake some form of work experience with many courses offering a one year work placement or two six month work experience periods. Around half of students currently have some supported work experience while studying, including a year's placement, which is taken up by over 700 students per year, about one third of the undergraduate cohort. The University has an aspiration to increase to 80% the proportion of students engaged in "meaningful work based learning" within three years.

Work placements benefit students in a variety of different ways. They offer students the opportunity for personal development as well as contextualising the knowledge learnt while studying. Placements can also help students to confirm their chosen career path by opening their eyes to opportunities they had never previously considered and helping them to decide what jobs they would or would not like to do in the future.

The experience and skills gained by students during their placement improves their employability as it means they are able to start contributing to their employer's business earlier than a less experienced graduate would be able to.

Brunel University London's focus on providing student part-time employment opportunities, supporting volunteering and actively encouraging work placements are all examples highlighting the importance Brunel University London places on ensuring students leave the University work ready and enriched by a wide variety of experiences during their time at the University.

## 5. WORKING WITH BUSINESS

Brunel University London drives economic impact through its business university engagement including its collaborative partnerships with businesses and the business support activities it undertakes.

The University's leading research interests form the centrepiece of its knowledge exchange activity. The University positions its research to provide "Solutions to Worldwide Problems"<sup>2</sup>. Brunel University London's research is organised into three institutes and 15 themes working on addressing global challenges through the adoption of inter-disciplinary methodologies. The themes are:

- Advanced Engines and Biofuels;
- Energy Efficient and Sustainable Technologies;
- Smart Power Networks;
- Resource Efficient Future Cities;
- Healthy Ageing;
- Health and Environment;
- Health Economics;
- Synthetic Biology;
- Biomedical Engineering and Healthcare Technologies;
- Social Sciences and Health;
- Structural Integrity;
- Liquid Metal Engineering;
- Micro-Nano Manufacturing;
- Materials Characterisation and Processing; and
- Design for Sustainable Manufacturing.

### 5.1 Business Collaboration

Brunel University London has an integrated approach to research, teaching and business collaboration. The University's intention is not to create one-off activities, but rather to develop long-term relationships which it does through placements and internships (discussed in Section 4.3) collaborative projects, and funded research and development projects.

The University's approach to business collaboration is clearly articulated:

*"For us at Brunel University London collaborating with employers is at the centre of our work. Everything we do is underpinned by our employer links which are*

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<sup>2</sup> Brunel University London, <http://www.brunel.ac.uk/research> (accessed 4<sup>th</sup> August 2015).

*varied and strong. We are also clear that we have a responsibility to support SMEs within our region.*<sup>3</sup>

The University undertakes a range of collaborative activities with businesses including:

- specialist consultancy;
- contract research services;
- continued professional development (CPD) training; and
- supporting Knowledge Transfer Partnerships (KTPs) with industrial partners.

These services can lead to in depth and highly constructive collaborations, which can have a transformative impact on individual businesses, as our case studies below show. Business collaborations also provide opportunities to develop the skills of the University's graduates, strengthening its employability performance.

Knowledge Transfer Partnerships (KTPs) at Brunel University London have provided successful routes to deliver dual benefits to businesses and graduates. The KTP scheme is a UK wide initiative designed to enable businesses to access the knowledge and expertise available within universities and colleges. A KTP is the three-way partnership between an academic, a business partner (including private sector companies, charities and public sector organisations) and a recent graduate (known as the Associate) who is employed to work on the specific project relevant to the business partner. Figure 5.1 provides a case study of successful business collaboration with Brunel University London through the KTP scheme and Figure 5.2 describes a Brunel University London venture to facilitate business university collaborations.

Figure 5.1 – Case Study: Business Collaboration with HaB International Ltd.

This successful collaboration involved HaB International Ltd, academic experts from Brunel University London and a knowledge transfer partnership (KTP).

The company was founded in 1988 as Leisure Systems International Ltd with sales, marketing and distribution of products for sport, health, lifestyle and wellness sectors. In April 2001 the company acquired the rights to the POWERbreathe inspiratory muscle training product. Since 2004 the company has taken part in three KTP projects with Brunel University London with Professor Alison McConnell as lead academic. As a result, the company has diversified into small-scale manufacture and been transformed, and now has its own product design and development capability. Three of the four KTP Associates on the projects still work for the company.

The purpose of the projects was to develop different aspects of the POWERbreathe and other non-pharmacological products for chronic disease management. A patent has been submitted with three academics and three Associates as co-inventors.

This KTP has resulted in a transformation in the company and the exploitation of expertise to develop a family of new products and a new capability within the company. It was a winning formula that has resulted in a continuing process of collaboration.

Source: Brunel University London

<sup>3</sup> Brunel University London (2015), Thirty Thousand Hours of Collaborative Innovation.

Figure 5.2 – Case Study: Co-Innovate

Co-Innovate is a programme jointly funded by Brunel University London and the European Regional Development Fund. Over the two year duration of the project the initiative has supported 250 small and medium sized enterprises (SMEs) in the London region. Co-Innovate provides design-led innovation, advice and guidance to SMEs, including providing direct support to SMEs from laboratory facilities, testing and prototyping.

Co-Innovate builds on the internationally renowned work of Brunel's School of Engineering and Design and is distinguished from many other initiatives to enhance collaboration between universities and industry through a focus on design and open, collaborative innovation.

The project's aim was to improve access and accelerate the transfer of knowledge and research expertise from Brunel University London to SMEs, introducing a dynamic range of activities to support new product and service development leading to business growth for the participating companies and economic and employment benefits for the region.

The project primarily targets London based SMEs who are currently not investing in innovation by building awareness and capacity to connect SMEs to the applied research expertise at the University.

*Source: Brunel University London*

Brunel University London is also involved in several collaborative research ventures with industry partners. Building on its research strengths in liquid metal engineering, the University is working to establish a new research centre, the Advanced Metals Casting Centre (AMCC) in partnership with Jaguar Land Rover, Constellium and others in the supply chain. Industry partners have committed over £50 million of funding for the Centre. The case study in Figure 5.3 provides further detail about this joint business university venture.

The University has medium term plans to build further on the success of the Brunel Centre for Advanced Solidification Technology (BCAST) with plans for a second and third phase of an Advanced Metals Processing Centre (AMCC), perhaps in the longer term leading to the development of a National Metals Park which would commercialise the technology from BCAST's expertise and ensure the UK receives the full economic benefits of Brunel's academic excellence. This seems achievable, given that AMCC is already working at an industrial scale. Unusually for a university commercialisation initiative, the industrialisation process here is about the business model, rather than developing the technology at scale – the starting point is already a proven industrial scale process. We would anticipate the timescales for the future economic impact of this development to be less than typically the case for academic/commercial collaboration.

Other major investments include co-investment with technology engineering organisation TWI Ltd at Granta Park, Cambridge to build the National Centre for Structural Integrity. In 2012 Brunel University London was awarded £15 million of funding from the Higher Education Funding Council for England (HEFCE) as part of this new £60 million initiative, with the balance of funding, £45 million, from industry. Along with TWI Ltd. other partners include major companies from the rail, marine, aerospace and energy sectors as well as University College London, the University of Cambridge and the University of Manchester.

The purpose-built National Centre will house more than 100 postgraduate taught and research students and more than 50 staff. It provides the most up-to-date facilities for engineering and materials research in the UK.

Figure 5.3 – Case Study: Manufacturing Engineering and Industry Partners

Brunel University London has research strengths in the field of manufacturing engineering, particularly within the sector of advanced materials. In fact, the preliminary findings of Sir Andrew Witty's Review of Universities and Growth featured Brunel as a University with research excellence in the advanced materials sector.

Research at Brunel within this field focuses on the recyclability of metals and is led by Professor Zhongyun Fan, Professor of Metallurgy, Director of the Brunel Centre for Advanced Solidification Technology (BCAST) and Principal Director of LiME, a national centre of excellence in liquid metal engineering at Brunel University London.

The aim of the research is to reduce the amount of new metal mined by reusing metal that has already been used to make high quality parts and materials. Revolutionary new metal casting techniques developed at Brunel have proved successful in creating superior quality components from recycled metal.

The challenge now faced is to scale these methods up for commercial use and show that they can reduce cost and improve quality. In order to overcome this, an Advanced Metals Casting Centre (AMCC) is being established at Brunel University London as a joint venture between the EPSRC (Engineering and Physical Sciences Research Council), Brunel University London and industry partners such as Jaguar Land Rover, Constellium and other companies in the supply chain. Industry partners have committed over £50 million of funding for the Centre.

The £17.4 million purpose built building will act as a national scale-up facility to bridge the gap between fundamental, laboratory scale research and full scale industrial trials and thereby shorten the time to bring laboratory discoveries to market. The Centre's initial focus will be the automotive industry with a longer term aim to make the facilities available to partners in other engineering sectors, including aerospace, defence, electronics and the general engineering sector.

The University intends to build on success in this area with plans for a second and third phase of the AMCC with the objective of developing a National Metals Park at Brunel. A major research bid, worth £77 million, for the second phase of the AMCC has been successfully obtained. This would commercialise the technology developed at the University in conjunction with Jaguar Land Rover, Constellium and other companies in the supply chain, as well as ensuring that the associated economic benefits are retained within the UK.

This research and collaboration with industry has the potential to lead to the development of an entirely new sector, advanced metals casting. This would not only bring significant environmental benefits but would also support jobs and economic growth and secure a future for the manufacturing of advanced materials in the UK. It therefore provides a prime example of the role of Brunel University London in pushing the boundaries of academic discovery and supporting the diffusion of this knowledge throughout the economy, providing the basis for future productivity improvements and therefore economic growth.

### **5.1.1 Business Collaboration Impact**

In 2013/14 the University earned over £4.5 million for undertaking contract research, over £200,000 from providing consultancy services and over £70,000 for delivering CPD. The University supported 17 KTPs over the past six years, five of which were on-going in 2013/14. The impact of this activity was estimated using the assumptions set out in Table 5.1. The detailed methodology used to do this is presented in the Technical Appendix.



Table 5.1 – Key Assumptions for Business Collaboration Impact 2013/14

|  | Value    | Source  |
|--|----------|---|
| Total income from business services    | £4.8m    | Brunel University and HE-BCI  |
| Contract research                      | £4.6m    | Financial Statements 2013/14  |
| Consultancy                            | £209,000 | HE-BCI 2012/13  |
| CPD                                    | £74,000  | HE-BCI 2012/13  |
| Location of business services clients  |          |   |
| % in LB of Hillingdon                  | 0%       | BiGGAR Economics Assumption   |
| % in London                            | 50%      |   |
| % in UK                                | 100%     |   |
| Number of ongoing KTPs                 | 5        | Brunel University London  |
| Number of KTPs completed in last 6 yrs | 17       |   |
| LB of Hillingdon                       | 1        |   |
| Rest of London                         | 6        |   |
| Rest of UK                             | 10       |   |
| Jobs created by each KTP               | 3        | Regeneris Consulting, Knowledge Transfer Partnerships, Strategic Review |
| Annual GVA per KTP (London)            | £147,833 |   |

Using these assumptions, it was estimated that in 2013/14 business collaboration activities undertaken services by Brunel University London enabled businesses to generate £1.6 million GVA and support 62 jobs in Hillingdon, £16.8 million GVA and 276 jobs in London and £35.5 million GVA and 568 jobs in the UK.

## 5.2 Business Support

Brunel University London supports businesses by providing space for them to locate on its Science Park and by supporting the formation of new businesses.

### 5.2.1 Brunel Science Park

Brunel Science Park was established in 1986 on the edge of the university campus, attracting a range of tenants including new start-ups and small specialist companies as well as spin-outs from established international companies. The Park offers flexible tenancy agreements designed to foster growth and offers a range of support services including guidance, access to R&D funding, patent and trademarks, training and venture finance.

Being located close to the University means that the companies based on the Science Park have easy access to the research base, facilities, business support services and business networking opportunities. These opportunities all help to support the growth of tenant companies. By providing suitable facilities with flexible leasing arrangements, the University also helps to retain these companies in the Hillingdon area.

Consultations with staff at Brunel University London indicate that there 18 tenant companies on the Science Park, employing a total of 80 people across 12,000 square feet of lettable space. One of these is Brunel University Enterprises Limited which manages the Science Park and acts as the holding company for any spin-off companies.

In order to estimate this impact it was necessary to make assumptions about the extent to which the activity supported by these companies could be attributed to the University. This is based on BiGGAR Economics' previous experience of estimating the impact of Science Parks and is explained further in the Technical Appendix.

In providing space for businesses to locate in its Science Park, Brunel University London generates economic impact. The value of this in 2013/14 was an estimated £6.3 million GVA and 113 jobs in the Borough of Hillingdon, £3.9 million GVA and 70 jobs in London and £2.6 million GVA and 46 jobs in the UK.

### 5.2.2 Spin-outs

One of the ways in which research can generate economic activity is through the creation of spin-out companies. There are currently two active spin-out companies from Brunel University London.

Dynamic Extractions is a specialist chromatography company based in Slough, which was spun-out in 2003. The company develops novel separation technologies which has particular value to the life sciences sector where it is used in the drug discovery and commercial sectors to isolate very high value active pharmaceutical and nutritional products.

Vizzata, based in Oxford is a company which has developed an online research tool and method, that can be used by Government and industry to engage with people at very short notice to find out their views and reactions to text, audio or visual content.

The economic impact of these companies was estimated based on their turnover, direct employment and location. The assumptions used to do this are presented in Table 5.2. The detailed methodology used is described in the Technical Appendix.

Table 5.2 – Key Assumptions for Spin-out Impact 2013/14

|                                | Value    | Source   |
|--------------------------------|----------|--|
| Turnover of spin-outs          | £591,000 | Brunel University London                             |
| Dynamic Extractions employment | 2        | BiGGAR Economics assumption based on company website |
| Vizzata employment             | 4        | BiGGAR Economics assumption based on company website |

Using these assumptions it was estimated that in 2013/14 spin-outs associated with Brunel University London generated £0.2 million GVA for the UK economy and supported 10 jobs.

### 5.2.3 Local Business Support

As well as the activities discussed above Brunel University London holds many events on campus every year which provides wider support to the local business community. As an example the University organised the Hillingdon Business Expo, held for the first time in 2015. More than 700 visitors attended this showcase event for the Borough's business community, held at Brunel University London. 56 Hillingdon businesses exhibited, with a Business Breakfast for exhibitors and sponsors, 14 workshops (including one by Brunel discussing placements and the services the Professional Development Centre can offer), and public admission throughout the day.

## 5.3 Summary Working with Business Impact

This section has described the numerous ways in which Brunel University London engages with businesses and estimated that this activity generated £35.6 million GVA for the UK economy in 2013/14 and supported more than 600 jobs. A breakdown of this impact by source is provided in Table 5.3 below.

Table 5.3 – Working with Business Impact in 2013/14

|                          | Hillingdon | London      | UK          |
|--------------------------|------------|-------------|-------------|
| <b>GVA (£m)</b>          |            |             |             |
| Contract research        | -          | 13.9        | 30.2        |
| Consultancy              | -          | 0.7         | 1.4         |
| CPD                      | -          | 0.2         | 0.5         |
| KTPs                     | 0.1        | 1.0         | 2.6         |
| Science Park             | 6.3        | 3.9         | 2.6         |
| Spin-outs                | -          | -           | 0.2         |
| <b>Total GVA</b>         | <b>6.4</b> | <b>19.8</b> | <b>37.5</b> |
| <b>Employment (jobs)</b> |            |             |             |
| Contract research        | 0          | 207         | 457         |
| Consultancy              | 0          | 10          | 21          |
| CPD                      | 0          | 2           | 4           |
| KTPs                     | 3          | 21          | 51          |
| Science Park             | 113        | 70          | 46          |
| Spin-outs                | 0          | 0           | 10          |
| <b>Total Employment</b>  | <b>116</b> | <b>310</b>  | <b>590</b>  |

## **6. TOURISM IMPACTS**

Brunel University London contributes to the tourism economy in a number of ways. Staff and students at Brunel University London receive visits from family and friends throughout their time at the University. The University also hosts a range of conferences and events, which attract further visitors. In addition, the University provides additional accommodation capacity by letting its student residences for summer language school students. The expenditure of all of these visitors is attributable to the presence of Brunel University London and directly benefits the local tourism sector.

### **6.1 Quantifiable Tourism Impact**

The assumptions used to estimate the impacts of visitors to the University, its staff and students are described in Table 6.1 below. This shows assumptions about the number of visitors to friends and family and their expenditure along with assumptions about visitors to conferences and events hosted at the University and summer school students. The methodology used to estimate the impact is explained in the Technical Appendix.

Table 6.1 – Key Assumptions for Tourism Impact 2013/14

| Visiting Friends and Family Assumptions                                       | Value   | Source  |
|---|---------|---|
| Number of full time students  | 12,915  | Brunel University London  |
| Number of staff   | 2,153   |   |
| Number of domestic visiting family and friends trips to London/head           | 0.53    | VisitEngland, Domestic Tourism Overview and ONS, Mid-Year Population Estimates      |
| Number of overseas visiting family and friends trips to London/head           | 0.46    | VisitBritain, International Passenger Survey and ONS, Mid-Year Population Estimates |
| Average expenditure/trip of domestic visitors to family and friends in London | £127    | VisitEngland (2014), Domestic Tourism Overview                                      |
| Average expenditure/trip of overseas visitors to family and friends in London | £471    | VisitBritain (2014), International Passenger Survey                                 |
| Conferences and Events Assumptions  |         |   |
| Number of conference bednights in University accommodation                    | 29,118  | Brunel University London  |
| Proportion of overseas delegates  | 77%     | London™ Tourism Report 2012/13  |
| Proportion of domestic delegates  | 23%     |   |
| Proportion of visitors from outside LB of Hillingdon                          | 90%     | BiGGAR Economics Assumption   |
| Proportion of visitors from outside London                                    | 33%     |   |
| Proportion of visitors from rest of the UK                                    | 33%     |   |
| Average overseas visitor spend per night                                      | £107    | London™ Tourism Report 2012/13  |
| Average domestic visitor spend per night                                      | £101    |   |
| Summer School Assumptions   |         |   |
| Number of summer school bednights   | 109,112 | Brunel University London  |
| Summer school visitor spend per day   | £107    | BiGGAR Economics Assumption   |

Using these assumptions it was estimated that in 2013/14 visits to staff and students from friends and relatives, conference delegates to Brunel University London and summer school students staying at Brunel University London contributed £3.5 million GVA to the UK economy and supported 119 jobs in the tourism sector. A breakdown of this impact within each of the study areas is provided in Table 6.2.



Table 6.2 – Tourism Impact in 2013/14

|                              | Hillingdon | London     | UK         |
|------------------------------|------------|------------|------------|
| <b>GVA (£m)</b>              |            |            |            |
| Visiting Friends & Relatives | 0.8        | 1.6        | 2.6        |
| Conferences and Events       | 0.8        | 0.4        | 0.4        |
| Summer Schools               | 1.0        | 0.5        | 0.5        |
| <b>Total GVA</b>             | <b>2.6</b> | <b>2.5</b> | <b>3.5</b> |
| <b>Employment (jobs)</b>     |            |            |            |
| Visiting Friends & Relatives | 32         | 55         | 87         |
| Conferences and Events       | 30         | 13         | 14         |
| Summer Schools               | 39         | 17         | 18         |
| <b>Total Employment</b>      | <b>101</b> | <b>86</b>  | <b>119</b> |

## 6.2 Local Tourism Contribution

### 6.2.1 Tourism Infrastructure

Brunel University London contributes significantly to the tourism infrastructure in Hillingdon.

The University owns and operates a 40 bedroom hotel onsite - Lancaster Hotel & Spa. Offering hotel, gym and spa facilities, it is marketed for its location just 5 miles from Heathrow Airport and a 20-minute walk from Uxbridge Tube station. Visitors to the University use the hotel and consultations with University staff suggest that around 35% of business is entirely external to the University. As one of the few hotels in the area (outside Heathrow airport), it provides a useful asset for the business tourism market. The hotel has preferred supplier status with major companies, such as Coca Cola which has its UK headquarters nearby, as well as supplying meeting room, function and accommodation space for local small businesses.

The University also has 4,500 bedrooms in halls of residences which are available between June and September, providing 109,100 bednights per year for international summer schools (language students). These rooms run at almost full capacity. There is no doubt that the accommodation infrastructure provided by the University plays a role in attracting summer schools and these students to the area, bringing custom to local retail and catering businesses. The impact of these students was estimated above.

### 6.2.2 Brunel University Sport

Brunel University London's sports facilities are among the best in the UK. The University is committed to providing students, staff and the wider community with the best possible opportunities to start, stay and succeed in sport at every level. It provides community access to state of the art facilities and highly skilled coaches.

There are around 3,000 members of Brunel University Sport, with about a quarter of members being external (community) users. Brunel University Sport offers a

wide range of activities for the community, including adult exercise classes and junior courses. Its Active 50's+ club boasts over 170 members and is evidence of a successful relationship within the local community. It also offers holiday programmes for half term and summer holidays, providing local children with opportunities to learn and develop new skills.

### **6.2.3 Other Community Events**

For the last six years Brunel University London has staged an annual Bonfire and Fireworks night for the benefit of staff, students and its local community. This is a large annual event and in 2014 it was moved to Brunel University Sport's Running Track, allowing for a larger venue and a more spectacular display, with more entertainment and more food outlets. A range of entertainment is also provided, headlined by the students of the University's Circus Skills Society. It was estimated that 6,500 people attended the 2014 event.

Other examples of the University's community role include a community literary festival, currently being planned.

## **7. GRADUATE PRODUCTIVITY IMPACTS**

### **7.1 Graduate Premium**

One of the most important ways in which Brunel University London generates economic impact is through its graduates. The skills students learn and the experiences they have while at University directly enhance their future productivity. This enables them to contribute more to their employer and generate a greater benefit for the UK economy than they would otherwise be able to.

The GVA of this productivity gain includes the additional profits that employers are able to generate by employing graduates and the additional employment costs they are willing to pay in order to generate these additional profits.

The subject of graduate earnings premiums has been well researched so information about them is readily available and can be used to provide a measure of the additional contribution graduates make to the economy each year. Unfortunately information about the additional profits of graduate employers or the additional taxation revenue they help to generate is not readily available so the impact presented in this section is likely to underestimate the true productivity impact of learning.

Information about the graduate premium for different subject areas is provided in a research paper produced by the Department for Business Innovation & Skills<sup>4</sup>, which considered data from the Labour Force Survey between 1996 and 2009. Although the data used in the report is now somewhat dated, evidence from the OECD<sup>5</sup> suggests that returns to higher education are fairly consistent over time. For this reason, the report remains the most robust and comprehensive source available for estimating this impact.

The analysis considered the after tax earnings of a graduate compared to the after tax earnings of a non-graduate. The direct and indirect costs were then subtracted from the gross graduate premium for each degree subject to give the net graduate premium.

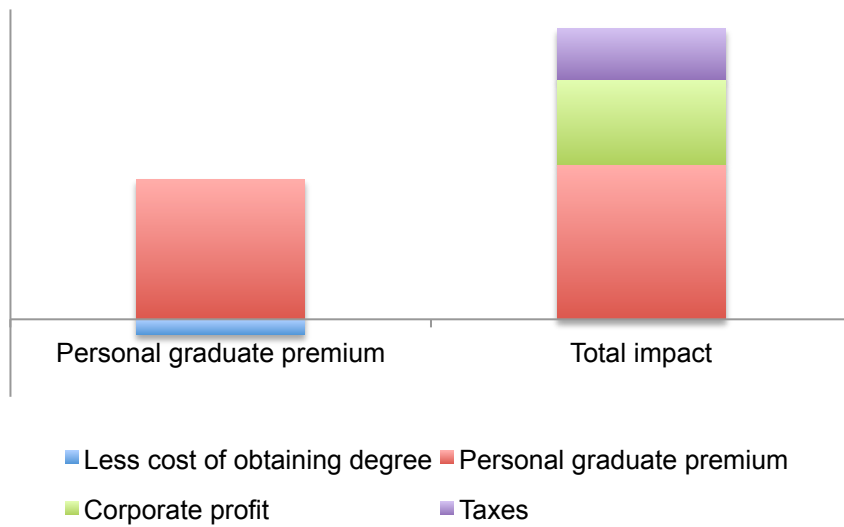
In this way the total graduate premium gives the combined personal economic benefit that the year's graduates will obtain rather than the increase in national productivity associated with the degree, which will be higher. It therefore does not include the corporate profit associated with each graduate as well as the taxes paid to the Treasury. For these reasons (as illustrated in Figure 7.1) the impact presented in this section is likely to underestimate the full impact that graduates from Brunel University London generate for the UK economy.

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<sup>4</sup> Department for Business Innovation & Skills (June 2011), *The Returns to Higher Education Qualifications*.

<sup>5</sup> Education at a Glance, OECD Indicators series

Figure 7.1 – Personal Graduate Premium Benefit Vs. Economic Benefit



## 7.2 Estimating the Graduate Earnings Premium

Degree subject determines the earnings premium that a graduate can expect to achieve over the course of his or her working life. The impact associated with graduates from Brunel University London was therefore estimated by applying the graduate premium for each degree subject to the number of graduates in each subject area. The assumptions used to do this are provided in Table 7.1.

Table 7.1 – Graduate Premium Assumptions – UK Students

|                                      | Undergraduate Graduates | Undergraduate Premium |
|--------------------------------------|-------------------------|-----------------------|
| Biological sciences                  | 375                     | £66,443               |
| Business and administrative studies  | 327                     | £117,853              |
| Creative arts and design             | 293                     | £16,183               |
| Education                            | 52                      | £159,995              |
| Engineering                          | 197                     | £143,959              |
| Historical and philosophical studies | 73                      | £23,226               |
| Languages                            | 99                      | £48,627               |
| Law                                  | 104                     | £171,543              |
| Mathematical and computing sciences  | 264                     | £136,309              |
| Mass communication and documentation | 64                      | £33,015               |
| Social studies                       | 267                     | £103,470              |
| Subjects allied to medicine          | 142                     | £186,392              |
| <b>Total/Average</b>                 | <b>2,257</b>            | <b>£108,121</b>       |
|                                      | Postgraduate Graduates  | Postgraduate Premium  |
| Masters graduates                    | 747                     | £55,720               |
| Doctoral graduates                   | 55                      | £62,395               |

Source: Brunel University London and Department of Business, Innovation and Skills (2011), *The Returns to Higher Education Qualifications*.

It was necessary to exclude students who leave the UK after graduation since these graduates will benefit the economies where they live rather than the UK. However, studies undertaken by the Department for Business Innovation and Skills<sup>6</sup> find that approximately 20% of overseas students remain in the UK after graduation. In 2013/14 there were 1,688 non-UK students graduating from Brunel University London, and the impact of 20% of these students was included.

Assumptions about where graduates live after graduation (Table 7.2) were then applied to the total graduate premium of UK students and the total graduate premium of the 20% of non-UK students who remain in the UK after graduation.

Table 7.2 – Destination of Graduates

|                          | Hillingdon | London | UK  |
|--------------------------|------------|--------|-----|
| Location of UK Graduates | 9%         | 68%    | 99% |

Source: Brunel University London

This indicates that the total graduate premium is £287.9 million in the UK.

<sup>6</sup> Department for Business Innovation and Skills, *Tracking International Graduate Outcomes 2011*, January 2012



Table 7.3 – Graduate Premium by Study Area (£m)

|                             | Hillingdon | London | UK    |
|-----------------------------|------------|--------|-------|
| Total Graduate Premium (£m) | 26.2       | 197.7  | 287.9 |

### 7.3 Estimating the Graduate Placement Premium

The Destinations of Leavers from Higher Education (DLHE) survey provides a snapshot of graduate activity six months after completing their studies. Data from the survey indicates that in 2013/14, 72% of Brunel University London graduates were working 6 months after graduating. It also found that 80% of graduates who undertook a placement while they were studying were employed 6 months after graduating, compared to 68% for graduates who had not undertaken a placement.

In addition to this, the average starting salary for a graduate who had undertaken a year long work placement during their studies was £3,196 higher than those who had not. In 2013/14, 730 students undertook year long work placements. Based on this information it can be estimated that the earnings premium associated with graduates undertaking year long work placements contributed £2.3 million to the UK economy.

As an example, many of Brunel University's PGCE (Postgraduate Certificate in Education) students undertake placements in local schools while studying and upon graduating contribute to the local workforce by providing skilled staff for local schools.

Table 7.4 – Graduate Placement Premium (£m)

|                   | Hillingdon | London | UK  |
|-------------------|------------|--------|-----|
| Placement Premium | 0.2        | 1.6    | 2.3 |

### 7.4 Summary Graduate Productivity Impacts

The overall graduate productivity impacts arising from the estimated earnings premium of Brunel University London graduates and the additional premium associated with students undertaking a year long placement during their studies are summarised in Table 7.5.

This indicates that productivity impacts from Brunel University London graduates contribute more than £290.0 million to the UK economy.

Table 7.5 – Graduate Productivity Impacts (£m)

|   | Hillingdon  | London       | UK           |
|---|-------------|--------------|--------------|
| Graduate Premium                          | 26.2        | 197.7        | 287.9        |
| Placement Premium                         | 0.2         | 1.6          | 2.3          |
| <b>Total Graduate Productivity Impact</b> | <b>26.4</b> | <b>199.3</b> | <b>290.2</b> |

## 7.5 Societal Impacts of Higher Education

It is important to note that the graduate premium quantified above focuses only on the economic benefit of each year's cohort of graduates. It does not take into account the significant wider benefits to the individual and society of higher education.

These benefits have been well documented<sup>7</sup> and include:

- reduced risk of unemployment;
- better physical health;
- reduced risk of depression; and
- greater civic engagement.

Higher education can also help to break cycles of educational deprivation. This suggests that increasing higher education in one generation can enhance the prospects, and therefore skills, of future generations.

Many of the benefits identified translate directly into economic benefit. For example, better physical and psychological health would lead to reduced health costs for the economy. These impacts are impossible to quantify but improve the well-being of individuals and have a wider societal impact.

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<sup>7</sup> Institute of Education, University of London (July 2001), *The wider benefits of higher education*, published by HEFCE.

## **8. WIDER IMPACTS**

### **8.1 Contribution to Health**

Brunel University London's Institute of Environment, Health and Societies delivers research that has a long term impact on health and quality of life, which, in turn, creates long term economic benefits. The Institute's research themes are:

- **Healthy Ageing:** to advance knowledge in the field of ageing with the aim of improving the quality of life and health of older people;
- **Health and Environment:** to further our understanding of ill-health and biodiversity loss, and to develop technologies and innovations that contribute to a sustainable environment and improved health;
- **Health Economics:** to undertake economic evaluations of a broad range of clinical and health service technologies in order to provide applied, policy-relevant research;
- **Synthetic Biology:** to design and engineer biologically based parts, novel devices and systems, and re-design existing natural biological systems to deliver improved products and applications;
- **Biomedical Engineering and Healthcare Technologies:** to research new and innovative solutions in practice for health, medicine and surgery to enrich the quality of life and services for 21st century needs; and
- **Social Sciences and Health:** to develop interventions and innovations that promote the behavioural health, wellbeing and resilience of human societies.

An example of this impact comes from Brunel's Health Economics Research Group (HERG), which undertook an assessment of the cost-effectiveness of a screening programme for abdominal aortic aneurysms (AAA), which in turn is estimated to have helped save just under half of the 6,800 men killed by the illness every year. A case study is provided in the figure below.

Figure 8.1 – Health Economics Research Group (HERG), AAA trial

A trial looking into the implementation of a screening programme for abdominal aortic aneurysms (AAA) is estimated to have helped save just under half of the 6,800 men killed by the illness every year. A vital part of the Multi-centre Aneurysm Screening Study (MASS) trial was an assessment of the cost-effectiveness of the screening programme – undertaken by Brunel’s Health Economics Research Group (HERG) and published in the *Lancet* in 2002.

The assessment helped inform a policy announced by the Government in 2008 to introduce a national screening programme for all men over the age of 65 years old.

The final report into the effectiveness of the MASS trial in 2012 estimated a 42% reduction in the AAA-related mortality rate by screening men aged 65 to 74 years old. By spring 2013 the programme was fully introduced in England, offering screening to 300,000 men annually.

In 2013/14, the NHS reported that nearly 500 men went on to have potentially life-saving surgery after attending a screening. Nearly 3,700 had aneurysms detected, leading to regular monitoring.

In 2011 the Department of Health recognised the work of HERG in informing the policy research programme, saying: “This has made a significant contribution to strengthening the evidence-base for policymaking through a range of applied economic research.”

Internationally, MASS is the most significant trial of AAA screening and provides the most robust evidence-based model of its cost-effectiveness. HERG’s research has influenced AAA screening guidelines and policies across Europe and the USA.

*Source: Brunel University London*

In 2013/14 Brunel University London received almost £4.0 million in medical and health research income. Research by the Wellcome Trust on the value of medical research in the UK considers two types of return: health gains (net of the health care costs of delivering them) and economic gains<sup>8</sup>.

### 8.1.1 Quality of Life Impact

The value of health gains was assessed in the Wellcome Trust report using the quality adjusted life years (QALY) method<sup>9</sup>. This is a widely used method developed by health economists to assess how many extra months or years of life of a reasonable quality a person might gain as a result of treatment. The Wellcome Trust report considered two areas of medical research expenditure, for cardiovascular disease and mental health.

The value of the health benefit was presented as a return on the initial expenditure on the research (IRR). This varies slightly between the two different areas of study, and more widely between the different scenarios for each of the study areas. The best estimate for the IRR in cardiovascular disease research is 9.2%, although the report also considered high and low expenditure scenarios that ranged from 7.7% and 13.9%. Similarly, the best estimate for the IRR for investment in mental health research was 7.0%. The high and low estimates for this area of study had a greater range and varied between 3.7% and 10.8%.

<sup>8</sup> Medical Research: What’s it worth? Estimating the economic benefits from medical research in the UK, For the Medical Research Council, the Wellcome Trust and the Academy of Medical Sciences, November 2008

<sup>9</sup> Ibid.

In order to apply these IRRs to the wide range of medical research undertaken at Brunel University London the average of the two best estimates was used. Therefore for every £1 invested in medical research results in health gains with a value of £0.08 each year in the UK for perpetuity.

### 8.1.2 Economic Impact

The Wellcome Trust also considered the effect that medical research expenditure would have on GDP. The study considered the impact that this would have in stimulating investment in the private R&D sector and the social returns to the private investment that is stimulated by the publically funded medical research. This found that a £1 investment by a public body in medical research and development stimulated an increase in private R&D investment of between £2.20 and £5.10. The report also found that the social rate of return to private sector R&D funding was approximately 50%.

As with the estimates for the Quality of Life IRR, the study finds that there is a range of estimates for the IRR for GDP impacts. The lowest estimate for IRR is 20% and the highest is 67%. The best estimate that is given is 30%. Unlike the Quality of Life research, there was no estimates given for the GDP impacts associated with mental health research and therefore the 30% is assumed to apply to all types of medical research. Therefore for every £1 invested in medical research results in GDP with a value of £0.30 each year in the UK in perpetuity.

### 8.1.3 Total Returns to Medical Research

As in the Wellcome Trust report we have calculated the Net Present Value of the University's investment in medical research using the Treasury approved discount rate of 3.5%. The impact in each of the other study areas was assumed to be proportional to their population.

Table 8.1 – Key Assumptions for Medical Research 2013/14

|                             | Value      | Source   |
|-----------------------------|------------|--|
| Income for Medical Research | £3,962,318 | Brunel University London                       |
| Hillingdon                  | 0.5%       | ONS (2015), Mid-Year Population Estimates 2014 |
| London                      | 13.2%      |  |
| UK                          | 100%       |  |
| Time Period (Years)         | 20         | BiGGAR Economics                               |
| Discount Rate               | 3.5%       |  |
| Social Return IRR           | 8%         | Wellcome Trust                                 |
| Economic Return IRR         | 30%        |  |

Using these assumptions it was estimated that in 2013/14 the medical research undertaken by Brunel University London would contribute £21.4 million GVA to the UK economy, £2.8 million to the London economy and £1.0 million in Hillingdon. At the UK level, £4.5 million would be from the social health gains and £16.9 million would be from economic impacts.



Table 8.2 – Health Impacts (£m)

|  | Hillingdon | London     | UK          |
|--|------------|------------|-------------|
| Social Returns to Research               | <0.1       | 0.6        | 4.5         |
| Economic Returns to Research             | 0.1        | 2.2        | 16.9        |
| <b>Total Returns to Medical Research</b> | <b>0.1</b> | <b>2.8</b> | <b>21.4</b> |

## **8.2 Benefits to the Local and Regional Community**

### **8.2.1 Securing Industrial Heritage and Growing Local Entrepreneurs**

Brunel University London has been instrumental in the development of the Central Research Laboratory at the Old Vinyl Factory in Hayes, described in the case study in Figure 8-2 below. This will stimulate local economic development in a deprived part of the city while at the same time driving innovation in manufacturing. The site may well have been used for other functions, such as housing, however the presence of Brunel University London in the development partnership has ensured a future for the site as an innovation hub with strong local economic development potential. In doing so, Brunel University London has helped secure future economic benefits for the local area including stimulating regeneration of local businesses in the supply chain, including retail, catering and cleaning firms as well as securing high value employment for the area.

Figure 8-2: Case Study: Central Research Laboratory at the Old Vinyl Factory

The Central Research Laboratory is an exciting new idea in British manufacturing and technology, also providing a bright future for The Old Vinyl Factory. EMI's headquarters at The Old Vinyl Factory in Hayes were once a global centre for innovation in product design, technology and manufacturing. The CAT scanner, stereo sound recording and airborne radar were all invented here - alongside landmark advances in TV broadcasting, computing - in a remarkable building called The Central Research Laboratory.

Brunel University London has created a space to bring the CRL back to life as a key part of the redevelopment of the entire site. The new CRL provides entrepreneurs, makers and inventors with a range of shared resources and work space including cutting edge prototyping facilities, expert mentoring, technical support and an inspiring place to collaborate and work. These facilities will also be available to local SMEs. On 2<sup>nd</sup> September 2015 a pilot facility will open with 25 individuals across 11 companies, who have been selected following a selection process including a 'Dragons' Den' type exercise. The full facility will open a year later with space for 182 individuals.

The CRL is jointly funded by the developers, the Mayor of London (through the Growing Places Fund) and Brunel University London in partnership with the Higher Education Funding Council for England.

The Central Research Laboratory will be about making extraordinary products, starting businesses and giving makers and start-ups a place with everything they need to bring their innovations to the marketplace.

What will make the CRL unique is that it's designed to support makers at every stage of the entrepreneurial journey – from concept development, through prototyping and first batch and beyond – with mentoring and investment provided along the way.

The CRL also has a strong commitment to collaboration and community engagement. Its programme of commercial support, technical advice, exhibitions and events is just as important as its prototyping labs and workspaces.

Source: <http://www.theoldvinylfactory.com/>

In addition to growing entrepreneurs at the CRL, there are a number of other excellent examples of student entrepreneurship, with several awards won. In 2014, PhD student Adam Lynch found himself the focus of national press attention when he “hacked his own microscope” and made a discovery that could save millions of pounds in bio testing fields. He created his own inverted microscope by adapting a cheap instrument he bought online to save himself time and money. The tool is used to measure cell motility, but the high-quality equipment, used to automatically test multiple samples, can normally stretch to hundreds of thousands of pounds. The technology also means that studies could be carried out in countries where diseases are rife, but resources low.

A further example can be found in Alumni of the Year, Damien Kennedy and Greg Duggan, who established Wheyhey ice cream in 2012. It is now a successful company trading “the world's first and best selling protein ice cream” (<http://wheyhey.com/>). The ice cream is low in fat and uses natural sweetener xylitol, which has no insulin response and is recommended by dentists. They managed to scale up their production and grow the business, which is now forecast to turn over £2.5 million this year and employs nine full-time staff. Greg and Damien recently returned to Brunel University London to speak to students in the Entrepreneurs' Society to share their experiences and advice.

### **8.2.2 Growing Local Skills Capacity**

We have shown that Brunel University London is an important driver of economic development in Hillingdon. The University is also taking steps to grow local skills capacity, for example, through its involvement in the Aviation University Technical College (UTC). Sponsored by Brunel University London, the Aviation UTC is focused on developing future aviation engineers. It aims to meet the growing local need for technically competent, employable young people to join the expanding aviation industry. Along with 14 other new UTCs, it will provide a practical grounding in mathematics, science and engineering for young people aged between 14 and 19 from a wide geographical area.

Brunel University London will work with partners including BAA, British Airways, Virgin Atlantic and other major businesses to provide practical assistance in the form of input to curriculum development and delivery as well as widening participation and schools liaison activities.

The UTC will fill an important gap in the local provision of high quality technical education and will make an important impact on the socio-economic challenges of the area by contributing to regional skills and employability targets.

Further investment in local skills is also underway, with a £5 million investment by the University (funded by a HEFCE grant) to re-balance the gender gap in science, engineering, technology and maths-based careers. Brunel University London will refurbish its facilities to grow its engineering undergraduate programmes 5% a year for the next five years and further increase those taking the apprenticeship route through the Aviation UTC. Key to the growth plans is working with schools and other stakeholders to create a step-change in the number of girls studying engineering and science subjects.

The new facilities will be the springboard for a large increase in STEM subject graduates but importantly, it will take an integrated approach to attracting many more girls into studying maths, physics and computing to A-level and beyond. At the heart of the new facilities will be a STEM Outreach Lab which will reach 30,000 school pupils a year on and off campus.

### **8.2.3 Contributing to Local Capital Infrastructure**

Brunel University London has undertaken major capital investments over the last ten years, in the region of £350 million of development, with its four campuses being consolidated into one. There are quantitative economic impacts from this, in terms of GVA and jobs created, which have been captured by our impact analysis in Section 3.1. However, there are considerable wider impacts which are hard to quantify.

As a result of the significant campus investment, more students have been brought into Hillingdon, bringing with them a lively and vibrant youth focused culture. Students deliver other benefits, for example, a strong volunteering effort that adds value to local third sector organisations (see Section 4.3). New buildings in themselves can stimulate economic confidence, improving the local amenity and the impression a place makes, including stimulated inward investment of businesses and attraction to existing and new residents. Indeed, it is anticipated that this positive influence on the local area will increase in the future, with planned investment in three areas:

- a new health and sports centre, with a 1,500 seat arena;
- new learning and teaching facilities; and
- new engineering facilities.

The total capital spend over the last five years of £54.5 million will be dwarfed over the next five years by an estimated investment in the region of £170 million. This is in addition to the major multi-million pound academic/industry developments highlighted in Chapter 5.

#### **8.2.4 Widening Participation and Improving Life Chances**

Widening participation (WP) activities in 2013/14 were targeted at students from under-represented groups with particular emphasis on students with disabilities and care-leavers. The aim is to ensure that Brunel University London continues to exceed its WP benchmarks in key areas.

The University's performance is currently very good:

- the number of young full time first degree students from Low Partition Neighbourhoods (LPNs) has increased from the baseline of 4.8% set in 2008 to 7.3% in 2012/13;
- the number of full time first degree students in receipt of the Disabled Students Allowance has increased from a baseline of 3.8% set in 2008 to 9.2% in 2012/13;
- in autumn 2012 Brunel was re-awarded the Buttle UK Quality Mark for a further three years for its work with care leavers. A Care Leaver/Foyer Federation bursary of £1,000 per annum first introduced for entrants in 2013 was awarded to 16 undergraduates from a care background; and
- evidence of activity to support the transition, progression, retention and employability of all WP students during 2013/14 includes the introduction of a WP Internship project to support the employability of under-represented undergraduates.

The WP Office has also continued to operate two strands of Professional Mentoring for UK second year undergraduates from widening participation backgrounds and under-represented ethnic minorities. The Ethnic Minority Undergraduate Scheme (EMUS) targets undergraduates from ethnic minority backgrounds and is managed in collaboration with the National Mentoring Consortium (NMC). Both programmes draw on experienced individuals from employers in the private and public sectors. Mentors receive full training and give their time voluntarily over a period of seven months. The scheme was cited by Government's Office for Fair Access (OFFA) and HEFCE in April 2014 as an example of good practice.

Brunel University London's WP Programme was cited as an example of best practice by OFFA in its annual report which stated:

*"Brunel University's approach to access encompasses not only outreach and financial support but also activity to improve retention and success. It focuses on employer engagement to improve job prospects, including a programme of*

*mentoring for undergraduates by professionals who work in a sector or industry related to the student's subject or career aspiration".*

### **8.2.5 Public Engagement**

Brunel University London's annual Public Lecture Series has been running since 2009. Attendance at the lectures is free and is open to the public, providing an important educational and cultural resource in an area of the city where there is low supply of such opportunities. The lecture series attracts over 7,000 people each year from the local community and beyond. The format was amended for this year, with a Spring and an Autumn series, and each lecture delivered by one high-profile speaker with follow-up discussion involving audience participation.

For the Spring 2014 phase, the broad overarching theme was 'Visions of the Future'. Professor AC Grayling, a renowned philosopher, and the Master of the New College of the Humanities, presented his vision on the future of secularism and religion, the Rt Hon David Willetts MP and former minister for Higher Education, spoke about his vision for the future of Higher Education and finally, Professor Lord Robert Winston, one of the UK's most respected scientists, spoke on the intriguing topic of 'Meddling with the Future'. By attracting renowned speakers addressing a range of topics and sharing the research of its staff through public lectures such as these Brunel University London provides an important forum for disseminating knowledge and expertise and engaging with the public.



## **9. SUMMARY AND CONCLUSIONS**

Brunel University London is focused on "*addressing society's challenges*" and is doing this through an emphasis on an integrated approach to teaching, research and business collaboration. The aim at Brunel is to have an ecosystem where teaching and research are not seen as separate activities and where there are no barriers between fundamental and applied research.

We have shown that each of these areas delivers considerable economic impact, bringing quantifiable benefits to the local, regional and national economy as well as driving a range of qualitative impacts that are harder to measure

### **9.1 Summary of Key Findings**

The tables below show that as an integrated package of teaching, research and business collaboration in 2013/14 Brunel University London generated an estimated:

- £212.6 million GVA and supported 2,512 jobs in the London Borough of Hillingdon;
- £504.5 million GVA and 5,908 supported jobs in London; and
- £785.4 million GVA and 10,407 supported jobs in the UK.

Table 9.1 – Brunel University London GVA Impact 2013/14 (£m)

|   | Hillingdon   | London       | UK           |
|---|--------------|--------------|--------------|
| Direct                                    | 119.6        | 119.6        | 119.6        |
| Supplier Spending                         | 4.8          | 33.1         | 60.1         |
| Staff Spending                            | 3.7          | 27.6         | 68.8         |
| Capital Spending                          | 0.8          | 2.3          | 20.6         |
| <b>Subtotal Core Impact</b>               | <b>128.9</b> | <b>182.6</b> | <b>269.1</b> |
| Student Spending                          | 17.6         | 45.2         | 80.2         |
| Student Part-time Work                    | 19.5         | 31.4         | 49.5         |
| Student Volunteering                      | 0.04         | 0.06         | 0.09         |
| Student Placements                        | 11.1         | 20.8         | 33.9         |
| <b>Subtotal Student Impact</b>            | <b>48.2</b>  | <b>97.5</b>  | <b>163.7</b> |
| Contract research                         | -            | 13.9         | 30.2         |
| Consultancy                               | -            | 0.7          | 1.4          |
| CPD                                       | -            | 0.2          | 0.5          |
| KTPs                                      | 0.1          | 1.0          | 2.6          |
| Science Park                              | 6.3          | 3.9          | 2.6          |
| Spin-outs                                 | -            | -            | 0.2          |
| <b>Subtotal Business Support</b>          | <b>6.4</b>   | <b>19.8</b>  | <b>37.5</b>  |
| Visiting Friends & Relatives              | 0.8          | 1.6          | 2.6          |
| Conferences and Events                    | 0.8          | 0.4          | 0.4          |
| Summer Schools                            | 1.0          | 0.5          | 0.5          |
| <b>Subtotal Tourism Impact</b>            | <b>2.6</b>   | <b>2.5</b>   | <b>3.5</b>   |
| <b>Sub-total Impact</b>                   | <b>186.2</b> | <b>302.4</b> | <b>473.9</b> |
| Graduate Premium                          | 26.2         | 197.7        | 287.9        |
| Placement Premium                         | 0.2          | 1.6          | 2.3          |
| <b>Total Graduate Productivity Impact</b> | <b>26.4</b>  | <b>199.3</b> | <b>290.2</b> |
| <b>Returns to Medical Research</b>        | <b>0.1</b>   | <b>2.8</b>   | <b>21.4</b>  |
| <b>GVA (£m)</b>                           | <b>212.6</b> | <b>504.5</b> | <b>785.4</b> |

Note: Totals may not sum due to rounding

Table 9.2 – Brunel University London Employment Impact 2013/14 (jobs)

|                                       | Hillingdon   | London       | UK            |
|---------------------------------------|--------------|--------------|---------------|
| Direct                                | 728          | 1,389        | 1,965         |
| Supplier Spending                     | 141          | 1,001        | 1,832         |
| Staff Spending                        | 83           | 654          | 1,639         |
| Capital Spending                      | 13           | 37           | 270           |
| <b>Subtotal Core Impact</b>           | <b>965</b>   | <b>3,081</b> | <b>5,707</b>  |
| Student Spending                      | 349          | 840          | 1,482         |
| Student Part-time Work                | 802          | 1,242        | 1,934         |
| Student Volunteering                  | -            | -            | -             |
| Student Placements                    | 180          | 350          | 574           |
| <b>Subtotal Student Impact</b>        | <b>1,331</b> | <b>2,432</b> | <b>3,991</b>  |
| Contract research                     | 0            | 207          | 457           |
| Consultancy                           | 0            | 10           | 21            |
| CPD                                   | 0            | 2            | 4             |
| KTPs                                  | 3            | 21           | 51            |
| Science Park                          | 113          | 70           | 46            |
| Spin-outs                             | 0            | 0            | 10            |
| <b>Subtotal Working with Business</b> | <b>116</b>   | <b>310</b>   | <b>590</b>    |
| Visiting Friends & Relatives          | 32           | 55           | 87            |
| Conferences and Events                | 30           | 13           | 14            |
| Summer Schools                        | 39           | 17           | 18            |
| <b>Subtotal Tourism Impact</b>        | <b>101</b>   | <b>86</b>    | <b>119</b>    |
| <b>TOTAL EMPLOYMENT</b>               | <b>2,512</b> | <b>5,908</b> | <b>10,407</b> |

Note: Totals may not sum due to rounding

## 9.2 Costs and Benefits

In 2013/14 Brunel University London directly contributed £119.0 million GVA to the UK economy and generated a total quantifiable economic impact of £785.4 million GVA. This implies that the GVA multiplier of the University is 6.6 and means that each £1 GVA directly generated by the University generates a total economic impact of £6.60 GVA for the UK economy.

In 2013/14 Brunel University London supported 10,407 jobs throughout the UK economy. This included 1,965 jobs of people who are directly employed by the University, which means that every job directly created by the University supported five jobs throughout the UK economy.

Brunel University London received £32.0 million of its income in the form of higher education funding body grants. This suggests that every £1 invested by higher education funding bodies generates £24.60 GVA for the UK economy.

These multipliers are summarised in Table 9.3.

Table 9.3 – Brunel University London Impact Multipliers

|                              | Including Graduate Productivity & Returns to Medical Research | Excluding Graduate Productivity & Returns to Medical Research |
|------------------------------|---|---|
| Direct GVA : Total GVA       | 6.6   | 4.0   |
| Direct Jobs : Total Jobs     | 5.3   | 5.3   |
| Funding Body Income : Impact | 24.6  | 14.8  |

Source: BiGGAR Economics

### 9.3 Conclusions

Being based in London, Brunel University may be less visible than universities in other cities, because it is one of many universities in a city with many very powerful economic drivers, not least the economic powerhouse of Heathrow Airport so close by. This means that its role as a contributor to the regional economy is not as obvious as it perhaps should be, given the scale and nature of the economic benefit it provides.

In addition to the considerable quantifiable GVA and job impacts described in the tables above, the University has delivered further qualitative economic and community/social benefits, including:

- Benefits to the local labour market from a structured emphasis on student employment and brokerage, filling vacancies in local businesses;
- Adding value to the third sector in Hillingdon, working alongside voluntary groups, charities and other not-for-profit organisations, where over 400 Brunel Volunteers completed over 10,000 hours of volunteering in the local community – a very large pool of volunteer labour with a very structured approach to filling volunteer vacancies;
- Strengthening tourism infrastructure, through significant capital development and creation of thousands of bed nights in the area, provision of sports facilities, and provision of community events of interest to visitors and local residents alike; and
- Driving initiatives to support the local and regional community, including industrial heritage, growing local skills capacity, delivering capital infrastructure that adds to local amenity, widening participation and public engagement activity.

Brunel University London is an “anchor institution” within its community. The concept of anchor institutions evolved in the USA as a way of understanding how certain public and private sector institutions have fundamentally shaped the character of particular cities. According to the Work Foundation...

*“Anchor institutions do not have a democratic mandate and their primary missions do not involve regeneration or local economic development. Nonetheless, their scale, local rootedness and community links are such that they are acknowledged to play a key role in local development and economic growth. They perform this role through their day-to-day tasks and activities, but also by acting more strategically, individually or – better still – collectively.”*

Source: Work Foundation, January 2010

According to the University of Pennsylvania (2008), anchor institutions:

- have a large stake and important presence in the city and community;
- have substantial economic impacts on employment, revenue gathering, and spending patterns;
- are one of the largest local employers;
- consume sizeable amounts of land;
- have relatively fixed assets and are unlikely to relocate;
- are among the largest purchasers of goods and services in the local area;
- generate jobs and employment, both directly and indirectly;
- attract businesses and highly skilled individuals;
- provide multiple employment possibilities at all levels; and
- are centres of culture, learning and innovation with substantial human and intellectual resources.

Within its local and regional community, Brunel University London certainly performs these functions. This is an unusual position for a London based university. Many of the London higher education institutions operate in an international market quite outside the context of their immediate geographical areas and so their reach and impact bypass their local communities. But as this study has shown, Brunel is delivering on the needs of the regional economy and for local people, at the same time as providing world leading research and achieving as an international university.

Brunel's engagement with business is meaningful, forging long term and highly constructive relationships with large multi-nationals and SMEs alike, including delivering activities and events that are focused on supporting the local business community. The University recognises the benefits it gains from knowledge exchange including, for example, new research material, opportunities for testing new technologies in real world situations and opportunities to secure new research funding. The quantifiable business support impact identified in this study demonstrates that Brunel University London's students and staff are providing real value to the businesses they have worked with. The case studies show that these impacts go beyond the quantifiable, providing wider benefits such as reducing the massive environmental impact of mining for metals or the health impacts of working with life sciences firms and NHS organisations. And, of course, in applying their skills to projects that enhance business performance, students and graduates are developing their individual experience and becoming highly employable.



This study has shown that Brunel University London's integrated approach to teaching, research and business collaboration delivers considerable economic impact, bringing quantifiable benefits to the local, regional and national economy as well as driving a wide range of qualitative impacts that underpin the University's role as a regional anchor institution.

## 10. TECHNICAL APPENDIX

### 10.1 Approach

Economic impact is reported in two ways:

- Gross Value Added (GVA) measures the monetary contribution of the organisation and individual to the economy; and
- employment, measured in full time equivalent (ftes) jobs supported.

Each area of impact requires the use of three types of economic assumptions:

- turnover to GVA ratio – this is used to estimate the GVA impact of the spend in an area. This is obtained from the UK Annual Business Survey<sup>10</sup>;
- turnover per employee – this is used to estimate the employment impact of the spend in area. This is obtained from the UK Annual Business Survey; and
- GVA and employment multipliers – these are used to estimate supplier and income impact created by businesses that directly benefit from additional spend in the area. These multipliers have been based on those published in the Scottish Government’s Input-Output tables<sup>11</sup>. The Scottish multipliers have been adapted to each of the study areas to reflect the comparative size of the economy in that area. This source has been used because it is more up to date than equivalent information published about the UK economy as a whole and also provides multipliers for different sectors.

### 10.2 Multipliers

The multipliers that are given in the Scottish Input-Output Tables give both the effects on the supply chain and the effects of staff spending. The location of some of the induced and supply chain activity is likely to be outside the area where the direct impacts occur. To reflect this, the Scottish multipliers were adjusted to reflect the size of each study area and the proportions used are given in Table 10.1.

Table 10.1 – Economic Multipliers as % Scottish Multipliers

|                                       | Borough of Hillingdon | London | UK   |
|---------------------------------------|-----------------------|--------|------|
| Multipliers as % Scottish Multipliers | 33%                   | 100%   | 120% |

Source: BiGGAR Economics

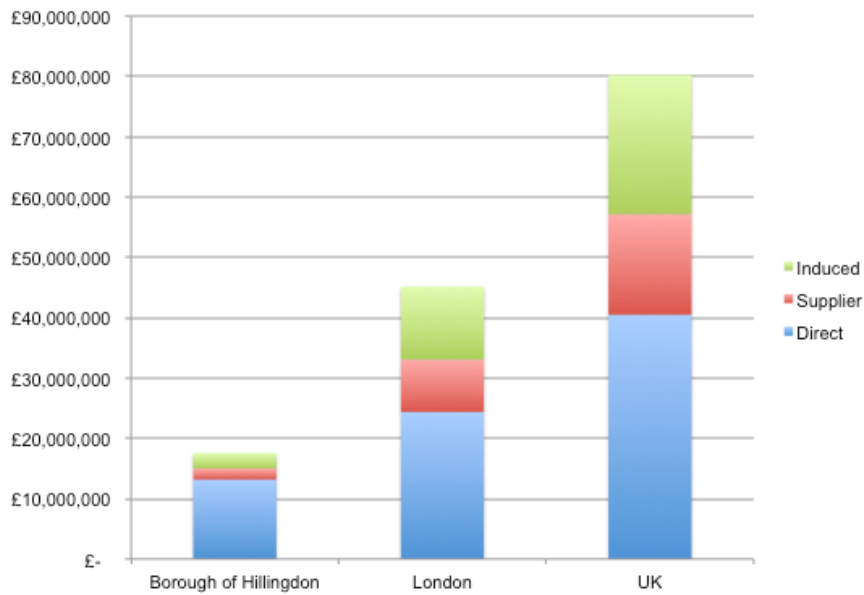
The result of these multiplier adjustments is that direct spending within the Borough of Hillingdon has a greater total economic impact in the UK, than within the Borough. This is because a greater proportion of the supply chain and induced impacts are captured outwith the Borough. In addition to this, direct spending outwith the Borough does not have any indirect impacts there. These two properties result in the impacts in the UK being significantly higher than those in the Borough of Hillingdon, even in instances where the direct spending is similar. This is shown in Figure 10.1, which gives the impact of student spending

<sup>10</sup> ONS, UK Annual Business Survey 2012, 2014

<sup>11</sup> Scottish Government, Input-Output Tables 2011, 2014

and shows the magnitude of the induced and supply chain impacts elsewhere in the UK.

Figure 10.1: Student Spending Impact (GVA) Location of Impact by Type



### 10.3 Core Impacts

#### 10.3.1 Direct Impact

The direct impact of any organisation is the value it adds to the economy and the number of jobs it supports in a given time frame. The direct operational Gross Value Added (GVA) of the University was calculated by subtracting all of the non-staff expenditure from the total operational income of the University.

#### 10.3.2 Supplier Spending Impact

Brunel University London has an impact on the wider economy through the purchase of goods and services as this increases turnover and supports employment in the companies that supply the University.

The first step in estimating this impact is to estimate how much of the supplier spending occurs in each study area.

The GVA impact of the spend on supplies is estimated by considering the spend on supplies by sector. The spend in each sector supports different GVA depending on the turnover to GVA ratio for that sector (the UK Annual Business Survey gives a breakdown of these figures for industries and smaller sectors). The direct impacts were distributed by the geographical distribution of the contracts to calculate the impacts based on the increased turnover in each area. The impact throughout the economy is estimated by applying GVA multipliers appropriate to the sector.

The employment impact of the spend on supplies is estimated by applying the turnover per employee in the industries relevant to the spend. The impact throughout the economy is estimated by applying employment multipliers appropriate to the sector.

### 10.3.3 Staff Spending Impact

The staff employed by Brunel University London have an impact on the economy by spending their salaries. This requires two steps to estimate.

The first is that the level of salary paid in each study area was assumed to be proportional to the number of staff that live in each area. Data provided by the University provided a breakdown of the proportion of staff living in each study area. This was applied to the staff salaries paid by the University in 2013/14 in order to estimate how much of the staff spending occurs in each study area.

The second step is an assumption of how much of a person’s wage is spent in each study area as shown in Table 10.2. This assumption is different for the staff living in each study area, for example, staff living in the rest of London are estimated to spend 93% of their salaries in the UK (i.e. 7% of salaries are spent outside the UK), of which 74% of salaries are spent in London (excluding Hillingdon) and 5% are spent in Hillingdon itself. The assumption for total spend in the UK is based on data available in the Scottish input-output tables.

Table 10.2: Staff Spending Assumptions

| Where staff live | Where staff spend their salaries |                |            |
|------------------|----------------------------------|----------------|------------|
|                  | Hillingdon                       | Rest of London | Rest of UK |
| Hillingdon       | 33%                              | 74%            | 93%        |
| Rest of London   | 5%                               | 74%            | 93%        |
| Rest of UK       | 5%                               | 33%            | 93%        |

The economic impact of staff spending as measured by GVA and employment supported, is estimated by applying economic assumptions appropriate to the sector as described in the previous section (i.e. turnover/GVA ratio, turnover/employee ratio, GVA multiplier and employment multipliers).

### 10.3.4 Capital Spending Impact

The first step in estimating this impact is to estimate how much of the capital spending occurs in each study area.

The economic impact of capital project spending as measured by GVA and employment supported, is estimated by applying economic assumptions appropriate to the sector as described in the previous section (i.e. turnover/GVA ratio, turnover/employee ratio, GVA multiplier and employment multipliers).

## 10.4 Student Impacts

### 10.4.1 Student Spending Impact

This impact considers:

- how much students spend;
- where they spend it; and
- what they spend it on.

To measure where students spend their money it was assumed that the students spend their money in the study area where they live.

The amount of money that students spend was based on the cost of living provided by the University of Hull on its website.

The analysis excludes money spent on University accommodation as this will have been accounted for in the University's turnover and is therefore part of the direct impact analysis.

Not all students will spend on all the categories listed. For example, it is assumed that students who stay with their parents will not spend money on accommodation and less money on food than students living independently. This enables the direct spend in each area to be calculated for each spending category.

The economic impact of student spending as measured by GVA and employment supported, is estimated by applying economic assumptions appropriate to the sector as described in the previous section (i.e. turnover/GVA ratio, turnover/employee ratio, GVA multiplier and employment multipliers).

#### **10.4.2 Student Part-time Work Impact**

The part-time work that students undertake also contributes to the economy. The economic impact of students' paid employment comes from the additional GVA of the businesses that employ them and the multiplier effect that these additional workers have on those businesses' supply chains.

This impact considers:

- the number of students who work;
- additionality of labour – what proportion of jobs undertaken by student would have been unfilled without the availability of student labour. It is reasonable to assume that some part-time jobs may otherwise have been filled by non-students. In order to reflect this we have taken account of local labour market conditions by using the youth unemployment rate as an indicator of the availability of replacement labour. The Annual Population Survey published annually by the ONS indicates that 20% of young people in London are unemployed. The additionality of student labour is therefore assumed to be inversely proportional to the youth unemployment rate and was calculated to be 64%;
- proportion of employed students who work for the University – these students are removed from the analysis as their contribution is already included in the core activities;
- average hours worked per year by a student with a part time job; and
- additional GVA that students generate for their employees - is calculated using the GVA per employee ratios for the industries in which students most frequently find work.

Applying these assumptions to the number of full time students studying with Brunel University London results in an estimation of how much labour is additional to the economy. The additional GVA that students generate for their employees



is calculated using the GVA per employee ratios for the industries in which students most frequently find work.

### **10.4.3 Student Volunteering**

Students also make an impact through volunteering. Data provided by Brunel University London indicates that 432 students volunteer, on average 24 hours a year. This indicates that 10,402 hours were volunteered in 2013/14. The FTE equivalent of this was then estimated. The value of the hours volunteered to organisations is estimated by assuming that the average output of a student's voluntary work is equivalent to the average GVA per employee in the social work activities sector. It was assumed that volunteering was undertaken where students live.

The nature of this type of activity is that it will contribute to increasing the productivity of the organisation volunteered for (by contributing to service provision) and will therefore have a GVA impact rather than an employment impact.

### **10.4.4 Student Placements**

Only placements that are 12 weeks or longer are included as placements shorter than this would not allow students enough time to learn about the organisation's activities and make a contribution.

Data provided by the University indicated the number of students undertaking placements by subject area. 730 of the 1,397 placements were a year long and the rest of were assumed to be 12 weeks long.

The contribution of these students to the organisations that they are placed in is lower than the average output that would be expected of a worker due to a student having less experience. To reflect this it is assumed that the GVA of students on placement is 33% of the average workers' GVA.

The employment impact of these placements was estimated by multiplying this percentage to the FTE equivalent of the weeks spent on placement. The direct GVA was estimated by multiplying the number of jobs supported by the average GVA/employee in each sector. Appropriate multipliers were then applied.

## **10.5 Business Collaboration**

### **10.5.1 Consultancy, Contract Research and CPD**

Universities also support local businesses by providing consultancy services, supporting contract research and offering Continuing Professional Development (CPD). These services support businesses by enabling them to undertake activity that they may not have the skills or facilities to undertake in-house.

It is reasonable to assume that the businesses that commissioned consultancy or contract research projects or paid for CPD would only have done so if they expected these projects to generate positive returns. Detailed information about the level of these returns is not available for Brunel University London's clients; however, an estimate can be made based on the findings of research from similar activity elsewhere.

BiGGAR Economics has evaluated the economic impact of several knowledge transfer initiatives around the UK<sup>12</sup>. These initiatives have covered a range of different types of engagement from small consultancy projects and access to university equipment and facilities through to company sponsored PhDs. The findings of these studies have shown that businesses investing in these types of activities receive an average direct return on investment of 360%. That is that every £1 invested by businesses generated £3.60 GVA in direct economic benefits.

The GVA impact of services provided to businesses by Brunel University London was therefore estimated by multiplying the amount spent by businesses on these services by £3.60. The employment impact was then estimated by dividing the direct GVA impact by GVA/employee in relevant sectors and the indirect effects were captured by applying appropriate multipliers.

### **10.5.2 Knowledge Transfer Partnerships**

A strategic review of the KTP programme undertaken in 2010 found that on average, KTPs undertaken in London contributed £887,000 GVA to the UK economy, equivalent to an annual impact of £147,833 in the six years after the KTP is completed. It is assumed that the annual impacts for the duration of the project are only 10% of the impacts after the KTP has been completed, as the outputs of the knowledge exchange will not have been realised. The same study found that on average, each KTP project supports the creation of three jobs.

By multiplying the impacts from this strategic review by the number of KTP projects undertaken by the University it was possible to estimate the economic impact that the KTPs have in each area.

### **10.5.3 Brunel University Science Park**

Consultations with Brunel University London staff indicated that the Science Park had 18 tenants employing approximately 80 people across the site.

The turnover of each company was estimated by using the average turnover/employee for the sector each company operates in. The direct GVA was then estimated by dividing the estimated turnover of each company by the average turnover to GVA ratio for that sector. GVA and employment multipliers were then applied.

The main assumption to be made was how much of the economic activity that was created at the Science Park could be attributable to Brunel University London.

Many of the companies would have found properties elsewhere in the country if the Science Park was not available. Previous studies by BiGGAR Economics, particularly one carried out for the University of Surrey in 2013, found that approximately 1/3 of the economic activity in the Science Park was attributable to the University. As the additionality for London would be higher than that at the national level it was assumed to be 50%. For Hillingdon it was assumed to be 80%.

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<sup>12</sup> Most recently this has included an economic impact study on behalf of Interface, the organisation responsible for facilitating engagement between industry and Scotland's higher education institutions.

These additionality assumptions were applied to the direct and indirect impact to estimate the impact of the science park by study area.

#### **10.5.4 Spin-outs**

The turnover, employment and location of Brunel University London's two spin-out companies was provided by the University.

The direct GVA impact of these companies was estimated by dividing the estimated turnover of each company by the turnover/GVA ratio for the sector in which it operates. The indirect impact of these companies was then captured by multiplying the direct turnover of each company by GVA multipliers and the direct employment (as given by the University) by employment multipliers appropriate to the sector in which it operates

### **10.6 Tourism**

#### **10.6.1 Visits to Staff and Students**

It is expected that friends and family who are not normally resident in the local area will visit staff and students of the university. These trips are referred to as visiting friends and relatives (VFR). The expenditure of these visitors generates GVA and supports jobs in the tourism sector.

The first step towards calculating this impact is to estimate the number of visits from friends and family that students and staff will receive. VisitEngland and VisitBritain compile data on the number of VFR trips from domestic and overseas visitors. Dividing this data by the population of London allowed the number of overseas and domestic VFR trips per capita to be calculated.

The number of domestic and overseas VFR trips per person was multiplied by the number of students and staff at the University to provide an estimate of the visits stimulated by the University. The number of trips attributable to the University was then multiplied by the average trip spend of a VFR domestic and overseas visitor.

The economic impacts of the spend from visitors to friends and family was estimated by using economic assumptions.

#### **10.6.2 Conferences and Events**

In 2013/14, there were 29,118 conference associated bednights in Brunel University London accommodation. The expenditure of these delegates on accommodation has already been captured in the direct impact of the University. However, the expenditure of these visitors on shopping, entertainment, food and drink has not been estimated elsewhere and would not occur if the University did not exist and is therefore captured here.

It was assumed that 90% of these visitors were additional to Hillingdon, i.e. 90% of delegates would not have been staying in Hillingdon were it not for the presence of the University. It was assumed that 33% of the delegates (and therefore the bednights) were additional to London and the UK. In this way the number of additional bednights by study area was estimated.

The number of additional bednights was multiplied by the average spend per night for domestic/visitors to London. The data indicated that 77% of visitors to

London were from overseas and this same proportion was applied to the number of additional bednights.

Data from VisitScotland indicates that 33% of visitor spend in Scotland was on accommodation. Based on this, it was possible to exclude accommodation spend from the total visitor spend.

### **10.6.3 Summer School**

In 2013/14 there were 109,112 bednights associated with summer school students. Although Brunel University London provided accommodation and food for these children during their stay, it is reasonable to expect that each child will have made additional expenditure, or have had expenditure made on his or her behalf, during their stay. For example, it is usual for children attending summer schools to participate in a number of group excursions during their visit. It is also reasonable to expect that each child will spend money on things such as souvenirs, food and drink during their trip. All of this expenditure is in addition to the money that Brunel University London generates from summer schools and has therefore not been considered elsewhere in this report.

In order to estimate the impact of this it was assumed that this expenditure amounted to £25 per child per day. By multiplying this by the number of language school associated bednights in 2013/14 and applying the same additionality assumptions as before allowed for an estimate of additional spend by area.

The additional spend by area was converted to direct GVA and employment by applying economic ratios and multipliers.

# Enclosure K

Site 4 Asbestos Survey

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ASBESTOS SURVEY OF SITE AND THE SOIL AT DEPTH OF 0.3M

**EXECUTIVE SUMMARY**

ASP was commissioned by Mr David Bannister, Director of Estates, BUL, to undertake an asbestos survey and investigation into the extent of contamination in the soil of Site 4 at Brunel University London (BUL).

The survey comprised of a combined approach of systematic inspection using a grid system to select the locations of the trial pits and investigations (Trial Pits 1-30), 'hot spot' investigations sites (31-41 & 51) and then a targeted inspection along the perimeter adjacent to the occupied neighbouring properties (42-50).

The site work was requested in order to support an ecological survey and to add the site 4 location to the existing Brunel 'Asbestos Register' as part of the annual re-inspection programme. Previous buildings located on of the site were known to contain ACMs and were subsequently demolished in 2004. In addition, the Artesian Well and the exposed pathways were subject to an isolated 'hand picking' exercise further to the identification of suspect asbestos cement materials in 2012. The purpose of this was to ensure safe access to the pathways for visitors accessing the site.

The site work was completed by ASP - Kate Johal (lead surveyor), James Apthorp and Kerry Darling-Wood between 15<sup>th</sup> and 22<sup>nd</sup> March 2015. The additional services were provided by Grace Turner (Ecologist WSP), Peter Parker (Asbestos Removal Operative EAS), John Dalrymple and Colum Monohan (Digger Operatives). Richard Lyon (Estates Assurance Manager BUL) was in attendance for the duration of the works.

As a result of the analysis of suspect materials taken from the site and the visual inspection of the area, we can confirm the presence of ACM in the following locations.

| Location     | Confirmed in Soil | Found surface on |
|--------------|-------------------|------------------|
| Trial Pit 1  | Positive          | Positive         |
| Trial Pit 2  | Positive          | Positive         |
| Trial Pit 3  | Negative          | Negative         |
| Trial Pit 4  | Positive          | Positive         |
| Trial Pit 5  | Negative          | Negative         |
| Trial Pit 6  | Negative          | Negative         |
| Trial Pit 7  | Positive          | Positive         |
| Trial Pit 8  | Positive          | Positive         |
| Trial Pit 9  | Negative          | Positive         |
| Trial Pit 10 | Negative          | Positive         |
| Trial Pit 11 | Positive          | Positive         |
| Trial Pit 12 | Negative          | Negative         |
| Trial Pit 13 | Positive          | Positive         |
| Trial Pit 14 | Positive          | Positive         |
| Trial Pit 15 | Positive          | Positive         |
| Trial Pit 16 | Negative          | Negative         |
| Trial Pit 17 | Positive          | Negative         |
| Trial Pit 18 | Negative          | Negative         |
| Trial Pit 19 | Negative          | Positive         |
| Trial Pit 20 | Negative          | Negative         |
| Trial Pit 21 | Negative          | Negative         |
| Trial Pit 22 | Negative          | Positive         |
| Trial Pit 23 | Negative          | Negative         |
| Trial Pit 24 | Negative          | Positive         |
| Trial Pit 25 | Negative          | Negative         |
|              |                   |                  |

| Location     | Confirmed in Soil | Found surface on |
|--------------|-------------------|------------------|
| Trial Pit 26 | Negative          | Negative         |
| Trial Pit 27 | Negative          | Negative         |
| Trial Pit 28 | Negative          | Negative         |
| Trial Pit 29 | Negative          | Negative         |
| Trial Pit 30 | Negative          | Negative         |
| Trial Pit 31 | Positive          | Positive         |
| Trial Pit 32 | Positive          | Positive         |
| Trial Pit 33 | Positive          | Positive         |
| Trial Pit 34 | Negative          | Positive         |
| Trial Pit 35 | Negative          | Negative         |
| Trial Pit 36 | Negative          | Negative         |
| Trial Pit 37 | Negative          | Positive         |
| Trial Pit 38 | Negative          | Positive         |
| Trial Pit 39 | Negative          | Positive         |
| Trial Pit 40 | Positive          | Positive         |
| Trial Pit 41 | Positive          | Positive         |
| Trial Pit 42 | Negative          | Negative         |
| Trial Pit 43 | Negative          | Negative         |
| Trial Pit 44 | Negative          | Negative         |
| Trial Pit 45 | Negative          | Negative         |
| Trial Pit 46 | Negative          | Negative         |
| Trial Pit 47 | Negative          | Negative         |
| Trial Pit 48 | Negative          | Negative         |
| Trial Pit 49 | Negative          | Negative         |
| Trial Pit 50 | Negative          | Negative         |
| Trial Pit 51 | Positive          | Positive         |

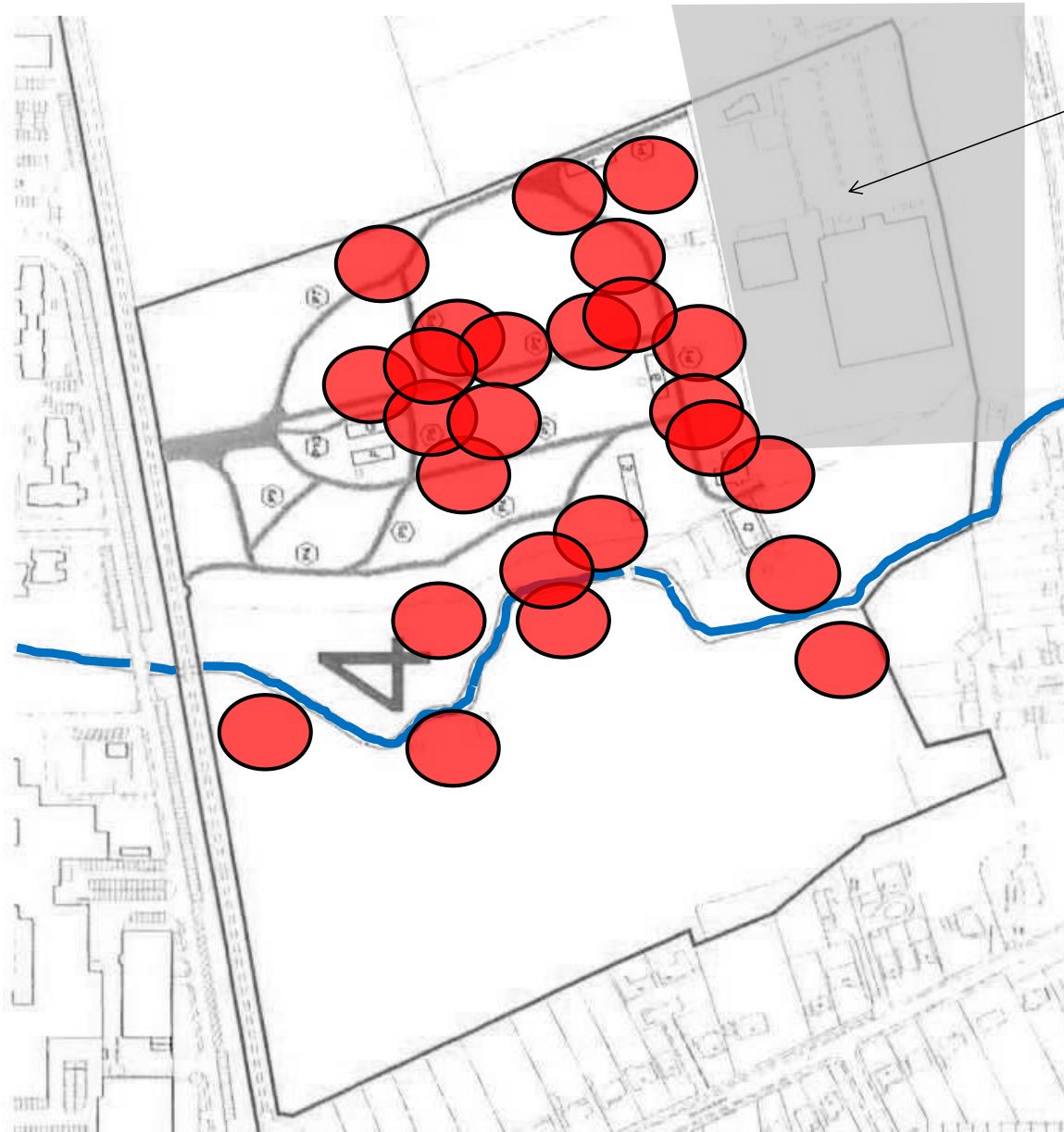
The locations of the findings detailed above have been summarised in the following location plans for the site that identify the pit location and the asbestos content.

The investigation was limited to a radius of approx. 5m from the plotted location in most cases and was significantly restricted due to the extent of shrubbery and undergrowth. The findings are limited to the inspection sites and extensive ACMs are strongly presumed to be located across the remainder of the site concealed within the undergrowth and vegetation coverage.

The ACMs identified were located off the main pathways previously accessed by visitors to the site and no significant or ACMs were identified on the grassed walkways.

Site 4  
Brunel University London

○ Trial Pit &  
Surrounding Area  
Location



← Current Garden Centre  
Excluded from the survey

Site 4  
Brunel University London

○ Trial Pit &  
Surrounding Area  
Location



Current Garden Centre  
Excluded from the survey



**SUMMARY OF ACMS**

Extensive amounts of asbestos containing material were identified in both the soil at a depth of 0.3m and exposed on the surface of the site during the survey.

Asbestos insulation (as free fibre), pipework insulation, insulating board, cement, vinyl, gasket materials, bitumen and debris were all positively identified during the investigation (as shown in the photographs below). Due to the friable and exposed nature of the product, additional controls will need to be implemented prior to further investigation of this type and extent of material.



In addition significant amounts of asbestos cement in both large sheets >1m<sup>2</sup> and small fragments have been found across the site and in the river bed in multiple locations. Other small amounts of non-friable materials and fragments were identified and removed as far as reasonably practicable during the survey. Thirty two bags of waste were removed.



Area 13 where extensive friable ACMs were identified on the surface of the soil has been cordoned off with hazard tape. This site is currently behind the safety barrier fence that separates the river and the main East Field of the site. Other friable materials identified during the survey have been re-enclosed with soil to minimise fibre release.

The survey was limited to the trial pit locations at a depth of 0.3m and the surrounding surface area within a 5m radius of the pit. There remains **'a significant likelihood'** that additional ACMs will be located beneath the surface of the soil and in the surrounding area that have not been identified in this survey. There is sufficient evidence to suggest that pipework insulation identified in multiple locations, runs sub ground level and there are currently no original plans available to identify the route taken or extent of such pipework.

In addition, the following restrictions of the site mean that the findings are not conclusive as a definitive list of ACMs for the site.

- The ecological disturbance,
- The overgrown nature,
- Size,
- Complexity,
- Friable nature of identified ACMs.



|   |   |   |
|---|---|---|
|  |  |  |
| AREA 8  | AREA 14   | AREA 23   |

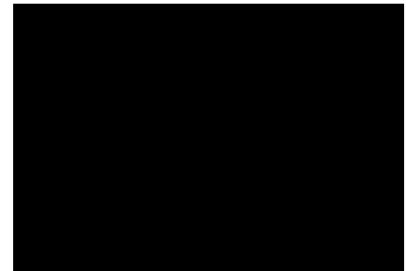
Due to the location of confirmed ACMs on the surface of the soil, ASP recommend that the site remains closed to all unauthorised visitors until further control actions have been implemented.

Access restriction signs should be installed immediately around the perimeter fence line to prevent access and provide warning to trespassers entering the site.

The horse located in the west field should be removed to prevent the migration of ACMs identified in the west field particularly, cement fragments across the site adjacent to the neighbouring properties.

Area 13 that has been cordoned off requires immediate remediation and the friable surface ACMs should be removed by a Licensed Contractor selected from the BUL approved list.

Further recommendations for remediation of the site will depend on the proposed use and future requirements of BUL.



Planning Department  
Civic Centre  
Uxbridge Road  
UB8 1UW

4<sup>th</sup> December 2015

Dear Sir/Madam

## **FAIRVIEW BUSINESS PARK, HAYES, UB3 1AU – REPRESENTATIONS TO THE REVISED PROPOSED SUBMISSION VERSION OF THE HILLINGDON LOCAL PLAN PART 2 (OCTOBER 2015)**

CBRE Limited ('CBRE' hereafter) has been instructed on behalf of CBRE Global Investors ('CBREGI' hereafter) to submit representations to Hillingdon Borough Council's ('the Borough Council' hereafter) Revised Proposed Submission Local Plan Part 2 (October 2015) with respect to Fairview Business Park, Hayes, UB3 1AU. CBREGI manage the site on behalf its owners the Civil Aviation Authority Pension Scheme who own the site.

The Local Plan Part 2 comprises the proposed Development Management Policies, Policies Map and Site Allocations Document. CBREGI welcomes the opportunity to engage with the Borough Council in respect of its emerging planning policies and we have focussed our comments on the Site Allocations document (specifically Policy SA 4: Fairview Business Centre) and the Policies Map.

### **SITE LOCATION AND DESCRIPTION**

The site is located within Hayes; in close proximity to the Town Centre and the Railway Station. The site plan is enclosed with this letter. The site is approximately 1.68 ha, and is currently predominantly occupied by a Ford Transit Van garage (33-39 Clayton Road) and a warehouse building which comprises a number of industrial units (units 25-31). There is also a surface car park on site serving units 25-31. The uses on site are a mix of B1 (Business) and B2 (General Industrial) use and Sui Generis (the Ford Garage).

The site is bound by the Grand Union Canal to the north, and to the east by a 5 storey building which is currently being converted to residential use (Union House) and a part 4, part 5, part 6 storey recently developed residential development (14-16 Clayton Road). Immediately south of the site is Clayton Road, a residential street, characterised by terraced two storey Victorian properties. The west of the site is characterised by more industrial and manufacturing uses. Further north, east and south of the site is dominated by residential neighbourhoods.

The site will be further enclosed by residential uses as a number of adjacent sites have been allocated in the Revised Proposed Submission Site Allocations (October 2015) for residential developments and a number have extant planning permissions or are currently under construction. Additionally, Hayes has been identified as a focal point for growth and regeneration within Hillingdon.

The site is located in very close proximity to Hayes Town Centre and the railway station which will soon benefit from Crossrail. The site currently has a PTAL of 4, but this will increase to 4 and 5 once Crossrail is in place.



Immediately south of the site is the Old Vinyl Factory site (allocated as Site SA2) along with the Gatefold building. These sites situated on Blyth Road, have planning permission granted for large-scale mixed use developments, comprising residential, leisure, retail and commercial floor space. To the south west of the site is Enterprise House (allocation SA1), this site has been allocated for mixed use office and residential, with the potential to accommodate approximately 96 dwellings. Additionally, the Eastern end of Blyth Road has also been allocated in the Revised Proposed Submission Site Allocations, again for residential-led mixed use development. Additionally, 20 Blyth Road an adjacent site was granted permission in 2012 (1425/APP/2011/3040) for the comprehensive redevelopment of the site to create 120 residential units. The site allocations and recent planning approvals have altered the area which is becoming increasingly residential in nature.

## LOCAL PLAN PART 1

Policy E1 of the Local Plan Part 1 (Adopted 2012) identifies specific areas of land which are to contribute to the managed release of employment land across the borough. Part of the Blyth Road area of Hayes was identified within the Local Plan Part 1 as an area with potential for release from employment use. This managed release is due to results of an Employment Land Study which concluded that Hillingdon has a surplus of employment land at present.

Additionally, the Local Plan Part 1 identifies the strategic benefits that will be delivered to Hayes as a result of Crossrail development. Local Plan Part 1 also states that growth and regeneration will be focused upon Hayes Town Centre as a direct result of the Crossrail development. The Local Plan Part 1 also states that the Council will aim to maximise regeneration and growth opportunities, in relation to the Grand Union Canal, and how the presence of the Canal has the potential to provide an attractive waterfront setting to regeneration projects.

## BACKGROUND AND PREVIOUS REPRESENTATIONS

In the November 2014 consultation on the Proposed Submission Version of Local Plan Part 2, the previous SIL designation of the site was removed in response to the aspirations for the release of surplus employment land set out in Local Plan Part 1.

On behalf of CBREGI, in November 2014 we submitted representations supporting the removal of the SIL and seeking the allocation of the site Fairview Business Centre within the emerging Policies Map and Site Allocations and Designations Document. Following our representations we subsequently met with Policy Officers at LB Hillingdon in 2015 where we discussed that the site is highly suitable for residential development given its proximity to the town centre and railway station, the context of surrounding existing and emerging residential areas and the opportunity the site provides through its location adjacent to the canal to provide canal side regeneration and to contribute the wider regeneration of Hayes Town Centre.

## POLICY SA 4: FAIRVIEW BUSINESS CENTRE

The site has now been allocated within the Revised Submission Policies Map and the Site Allocations and Designations Document (October 2015) and is referred to as Site Allocation 4: Fairview Business Centre which comprises Site A (25-31 Clayton Road) and Site B (33-39 Clayton Road). For reference the allocation has been copied below.

### **Policy SA 4: Fairview Business Centre**

***The Council will support proposals for residential development that contribute to the regeneration of Hayes Town Centre and meet the following criteria:***

- ***The provision of residential development at a density of 70 units per hectare. Higher development density may be acceptable subject to high quality design. Higher density development should be located along the canal side.***

- Small scale commercial uses at ground floor level that support residential uses will be considered suitable.
- Development proposals should include a buffer along the western boundary of the site to mitigate impacts on residential amenity from the adjacent industrial use.
- The Council will expect all development proposals to provide canal side improvement and contribute to the enhancement of the Strategic Canal and River Corridors in accordance with relevant policies on the Blue Ribbon network.

#### Site Information Table

| SITE NAME                                     | FAIRVIEW BUSINESS CENTRE   |  |
|---|--|--|
|   | Site B   | Site A   |
| Ward  | Botwell  | Botwell  |
| Location                                      | 25 - 31 Clayton Road   | 33 - 39 Clayton Road   |
| Area (ha/sqm)                                 | 1.03 ha  | 0.68 ha  |
| PTAL Rating                                   | 4  | 4  |
| Proposed Development                          | Residential-led mixed use  | Residential-led mixed use  |
| Current UDP Designations                      | Adjacent to Hayes Industrial Business Area; Strategic Canal and River Corridor, Air Quality Management Area  | Adjacent to Hayes Town Centre; Hayes Industrial Business Area, Strategic Canal and River Corridor, Air Quality Management Area |
| Proposed Designations                         | Adjacent to Strategic Industrial Location  | None   |
| Existing Use                                  | Warehousing and car service centre   |  |
| Relevant planning history                     | No relevant history  | No relevant history  |
| Proposed Number of Units                      | 72 units   | 47 units   |
| Existing Units                                | 0  | 0  |
| Net Completions                               | 72 units   | 47 units   |
| Infrastructure Considerations and Constraints | To be negotiated as part of any planning application.  |  |
| Flood risk                                    | Surface Water Flooding; Site specific Flood Risk Assessment required   |  |
| Contamination                                 | Potentially contaminated land. Land remediation likely to be required.   |  |
| Indicative Phasing                            | 2021- 2026   | 2016 - 2021  |
| Other information                             | Due to the site's location and high degree of public transport accessibility, the low end of the London Plan urban density range has been applied.<br>The Council will also consider the release of the Crown Trading Estate to the east should this site become available, taking account of relevant policies in the development plan and the conclusions of the latest evidence base. |  |

Source: Site Allocations and Designations (Revised Proposed Submission Version, October 2015)

#### SUPPORT FOR POLICY SA 4

On behalf of CBREGI we wholly support the allocation of Fairview Business Centre under Policy SA 4 and the removal of the site from the SIL designation for the following principle reasons:

- The location is a highly sustainable location in close proximity to the town centre and railway station which will soon benefit from Crossrail and will increase the PTAL of the site from 4 to 4/5;
- The site is surrounded by residential development, including the existing residential areas and the future residential developments which are coming forward in the immediate vicinity;

- The site benefits from its location on the Canal, thereby providing an opportunity to enhance the canal setting and contribute towards wider regeneration of the Canal;
- Key aspirations of the Local Plan focus on regeneration in and around Hayes with the redevelopment of this site providing a significant opportunity to contribute towards this;
- The site can contribute to meeting Hillingdon's housing need in light of increased London Plan targets.

## PROPOSED AMENDMENTS TO POLICY SA 4

In relation to the draft wording we do have some comments in order to ensure that the wording of Policy SA 4 meets the tests of soundness, namely that it is positively prepared, justified, effective and consistent with national policy.

### Density

In terms of density, draft Policy SA 4 states that *'the provision of residential development at a density of 70 units per hectare. Higher development density may be acceptable subject to high quality design. Higher density development should be located along the canal side'*.

Based on this it states in the Site Information Table the proposed number of units as 72 on Site B and 47 on Site A. The Site Information Table states that *'due to the site's location and high degree of public transport accessibility, the low end of the London Plan urban density range has been applied'*.

In terms of PTAL rating this is stated at 4, however based on TfL's PTAL mapping Site A will fall within PTAL 5 from at least 2021 due to Crossrail coming forward.

In addition the density surrounding the site is significantly higher than 70 units per hectare. Based on a review of the density of the surrounding planning permissions coming forward in the immediate vicinity the following densities will be present in the immediate area:

- Eastern end of Blythe Road (planning reference 1425/APP/2011/3040) – 691 habitable rooms per hectare (Site Allocation 3);
- Old Vinyl Factory (planning reference 59872/APP/2012/1838) – 179 units per hectare and 212 units per hectare (Site Allocation 2);
- The Gateford Building (planning reference 51588/APP/2011/2253) – 185 units per hectare (Site Allocation 2);
- Union House (planning reference 35250/APP/2014/3506) – 115 units per hectare (Site Allocation 7).

This shows that the density within the surrounding context is generally significantly higher than 70 dwellings per hectare. In addition it should be noted that the PTAL of the site will be PTAL 4/5 once Crossrail is in place and the development comes forward (Site A will be PTAL 5; Site B will be PTAL 4). The London Plan density matrix provides for a density range of between 70-260 units per hectare within Urban areas such as this for sites within PTAL 4-6. In order to comply with London Plan Policy 3.4, and to ensure that Policy SA 4 is justified and to be consistent with the approach taken in other site allocation policies within the document which do not specifically reference a specific density, we suggest that the reference to 70 units per hectare is removed as density will ultimately be dependent on a detailed master planning process that responds appropriately to the site's context by providing high quality design. We therefore suggest the following amendments to the wording:

***The provision of residential development at a density of 70 units per hectare. Higher development density may be acceptable subject to high quality design. Higher density development should be located along the canal side.***



~~‘Due to the site’s location and high degree of public transport accessibility, the low end of the London Plan urban density range has been applied.’~~

We suggest that the proposed number of units and net completions in the Site Information Table are amended to **‘minimum 72 units’** and **‘minimum 47 units’**.

#### PTAL Rating

In the Site Information Table it states that the PTAL rating is 4. Given Crossrail will be in place at the point the development comes forward it would be helpful for the future PTAL score to be acknowledged. Site A will fall within PTAL 5 in 2021 according to TfL’s PTAL mapping.

#### Commercial Units

In addition, the draft Policy SA 4 also states that *‘Small scale commercial uses at ground floor level that support residential uses will be considered suitable’*. In order to ensure that Policy SA 4 is deliverable and effective we suggest the wording is amended as follows:

***‘A solely residential development or residential led development with small scale commercial uses may be considered suitable’.***

This is because currently it is uncertain what demand there will be for small commercial units. We therefore suggest that within the Site Information Table under proposed development, it states instead of ‘Residential led mixed use’ it states **‘Residential or Residential led mixed-use’**. These amendments will allow flexibility for the future development of the site ensuring the policy is deliverable and effective going forward. The supporting introductory text to the policy states that *‘there is considered to be significant potential for residential-led mixed use development’*. We suggest this is amended as follows:

***‘there is considered to be significant potential for residential or residential-led mixed use development’.***

#### Factual Correction

In the Site Information Table, it is stated that Site B is located at 25-31 Clayton Road and that Site A is located at 33-39 Clayton Road. This is an error and in fact Site A is 25-31 Clayton Road and Site B is 33-39 Clayton Road.

#### Phasing

In terms of phasing, the site would be available in the short to medium term which would assist the Borough Council in meeting their 5 year land supply of housing. In terms of Site B we previously anticipated that this would come forward within the longer term, however we now anticipate that it may now be able to come forward in the shorter term in line with the timetable for Site A in order to allow the comprehensive redevelopment of the site.

## POLICIES MAP

The current proposals map from the ‘saved’ UDP will be replaced by the Local Plan Part 2: Policies Map. CBREGI wholly support the removal of the ‘Industrial and Business Area’ allocation in the Submission Policies Map and for the site’s allocation under Policy SA 4. Additionally CBREGI supports the allocation of a number of adjacent sites, as sites for residential development.

## OVERVIEW OF PROPOSED CHANGES TO POLICY SA 4

In summary all of our proposed amendments are provided below:

## Fairview Business Centre

This site accommodates a range of uses and is considered to be suitable for release from its existing employment designation. There is considered to be significant potential for **residential or residential-led mixed use** development that capitalises on the canal side location and proximity of the Crossrail link at Hayes and Harlington Station.

### Policy SA 4: Fairview Business Centre

The Council will support proposals for residential development that contribute to the regeneration of Hayes Town Centre and meet the following criteria:

- The provision of residential development. ~~at a density of 70 units per hectare.~~ Higher development density may be acceptable subject to high quality design. Higher density development should be located along the canal side.
- **A solely residential development or residential led development with small scale commercial uses at ground floor level that support residential uses will be considered suitable.**
- Development proposals should include a buffer along the western boundary of the site to mitigate impacts on residential amenity from the adjacent industrial use.
- The Council will expect all development proposals to provide canal side improvement and contribute to the enhancement of the Strategic Canal and River Corridors in accordance with relevant policies on the Blue Ribbon network.

#### Site Information Table

| SITE NAME                                     | FAIRVIEW BUSINESS CENTRE  |  |
|---|---|--|
|   | Site B  | Site A   |
| Ward  | Botwell   | Botwell  |
| Location                                      | <del>25 - 31 Clayton Road</del> <b>33 - 39 Clayton Road</b>   | <del>33 - 39 Clayton Road</del> <b>25 - 31 Clayton Road</b>  |
| Area (ha/sqm)                                 | 1.03 ha   | 0.68 ha  |
| PTAL Rating                                   | 4   | 4 (PTAL 5 once Crossrail comes forward)  |
| Proposed Development                          | <b>Residential or Residential-led mixed use</b>   | <b>Residential or Residential-led mixed use</b>  |
| Current UDP Designations                      | Adjacent to Hayes Industrial Business Area; Strategic Canal and River Corridor, Air Quality Management Area | Adjacent to Hayes Town Centre; Hayes Industrial Business Area, Strategic Canal and River Corridor, Air Quality Management Area |
| Proposed Designations                         | Adjacent to Strategic Industrial Location   | None   |
| Existing Use                                  | Warehousing and car service centre  |  |
| Relevant planning history                     | No relevant history   | No relevant history  |
| Proposed Number of Units                      | <b>Minimum 72 units</b>   | <b>Minimum 47 units</b>  |
| Existing Units                                | 0   | 0  |
| Net Completions                               | <b>Minimum 72 units</b>   | <b>Minimum 47 units</b>  |
| Infrastructure Considerations and Constraints | To be negotiated as part of any planning application.   |  |
| Flood risk                                    | Surface Water Flooding; Site specific Flood Risk Assessment required  |  |
| Contamination                                 | Potentially contaminated land. Land remediation likely to be required.                                      |  |

| <b>SITE NAME</b>          |  | <b>FAIRVIEW BUSINESS CENTRE</b> |
|---------------------------|--|---------------------------------|
| <i>Indicative Phasing</i> | <i>2021- 2026</i>  | <i>2016 - 2021</i>              |
| <i>Other information</i>  | <i>Due to the site's location and high degree of public transport accessibility, the low end of the London Plan urban density range has been applied.</i><br><i>The Council will also consider the release of the Crown Trading Estate to the east should this site become available, taking account of relevant policies in the development plan and the conclusions of the latest evidence base.</i> |                                 |

## SUMMARY

For the reasons cited above, CBREGI wholly supports the allocation of Fairview Business Centre under Policy SA 4. CBREGI considers that the development of the site represents a significant opportunity to deliver a high quality residential development, capitalising on the new Crossrail link and supporting the regeneration of the canal and Hayes Town Centre. We have suggested some amendments which we consider will assist the Council in ensuring the policy is effective and justified in line with the tests of soundness for Local Plans set out in paragraph 182 of the NPPF.

I trust that the above is helpful. I would be grateful if the Council could confirm receipt of this letter and that the representations have been duly made. I would also be grateful if we as agents for CBREGI can be kept up-to-date on the process of consideration of these representations. If you have any further queries please do not hesitate to contact myself [REDACTED] or my colleague Jonathan Stoddart [REDACTED]

Yours faithfully

[REDACTED]

**ISABEL KEPPEL**  
**SENIOR PLANNER**

CBRE Limited for and on behalf of CBRE Global Investors.

Enc.  
Site Plan  
Regulation 19 Revised Proposed Submission Version Representation Form





# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |               |              |  |
|----------------------------|---------------|--------------|--|
| Title                      | Care of Agent |              |  |
| First name                 |               |              |  |
| Last Name                  |               |              |  |
| Organisation (if relevant) |               |              |  |
| Unit                       |               | House number |  |
| House name                 |               |              |  |
| Address 1                  |               |              |  |
| Address 2                  |               |              |  |
| Town                       |               |              |  |
| County                     |               |              |  |
| Postcode                   |               |              |  |
| Telephone                  |               |              |  |
| Email                      |               |              |  |

| 2. Agent's Name and Address (if applicable) |                    |              |  |
|---|--------------------|--------------|--|
| Title                                       | Ms                 |              |  |
| First name                                  | Isabel             |              |  |
| Last name                                   | Keppel             |              |  |
| Company                                     | CBRE               |              |  |
| Unit  |                    | House number |  |
| House name                                  | ██████████         |              |  |
| Address 1                                   | ██████████         |              |  |
| Address 2                                   |                    |              |  |
| Town  | ██████             |              |  |
| County                                      |                    |              |  |
| Postcode                                    | ████████           |              |  |
| Telephone                                   | ██████████         |              |  |
| Email                                       | ██████████████████ |              |  |



|  |  |
|--|--|
|  |  |
|--|--|

|  |   |
|--|---|
|  | Also contact –<br>jonathan.stoddart@cbre.com<br>(020 7182 2000) |
|--|---|

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2 |                                   |
|-------------------|-----------------------------------|
|                   | Development Management Policies   |
| X                 | Site Allocations and Designations |
| X                 | Policies Map (Atlas of Changes)   |

| Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|--|---|
|  | Addendum to Sustainability Appraisal            |
|  | Consultation Statement                          |
|  | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |             |
|-------------------------------|-------------|
| Policy number;                | Policy SA 4 |
| Paragraph number;             |             |
| Table or figure number; or    |             |
| Map number (Atlas of Changes) |             |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|  | Yes                      | No                       |
|--|--------------------------|--------------------------|
| <b>Sound?</b><br>We consider it to be generally sound but have suggested some tweaks to the wording to ensure the policy meets the tests of soundness. |                          |                          |
| <b>Prepared in accordance with the duty to cooperate, legal and procedural requirements?</b>   | <input type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|  |                                     |
|--|-------------------------------------|
|  | It has not been positively prepared |
|--|-------------------------------------|

|   |                     |
|---|---------------------|
| X | It is not effective |
|---|---------------------|

|   |                     |  |   |
|---|---------------------|--|---|
| x | It is not justified |  | It is not consistent with national policy |
|---|---------------------|--|---|

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

**See accompanying letter**

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|   |   |
|---|---|
| x | <b>No, I do not want to participate in the oral examination</b> |
|   | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |



## Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**



Planning Department  
Civic Centre  
Uxbridge Road  
UB8 1UW

04 December 2015

Dear Sir/Madam,

**SILVERDALE FACTORY CENTRE, SILVERDALE ROAD, HAYES, UB3 3BL – REPRESENTATIONS TO THE REVISED PROPOSED SUBMISSION VERSION OF THE HILLINGDON LOCAL PLAN PART 2 (OCTOBER 2015) – DRAFT POLICY SA 24 BENLOW WORKS**

CBRE Limited ('CBRE' hereafter) has been instructed on behalf of CBRE Global Investors ('CBREGI' hereafter) to submit representations to Hillingdon Borough Council's ('the Borough Council' hereafter) Revised Proposed Submission Local Plan Part 2 (October 2015) with respect to CBREGI's interests at the Silverdale Factory Centre, Silverdale Road, Hayes, UB3 3BL which is owned by Electricity Supply Nominees Ltd and managed by CBREGI. The Local Plan Part 2 comprises the proposed Development Management Policies, Policies Map and Site Allocations Document.

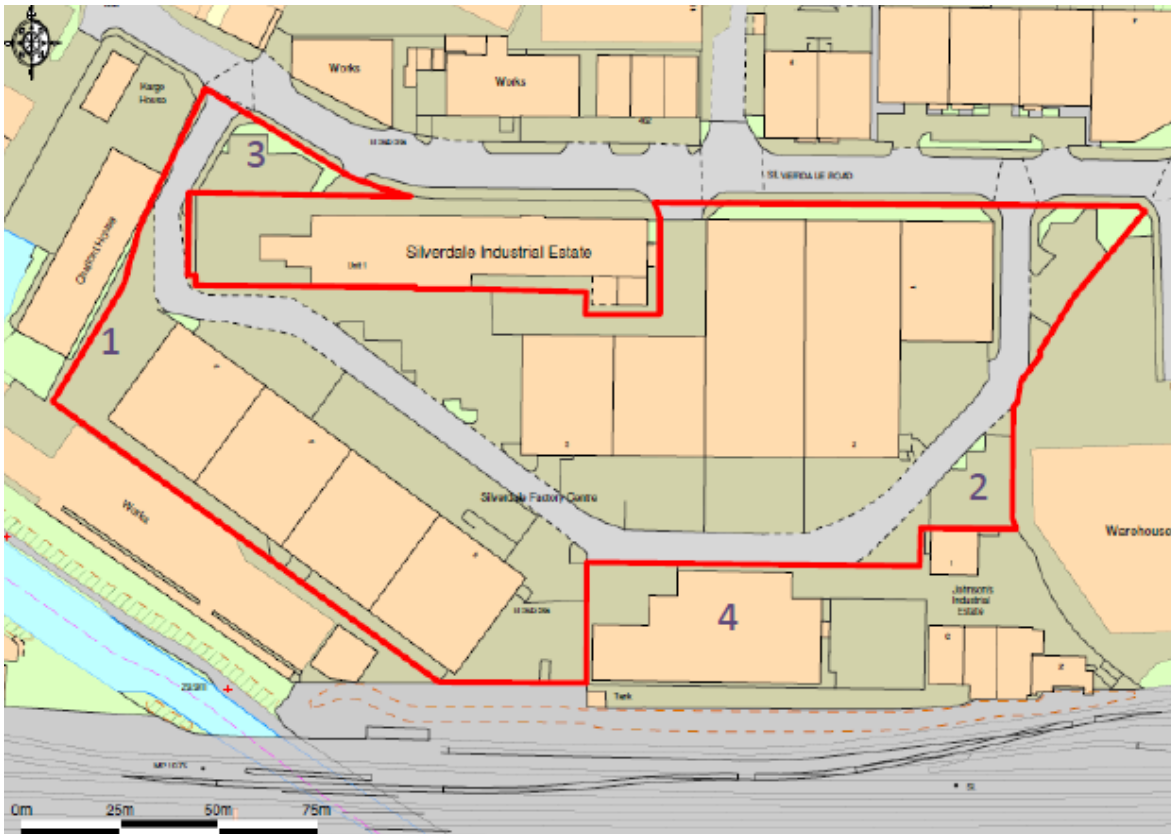
CBREGI welcomes the opportunity to engage with the Borough Council in respect of its emerging planning policies and we have focussed our comments on the Site Allocations document (specifically Policy SA 24: Benlow Words, Silverdale Road).

**SILVERDALE FACTORY CENTRE - SITE LOCATION AND DESCRIPTION**

Silverdale Factory Centre is located in close proximity to Hayes Town Centre. It falls within a Strategic Industrial Land allocation as defined on the Policies Map (October 2015). Silverdale Factory Centre comprises a number of B2/B8 industrial units and associated parking, servicing and access areas. It sits within a broader industrial area, to the west of the site is the Silverdale Road industrial area (which has a draft allocation for residential-led mixed-use development under Policy SA 23 Silverdale Road/Western View), beyond which are residential areas and the town centre. To the south of the site is the railway line, further industrial units and the Grand Union Canal. To the east of the site are further industrial areas within the SIL, and a mineral safeguarding area at Pump Lane. To the immediate north of the site is the grade II listed Benlow Works industrial building (which is subject to draft Policy SA24), beyond which is the Chailey Industrial Estate which has a draft residential allocation (under draft Policy SA22).

The land ownership is illustrated in the site plan below.





### **POLICY SA 24: BENLOW WORKS, SILVERDALE ROAD**

Draft Policy SA 24 allocates the grade II listed building known as Benlow Works located within the Silverdale Road Industrial site as a mixed use development that capitalises on the future Crossrail Station and promotes the regeneration of Hayes Town Centre. Draft Policy SA 24 is a new allocation included in the Revised Submission Version of the Site Allocations and Designations Document for the first time as part of the October 2015 consultation.

The draft allocation includes the Benlow Works building and large areas that fall within the ownership of CBREGI primarily located to the south of the Benlow Works building but also areas to the north, south and east that fall within CBREGI's ownership. The areas included within the allocation include substantial areas that are currently used as the access, parking and servicing areas for the Silverdale Factory Centre.

CBREGI would only be able to support Policy SA 24, were the wider Silverdale Factory Centre to be allocated as a wider comprehensive residential-led redevelopment. The current proposal to allocate Benlow Works in isolation with substantial areas of land within CBREGI's ownership cannot be supported by CBREGI as it considers this would compromise the operation of the Silverdale Factory Centre by taking away large area of its operational access, parking and servicing that are currently required to serve the Silverdale Factory Centre. CBREGI are also concerned that the allocation of this building in isolation, whilst still surrounded by the industrial estate on all sides, may compromise operations for instance through complaints from residents regarding deliveries and noise. CBREGI also considers that the surrounding industrial areas would not provide the most appropriate setting to a grade II listed residential building. There are also limited other areas within the control of CBREGI that could be used for access, parking and servicing should the areas proposed to be allocated under Policy SA 24 become unavailable to the Silverdale Factory Centre.

Accordingly CBREGI consider that Policy SA 24 would fail to meet the tests of soundness set out in paragraph 182 of the NPPF. The policy would not be effective as the site is not deliverable or developable as it comprises areas of land that would not be available for development under the currently proposed boundary. Policy SA 24 is also not consistent with national policy which requires LPAs to identify deliverable or developable sites (as required by paragraph 47 of the NPPF). The site is not deliverable or developable because there is no prospect that the site would be released by CBREGI for development in the absence of a wider allocation.

CBREGI will only support the allocation of Benlow Works, were a more strategic wider allocation encompassing the wider residential redevelopment of the Silverdale Factory Centre to be promoted. CBREGI considers that this would have a number of benefits as follows:

- It will enable sufficient space to be allowed for landscaping, amenity areas and parking to support a wider comprehensive residential development;
- It will improve the setting for the restoration of the Grade II listed Benlow Works building meaning that it will not be surrounded on all sides by an industrial setting;
- It will enable the wider site to connect with the adjacent Silverdale Road/Western View residential allocation and access to be made with the Grand Union Canal which provides the opportunity for Canal side regeneration in line with the aspirations set out in Local Plan Part 1;
- The site offers a highly sustainable location in close proximity to Hayes Town Centre and the railway station which will soon benefit from Crossrail;
- The wider redevelopment can contribute towards wider aspirations for the regeneration of Hayes Town Centre; and
- The wider allocation provides the opportunity to deliver a significantly higher number of new homes in line with the increased housing targets set out in the London Plan (2015).

### SUMMARY

For the reasons cited above, CBREGI is unable to support Policy SA 24 Benlow Works under the currently proposed boundary as this would compromise substantial areas of the access, parking and servicing areas that support the operation of the current Silverdale Factory Centre. CBREGI would support a wider allocation for a wider comprehensive residential redevelopment that would provide a number of benefits to Hayes Town Centre and the Borough as a whole.

I trust that the above is helpful. I would be grateful if the Council could confirm receipt of this letter and that the representations have been duly made. I would also be grateful if we as agents for CBREGI can be kept up-to-date on the process of consideration of these representations. If you have any further queries please do not hesitate to contact myself [REDACTED] or my colleague Jonathan Stoddart [REDACTED]

Yours faithfully

[REDACTED]  
**ISABEL KEPPEL**  
**SENIOR PLANNER**

CBRE Limited for and on behalf of CBRE Global Investors and Electricity Supply Nominees Ltd).

Enc.  
Regulation 19 Revised Proposed Submission Version Representation Form





# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |               |              |  |
|----------------------------|---------------|--------------|--|
| Title                      | Care of Agent |              |  |
| First name                 |               |              |  |
| Last Name                  |               |              |  |
| Organisation (if relevant) |               |              |  |
| Unit                       |               | House number |  |
| House name                 |               |              |  |
| Address 1                  |               |              |  |
| Address 2                  |               |              |  |
| Town                       |               |              |  |
| County                     |               |              |  |
| Postcode                   |               |              |  |
| Telephone                  |               |              |  |
| Email                      |               |              |  |

| 2. Agent's Name and Address (if applicable) |        |
|---|--------|
| Title                                       | Ms     |
| First name                                  | Isabel |
| Last name                                   | Keppel |
| Company                                     | CBRE   |
| Unit  |        |
| House name                                  |        |
| Address 1                                   |        |
| Address 2                                   |        |
| Town  |        |
| County                                      |        |
| Postcode                                    |        |
| Telephone                                   |        |
| Email                                       |        |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2        |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|--------------------------|-----------------------------------|--|---|
| <input type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| x                        | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| x                        | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |              |
|-------------------------------|--------------|
| Policy number;                | Policy SA 24 |
| Paragraph number;             |              |
| Table or figure number; or    |              |
| Map number (Atlas of Changes) |              |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes | No |
|---|-----|----|
| Sound?  |     | x  |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? |     |    |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |   |   |
|--------------------------|-------------------------------------|---|---|
| <input type="checkbox"/> | It has not been positively prepared | x | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | x | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

***See accompanying representations letter.***

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|   |   |
|---|---|
| x | <b>No, I do not want to participate in the oral examination</b> |
|   | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary



## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|          |  |
|----------|--|
| <b>X</b> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <b>X</b> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <b>X</b> | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

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- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

### 1) What is your gender?

Male  Female

### 2) To which age group do you belong?

under 15  25 – 44  65 – 85  
 15 - 24  45 - 64  85+

### 3) Do you consider yourself to be a disabled person?

No  Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |



Local Plan &lt;localplan@hillington.gov.uk&gt;

---

## Representations on behalf of KFC (GB) Limited

---

**Steve Simms** [REDACTED]  
To: "localplan@hillington.gov.uk" <localplan@hillington.gov.uk>

8 December 2015 at 16:36

Dear Sirs

We refer to your Revised Development Management Policies Submission Version. We welcome the deletion of part (B) of Policy DMTC4, but object to the consequential amendments to DMTC2 and DMTC3.

We welcome the attempt to clarify criteria for assessing unacceptable concentrations in the remaining part of Policy DMTC4 by reference to specific proportions set out in Policies DMTC2 and DMTC3.

However, we are concerned that the proportions specified are not supported by evidence. Moreover, we are concerned that amendments to Policies DMTC2 and DMTC3 focus solely on Class A5 uses.

This would be internally inconsistent with Policy DMTC4, which refers to a range of town centre uses, and would not reflect the intention expressed in the Consultation Statement or amended supporting text.

It may be that the intention is to use the implicit controls on uses outside Class A1 contained in amended Policy DMTC3 (A) (i) to deal with the other town centre uses in the range referred to in Policy DMTC4.

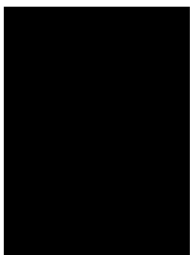
However, there is no evidence for what would be a proportion of combined uses outside Class A1, above which amenity, vitality or viability would be harmed, nor for imposing a separate limit on Class A5 uses.

We are also concerned that there appears to be an error in amended Policy DMTC3 (A) (i) as it sets alternative criteria of one-in-three (equating to 33%) or 70% (which is more than twice the alternative).

We reserve our right to make representations to and, if necessary, attend the Public Examination. We would be pleased to discuss our representations with an Officer with a view to agreeing amendments.

Yours faithfully

**Steve Simms** MA MRTPI  
**Director**



**SUBMITTED VIA EMAIL**

Our Ref: MR/SH/18182

London Borough of Hillingdon  
Planning Policy Team  
London Borough of Hillingdon  
3N/02 Civic Centre  
High Street  
Uxbridge  
Middlesex, UB8 1UW

8<sup>th</sup> December 2015

Dear Sir / Madam,

**LAND AT 3 VIVEASH CLOSE, HAYES, HILLINGDON  
HILLINGDON LOCAL PLAN PART 2 – PROPOSED CHANGES VERSION**

I write on behalf of my client, Elite Group, to submit a representation regarding the above planning policy document in relation to proposed policy SA5: Land to the South of the Railway, including Nestle.

As stated in our initial representations to the Draft Sites and Allocations Document, our client agrees this is an important site for Hayes and the borough as a whole and supports its inclusion within Hillingdon's emerging planning policy. We have reviewed the 'Proposed Changes' version following its release in October and have several comments and suggestions. First I have provided some background to the site and the background to the site and the emerging document.

**Background**

We submitted our initial representations to the Council on 4<sup>th</sup> November 2014. We supported the inclusion of the site in the emerging document however at the time had two suggestions:

1. We disagreed with the suggestion of a comprehensive development scheme forming across sites A and B as we suggested a more flexible approach should be adopted;
2. The proposed density calculations being based on the existing density guidelines and we considered these to not be relevant to the proposed site.

The relevant pages from the 'Proposed Changes' document are at Appendix 1 and the most significant alteration is that the site is now split into 3 and not 2 parts. The site at 3 Viveash Close is location at site B.

**Proposed Amendments**

I have set out below our suggestions and comments on the proposed wording of policy SA 5 below:



### *Provision of 97 Units on Site B*

Our client strongly objects to the inclusion of this statement which restricts the number of residential dwellings on the site. This policy again refers to the PTAL rating which is currently set at 4; however this is due to increase to 5 before 2021 due to Crossrail station opening before this date.

We therefore consider this number to be restrictive as a higher density scheme would be appropriate in this location given the proximity to Crossrail, which will support 10 trains an hour at peak times. The density matrix as set out in the emerging Development Management document is therefore not relevant to this site. Further, as the site is located adjacent to a railway it is in an optimum location for a tall building of high density. This location benefits from overlooking a railway line instead of buildings thus reducing the issue of overlooking or potential daylight/sunlight concerns. Taking this justification into account we suggest the wording of this policy be amended to read as follows:

*"The provision of residential units on sites B and C should be flexible to respond to respond to the site's individual characteristics and emerging public transport improvements."*

### *High Percentage of Employment Floorspace*

Our client also objects to the inclusion of the following statement, '*a minimum of 50% of each site should contain employment generating uses including B1 office, and suitable for B2 light industrial.*'

First, we strongly believe that B2 uses are not compatible with residential dwellings as part of a mixed use scheme. We therefore recommend that the wording is amended to ensure flexibility of the employment floorspace is promoted and should read 'employment generating floorspace,' rather than specify the end use class.

Second, providing 50% employment floorspace as part of a mixed use scheme on this site is too high and will significantly compromise the viability of delivering any scheme. Paragraph 173 of the NPPF seeks to ensure the viability and deliverability of development. It notes that 'pursuing sustainable development requires careful attention to viability and costs in plan-making and decision making.' It also notes that plans should be deliverable and sites should 'not be subject to such scale of obligations and policy burdens that their ability to be developed viably is threatened.'

Further, the Employment Land Study (2014) completed by URS notes that Hayes is considered to be an area in transition, with Nestle poised to leave and other traditional industrial sites being released for mixed use and office redevelopment. This supports our suggestion that providing 50% of the floorspace as commercial will not be viable, as this is likely to be more than the current provision.

With the above in mind we recommend the policy is reworded to state that employment floorspace is maintained and the amount of floorspace is reprovided in any redevelopment of the site. This will ensure the amount of employment floorspace remains viable and will not exceed the demand for the site.

With the above in mind we recommend amending the wording of the condition should read as follows:

*"The existing employment floorspace will be retained or reprovided as part of any redevelopment proposal. This employment floorspace should contain a mix of employment generating uses."*

#### *Comprehensive Development*

This section of the policy reads, 'as a preference, sites A, B and C should form a comprehensive development scheme.' We pointed out in our original representations submitted in November 2014 that although this may be an ideal scenario for the council, the land which forms part of the designation is in fragmented ownership. We therefore welcome the inclusion of the phrase 'as a preference' as this provides the element of flexibility for the developers.

#### *Council's Latest Housing Evidence*

The emerging policy also refers to the Council's 'latest evidence of housing need in terms of type and tenure or residential units.' Hillingdon's most recent Housing Market Assessment was released in 2009 and we understand this is to be reviewed upon the review of the Local Plan Part 1, the date of which is unconfirmed. The 2009 document states 70% of affordable units should be 2 and 3 bedrooms, with more than a fifth for 4 bedroom accommodation with just 7% one bedroom. This document also states that 56.3% of new market dwellings should be three bedroom properties, with 39.8% containing four or more bedrooms and 3.9% having two bedrooms. Furthermore, that additional one bedroom accommodation is not likely to be required, as future demand can be met by the stock currently available.

This assessment is not only out of date but does not take into account the sites individual characteristics. The site is not suitable for large quantities of family housing due to the lack of available amenity space and the mixes use schemes that are suggested and supported by emerging policy. Due to the location adjacent to Crossrail, the site would be ideal for smaller units housing professionals commuting in and out of London.

With this in mind, we recommend amending the wording of the policy to read

*"The type, tenure and mix of housing provided as part of a mixed use scheme should respond to the site's individual characteristics and be compatible with the changes in the accessibility levels."*

I therefore recommend that the above points are carefully taken into consideration, given they enhance the development potential of the site.

Please do not hesitate to contact me with any further queries.

Yours faithfully,



**Matthew Roe**  
Director

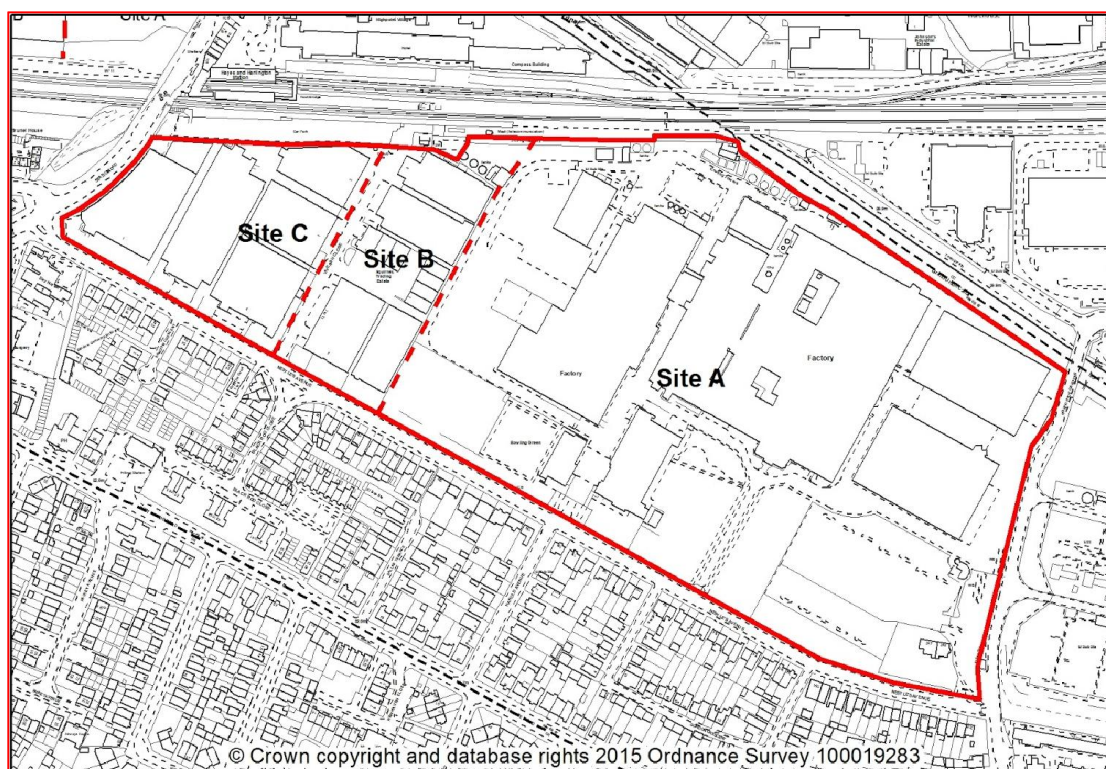
# **APPENDIX 1**

## New Homes

### Land to the South of the Railway, including Nestle Site, Nestle Avenue, Hayes

In 2012, Nestle announced the planned closure of its Hayes plant, which is currently used for the manufacture of coffee. The Council is in the early stages of discussion with the landholders about the future of this key development site, but is seeking to bring forward a comprehensive development scheme that includes the adjoining site (Site B).

Proposals will need to take account of a wide range of policy considerations, including those related to transportation, heritage and the wider objective of encouraging economic growth in Hayes town. It is recognised that the final overall quantum of uses and the number residential units will be determined through discussions with key stakeholders and the development of a sustainable masterplan.



### POLICY SA 5 40: Land to the South of the Railway, including Nestle Site

This is an important strategic site for Hayes town and the Borough as a whole. The Council will support proposals that meet the following criteria:

#### Site A

- The provision of up to 500 units. **Densities higher than 80 uph may be acceptable subject to high quality design.** Higher density development should be located along the canal frontage.
- **A minimum of 20 %** of the site (2.4 ha) should be used for employment generating uses. Suitable uses will include B1 and elements of B2 that are

## New Homes

compatible with the residential elements of the scheme.

### **POLICY SA 5 10: Land to the South of the Railway, including Nestle Site**

- Small scale commercial uses to support residential uses will be considered suitable.
- 10% of the site (1.2 hectares) should be used for open space and a sports pitch;
- Education facilities; and
- The provision of community facilities, including a public park.
- Proposals should include a heritage assessment which considers the retention and reuse of Locally Listed structures on this site.
- Proposals should include high quality design that fully integrates the Grand Union Canal, ensures canal-side improvements and maximises the canal's recreational potential.
- Development should contribute to the enhancement of the Strategic Canal and River Corridors in accordance with relevant policies on the Blue Ribbon network

#### **Sites B and C**

- The provision of up to 474 97 residential units on Site B and 110 residential units on Site C. Proposals should be consistent with the PTAL rating and take account of lower suburban densities to the south; and
- A minimum of 50% of each site (1.85 ha) should contain employment generating uses including B1 office, and suitable B2 light industrial.

As a preference Sites A, ~~and~~ B and C should form a comprehensive development scheme across the whole site, ~~and~~ which:

- Sustains and enhances the significance of the heritage assets;
- Provides pedestrian links to Hayes Town Centre and key transport nodes; and
- Reflects the Council's latest evidence of housing need in terms of the type and tenure of residential units.

~~Development on both sites should meet the requirements of policies in other parts of the Local Plan.~~



## New Homes

### Site Information

| Site name                                      | Land to the South of the Railway, including Nestle Site  |  |   |
|--|--|--|---|
|  | Site A   | Site B   | Site C  |
| <b>Ward</b>                                    | Botwell  | Botwell  | Botwell   |
| <b>Location</b>                                | Nestle Avenue/<br>Station Road   | Nestle Avenue  | Nestle Avenue   |
| <b>Area (ha/sqm)</b>                           | 12 ha  | <del>3.7 ha</del> 1.76 ha                                      | 2.2 ha  |
| <b>PTAL Ratings</b>                            | 1b, 2, 3   | 4  | 4   |
| <b>Proposed Development</b>                    | Mixed use  | Mixed use  | Mixed use   |
| <b>Current UDP Designations</b>                | Industrial Business Area; Conservation Area; Locally Listed Buildings  | Industrial Business Area; <b>Conservation Area</b>             | Industrial Business Area  |
| <b>Proposed New Designations</b>               | None   | None   | None  |
| <b>Existing Use</b>                            | Industrial units   | Industrial units, school, garages, caravan sales               | Industrial units, garages   |
| <b>Relevant Planning History (Most recent)</b> | No relevant history  |  |   |
| <b>Proposed Number of Units</b>                | 500  | <del>207</del> 97  | 110   |
| <b>Existing Units</b>                          | 0  | 0  | 0   |
| <b>Net Completions</b>                         | 500 units  | <del>207</del> 97 units  | 110 units   |
| <b>Infrastructure Considerations</b>           | The site is within close proximity to North Hyde sub-station and new buildings should not be located beneath power lines. Drainage infrastructure likely to be required. Site specific proposals should be discussed with National Grid and Thames Water at the earliest possible stage. Further infrastructure considerations are to be negotiated as part of the planning application. |  |   |
| <b>Flood Risk</b>                              | Flood Zone 1; Flood Risk Assessment required.  |  |   |
| <b>Contamination</b>                           | Potentially contaminated land due to former land use. Land remediation may be required.  |  |   |
| <b>Indicative Phasing</b>                      | 2021-2026  | 2021-2026  | 2021-2026   |
| <b>Other Information</b>                       | None   | Higher densities should be located adjacent to the canal. None | Multiple land ownership on this site may affect the timescale of delivery |

Cgms

**Cgms**  
[www.cgms.co.uk](http://www.cgms.co.uk)



# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |              |
|----------------------------|--------------|
| Title                      | Elite Group  |
| First name                 |              |
| Last Name                  |              |
| Organisation (if relevant) |              |
| Unit                       | House number |
| House name                 |              |
| Address 1                  |              |
| Address 2                  |              |
| Town                       |              |
| County                     |              |
| Postcode                   |              |
| Telephone                  |              |
| Email                      |              |

| 2. Agent's Name and Address (if applicable) |        |
|---|--------|
| Title                                       | Miss   |
| First name                                  | Sophie |
| Last name                                   | Hinton |
| Company                                     | CGML   |
| Unit  |        |
| House name                                  |        |
| Address 1                                   |        |
| Address 2                                   |        |
| Town  |        |
| County                                      |        |
| Postcode                                    |        |
| Telephone                                   |        |
| Email                                       |        |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** (please tick relevant box)

| Local Plan Part 2                   |                                   | Technical Reports (answer Q1 & Q9 only) |   |
|-------------------------------------|-----------------------------------|---|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |     |
|-------------------------------|-----|
| Policy number;                | AS  |
| Paragraph number;             | All |
| Table or figure number; or    |     |
| Map number (Atlas of Changes) |     |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** (please tick)

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** (Tick relevant box/es)

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input type="checkbox"/>            | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

Please refer to submitted cover letter





[Empty rectangular box for comments]

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

[Large empty rectangular box for comments]

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |



# HILLINGDON

LONDON

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### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |                    |
|----------------------------|--------------------|
| Title                      | Ms                 |
| First name                 | Emma               |
| Last Name                  | Beardmore          |
| Organisation (if relevant) | St James Group Ltd |
| Unit                       |                    |
| House name                 |                    |
| Address 1                  |                    |
| Address 2                  |                    |
| Town                       |                    |
| County                     |                    |
| Postcode                   |                    |
| Telephone                  |                    |
| Email                      |                    |

| 2. Agent's Name and Address (if applicable) |              |  |
|---|--------------|--|
| Title                                       |              |  |
| First name                                  |              |  |
| Last name                                   |              |  |
| Company                                     |              |  |
| Unit  | House number |  |
| House name                                  |              |  |
| Address 1                                   |              |  |
| Address 2                                   |              |  |
| Town  |              |  |
| County                                      |              |  |
| Postcode                                    |              |  |
| Telephone                                   |              |  |
| Email                                       |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input checked="" type="checkbox"/> | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |  |
|-------------------------------|--|
| Policy number;                |  |
| Paragraph number;             |  |
| Table or figure number; or    |  |
| Map number (Atlas of Changes) | Map 14.1 – Proposed Road Safeguarding Minet Country Park |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                          |   |
|-------------------------------------|-------------------------------------|--------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/>            | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |



**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

The Road Safeguarding within the Minet Country Park is identified to reflect detailed planning permission granted in 2010 (application reference LBH 54814-APP-2009-430) (the “permitted scheme” which permits the following development:

“New access roads from the Hayes-by-pass and Southall Town Centre to the application site for vehicle, cycle and pedestrian access including drainage and a flood relief pond. Widening of South Road across the railway line, widening of South Road over the railway line for the creation of bus lane and three new access onto Beaconsfield Road. Two bridges over the Grand Union Canal and Yeading Brook to provide pedestrian and cycle access to the Minet Country Park and Springfield Road.”

It is of note that Map 14.1 does not reflect or adequately take account of the permitted scheme. The reason for this is:

- a) The position of the road safeguarding on the plan is not in accordance with the position of the western access route approved under the Permitted Scheme; and
- b) The plan does not identify the location of the two further permitted pedestrian and cycle routes bridging the canal to provide access to the Minet Country Park and Springfield Road.

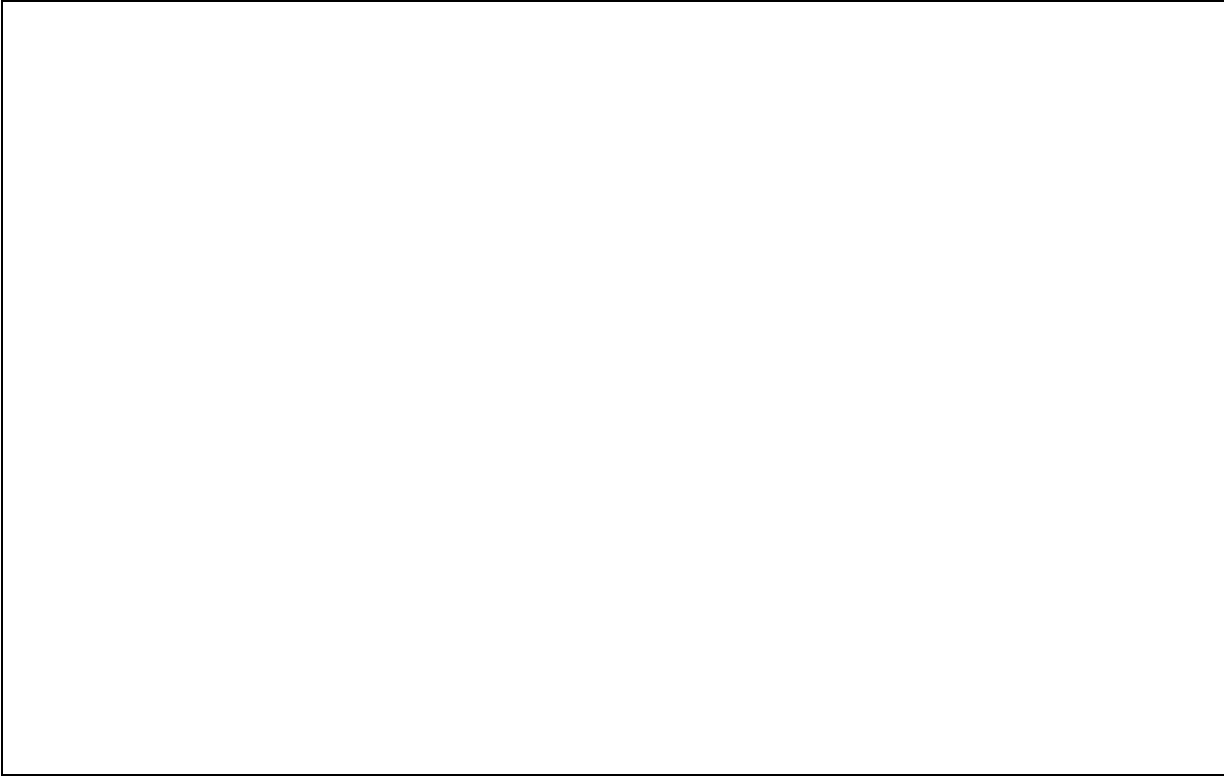
The plan has therefore failed to accurately locate or take account of all the routes approved pursuant to the Permitted Scheme and has for this reason not been positively prepared.

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|  |  |
|--|--|
| <input checked="checked" type="checkbox"/> | No, I do not want to participate in the oral examination |
| <input type="checkbox"/>                   | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**



**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |





## Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

### 1) What is your gender?

Male  Female

### 2) To which age group do you belong?

under 15  25 – 44  65 – 85  
 15 - 24  45 - 64  85+

### 3) Do you consider yourself to be a disabled person?

No  Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |



# HILLINGDON

LONDON

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| 1. Name and Address        |                    |
|----------------------------|--------------------|
| Title                      | Ms                 |
| First name                 | Emma               |
| Last Name                  | Beardmore          |
| Organisation (if relevant) | St James Group Ltd |
| Unit                       |                    |
| House name                 |                    |
| Address 1                  |                    |
| Address 2                  |                    |
| Town                       |                    |
| County                     |                    |
| Postcode                   |                    |
| Telephone                  |                    |
| Email                      |                    |

| 2. Agent's Name and Address (if applicable) |              |  |
|---|--------------|--|
| Title                                       |              |  |
| First name                                  |              |  |
| Last name                                   |              |  |
| Company                                     |              |  |
| Unit  | House number |  |
| House name                                  |              |  |
| Address 1                                   |              |  |
| Address 2                                   |              |  |
| Town  |              |  |
| County                                      |              |  |
| Postcode                                    |              |  |
| Telephone                                   |              |  |
| Email                                       |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input checked="" type="checkbox"/> | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |   |
|-------------------------------|---|
| Policy number;                |   |
| Paragraph number;             |   |
| Table or figure number; or    |   |
| Map number (Atlas of Changes) | Sinc Ext 5 – Yeading Brook and Minet Country Park |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                          |   |
|-------------------------------------|-------------------------------------|--------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/>            | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

The extension to the Site of Importance to Nature Conservation pays no regard to the works approved under planning permission LBH-54814-APP-2009-430 and the safeguarding within the 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.

As such it is considered that the proposal to extend the SINC to include the area adjoining Pump Lane is unsound.



Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | <b>No, I do not want to participate in the oral examination</b> |
| <input type="checkbox"/>            | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

### 1) What is your gender?

Male  Female

### 2) To which age group do you belong?

under 15  25 – 44  65 – 85  
 15 - 24  45 - 64  85+

### 3) Do you consider yourself to be a disabled person?

No  Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |



# Representations on Further Changes to the Local Plan Part 2

## Regulation 19 Revised Post Submission Version

Old Coal Depot,  
Tavistock Road, West Drayton

December 2015

**Further Changes to the Local Plan Part 2  
Regulation 19  
Revised Post Submission Version**

**Old Coal Depot,  
Tavistock Road, West Drayton**

|                       |                    |  |  |
|-----------------------|--------------------|--|--|
| <b>Project Ref:</b>   | 17388/A5/P23/KM/SO |  |  |
| <b>Status:</b>        | Draft              |  |  |
| <b>Issue/Rev:</b>     | 01                 |  |  |
| <b>Date:</b>          | December           |  |  |
| <b>Prepared by:</b>   | Kristina Mead      |  |  |
| <b>Checked by:</b>    | Adrian James       |  |  |
| <b>Authorised by:</b> | Adrian James       |  |  |



Ref: 17388/A5/P23/KM/SO  
File Ref: 17388.P23.RPSV.KM  
Date: December 2015

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**CONTENTS**

- 1.0 Introduction
- 2.0 Background
- 3.0 Site Allocations and Designations Document

## **1.0 INTRODUCTION**

- 1.1 These representations are prepared on behalf of Powerday PLC in response to further changes to the Local Plan Part 2. Powerday is a family owned recycling and waste management company founded in 1980. They currently operate a number of waste management sites in Greater London and are therefore a key stakeholder in the waste management industry.

## 2.0 BACKGROUND

- 2.1 Powerday currently have an interest in land associated with the former West Drayton Coal Depot on Tavistock Road. The Site is approximately 5.57 hectares in size and is wholly covered by hardstanding with a cluster of trees towards the south-eastern corner and boundary planting surrounding the Site. The Site forms part of the Old Coal Depot Site, which was granted planning permission in the 1960's. Since the closure of the Depot in the 1990's, the Site has been used for a range of different industrial and storage uses by a variety of business uses operating on a 24 hour a day basis.
- 2.2 Powerday has been using the north west corner of the Site for mixed B2 (maintenance, cleaning and transfer of skips and 'wheelie bins') and B8 Uses (the storage of skips) and incidental lorry parking as well as a Civic Amenity Site for one weekend a month as part of Hillingdon Council's 'Golden Weekend' initiative; a service that has been provided to the Council by the Applicant since late 2009 under formal contract. Powerday has systematically cleared the remainder of the Site of the various businesses, many of which occupied the land on short term licences, so that much of the Site is now vacant.
- 2.3 In December 2015 Powerday submitted a full planning application for the development of the Materials Recycling and Recovery Facility (MRRF) on the site, with a capacity of 450,000 tonnes per annum (LPA Reference as yet unknown). This application is subject to a full environmental impact assessment which found that the site is suitable for the proposed use. This application follows refusal of a similar application made in June 2013 (LPA Ref. 18736/APP/2013/1784) for a Materials Recycling facility that would separate and treat 950,000 tonnes of waste per annum. In response to comments made by the Local Planning Authority, Powerday sought to amend the submitted planning application to reduce the waste capacity of the facility from 950,000 tonnes to 450,000 tonnes to address traffic concerns. HBC would not accept the proposed amendment and refused the application for transport (and air quality impacts associated with the traffic generated) reasons in March 2014.



### 3.0 SITE ALLOCATIONS AND DESIGNATIONS DOCUMENT

#### Policy SA37

- 3.1 The Site Allocations and Designations Document proposes to allocate the site for a mixed use development, delivering 168-189 residential units between 2021 and 2026, under Policy SA37: Former Coal Depot, Tavistock Road.
- 3.2 There were two representations on the Proposed Submission Version which proposed the site be allocated for residential / mixed use development, from the Garden City Estates Residential Association and Cllr Ian Edwards. We are not aware of any developer / promoter interest in the Site's potential for residential development. Powerday, as promoters of the Site, do not intend to bring the site forward for housing and strongly oppose its de-allocation from an Industrial and Business Area. Given Powerday's continual promotion for waste purposes and the recent application for a MRRF, the Site is therefore not available for residential development. The Site is not in a suitable location for residential development for a number of reasons which would likely be difficult and costly to overcoming, potentially impacting on the site's viability for housing. The site is bound by rail lines on all sides, resulting in poor amenity for future occupiers. The Contaminated Land Assessment undertaken for the site notes there are likely to be localised hotspots of contamination across the site. While Powerday's proposed MRRF would result in a significant portion of the land being covered within concrete hardstanding, providing a barrier between contamination in soils and proposed users, mixed use / residential development of the site would not maintain the same level of hardstanding. Additionally, the site comprises up to 8m of made land. Designation of the site for mixed use development would not be effective, nor is it justified, as the site is neither suitable nor available for this form of development.
- 3.3 The site's current UDP Designation is for an Industrial Business Area. If Hillingdon is to remain a key industrial location, the Local Plan needs to protect sites such as Tavistock Road for industrial type uses and processes. Removal of the site's industrial / business allocation and designation as a mixed use development is in direct conflict with Policy SO15 of the Local Plan Part 1 which seeks 'to protect land for employment uses to meet the needs of different sectors of the economy'. The site should be designated as a Local Strategic Industrial Site.
- 3.4 The site information also proposes two designations, being an Archaeological Priority Zone and a Nature Conservation Site of Metropolitan or Borough Grade I Importance. The

proposed Nature Conservation Site of Metropolitan or Borough Grade I Importance is beyond Powerday's site boundary

- 3.5 Paragraphs 5.25 of the Development Management Policies Document relates to Archaeological Priority Zones and state that these are a tool for identifying the potential need for archaeological assessment and consultation with GLASS at pre-application stage, rather than necessarily asserting that archaeology will take high priority.
- 3.6 The rationale for including the site within the proposed Archaeological Priority Zone is unknown, particularly as an Archaeological Assessment has been undertaken for the site and notes that the Site comprises up to 8m of made ground and there is limited potential for archaeological remains at the site. Powerday object to this designation as it is not justified. The proposed Colne Valley Archaeological Priority Zone designation over the Site should be deleted.
- 3.7 Powerday consider it necessary to participate in the oral part of the examination.



# HILLINGDON

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## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |              |              |  |
|----------------------------|--------------|--------------|--|
| Title                      |              |              |  |
| First name                 |              |              |  |
| Last Name                  |              |              |  |
| Organisation (if relevant) | Powerday PLC |              |  |
| Unit                       |              | House number |  |
| House name                 |              |              |  |
| Address 1                  |              |              |  |
| Address 2                  |              |              |  |
| Town                       |              |              |  |
| County                     |              |              |  |
| Postcode                   |              |              |  |
| Telephone                  |              |              |  |
| Email                      |              |              |  |

| 2. Agent's Name and Address (if applicable) |                 |              |  |
|---|-----------------|--------------|--|
| Title                                       | Mrs             |              |  |
| First name                                  | Kristina        |              |  |
| Last name                                   | Mead            |              |  |
| Company                                     | Barton Willmore |              |  |
| Unit  |                 | House number |  |
| House name                                  |                 |              |  |
| Address 1                                   |                 |              |  |
| Address 2                                   |                 |              |  |
| Town  |                 |              |  |
| County                                      |                 |              |  |
| Postcode                                    |                 |              |  |
| Telephone                                   |                 |              |  |
| Email                                       |                 |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |             |
|-------------------------------|-------------|
| Policy number;                | Policy SA37 |
| Paragraph number;             |             |
| Table or figure number; or    |             |
| Map number (Atlas of Changes) |             |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/>            | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input type="checkbox"/>            | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

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***Please refer to attached document 'Representations on Further Changes to the Local Plan Part 2 on behalf of Powerday'***

Please continue on a separate sheet if necessary



**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

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**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

NA

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

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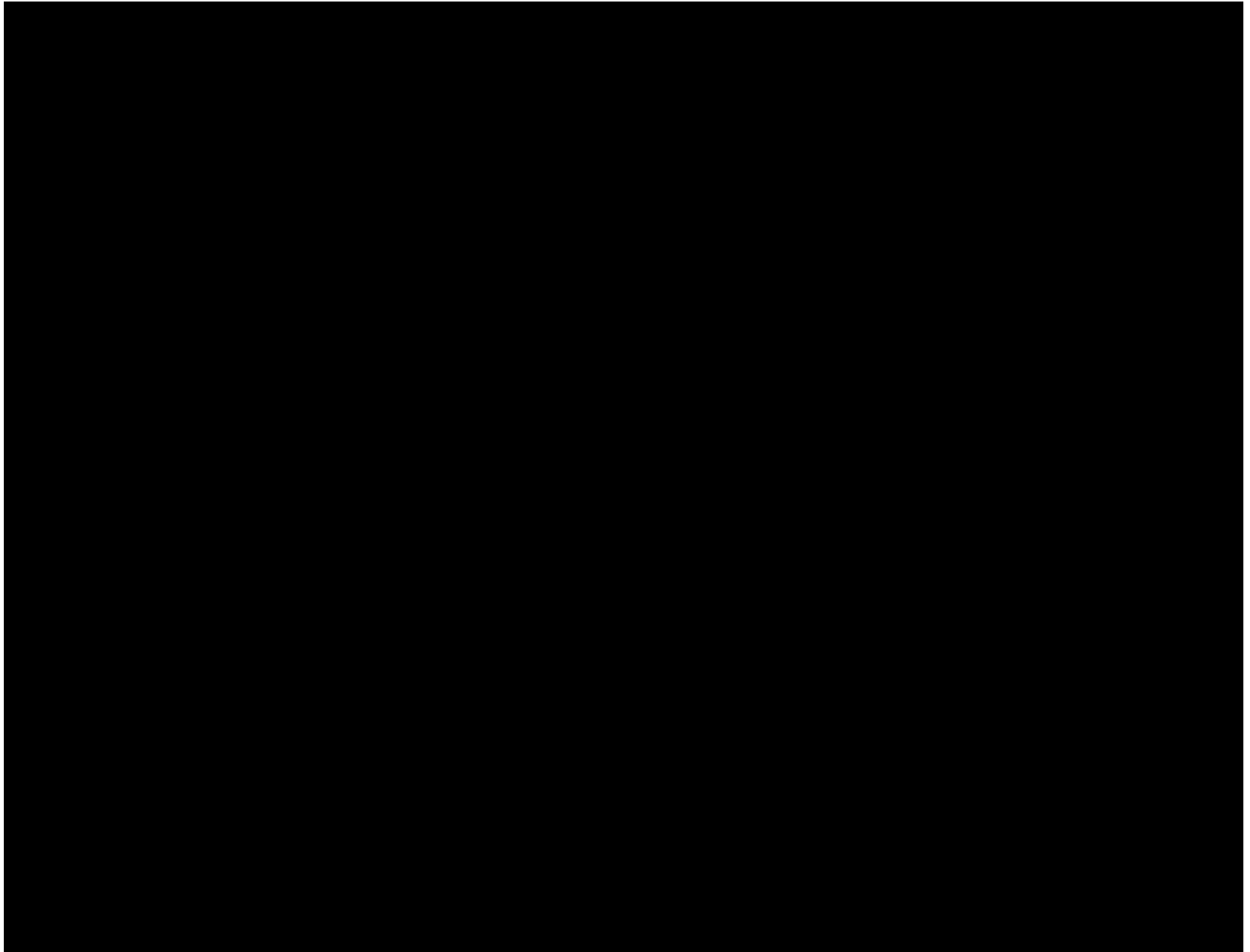
- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

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## **Monitoring Questions**

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# HILLINGDON

LONDON

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| 1. Name and Address        |                     |              |  |
|----------------------------|---------------------|--------------|--|
| Title                      |                     |              |  |
| First name                 |                     |              |  |
| Last Name                  |                     |              |  |
| Organisation (if relevant) | Intu Properties plc |              |  |
| Unit                       |                     | House number |  |
| House name                 | c/o Agent           |              |  |
| Address 1                  |                     |              |  |
| Address 2                  |                     |              |  |
| Town                       |                     |              |  |
| County                     |                     |              |  |
| Postcode                   |                     |              |  |
| Telephone                  |                     |              |  |
| Email                      |                     |              |  |

| 2. Agent's Name and Address (if applicable) |                                |
|---|--------------------------------|
| Title                                       | Mr                             |
| First name                                  | Matthew                        |
| Last name                                   | Williams                       |
| Company                                     | Nathaniel Lichfield & Partners |
| Unit  |                                |
| House name                                  |                                |
| Address 1                                   |                                |
| Address 2                                   |                                |
| Town  |                                |
| County                                      |                                |
| Postcode                                    |                                |
| Telephone                                   |                                |
| Email                                       |                                |



## PART B - Your responses

Please complete Part B **for each representation** you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |  |
|-------------------------------|--|
| Policy number;                | Policy DMTC2: Primary and Secondary Shopping Areas |
| Paragraph number;             |  |
| Table or figure number; or    |  |
| Map number (Atlas of Changes) |  |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/>            | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

Intu supports the protection of the Primary Shopping Areas ground floor for retail uses. However, Intu objects to the following requirements in DMTC2:

- A minimum of 70% of the frontage is retained in Use Class A1;
- The proposed use will not result a separation of more than 12 metres between A1 retail uses.

The requirements of this policy do not fit with the more modern shopping patterns and trends and are considered to be too prescriptive and inflexible. We have seen significant changes to town centres over the past 5 years and further changes will be essential to help them evolve and adapt in order to meet the changing demands of shoppers, overcome the ongoing effects of the recession and increase in internet shopping. The government's desire is to encourage vibrant and viable town centres through flexible changes of use and this policy does not support this aim. To remain competitive, town centres need to encourage other forms of town centre uses, such as restaurants, cafes and leisure uses in order to attract visitors to the town centre, increase their dwell time and extend their trading hours.

Intu supports policies that seek to provide an appropriate mix between the Class A Retail uses (A1-A5), but consider it is important to strike the right balance with meeting the needs of the changing role of the town centre. Flexibility is therefore important to embrace the changes. The above requirements are too prescriptive and arbitrary and all would harm rather than help the town centre.

Class A3 uses are a main town centre use (NPPF, Annex 2), which should be directed towards town centre locations in the first instance (NPPF, para. 24, London Plan Policy 4.7 and Local Plan Part 1 Policy E5). Within town centres the demand for food and drink establishments has increased significantly over the past 5 years, including significant expansion in the number of coffee shops, and national branded restaurant chains which have invested heavily in town centres.

Over the past decade, the proportion of Class A1 retail uses in GOAD town centres has decreased by 15% between 2000 and 2012 (9.1 percentage points), whilst Class A3 and A5 food and drink uses have significantly increased in proportional terms to just under 15% in 2015. Growth in Class A3 to A5 uses within town centres is likely to continue in the future, as town centres seek to broaden their attraction and provide a more experiential shopping trip in response to the increase in multi-channel shopping, particularly with the rise of internet shopping.

Uxbridge is a metropolitan centre and is therefore a principal centre in the Greater London hierarchy. As a principal centre, Uxbridge must have a strong leisure and restaurant offer to complement the retail uses and to reflect its position in the hierarchy. The need to provide this

more diverse offer is further emphasised with the town being identified in the London Plan as a town of Regional/Sub Regional importance for night time economy clusters.

Growth in A3 to A5 uses within town centres is likely to continue in the future, as town centres seek to broaden their attraction in response to the increase in multi-channel shopping, particularly the rise of internet shopping for comparison goods.

The prospects for growth within the catering sector are relatively buoyant. Restaurant uses are increasingly becoming important attractions in their own right, they also increase dwell time and visitor spend and provide a more experiential visit that cannot be found on line. All of this significantly helps to underpin the vitality and viability of town centres. This can be seen with the increase in celebrity chef restaurants and more diverse dining offers.

For a town of its size and status, Uxbridge is currently under-represented in terms of a modern catering offer. As a result, Intu advises that by far the strongest demand in Uxbridge town centre is from Class A3 operators, with about three times as many enquiries from this type of operator as from Class A1 retailers and proof of this demand can be seen through the number of vacant A1 units within Uxbridge that have recently been converted into restaurants. Intu would support a policy that provides the Council with the ability to consider applications on a case by case basis, with a key consideration being the degree to which the proposals will benefit the vitality and viability of the town centre. The introduction of the above inflexible thresholds should therefore be avoided.

The second part of this policy also dictates a set of arbitrary requirements for Secondary Shopping Areas. As outlined above, Intu supports the general thrust of the policy to safeguard retail uses, where appropriate. However, the requirements outlined in the policy are again too prescriptive and not reflective of general changes taking place in secondary shopping areas. Intu would support a policy that enables the council to respond positively to development proposals which would support the vitality and viability of a centre and bringing back into active use units that are vacant. To do this the policy needs to enable councils to consider applications on a case by case basis, avoiding inflexible thresholds.

Intu would however support the proposed thresholds of this policy if separate restaurant hub areas are allocated that are excluded from the tight restrictions. As outlined above, there is strong demand for new restaurant floorspace in Uxbridge and this demand can only be realistically met if the right size, configuration and quality of floorspace and locations are made available. Many types of modern restaurant prefer, where possible, to co-locate in groups of similar type establishments in order to provide choice to potential customers; and to be in close proximity to a major footfall generator such as a shopping centre or leisure anchor. The current policy, without the restaurant hub areas, specifically prevents this from happening.

Intu would welcome an approach similar to that taken by Watford Borough Council in allocating hub areas. For Uxbridge this would mean the Piazza area and the adjacent High Street area would be allocated as a Class A3 restaurant hub, exempt from the policy's thresholds. Intu suggests the following wording to be included in this policy:

**A3 Hub Areas: The restrictions set out within DMTC2 relating to the proportion of non-A1 uses and uninterrupted A1 frontage will not apply in the areas defined as restaurant hubs. A3 uses will be encouraged to locate in these areas.**

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

Intu Properties plc is a major town centre stakeholder and is a key stakeholder for the future delivery of the Council's city centre vision.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

N/A

## PART B (2) - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |   |
|-------------------------------|---|
| Policy number;                | Policy DMTC 4: Location and concentration of town centre uses |
| Paragraph number;             |   |
| Table or figure number; or    |   |
| Map number (Atlas of Changes) |   |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                                     |   |
|--------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/>            | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

Intu generally supports the thrust of this policy, however the policy should be amended to state that where proposals come forward in areas where residential properties are nearby they will be expected to demonstrate that there will not be unacceptable disturbance or loss of amenity.

Intu has identified a strong market for food and beverage uses in Uxbridge town centre, especially around the High Street and Piazza areas. These uses will keep the town centre viable in the coming years, promoting a vibrant centre and evening economy. Indeed, A3 uses, especially when clustered together around a strong leisure anchor, increase footfall and activity and this will enhance the performance of the shopping centre by attracting shoppers and by offering an enhanced range of food and drink facilities which will increase the dwell time of shoppers.

Cluster and zoning of the food offer is essential. Operators expect to be located close to similar dining offers to provide critical mass and choice for customers. They also expect to be located within areas that have high footfall throughout the day to ensure they are highly visible and accessible to shoppers. Locating casual dining uses in secondary areas in a dispersed manner is not desirable. For this reason, the policy should encourage such uses and allow for flexibility in decision making.

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

|              |
|--------------|
| <br><br><br> |
|--------------|



Intu Properties plc is a major town centre stakeholder and is a key stakeholder for the future delivery of the Council's city centre vision.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

N/A

### **PART B (3) - Your responses**

Please complete Part B **for each representation** you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| <b>Local Plan Part 2</b> |                                   |
|--------------------------|-----------------------------------|
| <input type="checkbox"/> | Development Management Policies   |
| <input type="checkbox"/> | Site Allocations and Designations |

| <b>Technical Reports (<i>answer Q1 &amp; Q9 only</i>)</b> |                                      |
|---|--------------------------------------|
| <input type="checkbox"/>                                  | Addendum to Sustainability Appraisal |
| <input type="checkbox"/>                                  | Consultation Statement               |

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>Policies Map<br/>(Atlas of Changes)</b> |
|-------------------------------------|--|

|                          |  |
|--------------------------|--|
| <input type="checkbox"/> | <b>Addendum to the Strategic Flood Risk Assessment</b> |
|--------------------------|--|

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                                      |  |
|--------------------------------------|--|
| <b>Policy number;</b>                | Policy DMTC2: Primary and Secondary Shopping Areas                                   |
| <b>Paragraph number;</b>             |  |
| <b>Table or figure number; or</b>    |  |
| <b>Map number (Atlas of Changes)</b> | Map 17.1 - Proposed extension to the Uxbridge Town Centre (onto former RAF Uxbridge) |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|  | Yes                                 | No                                  |
|--|-------------------------------------|-------------------------------------|
| <b>Sound?</b>  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| <b>Prepared in accordance with the duty to cooperate, legal and procedural requirements?</b> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |  |                                     |  |
|-------------------------------------|--|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>It has not been positively prepared</b> | <input checked="" type="checkbox"/> | <b>It is not effective</b>                       |
| <input type="checkbox"/>            | <b>It is not justified</b>                 | <input checked="" type="checkbox"/> | <b>It is not consistent with national policy</b> |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

Intu is concerned about the expansion of the Uxbridge Town Centre boundary (Map 17.1) south-westwards to include the Former RAF Uxbridge site. It is acknowledged that this site has been allocated primarily for residential use, as well as 14,000 m2 of office floorspace, a 90 bedroom hotel plus associated commercial uses.

Bringing this site within the town centre boundary would mean it is classified as sequentially preferable for other “main town centre” uses. While the site would be classified as ‘edge of centre’ for retail (Class A1) proposals and be required to demonstrate compliance with the sequential approach, other “main town centre” uses proposed for the site would no longer need to undertake an assessment. This could undermine the vitality and viability of the primary shopping area by encouraging main town centre uses to spread over a larger area, diluting the benefits of a clustering of uses.

Clustering of complimentary uses will keep the town centre viable in the coming years, especially when these uses are clustered together around a strong leisure anchor. This critical mass ensures an increase in footfall and activity. Extending the Uxbridge Town Centre boundary will encourage a dispersal of main town centre uses over a larger area and therefore is not desirable and will not deliver a vital and viable town centre. For this reason, the south-western boundary of Uxbridge Town Centre should remain unchanged from the UDP Proposals Map.

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

Intu Properties plc is a major town centre stakeholder and is a key stakeholder for the future delivery of the Council’s city centre vision.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

N/A

### **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                                     |   |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | When the Local Plan Part 2 Plan has been submitted for independent examination.   |
| <input checked="" type="checkbox"/> | The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2. |
| <input checked="" type="checkbox"/> | The adoption of the Local Plan Part 2.  |

## Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

### 1) What is your gender?

Male  Female

### 2) To which age group do you belong?

under 15  25 – 44  65 – 85  
 15 - 24  45 - 64  85+

### 3) Do you consider yourself to be a disabled person?

No  Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |



## LOCAL PLAN PART 2 – HAYES TOWN PARTNERSHIP RESPONSE

### Introduction

The Hillingdon Local Plan Part 2 was issued for public consultation in September and October 2014 and the Partnership submitted detailed comments on the sites identified for development in Hayes Town. The Council received 283 responses to the consultation and some of these have resulted in changes to the Plan. In view of the volume and content of the representations received the Council has decided to conduct a further round of consultation before submitting the final documents to the Secretary of State for independent examination. The consultation is intended to be only of the changes proposed from the previous draft and the closing date for the receipt of comments is 8th December.

### Submissions made in response to previous consultation

The comments made on behalf of the Partnership can be summarised as follows:

- Draw up a specific planning framework for Hayes Town Centre in order to ensure essential support facilities and services are in place to meet the needs of the increased numbers of people who will be living in the Town Centre.
- Review how the frontage of the Grand Union Canal could be used in a creative and co-ordinated way as a spur to regeneration and in particular examine the possibility of developing the frontage on the southern side of the canal between Station Road and Printing House Lane.
- Amend the boundaries of the 'Western Core' site in Station Road to include the large area of waste land behind McDonald's stretching through to Botwell Lane since this is currently unused and subject to anti-social behaviour.
- Investigate whether part of the Chailey Industrial Estate in Pump Lane which is proposed for release for mixed-use development could be developed as a site for a purpose-built mosque.
- Ensure the protection of Shackles Dock and the continuation of a public house facility in any development of the Silverdale Road/Western View site.
- Consider whether the Benlow Works should be released from industrial use in order to ensure the restoration and proper maintenance of this Grade 2 listed building which is currently in a very poor condition.
- Explore the provision of a footbridge between the Nestles site and the Hayes Town side of the Grand Union canal.

### Changes proposed by the Council in response to first round of consultation

The revised proposals for the development of sites in Hayes are now as follows:

| Site   | Housing units | Revised |
|--|---------------|---------|
| Enterprise House Blyth Road                    | 75-80         | 96      |
| Old Vinyl Factory Blyth Road                   | 642           | 642     |
| Eastern end of Blyth Road                      | 248           | 273     |
| Fairview Business Centre Clayton Road          | 0             | 119     |
| Nestles site and adjoining land Nestles Avenue | 707           | 707     |
| 'Western Core' – Station Road                  | 60            | 0       |
| Golden Cross Public House Botwell Lane         | 0             | 23      |
| Union House Clayton Road                       | 0             | 46      |
| Chailey Industrial Estate Pump Lane            | 150           | 198     |
| Silverdale Road/Western View                   | 300           | 141     |
| Benlow Works Silverdale Road                   | 0             | TBC     |

The revised proposals show the addition of the Fairview, Golden Cross, Union House and Benlow Works sites and the deletion of the 'Western Core' site in Station Road. If all the sites shown are developed there would be an increase from 2182/2185 residential units to 2245 units plus whatever is deemed acceptable for Benlow Works. The proposals do not include Trident House and it is recommended that this be pointed out. This is the former Avis office building in Station Road which has received consent for conversion to residential.

In the light of the fact that the consultation is only on the proposed changes from the first draft there is no scope to re-present the Partnership's previous comments about the need for an outline planning framework or area plan to show how support facilities will be provided for the increased number of people living in the Town. However this point remains relevant.

### **Fairview Business Centre Clayton Road**

This site is currently designated for employment and is included for release for the first time on the grounds that it has significant potential for residential-led mixed use development that capitalises on the canal side location and proximity to the Crossrail link at Hayes and Harlington Station. The Business Centre is currently in active use as a Ford Trucks depot.

The draft variation states that the Council would support residential development with small scale commercial uses at ground floor level and that it would expect any proposals to enhance the canal frontage. This reasoning is completely in line with the second bullet point of the earlier submission by the Partnership and it is therefore recommended that the proposal should be supported.

Just as the report to the Cabinet was being finalised the Council received representations from the owners of the adjoining Crown Trading Estate in Clayton Road. They made the case that the current state of their buildings is very poor with inadequate insulation and a preponderance of asbestos materials plus inadequate drainage and parking for the site as a whole. In their view there is no realistic prospect of the Estate being improved in its present form because of the costs involved and they therefore requested that this site should also be released from employment use for mixed use development.

The report to the Cabinet states that the Council will also consider the release of this site, 'taking account of relevant policies in the development plan and the conclusions of the latest evidence base'. Since this site also fronts the canal it is subject to the same comment by the Partnership about the potential for the centre of the Town to be radically improved by the opening up of the canal frontage and the introduction of active uses. It is recommended that the Crown Trading Estate should be added to the Plan as a specific proposal with development to be linked with the proposals for the adjoining Fairview Business Centre.

The Partnership agreed that one of the key issues for improving access to the canal was to enable public access to the waterside on the Clayton Road side of the Canal. This would create the opportunity for the type of canal frontage that has made such a positive impact in other town centres regeneration projects. Paddington Basin and Birmingham were cited as examples. Opening up the Clayton Road canal side would also have a positive impact on usage of the canal towpath on the other side of the canal. The Partnership were keen for the mistakes made by the High Point village development (where canal side access is restricted) not to be repeated in Clayton Road.

The Partnership acknowledged that as it was unlikely that all of the parcels of land adjacent to the canal in Clayton Road would come forward for development at the same time that the Council be recommended to safeguard public access along the entire stretch of canal from the Station Road Bridge to the Printing House Lane bridge.

## **Nestles site and adjoining land in Nestles Avenue**

The closure of the Nestles factory offers the single largest development site in Hayes Town and if the land up to Station Road is included it will be even larger. The proposal in the first draft of the Plan was for a mixed use development that would include 707 residential units. Since the first consultation exercise the site has been sold to SEEGRO which specialises in logistics rather than residential developments. It might therefore be thought that they would be proposing a lower level of residential use but no planning application has yet been submitted and the overall thrust of the proposal remains unchanged.

Reference is made to the need for open space, community facilities, a heritage assessment and the enhancement of the canal. It is recommended that all these requirements are supported.

The canal frontage presents an opportunity to provide active uses such as cafes, restaurants and community facilities. The Hayes Community Canal Day earlier this year highlighted substantial local interest in kayaking and this site would provide an ideal location for the development of a waters sports centre.

One of the biggest challenges that the site presents is its lack of connectivity with the town centre. Connectivity could be improved by a pedestrian bridge across the canal and this would introduce pedestrian traffic and activity along a stretch of the towpath which is currently under-used and unwelcoming. It is recommended that this observation should be repeated.

## **'Western Core' (Station Road)**

The revised Plan proposes the deletion of the so-called 'Western Core' site in Station Road. It is understood that this is on the grounds that the land is in multiple ownerships and that the units coming forward from other sites mean that this development is no longer required.

The Partnership understands the reasoning behind this view but is concerned that this decision leaves this key area of Hayes in limbo. The Partnership is of the opinion that unlocking and developing this area would serve to regenerate the core of the Town centre and would provide housing retail and community facilities. However, development on this scale is unlikely to happen unless the Council take the initiative. The Partnership is mindful of the approach taken by Hounslow Council who are delivering regeneration in a town centre facing similar challenges to Hayes. The Partnership would welcome a dialogue with the Council on this issue if it pursues the idea of deleting the 'Western Core' from the Local Plan proposals.

## **Chailey Industrial Estate Pump Lane**

The Council has not taken up the Partnership's suggestion that this site should be considered as a possible location for a purpose-built mosque to replace the current inadequately sized facility in the nearby former Civic Hall. The draft alteration is that the site should be released for residential development rather than mixed use development as originally proposed.

As stated in the previous submission the Hillingdon Local Plan recognises that the Borough includes a wide range of cultural, ethnic and religious communities and accepts that these groups often have difficulty in finding suitable locations for new buildings. It commits the Council to assist wherever possible but fails to make any specific proposals. This site offers that opportunity and it is recommended that the previous suggestion be re-submitted.

## **Silverdale Road/Western View**

The previous proposal was for the release of this site for residential use with an estimated total of 300 units. The revised proposal divides the site in two and proposes that the area closest to Station Road should be developed for 'high value retail and others uses that promote the vitality and viability of Hayes Town Centre'. The development is envisaged to include up to 60 residential units.

This site is where the canal interacts directly with the Town Centre and the revised proposal recognises that it has potential to become a focal point that would enable the amenity of the water frontage to make a significant contribution to the Town. It is recommended that this change should be strongly supported.

The second part of the site is currently occupied by a number of small industrial units, most of which are of poor quality. It also includes Shackles Dock which was previously used as part of the brick-making operations for which Hayes was famous before the coming of industry. (Bricks from Hayes were used in the construction of the Natural History Museum and the Science Museum in South Kensington). Many other docks that were used for a similar purpose have long since disappeared and this is the only one remaining in the area.

The proposal is for residential development involving the provision of 141 units. Reference is made to the need to 'consider the retention and re-use of Listed and Locally Listed structures' but there is no specific reference to Shackles Dock. It is recommended that the release for residential use be supported but that the requirement to retain and enhance Shackles Dock should be made specific.

The consultation document states that the overall number of units for the two sites will be 141 but this omits the 60 envisaged in the area nearest to Station Road. It is recommended that the discrepancy in the numbers should be amended.

## **Benlow Works Silverdale Road**

The Partnership and others suggested that Benlow Works in Silverdale Road should be considered for mixed use development because it is a Grade 2 listed building that has fallen into a dilapidated state and is now on the Heritage at Risk Register maintained by English Heritage. There appears little prospect of it being restored by any other means and it is recommended that the proposal to allow mixed use development should be supported

**DAVID BROUGH**  
**Chairman**  
**Hayes Town Partnership**

2 December 2015



# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |  |
|----------------------------|--|
| Title                      | MR                                       |
| First name                 | DAVID                                    |
| Last Name                  | ANDREW                                   |
| Organisation (if relevant) | Garden City Estate Residents Association |
| Unit                       | [REDACTED]                               |
| House name                 |  |
| Address 1                  |  |
| Address 2                  |  |
| Town                       |  |
| County                     |  |
| Postcode                   |  |
| Telephone                  |  |
| Email                      |  |

| 2. Agent's Name and Address (if applicable) |  |              |  |
|---|--|--------------|--|
| Title                                       |  |              |  |
| First name                                  |  |              |  |
| Last name                                   |  |              |  |
| Company                                     |  |              |  |
| Unit  |  | House number |  |
| House name                                  |  |              |  |
| Address 1                                   |  |              |  |
| Address 2                                   |  |              |  |
| Town  |  |              |  |
| County                                      |  |              |  |
| Postcode                                    |  |              |  |
| Telephone                                   |  |              |  |
| Email                                       |  |              |  |

**PART B - Your responses** *Fourth response.*

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1.** I am commenting on proposed changes to: *(please tick relevant box)*

| Local Plan Part 2                   |                                   |
|-------------------------------------|-----------------------------------|
| <input type="checkbox"/>            | Development Management Policies   |
| <input checked="" type="checkbox"/> | Site Allocations and Designations |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|--|---|
| <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2.** Please indicate the Proposed Change on which you wish to comment:

|                               |                                |
|-------------------------------|--------------------------------|
| Policy number;                |                                |
| Paragraph number;             | <i>Paragraph 7.16 page 245</i> |
| Table or figure number; or    |                                |
| Map number (Atlas of Changes) |                                |

**Q3.** Do you consider that as a result of the proposed changes, the Local Plan Part 2 is *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4.** If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below *(Tick relevant box/es)*

|                          |                                     |                                     |   |
|--------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/>            | It is not consistent with national policy |



**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

Of late, the proposal to develop a Health Centre at the former 'Swimming Pool Site' in Yewstey has been abandoned - because of cost objections by NHS England.

The population of the Yewstey/West Drayton area is will be increasing substantially given the level of new dwellings built, in process or already permissioned. (In part, driven by the advent of Cross Rail.)

It is the long-held view of local residents that the area is under-provisioned with GP and related primary care services.

Against this background, and given the focus of public transport services around West Drayton railway bus station, we strongly assert the need for a site to be identified in Yewstey/West Drayton for one of the 3 'Health Facility Hubs'

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
(Please tick appropriate box)

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

I am commenting as Chair of a Residents' Association (GCERA) so wish to attend the ESP, speaking if the Inspector thinks that appropriate.

**PART B - Your responses**

*Third Response*

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   |
|-------------------------------------|-----------------------------------|
| <input type="checkbox"/>            | Development Management Policies   |
| <input checked="" type="checkbox"/> | Site Allocations and Designations |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|--|---|
| <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                           |
|-------------------------------|---------------------------|
| Policy number;                |                           |
| Paragraph number;             | <i>7.11 pages 238/239</i> |
| Table or figure number; or    |                           |
| Map number (Atlas of Changes) |                           |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/>            | It is not justified                 | <input type="checkbox"/>            | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

Given the large increase in housing provision in the South of the Borough there will be an increase in the school-age population in the years covered by this LDP.

It is remarkable that Hillingdon Council have so far not designated any <sup>additional</sup> site in the South of the Borough to service the educational needs of ~~the~~ secondary school children.

Does the Council expect the ~~extra~~ <sup>extra</sup> demand to be met by pupils travelling to schools in the North (of Hillingdon) or outside the Borough?

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
(Please tick appropriate box)

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

I am commenting as Chair of a Residents' Association (ALERA) so wish to attend the EIP speaking if the Inspector thinks that appropriate.

**PART B - Your responses**

*Second Response.*

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   |
|-------------------------------------|-----------------------------------|
| <input type="checkbox"/>            | Development Management Policies   |
| <input checked="" type="checkbox"/> | Site Allocations and Designations |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|--|---|
| <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                           |
|-------------------------------|---------------------------|
| Policy number;                | <i>SA37 pages 107/108</i> |
| Paragraph number;             |                           |
| Table or figure number; or    |                           |
| Map number (Atlas of Changes) |                           |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |
|--------------------------|-------------------------------------|
| <input type="checkbox"/> | It has not been positively prepared |
| <input type="checkbox"/> | It is not justified                 |

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not consistent with national policy |



**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

Note: we strongly support this change. It is in keeping with the changed nature of the area around this site away from industrial to light commercial and residential uses; not least with the advent of Crossrail.

Please continue on a separate sheet if necessary

**Q6.** If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?  
(Please tick appropriate box)

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7.** If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

I am commenting as Chair of a Residents' Association (GCERA) so wish to attend the EIP speaking if the Inspector thinks that appropriate.

**PART B - Your responses**

*First Response*

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   |
|-------------------------------------|-----------------------------------|
| <input checked="" type="checkbox"/> | Development Management Policies   |
| <input type="checkbox"/>            | Site Allocations and Designations |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|--|---|
| <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                        |
|-------------------------------|------------------------|
| Policy number;                | <i>DMCI 1 page 139</i> |
| Paragraph number;             |                        |
| Table or figure number; or    |                        |
| Map number (Atlas of Changes) |                        |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |
|--------------------------|-------------------------------------|
| <input type="checkbox"/> | It has not been positively prepared |
| <input type="checkbox"/> | It is not justified                 |

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

Please continue on a separate sheet if necessary

**Q6.** If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?  
(Please tick appropriate box)

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7.** If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

I am commenting as Chair of a Residents' Association (GCERA) so wish to attend the EIP speaking if the Inspector thinks that appropriate

## **PART C - Progress of the Local Plan Part 2**

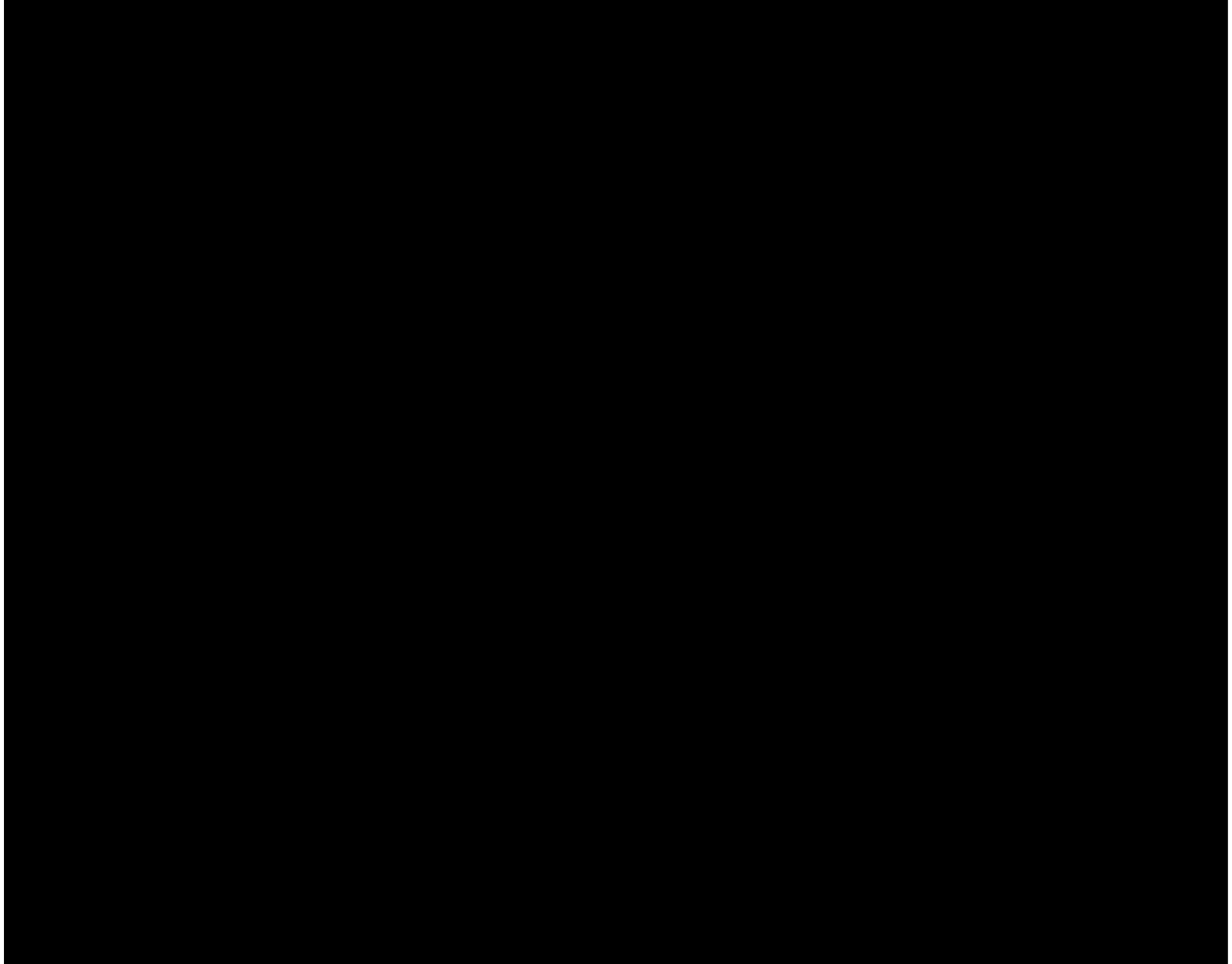
If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |



## **Monitoring Questions**

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.





# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |                       |              |  |
|----------------------------|-----------------------|--------------|--|
| Title                      |                       |              |  |
| First name                 |                       |              |  |
| Last Name                  |                       |              |  |
| Organisation (if relevant) | Royal Local (CIS) Ltd |              |  |
| Unit                       |                       | House number |  |
| House name                 |                       |              |  |
| Address 1                  | C/O Agent             |              |  |
| Address 2                  |                       |              |  |
| Town                       |                       |              |  |
| County                     |                       |              |  |
| Postcode                   |                       |              |  |
| Telephone                  |                       |              |  |
| Email                      |                       |              |  |

| 2. Agent's Name and Address (if applicable) |                |
|---|----------------|
| Title                                       | Miss           |
| First name                                  | Hannah         |
| Last name                                   | Bryant         |
| Company                                     | Gerald Eve LLP |
| Unit  |                |
| House name                                  |                |
| Address 1                                   |                |
| Address 2                                   |                |
| Town  |                |
| County                                      |                |
| Postcode                                    |                |
| Telephone                                   |                |
| Email                                       |                |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input checked="" type="checkbox"/> | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |       |
|-------------------------------|-------|
| Policy number;                | SA22  |
| Paragraph number;             | N/A   |
| Table or figure number; or    | N/A   |
| Map number (Atlas of Changes) | 19.22 |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                          |   |
|-------------------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/>            | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

This representation relates to Policy SA22 and Map 19.22 of Hillingdon's Local Plan Part 2.

We write on behalf of our client, Royal London (CIS) Limited, to provide written representations on the Local Plan Part 2.

It should be noted that we are generally supportive of the revised policy wording, in particular the shift towards a residential led mixed used scheme for the site with small scale commercial uses at ground floor level. We are also supportive of the amended red line plan at Map 19.22 which now accurately reflects the ownership boundaries therefore allowing Chailey Industrial Estate to come forward separately as a development opportunity.

Whilst we are supportive of the policy generally, it is considered that the site itself has the potential to offer a significantly greater density level in this urban location.

The policy currently states that the site should be released for development at a density of 110 units per hectare, but does not seek to justify this allocated density.

In the notes contained in Table 3.2 of the consolidated London Plan (2015), it is stated that an urban area is an area with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two to four storeys, located within walking distance of a District centre, or along main arterial routes.

Chailey Industrial Estate is considered to be located within an urban area as the site is surrounded by terraced housing, a mix of uses, including retail uses and industrial, the building footprints vary and most buildings are between two to four storeys. The site is also located within approximately 400m of Hayes town centre. This is supported by the recent application for The Old Vinyl Factory which is in a similar location within Hayes and was considered by the GLA, in its Stage II report, to be an urban location.

Policy CS22 highlights that the site is located within an area with a current PTAL rating of 3. Table 3.2 of the consolidated London Plan states that, for areas with PTAL ratings of 2-3, sites will have a maximum capacity of 170 unit / hectare.

The NPPF places a strong emphasis on boosting the supply of housing within the UK.

There are emerging plans that this area will benefit from even greater connectivity, from the Hayes Crossrail link which will inevitably increase the PTAL rating for this area and site. Accordingly this should be factored in to this site allocation now as the Government is committed to the provision of Crossrail and this site has the opportunity to deliver a significant amount of much needed residential accommodation in a well-connected location.

It is therefore considered that, as a minimum, the first bullet point of Policy SA22 should be amended to state the following:

“The site should be released for residential development and is capable of achieving a development density of 170 units per hectare”.

This would also provide some flexibility to the policy wording, which is currently extremely rigid, allowing the developer the opportunity to progress a scheme that is suitable to the site rather than trying to reach a particular density level.

Accordingly, we also consider that the proposed number of units and net completions within the site information table should be amended to reference a total number of minimum 306 units (170u/ha x 1.8ha).

We trust that the above information allows for the wording of Policy SA22 to be revised accordingly.

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

We consider it necessary to participate in the oral part of the examination as our reasoning behind the amendments we consider are required to this policy would be easier to present orally.



**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

N/A

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

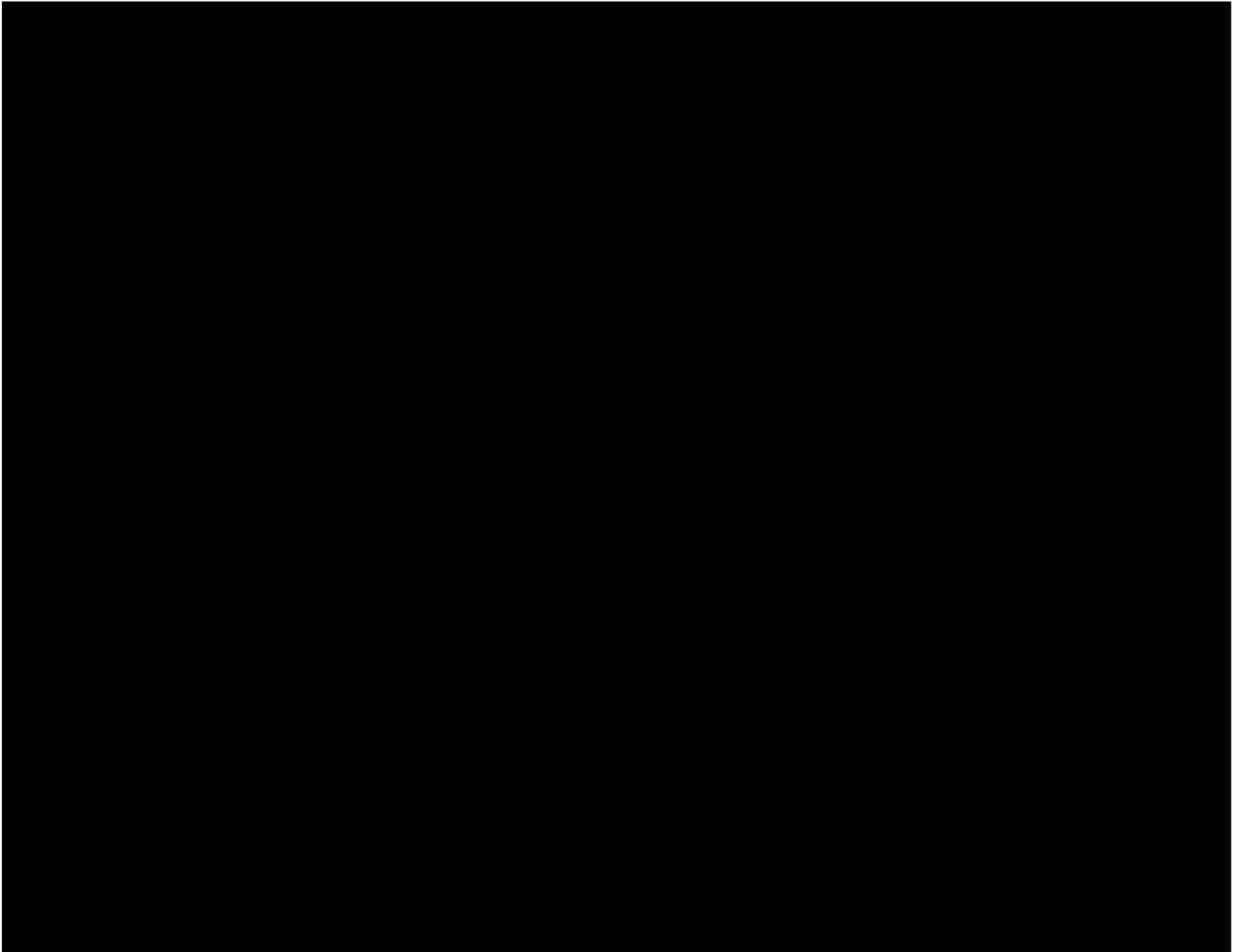
- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## Monitoring Questions

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# HILLINGDON

LONDON

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### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |                    |              |  |
|----------------------------|--------------------|--------------|--|
| Title                      | Mr                 |              |  |
| First name                 | Edward             |              |  |
| Last Name                  | Crome              |              |  |
| Organisation (if relevant) | Environment Agency |              |  |
| Unit                       |                    | House number |  |
| House name                 |                    |              |  |
| Address 1                  |                    |              |  |
| Address 2                  |                    |              |  |
| Town                       |                    |              |  |
| County                     |                    |              |  |
| Postcode                   |                    |              |  |
| Telephone                  |                    |              |  |
| Email                      |                    |              |  |

| 2. Agent's Name and Address (if applicable) |  |              |  |
|---|--|--------------|--|
| Title                                       |  |              |  |
| First name                                  |  |              |  |
| Last name                                   |  |              |  |
| Company                                     |  |              |  |
| Unit  |  | House number |  |
| House name                                  |  |              |  |
| Address 1                                   |  |              |  |
| Address 2                                   |  |              |  |
| Town  |  |              |  |
| County                                      |  |              |  |
| Postcode                                    |  |              |  |
| Telephone                                   |  |              |  |
| Email                                       |  |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |        |
|-------------------------------|--------|
| Policy number;                | DMEI 5 |
| Paragraph number;             |        |
| Table or figure number; or    |        |
| Map number (Atlas of Changes) |        |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |



**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

We are pleased to note the inclusion of a requirement for developments to provide new areas of green infrastructure in areas where green chains are currently deficient.

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | No, I do not want to participate in the oral examination |
| <input type="checkbox"/>            | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

N/A

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

No comments

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| <b>Local Plan Part 2</b>            |                                   |
|-------------------------------------|-----------------------------------|
| <input checked="" type="checkbox"/> | Development Management Policies   |
| <input type="checkbox"/>            | Site Allocations and Designations |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| <b>Technical Reports (answer Q1 &amp; Q9 only)</b> |   |
|--|---|
| <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |        |
|-------------------------------|--------|
| Policy number;                | DMEI 8 |
| Paragraph number;             |        |
| Table or figure number; or    |        |
| Map number (Atlas of Changes) |        |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

We are pleased to note the inclusion of a number of our previous recommendations in this policy. In particular we welcome the inclusion of the requirement for 8 and 5 meter buffers on main and ordinary watercourses within the policy.

The policy could be stronger still in section F – requiring contributions to biodiversity improvement for Canal-side developments to be extended to all types of watercourse (canal, main and ordinary). This will build further on policy EM3 of Part 1 of your Local Plan.

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | No, I do not want to participate in the oral examination |
| <input type="checkbox"/>            | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

N/A

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

No comments.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| <b>Local Plan Part 2</b>            |                                   |
|-------------------------------------|-----------------------------------|
| <input checked="" type="checkbox"/> | Development Management Policies   |
| <input checked="" type="checkbox"/> | Site Allocations and Designations |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| <b>Technical Reports (answer Q1 &amp; Q9 only)</b> |   |
|--|---|
| <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                           | Consultation Statement                          |
| <input checked="" type="checkbox"/>                | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |        |
|-------------------------------|--------|
| Policy number;                | DMEI 9 |
| Paragraph number;             |        |
| Table or figure number; or    |        |
| Map number (Atlas of Changes) |        |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

We are pleased to note positive changes to policy DMEI 9. However, we still have some outstanding issues with the policy detailed below in respect of the following points: sequential test, sequential approach, climate change, and flood defences. We have suggested alternative wording for the policy to make the policy stronger and relate better to the evidence base documents. Please also see our response to question 8 in relation to the Sequential/SFRA addendum.

As we stated in our previous consultation response, policy EM6 of your Local Plan Part 1 clearly sets out a sequential approach in line with national policy. We recommend that this is carried through into Part 2 of your Local Plan and the policy requires sites to pass the sequential test before undertaking a Flood Risk Assessment (FRA). Your addendum to Sustainability Appraisal (page 75 and 90, October 2015) also highlights that the policy does not referenced the sequential or exceptions tests and recommends their inclusion. We also recommend that where sites are located in Flood Zones 2, 3a or 3b and the Sequential Test has been passed, that the policy requires development to be planned using a sequential approach within the site boundary so that more vulnerable developments are placed in areas at lowest risk of flooding. This means that policy is then in line with the SFRA in which windfall sites not included in the site allocations should be sequentially tested to ensure that development is directed towards areas at lower risk of flooding.

The policy fails to explicitly mention climate change adaptation and mitigation in the context of flood risk. The sustainability appraisal addendum also shows that the policy does not have any impact on climate change. Development proposals must be designed to reduce vulnerability to climate change, setting living accommodation finished floor levels 300mm above the predicted flood level for the 1 in 100 chance in any year flood event including an allowance for climate change. Developments should provide an appropriate means of escape to a higher level within the building or a safe evacuation route above the predicted flood level. This should be carried out through the preparation of a site specific Flood Risk Assessment. Please note that we are publishing updated climate change levels in the near future and the current allowances are subject to change.

The policy fails to explicitly state that any development at risk of flooding, protected by a defence asset must be commensurate with the lifetime of the development. We strongly recommend that the policy ensures that any works are designed to maintain the integrity of any flood defence assets on site, and do not prevent the upgrading of defence assets to meet the increased risk of flooding due to climate change.

Our suggested wording for policy DMEI 9 to incorporate the above is as follows:

**A) *Planning applications for development proposals outside a site allocation within this local plan should be accompanied by evidence that the sequential test and where appropriate, the exceptions test, have been passed.***

**B) *All development proposals in Flood Risk Zones 2 and 3a and 3b (medium and high probability risk) and areas identified as being at risk from artificial sources, sewer and surface water flooding and ordinary watercourses or historic flood events will be required to submit an appropriate level Flood Risk Assessment (FRA)9 to demonstrate that the development is resistant and resilient to all relevant sources of flooding.***

**B) *Development in Flood Zone 3b will be refused in principle unless identified as an appropriate development in Flood Risk Planning Policy Guidance. Development for appropriate uses in Flood Zone 3b will only be approved if accompanied by an***



*appropriate FRA that demonstrates the development will be resistant and resilient to flooding and suitable warning and evacuation methods are in place.*

*C) Developments may be required to make contributions (through legal agreements) to previously identified flood improvement works that will benefit the development site.*

*D) Proposals that fail to make appropriate provision for flood risk mitigation, or which would increase the risk or consequences of flooding, will be refused.*

*E) Development proposals must be designed to take account of climate change and apply the sequential approach on site. Finished floor levels should be set at a minimum of 300mm above the predicted flood level for the 1 in 100 chance in any year flood event including the appropriate allowance for climate change.*

*F) Where sites are adjacent to watercourses an appropriate buffer must be incorporated for flood defence access, maintenance and inspection purposes (8m for main rivers). Proposals must demonstrate that the structural stability of the defences along the watercourse are commensurate with the lifetime of the development. Where remedial works are necessary these will be expected to be detailed within the planning application.*

Please note that we would be happy for part F to be inserted into policy DMEI 8 if felt more appropriate.

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | No, I do not want to participate in the oral examination |
| <input type="checkbox"/>            | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

N/A

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Section 3.4 of the Addendum to the Strategic Flood Risk Assessment suggests that the 1 in 20 year modelling will be used as a starting point for defining Flood Zone 3b. However it goes on to say that the developed/undeveloped floodplain on a site by site basis. Although

we do not find this approach unsound you may want to consider providing a more specific definition of Flood Zone 3b, preventing the need for site by site assessment of whether the site is within FZ3b. You should consider using a similar approach to Harrow who differentiate between currently developed and Greenfield land to more accurately assess flood risk (available here [http://www.harrow.gov.uk/download/downloads/id/1329/development\\_in\\_the\\_functional\\_floodplain\\_note](http://www.harrow.gov.uk/download/downloads/id/1329/development_in_the_functional_floodplain_note)).

There are two sites that have not been included in the Sequential Test that are in areas of flood risk. Packet Boat House is nearing completion has not been allocated for further development and so 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 in the Addendum to Strategic Flood Risk Assessment as part of the Sequential Test.

Allocated sites that have passed the sequential test and fall within Flood Zones 2&3 should also draw upon the evidence base documents to highlight specific design criteria within the plan. For example we suggest the following to be included within the site allocations documents, tailored to each individual site as applicable:

- The site is located in Flood Zone 2/3 (*delete as applicable*)
- *For riverside sites* - maximise set back to provide an 8m undeveloped buffer strip wherever feasible.
- The design and layout of proposed development based on the sequential approach with more vulnerable uses (such as residential) located to the least risk areas of the site. Built footprint should be avoided in the 1 in 100 year plus allowance for climate change extent. If, following the sequential approach, development has to be located within this extent floodplain compensation must be provided on a level for level and volume for volume basis.
- Finished floor levels must be set above the 1 in 100 plus allowance for climate change extent.
- The provision of a dry access route for pedestrians (i.e. above the 100 year plus climate change flood level) and the development of a dedicated emergency response plan in case of flooding.

We are pleased to note the inclusion in section 6.1 of the Addendum to the Strategic Flood Risk Assessment of a requirement for site specific Flood Risk Assessment of sites in flood zones alongside the requirement that flood plain is retained. However we do not consider this document to adequately demonstrates the application of the Sequential Test. While it requires that the design of sites follows the sequential approach, it does not appear that other sites in the borough, outside of high and medium flood risk, have been considered before allocating these sites. We recommend that this is included in the document prior to adoption.

|  |
|--|
|  |
|--|

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   |
|-------------------------------------|-----------------------------------|
| <input checked="" type="checkbox"/> | Development Management Policies   |
| <input type="checkbox"/>            | Site Allocations and Designations |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|--|---|
| <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |         |
|-------------------------------|---------|
| Policy number;                | DMEI 10 |
| Paragraph number;             |         |
| Table or figure number; or    |         |
| Map number (Atlas of Changes) |         |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |
|--------------------------|-------------------------------------|
| <input type="checkbox"/> | It has not been positively prepared |
| <input type="checkbox"/> | It is not justified                 |

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

We are pleased to note that while you have removed policy DMEI 12 from this draft, you have strengthened policy DMEI 10 to include a robust SuDS element to maintain the focus on improving surface water quality. We agree with advisory comment 14 of your Sustainability Appraisal Addendum (October 2015) to include a more explicit link to the multiple benefits that SuDS offer to encourage developers to integrate their drainage proposals into biodiversity enhancements for example.

In line with this focus on water quality, we maintain our suggestion that you include text to address the issue of misconnections in the sewer network and the role they play in phosphate pollution. Paragraph 6.47 highlights that phosphate is a particular issue in the failure of certain rivers in the borough under the Water Framework Directive, however the policy does not include any measures which developments should include to address this. Requiring applicants to investigate and rectify any misconnections on their site would help to address the phosphate issue, while the incorporation of SuDS schemes will help address urban diffuse pollution. We suggest either adding to the policy or the supporting text reference to the Water Framework Directive:

**Development proposals should take account of the River Basin Management Plan and not cause any further deterioration of waterbodies under WFD. Wherever possible proposals should seek to include provisions to enhance water quality.**

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**

*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | <b>No, I do not want to participate in the oral examination</b> |
| <input type="checkbox"/>            | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

N/A

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

No comments

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| <b>Local Plan Part 2</b>            |                                   |
|-------------------------------------|-----------------------------------|
| <input checked="" type="checkbox"/> | Development Management Policies   |
| <input type="checkbox"/>            | Site Allocations and Designations |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| <b>Technical Reports (answer Q1 &amp; Q9 only)</b> |   |
|--|---|
| <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |         |
|-------------------------------|---------|
| Policy number;                | DMEI 12 |
| Paragraph number;             |         |
| Table or figure number; or    |         |
| Map number (Atlas of Changes) |         |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**



*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

We welcome the inclusion of context in this policy, taken from our Groundwater Protection: Principles and Practice (GP3) document. This provides more specific requirements for a Preliminary Risk Assessment to be submitted, in line with Paragraph 007 under Land Affected by Contamination of the NPPG.

The policy should go further to encourage development on Brownfield land, in order to ensure remediation of contaminated sites where possible. This should be reflected both in your policy and the supporting text.

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | No, I do not want to participate in the oral examination |
| <input type="checkbox"/>            | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

N/A

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

No comments

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input type="checkbox"/>            | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

### 1) What is your gender?

Male  Female

### 2) To which age group do you belong?

under 15  25 – 44  65 – 85  
 15 - 24  45 - 64  85+

### 3) Do you consider yourself to be a disabled person?

No  Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |



# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |                               |
|----------------------------|-------------------------------|
| Title                      |                               |
| First name                 |                               |
| Last Name                  |                               |
| Organisation (if relevant) | BRITISH SIGN & GRAPHICS ASSN. |
| Unit                       | House number                  |
| House name                 |                               |
| Address 1                  |                               |
| Address 2                  |                               |
| Town                       |                               |
| County                     |                               |
| Postcode                   |                               |
| Telephone                  |                               |
| Email                      |                               |

*clerk agent*

| 2. Agent's Name and Address (if applicable) |        |
|---|--------|
| Title                                       | MR     |
| First name                                  | CHERLS |
| Last name                                   | THOMAS |
| Company                                     |        |
| Unit  |        |
| House name                                  |        |
| Address 1                                   |        |
| Address 2                                   |        |
| Town  |        |
| County                                      |        |
| Postcode                                    |        |
| Telephone                                   |        |
| Email                                       |        |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on proposed changes to: (please tick relevant box)

| Local Plan Part 2                   |                                   | Technical Reports (answer Q1 & Q9 only) |   |
|-------------------------------------|-----------------------------------|---|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                | Addendum to the Strategic Flood Risk Assessment |

Q2. Please indicate the Proposed Change on which you wish to comment:

|                               |                   |
|-------------------------------|-------------------|
| Policy number;                | DMHB 13 (E) & (F) |
| Paragraph number;             |                   |
| Table or figure number; or    | APPENDIX B        |
| Map number (Atlas of Changes) |                   |

Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is (please tick)

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below (Tick relevant box/es)

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |



**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

*See attached letter*

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | <b>No, I do not want to participate in the oral examination</b> |
| <input type="checkbox"/>            | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

**PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

**Chris Thomas Ltd**  
*Outdoor Advertising Consultants*



The Planning Policy Team  
London Borough of Hillingdon Council  
3N/02 Civic Centre  
High Street  
Uxbridge  
Middlesex UB8 1UW

30 October 2015

Dear Sir/Madam,

**London Borough of Hillingdon Local Plan Part 2, Development Management Policies, Revised Proposed Submission Version, October 2015**

These representations are submitted on behalf of the British Sign and Graphics Association (BSGA) in response to Policy DMHB13 and the Shopfronts Design Guidance in Appendix B.

The BSGA represents 65% of the sales of signage throughout the UK and monitors development plans throughout the country to ensure that emerging Local Plan Policies do not inappropriately apply more onerous considerations on advertisements than already apply within the NPPF, Planning Practice Guidance (PPG) and the Town and Country Planning (Control of Advertisements)(England) Regulations 2007 (as amended).

The BSGA would firstly point out that, in line with section 3 of the PPG, a local plan does not have to contain advertisement control policies; and that, if such policies are considered necessary to protect the unique character of a particular area, these should be evidence based.

We submitted representations on the "Publication Draft" of this document in September 2014. Clearly, some of our representations have been accepted. However, the interrelationship between Policy DMHB13 "Shopfronts", Policy DMHB12 "Streets and Public Realm" and the design guidance in Appendix B remains confusing and, to some extent, self-contradictory. For example, the section on "Advertisements", now reduced to the single paragraph 5.48, appears in the preamble to Policy DMHB12, and is supported in section (C) of this policy. But further policy on advertisements appears also in Policy DMHB13 and in Appendix B. We would again suggest that all advice on shopfronts and advertisements be contained within a single section; or, alternatively, that the advice on shopfronts and on

advertisements be completely separated and contained in two totally separate sections.

As to detailed comment:

As we pointed out previously, Para 5.53 correctly identifies that poorly designed and sited shop signs can have an adverse impact on the character of an area. However, this provides no evidential support for Policy DMHB13(E) and (F). Shop signs do not need to be restricted in number or to certain areas of a shopfront - each proposal must be considered on individual merit (and size, position on the building and design, illumination and clutter will be relevant considerations, exactly as within Policy DMHB12(C). This advice also appears to contradict that in Appendix B which describes the "signable area" as the entire shopfront frame including pilasters and columns. The advice that shop sign content will be restricted to the shop name is contrary to the Regulations, as advised in PPG Section 4 (see advice on "necessity"). As to Policy DMHB 13(F), we agree that illumination to shopfronts should avoid light pollution and intrusion to nearby residents. But this does not justify the proposed ban on all flashing and internally illuminated "box lights". Again, each proposal must be considered on merit (and I do not for a second believe that there are no internally illuminated "box lights" displayed on bus shelters in the Borough with the Council's approval).

Para 5.53 refers to advice on advertisements being found in Policy DMHB12(C). But, in stating that further advice on shopfronts is to be found in Appendix B, it does not advise that this also involves advertisements. How many places within this plan does a prospective advertiser have to look to find all the relevant advice?

Para 5.48 states "advertisement proposals, including ....etc" is unnecessary. All are "advertisements" within the statutory definition. Evidence taken from Inspector's Reports at Local Plan Inquiries at Mendip and Wandsworth support our objections. In the Mendip case the Inspector concluded that a similarly restrictive policy being put forward by the Council was not justified. I quote from paragraph 4.182 of the Inspector's Report:

**"There is also no need to make special mention of poster hoardings. They clearly fall within the normal meaning of advertisements and, whilst they are the subject of specific guidance in the annex to PPG19 (now section 8 of the PPG), they are still subject to the same amenity and public safety tests contained in the Regulations as other outdoor advertising."**

In the Wandsworth case the Inspector again dismissed the use of blanket policies that would restrict advertisements of certain types or locations. I quote from paragraph 3.145 below:

**"The Regulations limit Council control of those advertisements which fall within their scope to the interests of amenity and public safety. There is, therefore, no support in them for a blanket policy to prevent advertisements near schools and playgrounds....It is clear that all applications should be considered on these two grounds on their own merits. For the same reason I**

**cannot accept objection 319 which would not allow the number of hoarding sites to be increased."**

So, whilst we accept that para 5.52 should quite properly draw attention to "clutter", there is no justification for picking out particular forms of advertisement.

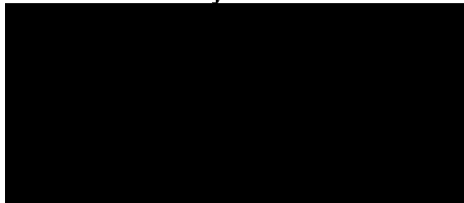
As to Appendix B, in paragraph B1.11, corporate signs **may** need to be adjusted to suit the particular building and area. In many cases, they may not be required to do so. We therefore suggest that "where necessary to preserve and/or enhance the character and appearance of the building and area" be inserted after "applicants will be expected to adapt their corporate signage"; and that this will replace the remainder of the sentence. In the same paragraph, "effecting" should be "affecting".

In paragraph B1.12, most of the advice is overly restrictive. For example, why should hanging signs normally be at fascia level? Signs of this type are commonly hung above fascia level on commercial buildings (eg public houses). And why should high level signs be considered "unlikely to be acceptable in sensitive areas"? All will depend on the proposal and its relationship with the building and area. New hanging banners and signs must be considered on the basis of amenity and public safety only. That it should be "deemed necessary ..." is contrary to the Regulations and (again) the advice in the PPG Section 4 (as above). We therefore consider that the whole of paragraph B1.12 should be deleted.

In paragraph B1.14, there are too many assumptions and generalisations. The first sentence of paragraph B1.14 correctly identifies that illumination should be used with restraint. The second sentence fails to recognise that modern internally illuminated signs are almost invariably slimline in design; and brightness can be controlled by conditions on the consent. Many conservation areas (which very often include listed buildings) are thriving commercial areas where the full range of advertising on business premises is to be expected and welcomed, providing it does not detract from amenity. We therefore consider that the second sentence in this paragraph should be deleted.

It is hoped that these comments are found to be useful and informative, if you have any further questions, please contact me.

Yours faithfully



**Chris Thomas**  
**Chris Thomas Ltd**



# Heine Planning Consultancy



By email:localplan@hillington.gov.uk

11 November 2015  
L3-j67-09

Local Plans Team  
Planning Policy Team  
LB Hillingdon Council  
3N/02 Civic Centre  
High St  
Uxbridge UB8 1UW

Dear Sir/ Madam

**Re: Part 2 Local Plan Reg 19 consultation  
Revised Proposed Submission Version  
Gypsy-Traveller issues.**

Thank you for notifying me of the consultation period for the above document.

My concern is with policy for Gypsy-Travellers.

Policy as drafted relies on Policy H3 of the Local Plan part 1 and proposes that sufficient provision to meet the Traveller needs by extending the existing socially provided site at Colne Park.

Policy as drafted is not considered sound or policy compliant for reasons explained below.

## **1) Failure to listen to public comment**

A crucial aspect of the local plan system is the need to consult and have regard to public comment. If comments are ignored and disregarded there is little incentive for the public to comment. In drafting this policy Hillingdon Council appear to have ignored

- a) Evidence submitted in support of planning appeals for Traveller sites
- b) Concerns expressed by those representing the Gypsy-Traveller community at three appeals in recent years (New Years Green Lane, Jackets Lane and Moorhall Road appeals)
- c) Concerns expressed by the Planning Inspectors for all three appeals
- d) My concerns as set out in my letter of 1 December 2014 to you.

I am also told the Council failed to consult its own Traveller Forum until after the last consultation period and. It is not clear how their input has fed into the policy making

process, if at all. But a member of that forum attended the hearing for New Years Green Lane where her views were vindicated by the Inspector even though the Case Officer sought to dismiss all her concerns. If Planning Officers can not be relied on to treat with some respect the honest and heart felt concerns of their own Gypsy community there is frankly no point consulting on planning issues. It is clear from the recent Moorhall Lane appeal that the Council are of the opinion housing is a suitable alternative for Travellers. With that attitude the planning issues will never be properly addressed.

**2.The September 2014 GTAA carried out by the Council is not robust and can not be relied on for the reasons explained in my letter of 1 December 2014 ie**

-it was published late in the day in September 2014, just at the start of this final consultation exercise (22 September – 4 November). Its existence was not made known to those working for Travellers in the district. I am not clear when it was added to the Council evidence base.

-it appears to ignore the findings of two recent appeal decisions for New Years Green Lane and Jackets Lane where Inspectors were convinced there was a significant unmet need for more sites.

- It does not follow the methodology set out in the 2007 DCLG guidance. I do not understand how different population increases were assessed and over what time period. Para 6.6 implies the need has been assessed over the next 5 years and not the full plan period 2011-2026.

-it fails to include all known sites in the district. It would be helpful to list all known sites and explain why families living on what are presumed to be tolerated sites off Moorhall Road Harefield, New Years Green Lane and elsewhere are not included.

-it fails to consider the ethnic breakdown of all families with a need to reside in the district.

-Para 6.3 confirms that the study fails to include the needs of housed Travellers of which there are many, especially in the Harefield area. Para 4.7 GTAA admits that the majority of Travellers in the Borough probably live in housing. Para 5.5 would appear to suggest that from a small sample of families living in housing there is a preference for some to return to living in a caravan on a council owned site.

-there is no consideration of in-migration and the needs of families displaced from Hillingdon on account of the lack of sites.

-it appears to wrongly assumes a high turnover rate at Colne Park. I am told there was an incident which led to families leaving the site some 5 years ago and since then very few plots have changed hands. This would appear to be confirmed in para 5.6 of the 2014 GTAA . Para 5.2 GTAA 2014 notes that not one of the families interviewed at Colne Park intended to move. This would not suggest that much (if any) scope exists to meet need from turnover of plots on this site.

**3) The proposed extension of Colne Park will not address all the existing need for the following reasons**

-The need for pitches is far greater than that proposed. The Gypsy Council did its own quick check of the situation in late November 2014. On one afternoon Mr J Jones of the Bucks Floating support group of the Gypsy Council interviewed the occupants of 11 plots at Colne Park and identified an immediate need for 16 pitches from current overcrowding and household formation. This report was submitted at the appeal for Moorhall Road, Harefield on 25 November 2014. This suggests the need in Hillingdon is clearly far greater than just 3-4 pitches identified by the Council. It also suggests that the Council continues to ignore the evidence submitted on Traveller matters.

-this is not an objectively assessed appraisal. The Council has failed to consider the suitability of other sites. It is presumed no suitable sites can be found on Previously Developed Land in settlements boundaries or elsewhere. It is presumed no allocation is to be made as part of any housing scheme but this is not clear from the very brief consideration of this matter. Paras 3.10-3.12 of the Local Plan part 2 read very much as an afterthought thrown in at the last minute with little consideration of the issues and options. There is no consideration of suitable sites as promised in Part 1.

-Colne Park is a socially run site. It does not address the needs of those seeking to self provide. The Council is aware of the needs of families seeking private sites at New Years Green Lane, Moorhall Road Harefield and Jackets Lane. It may surprise many to learn that socially provided sites are not cheap. Many families can not afford the high weekly rent. Many prefer to self provide on land they own or can stop on without the worry of meeting expensive weekly rental rates. Most Travellers who seek to self provide are self employed and on limited income which can not be guaranteed. It would be of interest to learn what the weekly rent is at Colne Park, how expensive the electricity is and how many families at Colne Park have their rent paid from benefits.

-As noted in section 5 GTAA Key Findings, the majority of the residents at Colne Park are Irish Travellers. It would be difficult to integrate families of other ethnic backgrounds when the site is overwhelmingly taken by one ethnic group. Not all families seeking to reside in Hillingdon are Irish Travellers. The ethnic breakdown is not considered as part of the GTAA. This approach of expecting all families to live together on one site is not consistent with criteria (c) Policy H3 Part 1 Local Plan which states that proposals for sites will accommodate the specific needs of the different travelling groups.

-There are site issues with Colne Park. Para 4.6 of the GTAA states that the site was reduced in size from 30 to 21 to improve the site. It is unclear how it will be improved by adding extra plots. Saved Government guidance 2008 (para 4.7) is that the ideal site size is 15 pitches. Existing plots are small and cramped. There are drainage issues with the site. The site is located on the edge of a flood zone and the EA map suggests the access road is at risk of flooding-although the Council deny this. The Council's addendum Strategic FRA and Sequential Test July 2014 states that the site was previously partly within the flood plain but recent modelling concludes it is now in FRZ1. The EA flood maps appear suggest that the site access and approach road up into West Drayton is still at risk of flooding and reliant on flood defences.

- The site is located within the Green Belt. Expansion of this site would not be consistent with other relevant Local Plan policies as required by Policy H3 of the Local Plan Part 1. The Council has refused three other applications for private sites in the Green Belt because it is inappropriate development. It would be inconsistent of the Council to make an exception to Green Belt policy for its own site. It is unclear what exceptional circumstances the Council rely on in accordance with Policy E of the Planning Policy for Traveller Sites (PPTS) which are not relied on to support private site provision in the same Green Belt. Expansion of Colne Park would remain inappropriate development and would not be approved except in very special circumstances. Recent appeal decisions have already confirmed that the Very Special Circumstances to grant sites in the Green Belt do not exist in Hillingdon even where exceptional personal circumstances are relied on. Personal circumstances can not be relied on for socially provided sites as pitches can not be allocated on a personal basis but must be made available for any Gypsy-Traveller. Merely identifying a site in the Local Plan does not remove the need to demonstrate very special circumstances for the determination of any subsequent planning application. It is necessary for the Council to alter the Green Belt boundary in accordance with para 15 PPTS and para 85 NPPF. In particular it is necessary that the LPA is satisfied that any site to be inset from the Green Belt has defensible boundaries. This exercise has not been followed. This approach has been explored as part of the Solihull EIP for a Gypsy-Traveller local plan, and is being followed by Guildford, Bromley and South Staffordshire with the production of their local plans.

-Colne Park is already overcrowded. Current pitches fail to meet site licence requirements. Following fires which resulted in the tragic deaths of families at Traveller sites at The Plantation Lingfield December 2014 and recently on a site near Dublin there is no justification to condone overcrowding on existing sites. The unacceptable overcrowding at Colne Park leads to tension and friction amongst families. The site should be extended to provide decent sized pitches for existing families, not for more sub standard pitches. The whole site should be redeveloped to make some use of the waste ground in the middle.

-pitches at Colne Park are allocated on a very restrictive basis by Locata Housing Services. The 2014 GTAA confirms that a waiting list is no longer maintained in which case it is far from clear how the Council are aware of the need for pitches in their Borough. The Council need to provide a definitive statement setting out the site occupants and allocation of pitches on this site. The October 2014 Jackets Lane appeal decision reports a waiting list of 12 (para 117). The same appeal decision also noted that applicants must be resident in the Borough 10 years before they can be accepted on the waiting list (see para 117 27.10.14 Secretary of State appeal decision for site at Jackets Lane).

#### **4) Policy needs to provide choice of location, tenure, size of provision.**

The one size fits all approach is not acceptable and fails to meet the expectations of section 6 NPPF which calls for wide choice of high quality homes.

Para 50 NPPF calls for a need to plan for a mix of housing to deliver a wide choice of homes to meet the needs of different groups.

### **5) Policy as drafted is not compliant with adopted Policy H3**

The Council has failed to honour the promises given in Policy H3 as adopted November 2012. It has failed to carry out a robust need assessment. It has failed to set realistic targets for pitch provision. The decision to concentrate all new development at an extended Colne Park is not consistent with policy which seeks to protect the Green Belt. It remains questionable whether this is suitable environmentally for further pitches due to concerns about flooding and the overcrowding on the existing site. In short policy as proposed fails to ensure that new sites are sustainable socially, economically and environmentally as we were promised in para 6.36 and as the Inspector who considered the EIP for Part 1 was led to believe.

#### Summary

The policy approach to Gypsy-Traveller site provision is not sound or positively prepared and is not compliant with

Policy H3 Local Plan part 1 Gypsy and Traveller Pitch provision

Para 47 NPPF which requires full objectively assessed need appraisals

Para 50 NPPF to provide a wide choice of homes to meet local need

Para 85 NPPF on Green Belt Boundaries

Para 4 PPTS which seeks to promote private sites

Para 6 PPTS which requires a robust evidence base

Para 10 PPTS which requires local plans to identify a supply of sites to provide a 5 years' worth against locally set targets.

Para 15 PPTS which requires any alterations to the Green Belt boundary to be made through the local plan process only where there are exceptional circumstances.

Para 16 PPTS which makes clear unmet need (combined with personal circumstances) is unlikely to outweigh definitional harm to the Green Belt and any other harm eg loss of openness, encroachment into open countryside.

I am most concerned that the Local Plan Part 2 fails to have regard to the outcome of recent appeal decisions for Gypsy-Travellers.

I am concerned that the Local Plan Part 2 if adopted as proposed will fail to address the immediate and pressing need for more sites in this part of Greater London.

I am concerned that the voice of local Gypsy-Travellers has not been heard or taken into consideration.

I am most concerned that Hillingdon Council has ignored advice already provided by myself, others and Planning Inspectors and is pursuing a policy that stands no chance of being found sound or robust, and has no prospect of being adopted.

It is most troubling that policy is to be submitted for examination in this form.

Yours faithfully

Mrs Alison Heine



# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |               |
|----------------------------|---------------|
| Title                      | Mrs           |
| First name                 | ALISON        |
| Last Name                  | HEINE         |
| Organisation (if relevant) | HEINE PLANNNG |
| Unit                       |               |
| House name                 |               |
| Address 1                  |               |
| Address 2                  |               |
| Town                       |               |
| County                     |               |
| Postcode                   |               |
| Telephone                  |               |
| Email                      |               |

| 2. Agent's Name and Address (if applicable) |              |  |
|---|--------------|--|
| Title                                       |              |  |
| First name                                  |              |  |
| Last name                                   |              |  |
| Company                                     |              |  |
| Unit  | House number |  |
| House name                                  |              |  |
| Address 1                                   |              |  |
| Address 2                                   |              |  |
| Town  |              |  |
| County                                      |              |  |
| Postcode                                    |              |  |
| Telephone                                   |              |  |
| Email                                       |              |  |



## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |               |
|-------------------------------|---------------|
| Policy number;                | H3            |
| Paragraph number;             | 3.18 and 4.26 |
| Table or figure number; or    |               |
| Map number (Atlas of Changes) |               |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

***Please see attached letter***

***The policy needs to be reconsidered based on***

***-robust up to date proper need assessment***

***-regard to policy requirements in NPPF/ PPTS***

***-realistic approach to addressing need***

***-comments made by Travellers and those representing them***

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

Because I am not confident concerns expressed are being listened to or addressed and the Inspector needs to be made aware of this.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

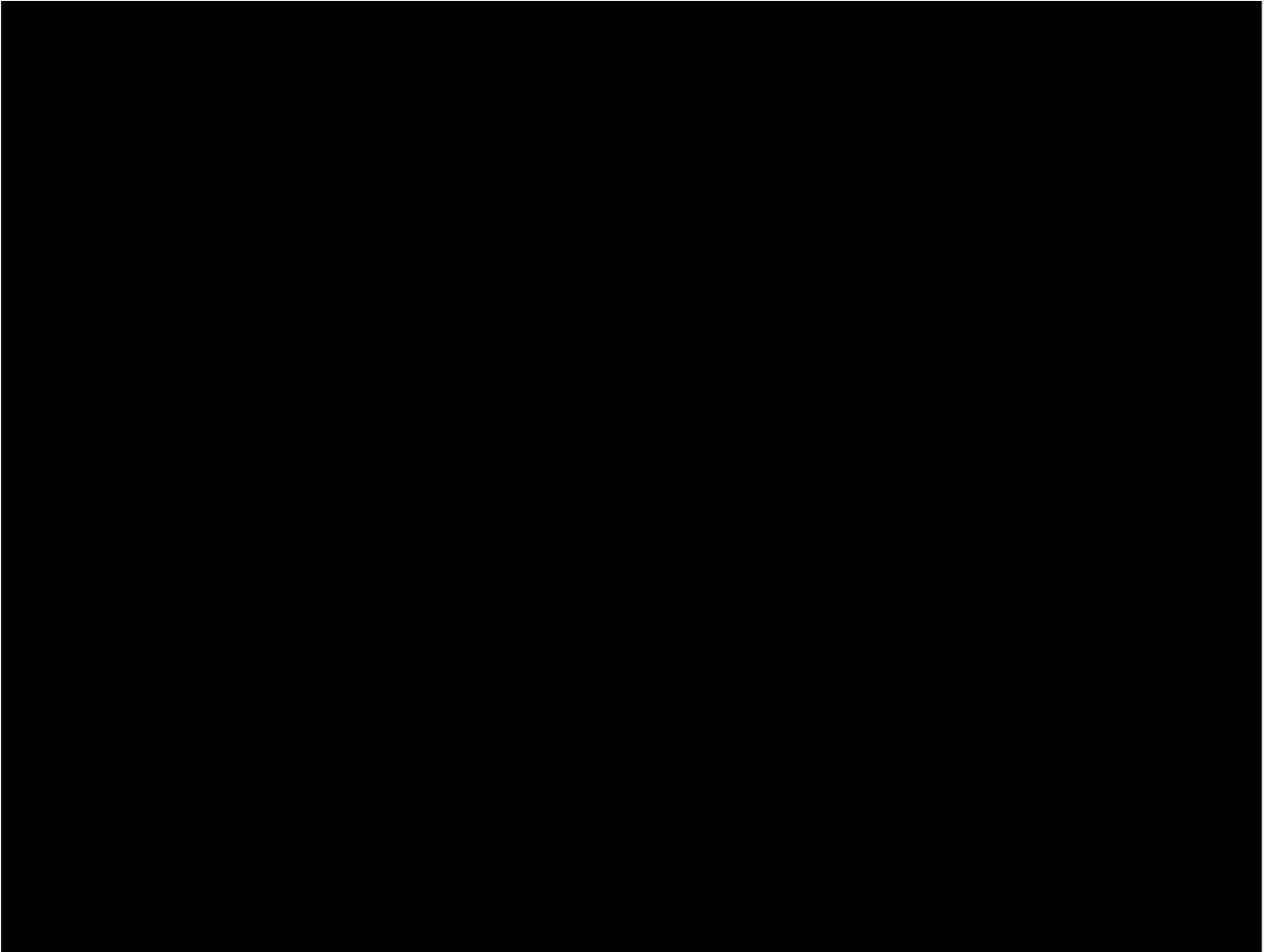
**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**



## **Monitoring Questions**

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.





Local Plan <localplan@hillington.gov.uk>

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## Local Plan part 2

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26 October 2015 at 13:42

To: "localplan@hillington.gov.uk" <localplan@hillington.gov.uk>

Good afternoon,

I have just had a good look at the future plan also the dvd and I do not have any comments to add, all issues look realistic.

Regards

Ian

TRA Chair Person Cobden Close.



Local Plan <localplan@hillington.gov.uk>

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## Publication of Proposed Changes to the Local Plan Part 2

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Richard Ford [REDACTED]  
To: "localplan@hillington.gov.uk" <localplan@hillington.gov.uk>

27 October 2015 at 09:03

Dear Planning Policy Team,

### Publication of Proposed Changes to the Local Plan Part 2

Thank you for inviting Runnymede Borough Council to comment on the above.

I am pleased to advise that we have no comments to make.

Please do not hesitate to contact me if any clarification is required.

Kind regards,

R. Ford

Richard Ford | Policy and Strategy Manager | Runnymede Borough Council

[REDACTED]



Local Plan <localplan@hillington.gov.uk>

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## local plan representation

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**Derek McCall** [REDACTED]

26 October 2015 at 17:17

Reply-To: Derek McCall [REDACTED]

To: localplan@hillington.gov.uk

Sirs—Thank you for the invitation to be selected to comment on the Local Plan Part 2. However, as both my wife and I will soon be ninety years old, we both think it would be more appropriate to select someone with a stronger reason to comment on the future plans than we have, so would you kindly give a younger person who has a bigger stake in the future a chance to make comments, as someone who will have a real interest in such long-term planning. Yours faithfully, D. McCall.



# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |                                |              |  |
|----------------------------|--------------------------------|--------------|--|
| Title                      | Mr                             |              |  |
| First name                 | Matt                           |              |  |
| Last Name                  | Dodds                          |              |  |
| Organisation (if relevant) | Herts and Middx Wildlife Trust |              |  |
| Unit                       |                                | House number |  |
| House name                 |                                |              |  |
| Address 1                  |                                |              |  |
| Address 2                  |                                |              |  |
| Town                       |                                |              |  |
| County                     |                                |              |  |
| Postcode                   |                                |              |  |
| Telephone                  |                                |              |  |
| Email                      |                                |              |  |

| 2. Agent's Name and Address (if applicable) |  |              |  |
|---|--|--------------|--|
| Title                                       |  |              |  |
| First name                                  |  |              |  |
| Last name                                   |  |              |  |
| Company                                     |  |              |  |
| Unit  |  | House number |  |
| House name                                  |  |              |  |
| Address 1                                   |  |              |  |
| Address 2                                   |  |              |  |
| Town  |  |              |  |
| County                                      |  |              |  |
| Postcode                                    |  |              |  |
| Telephone                                   |  |              |  |
| Email                                       |  |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |   |
|-------------------------------|---|
| Policy number;                | DMEI7 Biodiversity Protection and Enhancement |
| Paragraph number;             | 6.26 – 6.29                                   |
| Table or figure number; or    |   |
| Map number (Atlas of Changes) |   |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes | No |
|---|-----|----|
| Sound?  |     | X  |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? |     |    |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                                     |   |
|--------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/>            | It is not consistent with national policy |



**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

NPPF and this draft local plan carry within themselves a desire to achieve no net loss and where possible net gains or enhancements to biodiversity. If this phrase is to mean anything, this local plan should set out exactly how the biodiversity value of any given site will be measured. This is vitally important to ensure that the planning system is fair, objective, scientifically defensible and repeatable in regards to its consideration of biodiversity. Without stating the mechanism by which ecological value will be gauged, the process becomes subjective, inconsistent and frequently tokenistic. Specification of the mechanism by which this shall be determined is therefore the key to this aspiration. The most appropriate method of quantifying biodiversity is the Biodiversity Impact Calculator, developed and endorsed by DEFRA, Natural England and the Environment Bank, amongst others. This metric is designed to assign an ecological score to all pre development sites, based on habitat quality, which must then be equalled or exceeded by the development. The value of a site is calculated by considering the area in relation to the inherent ecological value of habitats present. Habitats of higher value (e.g. scrub, semi improved grassland) will therefore generate a proportionately higher score than sites of low value (hardstanding). This system is not designed to be applied to priority habitats which should not be developed except in exceptional circumstances as set out in NPPF. Ecological units can be delivered on or offsite to enable flexibility and maximise ecological gains. The use of the metric as an appropriate mechanism to determine no net loss and where possible net gain has been upheld by the Inspector and Secretary of State in planning decisions (e.g. Application by William Kendrick and Sons Ltd. – Land at Stretton Croft, Burbage LE10 3JB: Application ref: R11/0239). It has also been explicitly referred to as the stated method to determine ecological value in approved local and neighbourhood plans, as endorsed by the Examiner (e.g. Haddenham, Marsh Gibbon, Wing, Cheddington).

In order to translate this into the LB Hillingdon LP the following changes are recommended (suggested changes in red):

#### **BIODIVERSITY PROTECTION AND ENHANCEMENT**

6.26 Policies EM1 and EM7 in Hillingdon's Local Plan Part 1 aim to protect the Council's strategic nature conservation sites. These sites are significant in helping to protect and enhance the Borough's biodiversity value. However, it is also appropriate to **consider the value of local sites that may not carry designations when making planning decisions**, including open spaces and gardens. **N.B. NPPF seeks to conserve and enhance biodiversity, not just priority habitats. These help to provide resources for the biodiversity of the Borough and** increase the permeability of the urban environment for wildlife.

6.27 All development proposals should ensure **no net loss to biodiversity** and aspire to include biodiversity enhancement measures **wherever possible**. The Council is particularly concerned by the loss of habitats that support non-protected species. **The**

mechanism by which no net loss will be measured will be the DEFRA and Natural England derived Biodiversity Impact Calculator (BIC Environment Bank 2015 or as amended). All development will be expected to show a neutral to positive ecological unit score. The Council recognises the importance of all features that support biodiversity, not just priority habitats, and will seek to retain and enhance as much habitat as possible on-site, in accordance with the requirements of the calculator, for any given site. Where required, specific areas of development sites will be allocated to wildlife habitat creation accompanied by a clear, resourced, ecological management plan. Only as a last resort will the Council seek off-site compensation. If no net loss cannot be achieved then the Council will refuse the planning application.

6.28 It is important that planning decisions are appropriately informed by the right level of survey and information on ecological features. The Council will apply Natural England's standing advice at the validation stage. Applications will only be validated if they have the appropriate information. Where initial assessments recommend further surveys, these will be expected to be provided as part of a planning submission. All ecological information submitted should adhere to nationally accepted best practise survey standards and be consistent with the British Standard: BS 42020:2013 Biodiversity – Code of practise for planning and development.

6.29 Much of the urban wildlife of the Borough is dependent on the built environment for nesting and roosting. Buildings which front productive habitat e.g. green space or aquatic corridors, will be expected to provide suitable features for these species. Therefore features such as Swift boxes and bat tubes should be integrated into the brickwork of appropriate development to ensure permanent, ongoing habitat provision.

#### Policy DMEI 7: Conservation and Enhancement of Biodiversity

A) All development must achieve no net loss and where possible net gains to biodiversity. Ecological impacts will be quantified by utilising the Biodiversity Impact Calculator (BIC). Development must demonstrate a neutral or positive ecological unit score. The design and layout of new development should retain and enhance existing features of biodiversity value within the site. Where loss of existing features of biodiversity value is unavoidable, replacement features of equivalent biodiversity value should be provided on-site. Where development is constrained and cannot provide high quality biodiversity enhancements on-site, then appropriate contributions will be sought to deliver off-site improvements through a legal agreement.

B) When required, ecological reports should conform to nationally accepted best practise survey standards and must be consistent with BS 42020 2013.

C) All development alongside, or that benefits from a frontage on to a main river or the Grand Union Canal will be expected to provide net gains to biodiversity.

D) Proposals that would be detrimental to the ecological value of sites designated for nature conservation will be resisted.

E) Buildings bordering green space or aquatic corridors should provide integrated features for wildlife within the built environment.

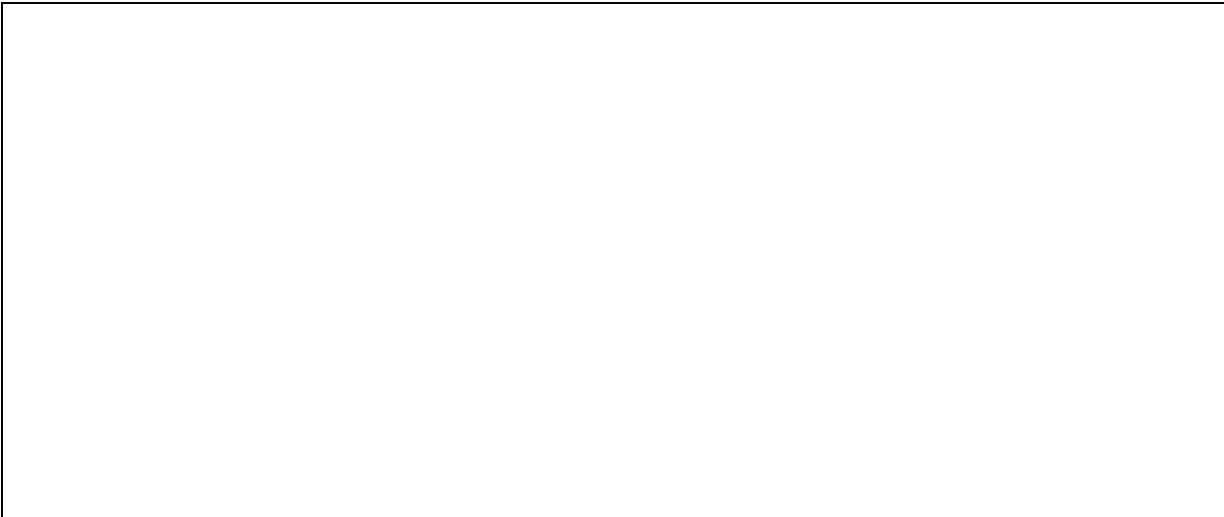
Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

The adoption of the BIC is the critical measure currently available to meaningfully achieve no net loss to biodiversity. However it is a relatively new mechanism and is often misunderstood or misrepresented. Therefore I would welcome the opportunity to present further justification for its application or to defend it against any criticism that may occur in an oral examination.



**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**



Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

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- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

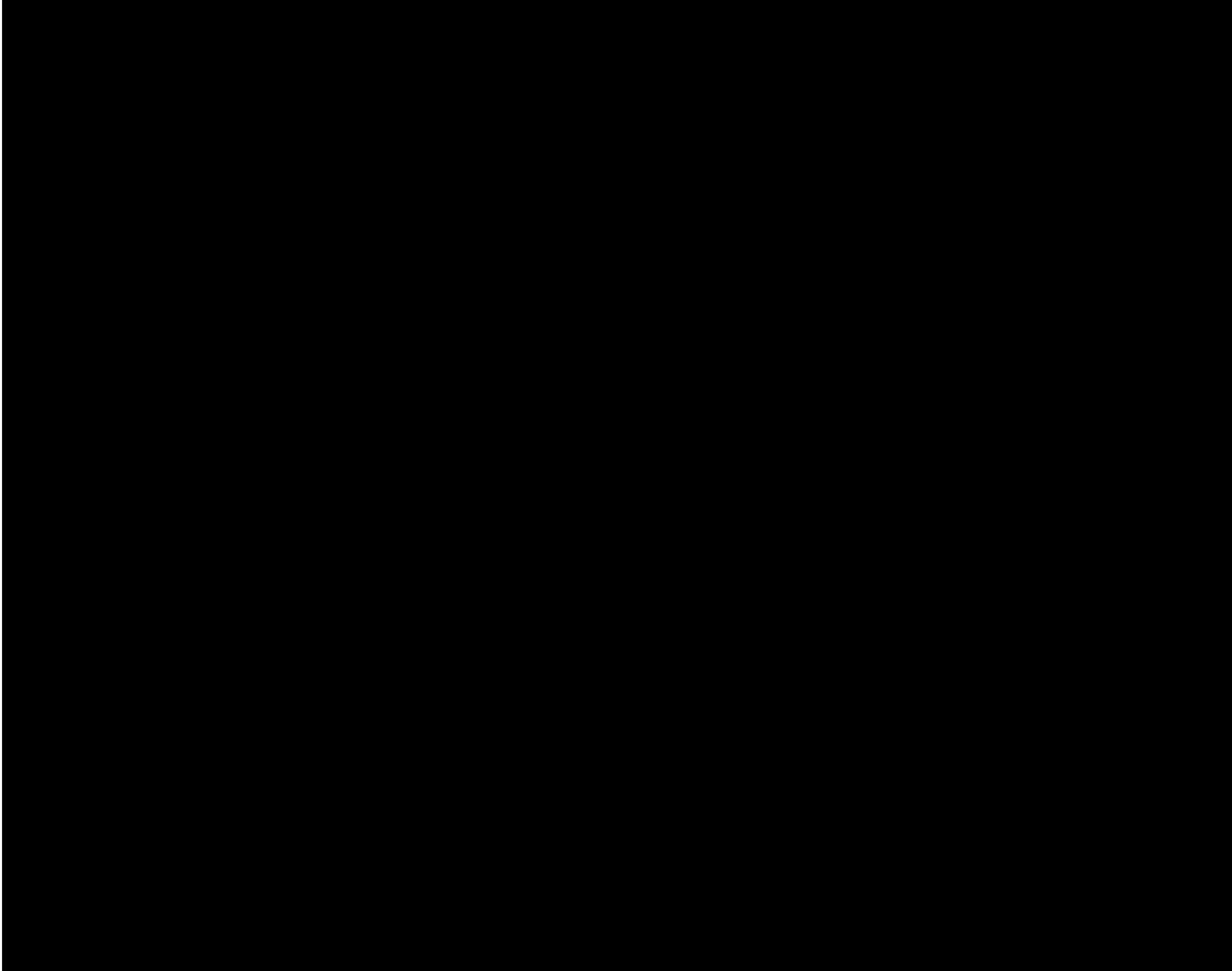
**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

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## **Monitoring Questions**

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Planning Policy Team  
3/1/02



Dear Sir/Madam

## LOCAL PLANNING

I've spent two hours, at Oxbridge Library, reading your local planning documents (incl. Part 2) and have the following views to be taken into consideration, before submission of the same.

### Chapter 6 - Air Quality.

You seem happy with the situation at present. In fact, where I live - North Hillingdon - the air quality is appalling. It's the worst in the Borough, apart from Heathrow. Every time I eat at home, my nose runs continually. I never experience this phenomenon elsewhere. My doctor confirms the cause.

### Chapter 7 - Community Infrastructure.

They say it's "deficient". You say it's "OK". Is it?

### RAF Northolt

You refer to "Commercial movements are currently restricted to quieter aircraft." This is not true. Recently, some are

louder than they used to be (the turned-up wing tip type). In my garden, with earphones on, one cannot hear anything except some of the commercial jet aircraft, when taking off. Even indoors, it's very loud. Oak Farm Estate is a residential area and very noisy, due to these aircraft, which are to be increased in flight frequency. We need less commercial flights, not more.

### Environment

You write of "High quality pedestrian street environment". In fact, the pavements in many parts of North Hillingdon are deplorable, e.g. Herrick's Road, Sweetcroft Lane, the shops at the junction of Herrick's Rd and Long Lane, North Side and, outside G.M.C. car Showrooms.

Apart from the above, I think that your aims are very good. I've lived here since 1958 and am 82 years old. I'm interested in maintaining good standards in this Borough. Reduction of car traffic is essential.

Yours faithfully

THOMAS W.P. CROW



# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |         |
|----------------------------|---------|
| Title                      | Mr      |
| First name                 | Anthony |
| Last Name                  | Crane   |
| Organisation (if relevant) |         |
| Unit                       |         |
| House name                 |         |
| Address 1                  |         |
| Address 2                  |         |
| Town                       |         |
| County                     |         |
| Postcode                   |         |
| Telephone                  |         |
| Email                      |         |

| 2. Agent's Name and Address (if applicable) |              |  |
|---|--------------|--|
| Title                                       |              |  |
| First name                                  |              |  |
| Last name                                   |              |  |
| Company                                     |              |  |
| Unit  | House number |  |
| House name                                  |              |  |
| Address 1                                   |              |  |
| Address 2                                   |              |  |
| Town  |              |  |
| County                                      |              |  |
| Postcode                                    |              |  |
| Telephone                                   |              |  |
| Email                                       |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input checked="" type="checkbox"/> | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |     |
|-------------------------------|-----|
| Policy number;                |     |
| Paragraph number;             |     |
| Table or figure number; or    |     |
| Map number (Atlas of Changes) | 8.1 |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/>            | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

***I support the changes to map 8.1***





**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

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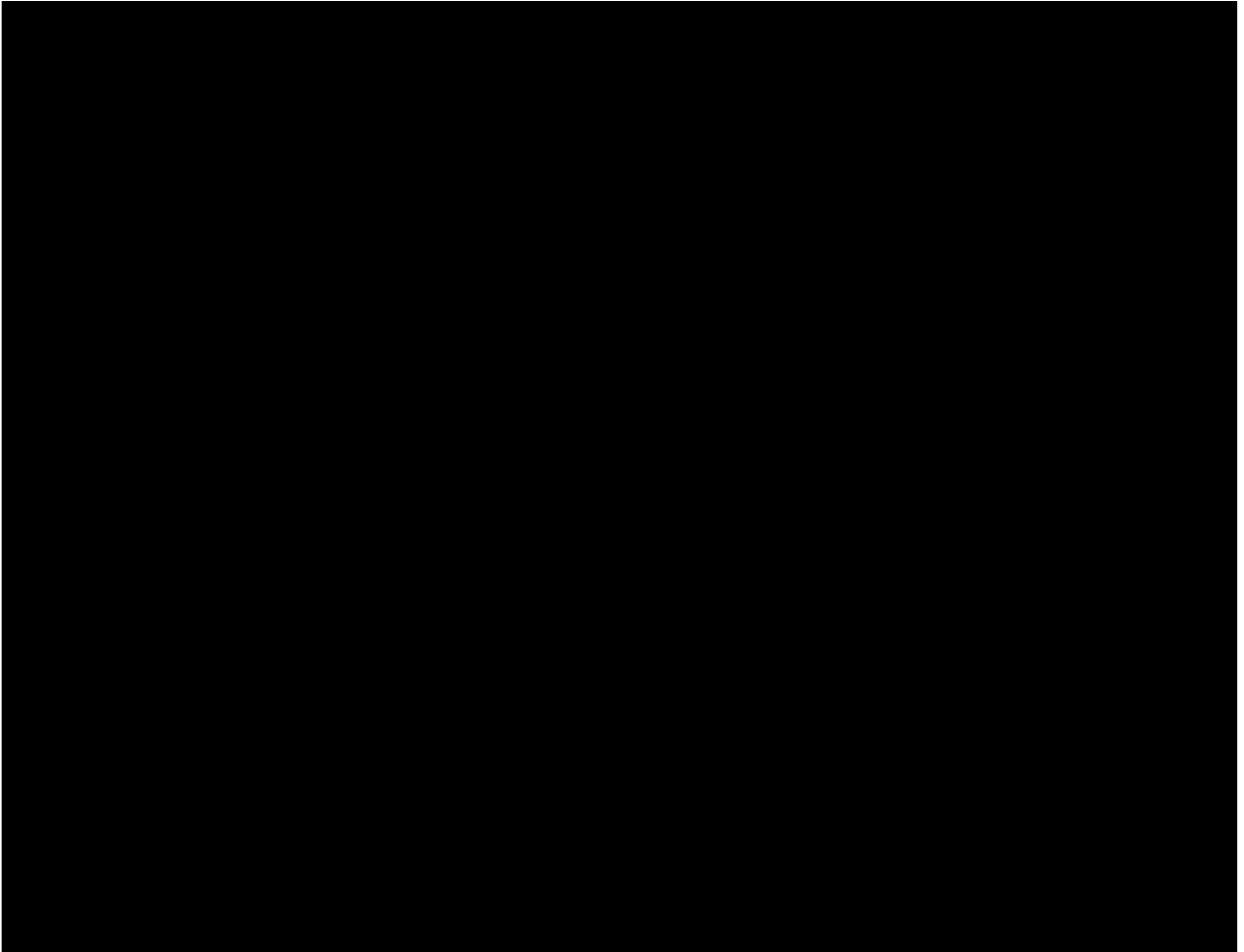
- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

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## **Monitoring Questions**

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Local Plan <localplan@hillington.gov.uk>

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## My comments

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Dave Robins [REDACTED]

23 November 2015 at 13:58

Reply-To: Dave Robins [REDACTED]

To: "localplan@hillington.gov.uk" <localplan@hillington.gov.uk>

West Drayton has seen a vast increase in population in recent years with the number of new building developments which are still going on. There has not been a commensurate improvement in the local infrastructure. It is strongly to be hoped that the proposed new development on the Coal yard site will address this. In particular we desperately need more medical facilities now that the anticipated new doctors' surgery in Yiewsley will not be happening. The town also lacks proper leisure facilities specially as compared to other parts of the borough. I needn't point out that we have recently lost a swimming pool. Health is a serious issue here what with deprivation, rising levels of obesity and of course poor air quality. As a priority we need a new doctors' surgery and a leisure centre.

Certainly West Drayton has started to regenerate in recent years with much improved shopping facilities but more needs to be done to maintain this improvement.





Planning Policy Team  
London Borough of Hillingdon  
3N/02 Civic Centre  
High Street  
Uxbridge  
Middlesex UB8 1UW

Sent via email: [localplan@hillingsdon.gov.uk](mailto:localplan@hillingsdon.gov.uk)

2 December 2015

Dear Sir/Madam,

**Response to Hillingdon Local Plan consultation on Local Plan: Part 2: Development Management Policies, Site Allocations and Designations and Policies Map.**

CPRE London is a membership based campaigning charity, a Branch of the national charity Campaign to Protect Rural England, concerned with protecting and enhancing London's Green Belt, Metropolitan Open Land, parks, green spaces and green infrastructure, and achieving compact, green urban communities to help prevent sprawl into the countryside.

**Summary**

- We support Hillingdon's Draft Local Plan insofar as it seeks to protect and enhance the green spaces and green infrastructure (such as green roofs) of Hillingdon.
- We support the increase of almost 70ha of land designated as Metropolitan Open Land (MOL)
- We are concerned this does not make up for the 100 ha of Green Belt lost largely as a result of the construction of Heathrow Terminal 5 and the further loss of 70ha of land forming links in green chains (Table 5.1 in Site Allocations and Designations). Given that this represents a net loss of 100ha of protected green space, further loss should be strongly resisted and replacement designations sought to ensure that open and green space provision meets the needs of Hillingdon's population now and in the future.
- We object to the removal of Green Belt designation at 470 Bath Road, Longford, Land at Stockley Road adjoining the Grand Union Canal, Hayes and Lake Farm School, Hayes
- We object to development proposals at the Former Allotments and Melrose Close Car Park, Burns Close
- We request clarification about the protection of the Green Belt at Master Brewer and Hillingdon Circus, Hillingdon
- We ask why two other sites shown to meet Green Belt criteria have not been designated.

## Development Management Policies (October 2015)

- Chapter 1: We support the edit for the summary of Chapter 6 on Environmental Protection and Enhancement. It is important that this distinction is made to ensure that Hillingdon's green infrastructure remains a good thing for Hillingdon's residents and environment.
- Chapter 5: Policy DMHB 14: We support inclusion of trees and landscaping policy. This will protect valued open spaces, particularly within urban areas.
- Policy DMEI 1: We support the emphasis on encouraging all major developments to 'incorporate living roofs and/or walls. However, **the council should clarify what constitutes "suitable justification" for a developer to *not* incorporate living roofs and/or walls.**
- Policy DMEI 4: CPRE London supports this policy against inappropriate development in the Green Belt and MOL. We look forward to seeing this being given due weight in planning decisions.

## Site Allocations and Designations

### Chapter 3: New Homes:

- We support the fact that the land to the rear of 119-137 Charville Lane, Hayes is no longer proposed for housing development.
- We also support the provisions in the Former Coal Depot site allocation that aim to conserve and enhance the Beeches Nature Conservation Site.
- Policy SA12: Former Allotments and Melrose Close Car Park, Burns Close Whilst this site is not in itself currently designated, this green space seems to be well used by the local community. The council should be seeking to bring these allotments back into full use, as allotments (whilst there appears to be empty plots in this particular area it could possibly help to alleviate shortfalls elsewhere in the borough), to enhance them for their community and environmental benefits. As in the purpose of chapter 6 of the Development Management Policies Document, **the Council should ensure that this green space is protected and enhanced - not allocated for housing developments.**
- Policy SA14: Master Brewer and Hillingdon Circus, Hillingdon It is unclear exactly what the plans for this site actually are. On the one hand the document states that any development will "reinforce and enhance the green belt landscape", "Improve access to Freezeland Covert to promote open space of recreational value" and "enhance the ecology and wildlife interest of the site". It acknowledges the Green Belt status and proposes additional designation as Nature Conservation Site of Metropolitan or Borough Grade 1 Importance. On the other hand, it seems to acknowledge that some of the allocated mixed use development will occur within the green belt (stating "development within the green belt should"...). Extant planning permission exists for a mixed use proposal on the Master Brewer Site, led by Tesco, which aimed to 'secure off site landscaping enhancements to provide a new publicly accessible open space with an area of approximately 5 hectares' (application numbers: 4266/APP/2014/519 and 4266/APP/2014/518). However, in October 2015 Tesco sold this site to a property developer<sup>1</sup>. On the Borough Council's website the status of these planning applications is undecided; but, on the local plan document they are described as Extant. **The Council should clarify the status of planning applications at this site, any issues relating to the sale by**

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<sup>1</sup> <http://www.bbc.co.uk/news/business-34528959>

Tesco of the site and should state clearly that there will be no 'inappropriate development' within the Green Belt and that the open space will still be protected and enhanced in line with the Council's own proposed policies.

#### Chapter 5: Green Belt, Metropolitan Open Land; Green Chains and Nature conservation sites

We note that no major removals of Green Belt designation are planned following the Green Belt review and that there are a significant number of additions to Green Belt and MOL (Para 5.7). However, even minor adjustments must meet the same strict criteria for de-designation and CPRE London objects to a number of deletions as follows:

- 470 Bath Road, Longford We object to the removal of protections at 470 Bath Road. Despite not being found to meet any of the criteria for designation as Green Belt, the area still forms part of London's green chain, in particular in its being directly adjacent to the River and **this site should be designated instead as Metropolitan Open Land.**
- Land at Stockley Road adjoining the Grand Union Canal, Hayes We object to the removal of protections on the land at Stockley Road. The Green Belt Review states that this site continues to fulfil its function as part of the wildlife corridor therefore **the site should instead be designated as Metropolitan Open Land**, in addition to the proposed Green Chain designation, to give it the same protection from development.
- Lake Farm School, Hayes We object to the removal of playing fields from Green Belt. We acknowledge that the removal of Green Belt designation at this site accounts for the (controversial) building of Lake Farm School on the site however there is no reason to include the playing fields in the area to be removed from Green Belt. Also, the playing fields still fulfil the 5<sup>th</sup> criterion of encouraging urban regeneration as the removal of the Green Belt designation increases the threat to the green space's future. **The boundary for this proposal should be changed so that a line closer to the built up area of the school is used.** This would still provide a defensible boundary and ensure that the playing fields - an important facility at the school - remain protected. This is particularly important given that the selling off of playing fields for development continues apace in London.

#### The 2013 Green Belt Review

CPRE London supports extensions to areas of Green Belt. However there are two sites which met criteria for designation in the Green Belt Review but which have not been taken forward to this stage of the local plan. These sites should be given Green Belt status to help reduce the net loss.

- Ruslip Depot, Austins Lane, Ickenham The Green Belt review found that this area of land met one of the Green Belt criteria however but is not included as new Green Belt because of concerns that it would limit future railway development. However, should railway expansion be needed, this could be addressed as and when needed using 'exceptional circumstances' justification. The constraint the designation provides is not in itself a reason to prevent the designation of green belt land. Therefore, **this land should be designated as Green Belt.**

- Windsor Avenue Allotments, North Hillingdon The Green Belt review found that the site met one of the criteria, however then states that it would 'not provide any green belt function'. By assisting urban regeneration, the designation of this site would help to ensure better urban planning and green space protection. The site is recognised as a public allotment site, affording some protections, but this is not a reason to exclude it from becoming Green Belt. Therefore, **this land should be designated as Green Belt.**

Yours faithfully

Rebecca Pullinger

Green Belt Campaigner  
CPRE London



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| 1. Name and Address        |  |
|----------------------------|--|
| Title                      | Mr   |
| First name                 | Keith  |
| Last Name                  | Saunders   |
| Organisation (if relevant) | Yiewsley & West Drayton Town Centre Action Group |
| Unit                       |  |
| House name                 |  |
| Address 1                  |  |
| Address 2                  |  |
| Town                       |  |
| County                     |  |
| Postcode                   |  |
| Telephone                  |  |
| Email                      |  |

| 2. Agent's Name and Address (if applicable) |              |  |
|---|--------------|--|
| Title                                       |              |  |
| First name                                  |              |  |
| Last name                                   |              |  |
| Company                                     |              |  |
| Unit  | House number |  |
| House name                                  |              |  |
| Address 1                                   |              |  |
| Address 2                                   |              |  |
| Town  |              |  |
| County                                      |              |  |
| Postcode                                    |              |  |
| Telephone                                   |              |  |
| Email                                       |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2        |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|--------------------------|-----------------------------------|--|---|
| <input type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| X                        | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/> | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |          |
|-------------------------------|----------|
| Policy number;                | SA 37    |
| Paragraph number;             |          |
| Table or figure number; or    | Page 107 |
| Map number (Atlas of Changes) |          |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes | No                       |
|---|-----|--------------------------|
| Sound?  | X   | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | X   | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |



**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

***The Yiewsley and West Drayton Town Centre Action Group, totally support the Change of use of the Former Coal Depot in Tavistock Road from IBA use to Mixed Use Development, and feel that it will enhance the area in general, and would hope that this welcome change goes through unopposed.***

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|   |   |
|---|---|
| X | <b>No, I do not want to participate in the oral examination</b> |
|   | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
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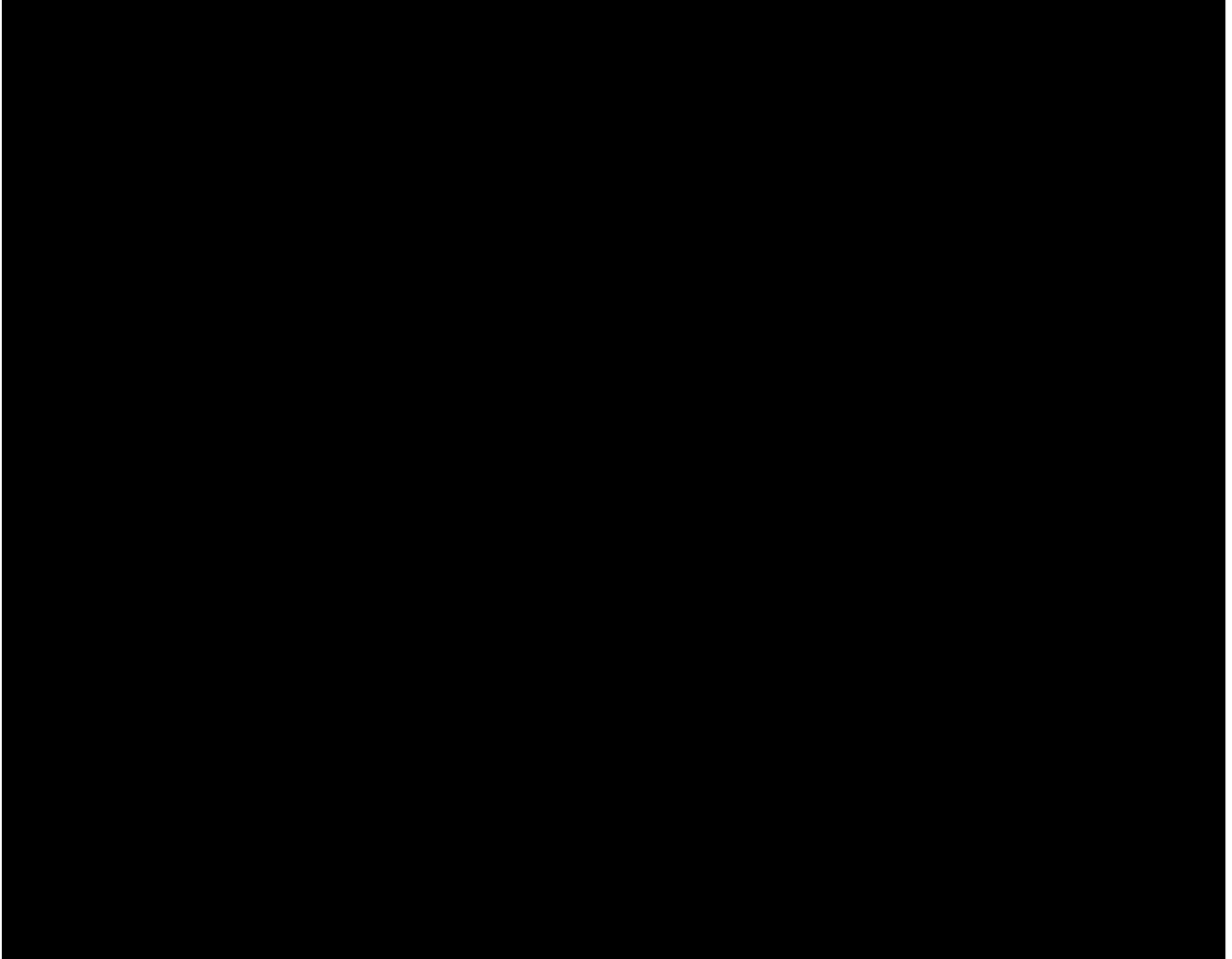
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| 1. Name and Address        |            | 2. Agent's Name and Address (if applicable) |              |  |
|----------------------------|------------|---|--------------|--|
| Title                      | COUNCILLOR | Title                                       |              |  |
| First name                 | JANET      | First name                                  |              |  |
| Last Name                  | SWEETING   | Last name                                   |              |  |
| Organisation (if relevant) | COUNCIL    | Company                                     |              |  |
| Unit                       |            | Unit  | House number |  |
| House name                 |            | House name                                  |              |  |
| Address 1                  |            | Address 1                                   |              |  |
| Address 2                  |            | Address 2                                   |              |  |
| Town                       |            | Town  |              |  |
| County                     |            | County                                      |              |  |
| Postcode                   |            | Postcode                                    |              |  |
| Telephone                  |            | Telephone                                   |              |  |
| Email                      |            | Email                                       |              |  |

## PART B - Your responses

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Q1. I am commenting on proposed changes to: *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

Q2. Please indicate the Proposed Change on which you wish to comment:

|                               |      |
|-------------------------------|------|
| Policy number;                | DMC1 |
| Paragraph number;             | 7.5  |
| Table or figure number; or    |      |
| Map number (Atlas of Changes) |      |

Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/>            | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input type="checkbox"/>            | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The loss of any existing community infrastructure in areas of significant housing development and increased population should not be allowed. Any sites which are currently used for community activities or have a covenant restricting it to community use should be protected.

In addition, the Council should identify new sites for community use in areas which have or are experiencing or are planned to experience significant population increases as evidenced by sites identified for new housing within the Local Plan or have already received planning permission. The Local Plan Part 2 is not sound as it has taken no account of significant development in undertakes searches for additional health, school and other community assets within these areas.

Please continue on a separate sheet if necessary

*New wording: -*

*All community facilities and sites where additional community facilities could be delivered should be protected in those areas which have significant increases in housing development and population growth*

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
(Please tick appropriate box)

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

*I represent an area of the borough (West Drayton) as a local councillor and have seen over 2000 additional properties built in this ward over the last few years, and with more to come. The area has seen no additional community facilities provided for the significant increases to this ward's population, and with no indication in the Local Plan Part 2 that sites for such additional facilities such as new schools, health facilities, increased library capacity, advice services are planned. Also there is no protection for existing community sites, no protection for facilities with a community covenant attached.*

The current poor provision of community infrastructure in West Drayton is of considerable local concern. The Local Plan Part 2 gives no indication that the Council is putting the residents of West Drayton first in this respect.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

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## **PART C - Progress of the Local Plan Part 2**

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|----------------------------|--------------|--|--|
| Title                      | COUNCILLOR   |  |  |
| First name                 | JANET        |  |  |
| Last Name                  | SWEETING     |  |  |
| Organisation (if relevant) |              |  |  |
| Unit                       | House number |  |  |
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| Telephone                  |              |  |  |
| Email                      |              |  |  |

| 2. Agent's Name and Address (if applicable) |              |  |  |
|---|--------------|--|--|
| Title                                       |              |  |  |
| First name                                  |              |  |  |
| Last name                                   |              |  |  |
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| Address 1                                   |              |  |  |
| Address 2                                   |              |  |  |
| Town  |              |  |  |
| County                                      |              |  |  |
| Postcode                                    |              |  |  |
| Telephone                                   |              |  |  |
| Email                                       |              |  |  |

**PART B - Your responses**

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** (please tick relevant box)

| Local Plan Part 2                   |                                   |
|-------------------------------------|-----------------------------------|
| <input type="checkbox"/>            | Development Management Policies   |
| <input checked="" type="checkbox"/> | Site Allocations and Designations |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| Technical Reports (answer Q1 & Q9 only) |   |
|---|---|
| <input type="checkbox"/>                | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                | Consultation Statement                          |
| <input type="checkbox"/>                | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                                |
|-------------------------------|--------------------------------|
| Policy number;                | COMMUNITY INFRASTRUCTURE SITES |
| Paragraph number;             | SECONDARY SCHOOLS              |
| Table or figure number; or    | PAGE 238/239                   |
| Map number (Atlas of Changes) | PARAGRAPH 7.8 - 7.11           |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** (please tick)

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** (Tick relevant box/es)

|                          |                                     |
|--------------------------|-------------------------------------|
| <input type="checkbox"/> | It has not been positively prepared |
| <input type="checkbox"/> | It is not justified                 |

|                                     |   |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/>            | It is not consistent with national policy |

Please continue on a separate sheet if necessary

The new wording should read.  
6 The Council will undertake a search for a site for a new secondary school for Keensley West Drayton to meet the areas growing pupil population'

Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?  
(Please tick appropriate box)

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

I am ward councillor for West Drayton ward and have had many representations from local people for a new secondary school to be provided in this area of significant population growth.

Please note Incorrect information on page 243. The school is not 5FE Junior it had to be changed in 3FE St Martin's Primary although planning permission was granted for 5FE Junior School!

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

although this has not been included in Local Plan Pt 2 info

The Council has identified the need for 5FE of additional secondary school places are required in the south of the borough. This will require the identification of a new site in this area and particularly in West Drayton and Yewley which have experienced the highest numbers of additional residences built over the last few years. Residents are asking where their children will be going to school at age 11. The Council needs to look for a site for a new school in this area before all available sites are built on. Existing local secondary schools, Stockley Academy and Harlington are both on inadequate sites for expansion. The new primary school was not built in the correct place in West Drayton another mistake would be unfortunate.

[Empty rectangular box for comments]

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

[Large empty rectangular box for comments]

Please continue on a separate sheet if necessary



## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input type="checkbox"/>            | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input type="checkbox"/>            | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

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## Monitoring Questions

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### 1) What is your gender?

Male                       Female

### 2) To which age group do you belong?

under 15                                       25 – 44                                       65 – 85

15 - 24                                       45 - 64                                       85+

### 3) Do you consider yourself to be a disabled person?

No                                       Yes

**4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):**

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |



# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

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| 1. Name and Address        |            |              |  |
|----------------------------|------------|--------------|--|
| Title                      | COUNCILLOR |              |  |
| First name                 | JANET      |              |  |
| Last Name                  | SWEETING   |              |  |
| Organisation (if relevant) |            |              |  |
| Unit                       |            | House number |  |
| House name                 |            |              |  |
| Address 1                  |            |              |  |
| Address 2                  |            |              |  |
| Town                       |            |              |  |
| County                     |            |              |  |
| Postcode                   |            |              |  |
| Telephone                  |            |              |  |
| Email                      |            |              |  |

| 2. Agent's Name and Address (if applicable) |  |              |  |
|---|--|--------------|--|
| Title                                       |  |              |  |
| First name                                  |  |              |  |
| Last name                                   |  |              |  |
| Company                                     |  |              |  |
| Unit  |  | House number |  |
| House name                                  |  |              |  |
| Address 1                                   |  |              |  |
| Address 2                                   |  |              |  |
| Town  |  |              |  |
| County                                      |  |              |  |
| Postcode                                    |  |              |  |
| Telephone                                   |  |              |  |
| Email                                       |  |              |  |

**PART B - Your responses**

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** (please tick relevant box)

| Local Plan Part 2                   |                                   |
|-------------------------------------|-----------------------------------|
| <input type="checkbox"/>            | Development Management Policies   |
| <input checked="" type="checkbox"/> | Site Allocations and Designations |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| Technical Reports (answer Q1 & Q9 only) |   |
|---|---|
| <input type="checkbox"/>                | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                | Consultation Statement                          |
| <input type="checkbox"/>                | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                     |
|-------------------------------|---------------------|
| Policy number;                | SA 37 PAGES 107/108 |
| Paragraph number;             |                     |
| Table or figure number; or    |                     |
| Map number (Atlas of Changes) |                     |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** (please tick)

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** (Tick relevant box/es)

|                          |                                     |
|--------------------------|-------------------------------------|
| <input type="checkbox"/> | It has not been positively prepared |
| <input type="checkbox"/> | It is not justified                 |

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

I fully support the Council's suggested redesignation of the Coal Yard site Jewsey / West Drayton from a IBA to mixed use development with a proportion for community use.





## Monitoring Questions

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### 1) What is your gender?

Male                       Female

### 2) To which age group do you belong?

under 15                       25 – 44                       65 – 85  
 15 - 24                       45 - 64                       85+

### 3) Do you consider yourself to be a disabled person?

No                       Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

Please continue on a separate sheet if necessary

*New wording :-*

*The Council will seek to identify a site for a new healthcare hub in Yensley / West Drayton.*

*The Council will develop the old swimming pool site Yensley for community uses*

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
(Please tick appropriate box)

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

*An important issue raised by residents where I am a councillor (West Drayton)*

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

With the decision that no new Health Centre will be built on the old swimming pool site Yewlsley, it is now imperative that the Council identifies a new site for a Health Hub in Yewlsley/West Drayton which will need to increase healthcare capacity in this area which has seen significant increases to the area's population due to the thousands of new properties built in recent years. Currently patients have to wait up to 1 month to see a G.P and one surgery is reliant on locums. The Council must use its influence to identify a site for new healthcare capacity in its statutory capacities.

**PART B - Your responses**

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   |
|-------------------------------------|-----------------------------------|
| <input type="checkbox"/>            | Development Management Policies   |
| <input checked="" type="checkbox"/> | Site Allocations and Designations |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|--|---|
| <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |             |
|-------------------------------|-------------|
| Policy number;                |             |
| Paragraph number;             | 7.14 — 7.17 |
| Table or figure number; or    |             |
| Map number (Atlas of Changes) |             |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |
|--------------------------|-------------------------------------|
| <input type="checkbox"/> | It has not been positively prepared |
| <input type="checkbox"/> | It is not justified                 |

|                                     |   |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/>            | It is not consistent with national policy |





# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

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### PART A - Your details

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| 1. Name and Address        |              |  |  |
|----------------------------|--------------|--|--|
| Title                      | COUNCILLOR   |  |  |
| First name                 | JANET        |  |  |
| Last Name                  | SWEETING     |  |  |
| Organisation (if relevant) |              |  |  |
| Unit                       | House number |  |  |
| House name                 |              |  |  |
| Address 1                  |              |  |  |
| Address 2                  |              |  |  |
| Town                       |              |  |  |
| County                     |              |  |  |
| Postcode                   |              |  |  |
| Telephone                  |              |  |  |
| Email                      |              |  |  |

| 2. Agent's Name and Address (if applicable) |              |  |  |
|---|--------------|--|--|
| Title                                       |              |  |  |
| First name                                  |              |  |  |
| Last name                                   |              |  |  |
| Company                                     |              |  |  |
| Unit  | House number |  |  |
| House name                                  |              |  |  |
| Address 1                                   |              |  |  |
| Address 2                                   |              |  |  |
| Town  |              |  |  |
| County                                      |              |  |  |
| Postcode                                    |              |  |  |
| Telephone                                   |              |  |  |
| Email                                       |              |  |  |

## Monitoring Questions

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### 1) What is your gender?

Male                       Female

### 2) To which age group do you belong?

under 15                                       25 – 44                                       65 – 85  
 15 - 24                                       45 - 64                                       85+

### 3) Do you consider yourself to be a disabled person?

No                                       Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |

## Returning your form

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**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                          |  |
|--------------------------|--|
| <input type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary



# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

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| 1. Name and Address        |                |
|----------------------------|----------------|
| Title                      | Mr             |
| First name                 | Ross           |
| Last Name                  | Anthony        |
| Organisation (if relevant) | Theatres Trust |
| Unit                       |                |
| House name                 |                |
| Address 1                  |                |
| Address 2                  |                |
| Town                       |                |
| County                     |                |
| Postcode                   |                |
| Telephone                  |                |
| Email                      |                |

| 2. Agent's Name and Address (if applicable) |              |  |
|---|--------------|--|
| Title                                       |              |  |
| First name                                  |              |  |
| Last name                                   |              |  |
| Company                                     |              |  |
| Unit  | House number |  |
| House name                                  |              |  |
| Address 1                                   |              |  |
| Address 2                                   |              |  |
| Town  |              |  |
| County                                      |              |  |
| Postcode                                    |              |  |
| Telephone                                   |              |  |
| Email                                       |              |  |



## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                            |
|-------------------------------|----------------------------|
| Policy number;                | DMCI 1 and supporting text |
| Paragraph number;             |                            |
| Table or figure number; or    |                            |
| Map number (Atlas of Changes) |                            |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

Whilst the Theatres Trust agrees with this proposed policy, we would recommend that all the references to social infrastructure/ community infrastructure/ community facilities, etc. are amended so they are one consistent phrase – e.g., just use community facilities.

We also recommend a definition for community facilities and suggest that an all-inclusive description is contained within the text for clarity and continuity, such as:  
*community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.*

This would obviate the need to provide examples and would cover the infrastructure as stated in item 70 of the National Planning Policy Framework which advises that to deliver the social, recreational and cultural facilities and services that the community needs, planning policies and decisions should plan for the use of shared space and guard against unnecessary loss of valued facilities. Also to ensure that established facilities and services are retained and able to develop for the benefit of the community.



**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | When the Local Plan Part 2 Plan has been submitted for independent examination.   |
| <input type="checkbox"/> | The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2. |
| <input type="checkbox"/> | The adoption of the Local Plan Part 2.  |

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### 1) What is your gender?

Male  Female

### 2) To which age group do you belong?

under 15  25 – 44  65 – 85  
 15 - 24  45 - 64  85+

### 3) Do you consider yourself to be a disabled person?

No  Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |



# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

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### PART A - Your details

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| 1. Name and Address        |                        | 2. Agent's Name and Address (if applicable) |                                    |  |
|----------------------------|------------------------|---|------------------------------------|--|
| Title                      | Mrs                    | Title                                       |                                    |  |
| First name                 | Sally                  | First name                                  |                                    |  |
| Last Name                  | Arnold                 | Last name                                   |                                    |  |
| Organisation (if relevant) | Planning Potential Ltd | Company                                     | Paddy Power Leisure Bookmakers Ltd |  |
| Unit                       |                        | Unit  | House number                       |  |
| House name                 |                        | House name                                  | C/O Agent                          |  |
| Address 1                  |                        | Address 1                                   |                                    |  |
| Address 2                  |                        | Address 2                                   |                                    |  |
| Town                       |                        | Town  |                                    |  |
| County                     |                        | County                                      |                                    |  |
| Postcode                   |                        | Postcode                                    |                                    |  |
| Telephone                  |                        | Telephone                                   |                                    |  |
| Email                      |                        | Email                                       |                                    |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   |
|-------------------------------------|-----------------------------------|
| <input checked="" type="checkbox"/> | Development Management Policies   |
| <input type="checkbox"/>            | Site Allocations and Designations |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|--|---|
| <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |      |
|-------------------------------|------|
| Policy number;                |      |
| Paragraph number;             | 3.20 |
| Table or figure number; or    |      |
| Map number (Atlas of Changes) |      |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |
|-------------------------------------|-------------------------------------|
| <input type="checkbox"/>            | It has not been positively prepared |
| <input checked="" type="checkbox"/> | It is not justified                 |

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

In our view paragraph 3.20, is not justified, as it is not founded on a robust and credible evidence base. Furthermore, the paragraph is not consistent with national policy or with the London Plan Town Centres SPG.

The overly onerous approach taken by the Council in relation to betting shops is not compliant with the spirit and aspirations of the NPPF or with guidance set out in the London Plan Town Centres SPG.

The policy therefore amounts to a conflict with Section 19 of the Planning and Compulsory Purchase Act 2004 and also conflicts with Part 4 Regulation 8 of the 2012 Town and Country Planning (Local Planning) (England) Regulations.

The text should therefore be removed and the paragraph re-worded, or as a minimum, significantly loosened to allow healthy competition between betting shops whilst also removing the unnecessary grouping of a variety of uses which are not intertwined.

A full explanation can be found in our letter of representation that has been submitted alongside this form.

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

The matter should be addressed and discussed with the Inspector at EiP.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

N/A

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |



|   |   |
|---|---|
| X | <b>The adoption of the Local Plan Part 2.</b> |
|---|---|

## Returning your form

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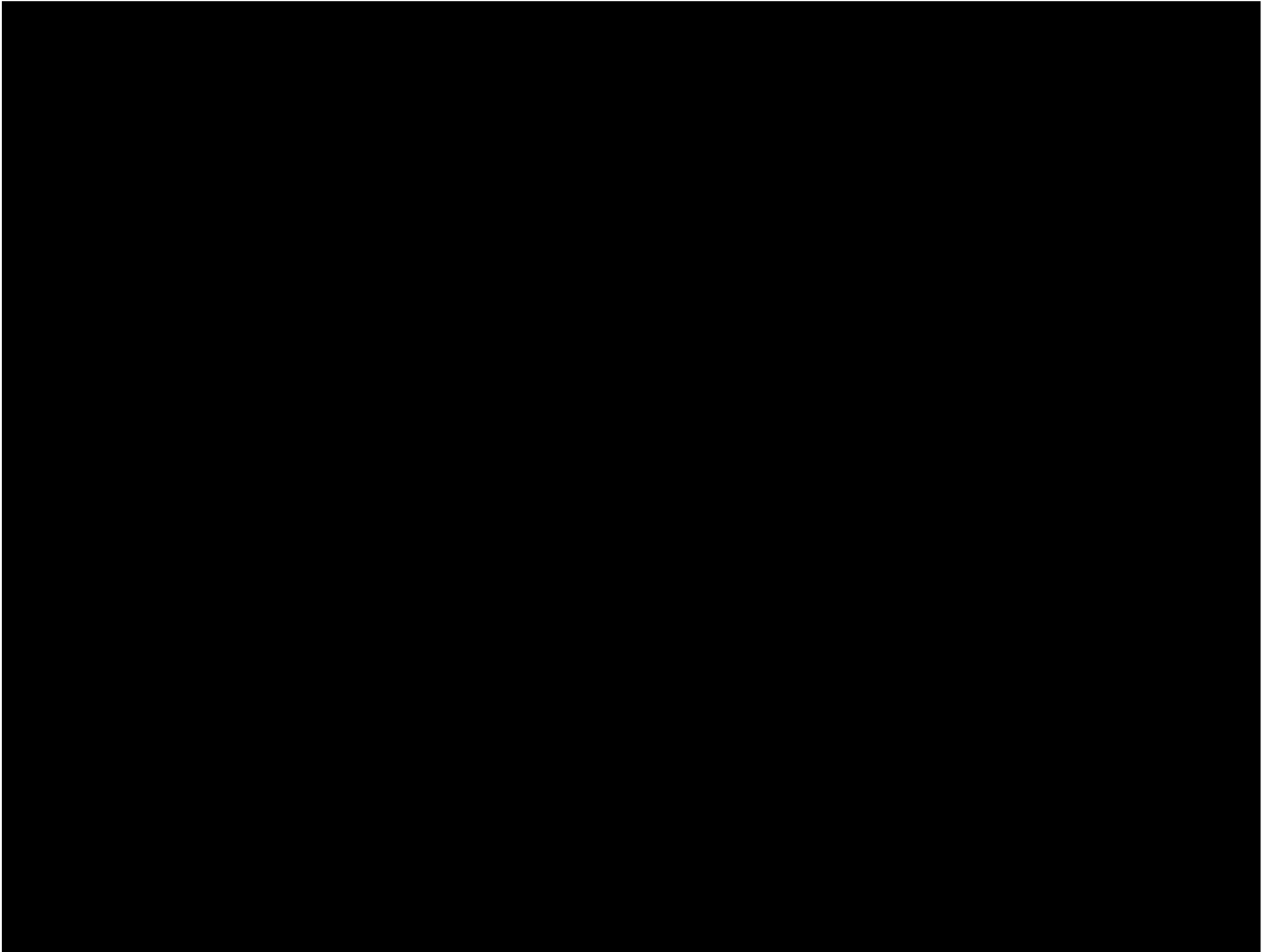
- **Email to:** [localplan@hillingsdon.gov.uk](mailto:localplan@hillingsdon.gov.uk), or
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**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## **Monitoring Questions**

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# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |                        |
|----------------------------|------------------------|
| Title                      | Mrs                    |
| First name                 | Sally                  |
| Last Name                  | Arnold                 |
| Organisation (if relevant) | Planning Potential Ltd |
| Unit                       |                        |
| House name                 |                        |
| Address 1                  |                        |
| Address 2                  |                        |
| Town                       |                        |
| County                     |                        |
| Postcode                   |                        |
| Telephone                  |                        |
| Email                      |                        |

| 2. Agent's Name and Address (if applicable) |                                    |
|---|------------------------------------|
| Title                                       |                                    |
| First name                                  |                                    |
| Last name                                   |                                    |
| Company                                     | Paddy Power Leisure Bookmakers Ltd |
| Unit  | House number                       |
| House name                                  | C/O Agent                          |
| Address 1                                   |                                    |
| Address 2                                   |                                    |
| Town  |                                    |
| County                                      |                                    |
| Postcode                                    |                                    |
| Telephone                                   |                                    |
| Email                                       |                                    |

## PART B - Your responses

Please complete Part B **for each representation** you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |      |
|-------------------------------|------|
| Policy number;                |      |
| Paragraph number;             | 3.21 |
| Table or figure number; or    |      |
| Map number (Atlas of Changes) |      |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/>            | It has not been positively prepared | <input type="checkbox"/>            | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

In our view paragraph 3.21, is not justified, as it is not founded on a robust and credible evidence base. Furthermore, the paragraph is not consistent with national policy or with the London Plan Town Centres SPG.

The overly onerous approach taken by the Council in relation to betting shops is not compliant with the spirit and aspirations of the NPPF or with guidance set out in the London Plan Town Centres SPG.

The policy therefore amounts to a conflict with Section 19 of the Planning and Compulsory Purchase Act 2004 and also conflicts with Part 4 Regulation 8 of the 2012 Town and Country Planning (Local Planning) (England) Regulations.

The text should therefore be removed and the paragraph re-worded, or as a minimum, significantly loosened to allow healthy competition between betting shops whilst also removing the unnecessary grouping of a variety of uses which are not intertwined.

A full explanation can be found in our letter of representation that has been submitted alongside this form.



**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

The matter should be addressed and discussed with the Inspector at EiP.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

N/A

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |

|   |   |
|---|---|
| X | <b>The adoption of the Local Plan Part 2.</b> |
|---|---|

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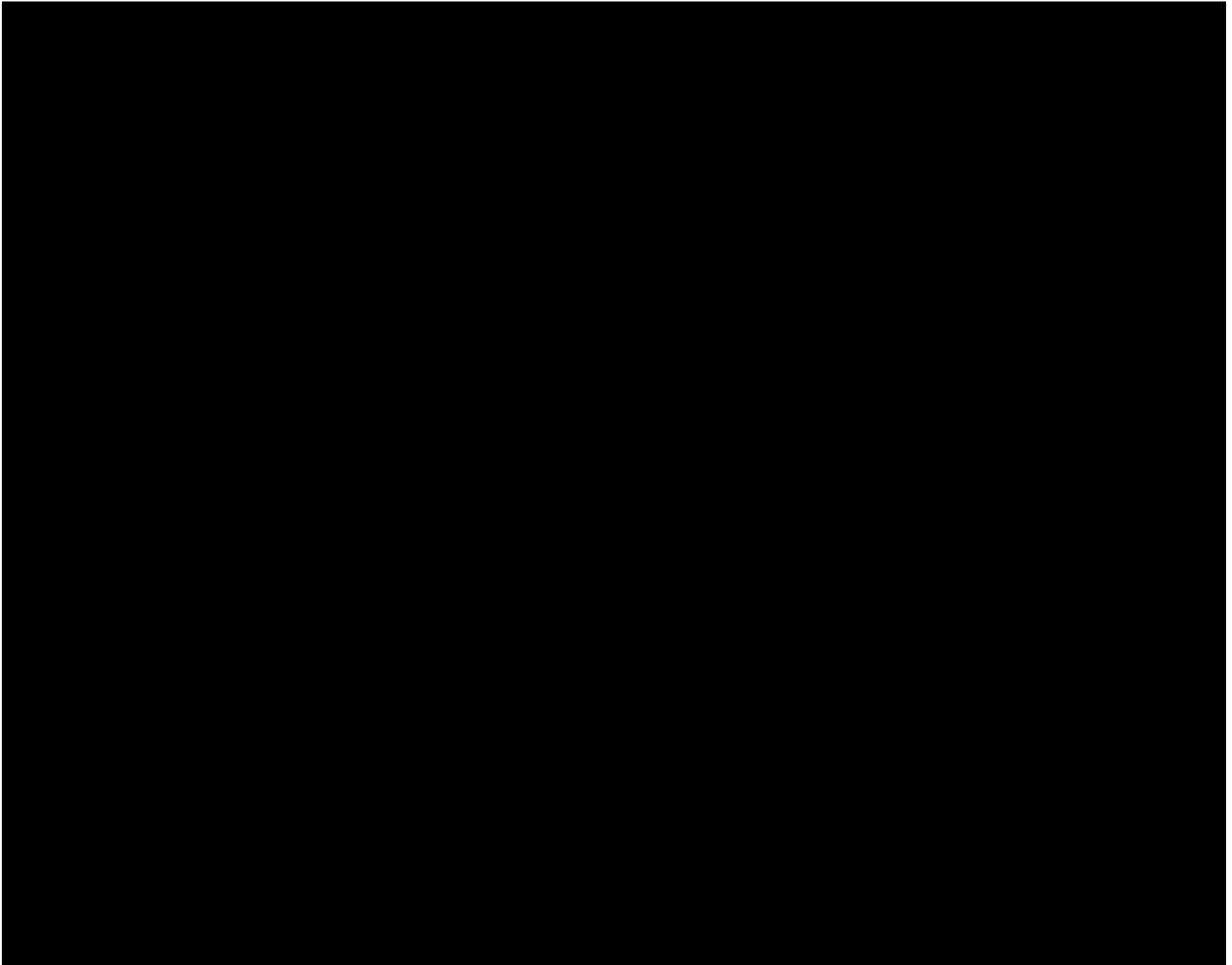
- **Email to:** [localplan@hillingsdon.gov.uk](mailto:localplan@hillingsdon.gov.uk), or
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# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |                        |              |  |
|----------------------------|------------------------|--------------|--|
| Title                      | Mrs                    |              |  |
| First name                 | Sally                  |              |  |
| Last Name                  | Arnold                 |              |  |
| Organisation (if relevant) | Planning Potential Ltd |              |  |
| Unit                       |                        | House number |  |
| House name                 |                        |              |  |
| Address 1                  |                        |              |  |
| Address 2                  |                        |              |  |
| Town                       |                        |              |  |
| County                     |                        |              |  |
| Postcode                   |                        |              |  |
| Telephone                  |                        |              |  |
| Email                      |                        |              |  |

| 2. Agent's Name and Address (if applicable) |                                    |              |  |
|---|------------------------------------|--------------|--|
| Title                                       |                                    |              |  |
| First name                                  |                                    |              |  |
| Last name                                   |                                    |              |  |
| Company                                     | Paddy Power Leisure Bookmakers Ltd |              |  |
| Unit  |                                    | House number |  |
| House name                                  | C/O Agent                          |              |  |
| Address 1                                   |                                    |              |  |
| Address 2                                   |                                    |              |  |
| Town  |                                    |              |  |
| County                                      |                                    |              |  |
| Postcode                                    |                                    |              |  |
| Telephone                                   |                                    |              |  |
| Email                                       |                                    |              |  |



## PART B - Your responses

Please complete Part B **for each representation** you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |      |
|-------------------------------|------|
| Policy number;                |      |
| Paragraph number;             | 3.22 |
| Table or figure number; or    |      |
| Map number (Atlas of Changes) |      |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/>            | It has not been positively prepared | <input type="checkbox"/>            | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

In our view paragraph 3.22, is not justified, as it is not founded on a robust and credible evidence base. Furthermore, the paragraph is not consistent with national policy or with the London Plan Town Centres SPG.

The overly onerous approach taken by the Council in relation to betting shops is not compliant with the spirit and aspirations of the NPPF or with guidance set out in the London Plan Town Centres SPG.

The policy therefore amounts to a conflict with Section 19 of the Planning and Compulsory Purchase Act 2004 and also conflicts with Part 4 Regulation 8 of the 2012 Town and Country Planning (Local Planning) (England) Regulations.

The text should therefore be removed and the paragraph re-worded, or as a minimum, significantly loosened to allow healthy competition between betting shops whilst also removing the unnecessary grouping of a variety of uses which are not intertwined.

A full explanation can be found in our letter of representation that has been submitted alongside this form.

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

The matter should be addressed and discussed with the Inspector at EiP.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

N/A

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |

|   |   |
|---|---|
| X | <b>The adoption of the Local Plan Part 2.</b> |
|---|---|

## Returning your form

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- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
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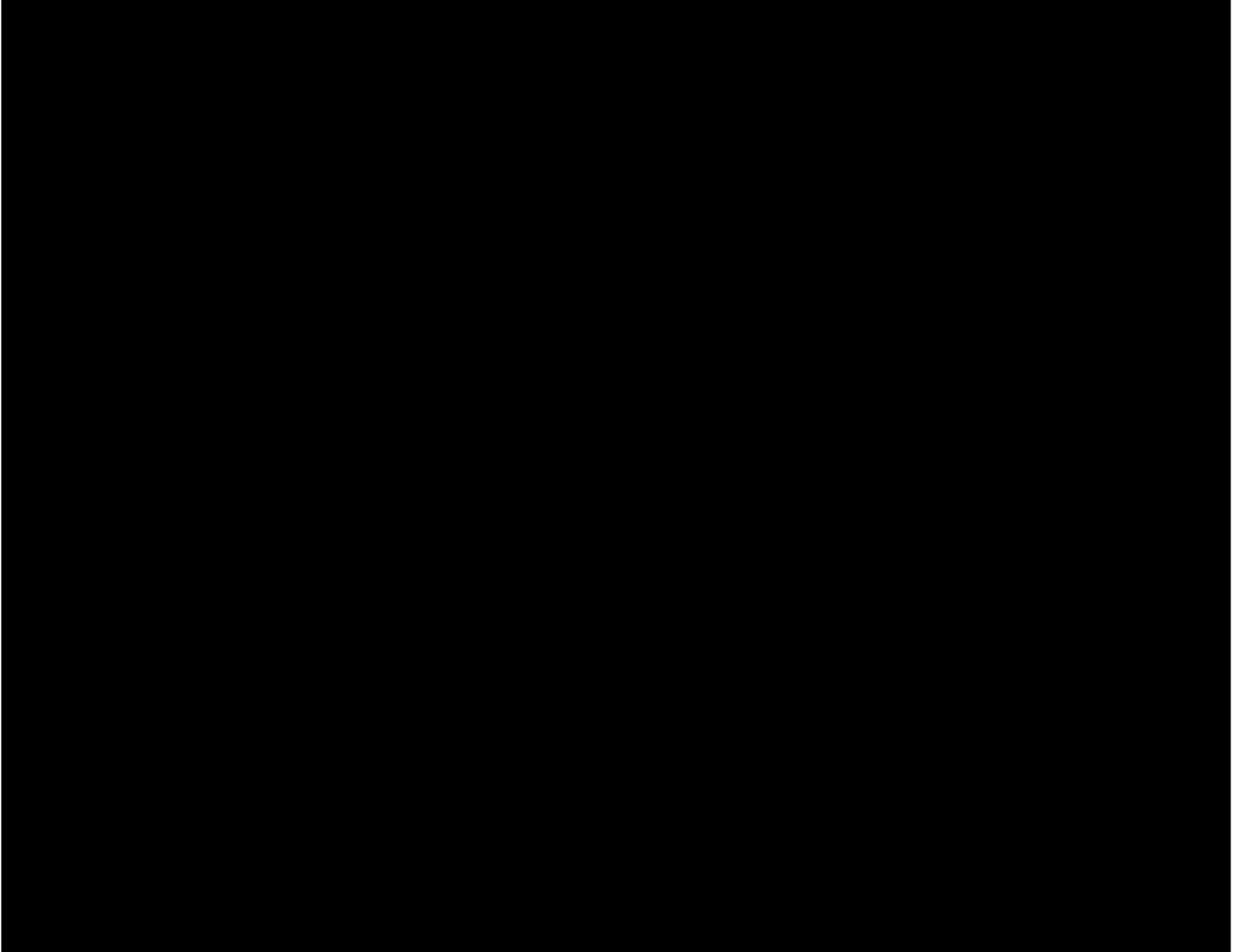
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# HILLINGDON

LONDON

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| 1. Name and Address        |                        | 2. Agent's Name and Address (if applicable) |                                    |  |
|----------------------------|------------------------|---|------------------------------------|--|
| Title                      | Mrs                    | Title                                       |                                    |  |
| First name                 | Sally                  | First name                                  |                                    |  |
| Last Name                  | Arnold                 | Last name                                   |                                    |  |
| Organisation (if relevant) | Planning Potential Ltd | Company                                     | Paddy Power Leisure Bookmakers Ltd |  |
| Unit                       |                        | Unit  | House number                       |  |
| House name                 |                        | House name                                  | C/O Agent                          |  |
| Address 1                  |                        | Address 1                                   |                                    |  |
| Address 2                  |                        | Address 2                                   |                                    |  |
| Town                       |                        | Town  |                                    |  |
| County                     |                        | County                                      |                                    |  |
| Postcode                   |                        | Postcode                                    |                                    |  |
| Telephone                  |                        | Telephone                                   |                                    |  |
| Email                      |                        | Email                                       |                                    |  |

## PART B - Your responses

Please complete Part B **for each representation** you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |   |
|-------------------------------|---|
| Policy number;                | DMTC 2 - Primary and Secondary Shopping Areas |
| Paragraph number;             |   |
| Table or figure number; or    |   |
| Map number (Atlas of Changes) |   |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/>            | It has not been positively prepared | <input type="checkbox"/>            | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

In our view policy DMTC 2, is not justified, as it is not founded on a robust and credible evidence base. Furthermore, the policy is not consistent with national policy or with the London Plan Town Centres SPG.

The overly onerous approach taken by the Council in relation to betting shops is not compliant with the spirit and aspirations of the NPPF or with guidance set out in the London Plan Town Centres SPG.

The policy therefore amounts to a conflict with Section 19 of the Planning and Compulsory Purchase Act 2004 and also conflicts with Part 4 Regulation 8 of the 2012 Town and Country Planning (Local Planning) (England) Regulations.

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*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
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N/A

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
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|   |   |
|---|---|
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|---|---|

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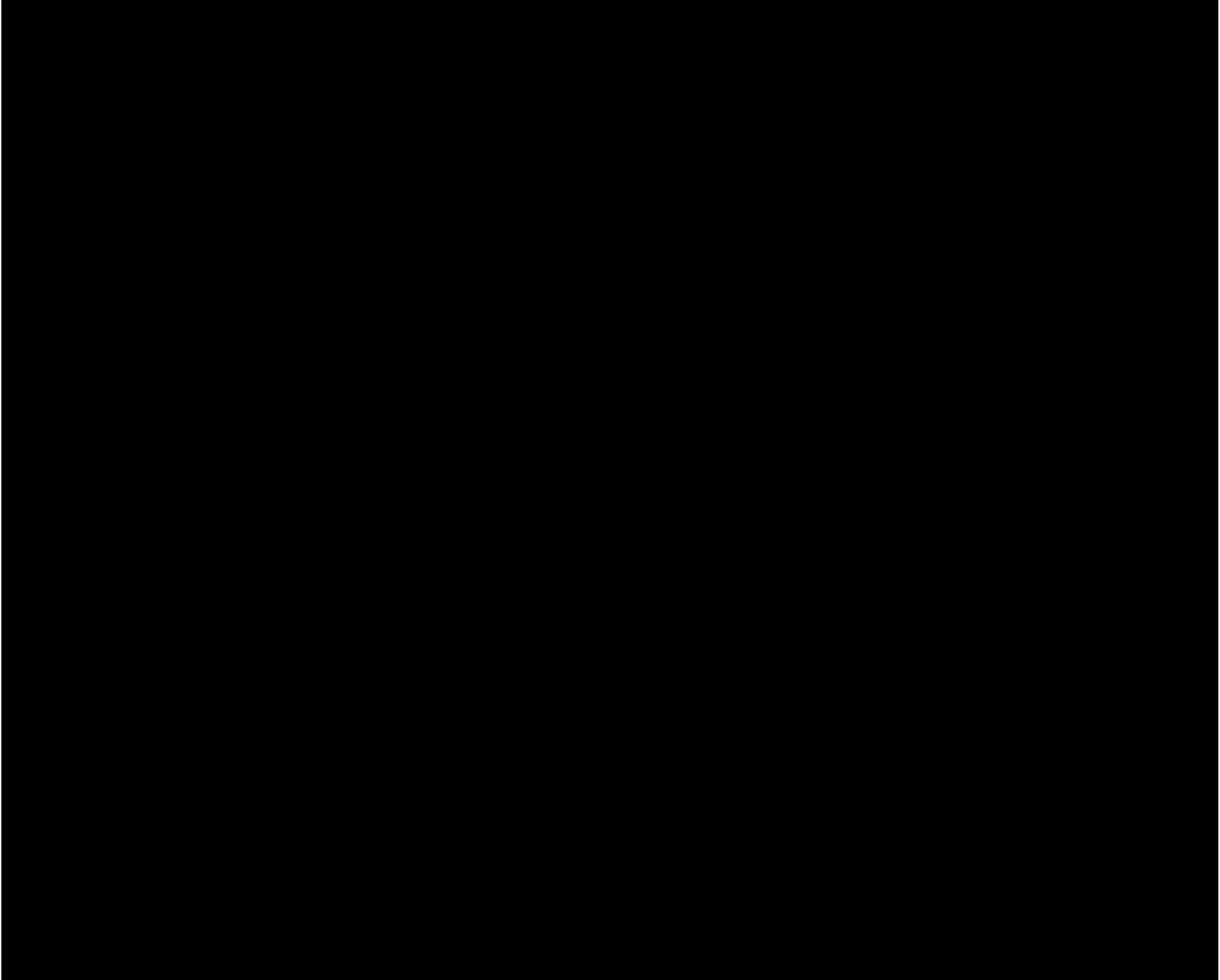
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# HILLINGDON

LONDON

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| Town                       |                        |              |  |
| County                     |                        |              |  |
| Postcode                   |                        |              |  |
| Telephone                  |                        |              |  |
| Email                      |                        |              |  |

| 2. Agent's Name and Address (if applicable) |                                    |              |  |
|---|------------------------------------|--------------|--|
| Title                                       |                                    |              |  |
| First name                                  |                                    |              |  |
| Last name                                   |                                    |              |  |
| Company                                     | Paddy Power Leisure Bookmakers Ltd |              |  |
| Unit  |                                    | House number |  |
| House name                                  | C/O Agent                          |              |  |
| Address 1                                   |                                    |              |  |
| Address 2                                   |                                    |              |  |
| Town  |                                    |              |  |
| County                                      |                                    |              |  |
| Postcode                                    |                                    |              |  |
| Telephone                                   |                                    |              |  |
| Email                                       |                                    |              |  |

## PART B - Your responses

Please complete Part B **for each representation** you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |   |
|-------------------------------|---|
| Policy number;                | DMTC 3 - Maintaining the Viability of Local Centres and Local Parades |
| Paragraph number;             |   |
| Table or figure number; or    |   |
| Map number (Atlas of Changes) |   |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/>            | It has not been positively prepared | <input type="checkbox"/>            | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

In our view policy DMTC 3, is not justified, as it is not founded on a robust and credible evidence base. Furthermore, the policy is not consistent with national policy or with the London Plan Town Centres SPG.

The overly onerous approach taken by the Council in relation to betting shops is not compliant with the spirit and aspirations of the NPPF or with guidance set out in the London Plan Town Centres SPG.

The policy therefore amounts to a conflict with Section 19 of the Planning and Compulsory Purchase Act 2004 and also conflicts with Part 4 Regulation 8 of the 2012 Town and Country Planning (Local Planning) (England) Regulations.

The text should therefore be removed and the policies re-worded, or as a minimum, significantly loosened to allow healthy competition between betting shops whilst also removing the unnecessary grouping of a variety of uses which are not intertwined.

A full explanation can be found in our letter of representation that has been submitted alongside this form.



**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

The matter should be addressed and discussed with the Inspector at EiP.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

N/A

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |

|          |   |
|----------|---|
| <b>X</b> | <b>The adoption of the Local Plan Part 2.</b> |
|----------|---|

## Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

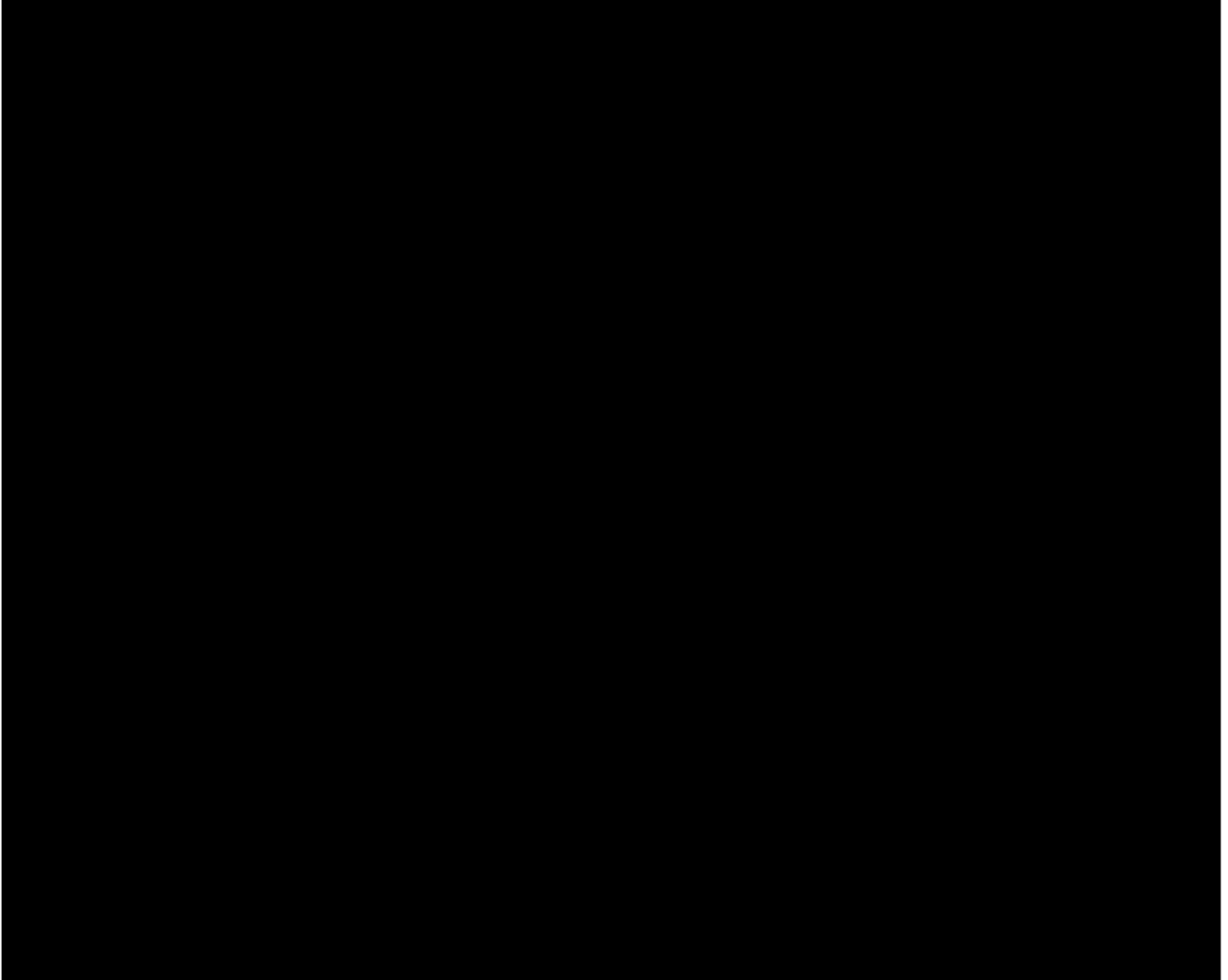
- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## **Monitoring Questions**

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.





# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |                        |              |  |
|----------------------------|------------------------|--------------|--|
| Title                      | Mrs                    |              |  |
| First name                 | Sally                  |              |  |
| Last Name                  | Arnold                 |              |  |
| Organisation (if relevant) | Planning Potential Ltd |              |  |
| Unit                       |                        | House number |  |
| House name                 | [Redacted]             |              |  |
| Address 1                  |                        |              |  |
| Address 2                  |                        |              |  |
| Town                       |                        |              |  |
| County                     |                        |              |  |
| Postcode                   |                        |              |  |
| Telephone                  |                        |              |  |
| Email                      |                        |              |  |

| 2. Agent's Name and Address (if applicable) |                                    |              |  |
|---|------------------------------------|--------------|--|
| Title                                       |                                    |              |  |
| First name                                  |                                    |              |  |
| Last name                                   |                                    |              |  |
| Company                                     | Paddy Power Leisure Bookmakers Ltd |              |  |
| Unit  |                                    | House number |  |
| House name                                  | C/O Agent                          |              |  |
| Address 1                                   |                                    |              |  |
| Address 2                                   |                                    |              |  |
| Town  |                                    |              |  |
| County                                      |                                    |              |  |
| Postcode                                    |                                    |              |  |
| Telephone                                   |                                    |              |  |
| Email                                       |                                    |              |  |



## PART B - Your responses

Please complete Part B **for each representation** you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   |
|-------------------------------------|-----------------------------------|
| <input checked="" type="checkbox"/> | Development Management Policies   |
| <input type="checkbox"/>            | Site Allocations and Designations |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|--|---|
| <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |   |
|-------------------------------|---|
| Policy number;                | DMTC 4 - Location Amenity and Concentration of Town Centre Uses |
| Paragraph number;             |   |
| Table or figure number; or    |   |
| Map number (Atlas of Changes) |   |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |
|-------------------------------------|-------------------------------------|
| <input type="checkbox"/>            | It has not been positively prepared |
| <input checked="" type="checkbox"/> | It is not justified                 |

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

In our view policy DMTC 4, is not justified, as it is not founded on a robust and credible evidence base. Furthermore, the policy is not consistent with national policy or with the London Plan Town Centres SPG.

The overly onerous approach taken by the Council in relation to betting shops is not compliant with the spirit and aspirations of the NPPF or with guidance set out in the London Plan Town Centres SPG.

The policy therefore amounts to a conflict with Section 19 of the Planning and Compulsory Purchase Act 2004 and also conflicts with Part 4 Regulation 8 of the 2012 Town and Country Planning (Local Planning) (England) Regulations.

The text should therefore be removed and the policies re-worded, or as a minimum, significantly loosened to allow healthy competition between betting shops whilst also removing the unnecessary grouping of a variety of uses which are not intertwined.

A full explanation can be found in our letter of representation that has been submitted alongside this form.

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

The matter should be addressed and discussed with the Inspector at EiP.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

N/A

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |

|   |   |
|---|---|
| X | <b>The adoption of the Local Plan Part 2.</b> |
|---|---|

## Returning your form

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- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

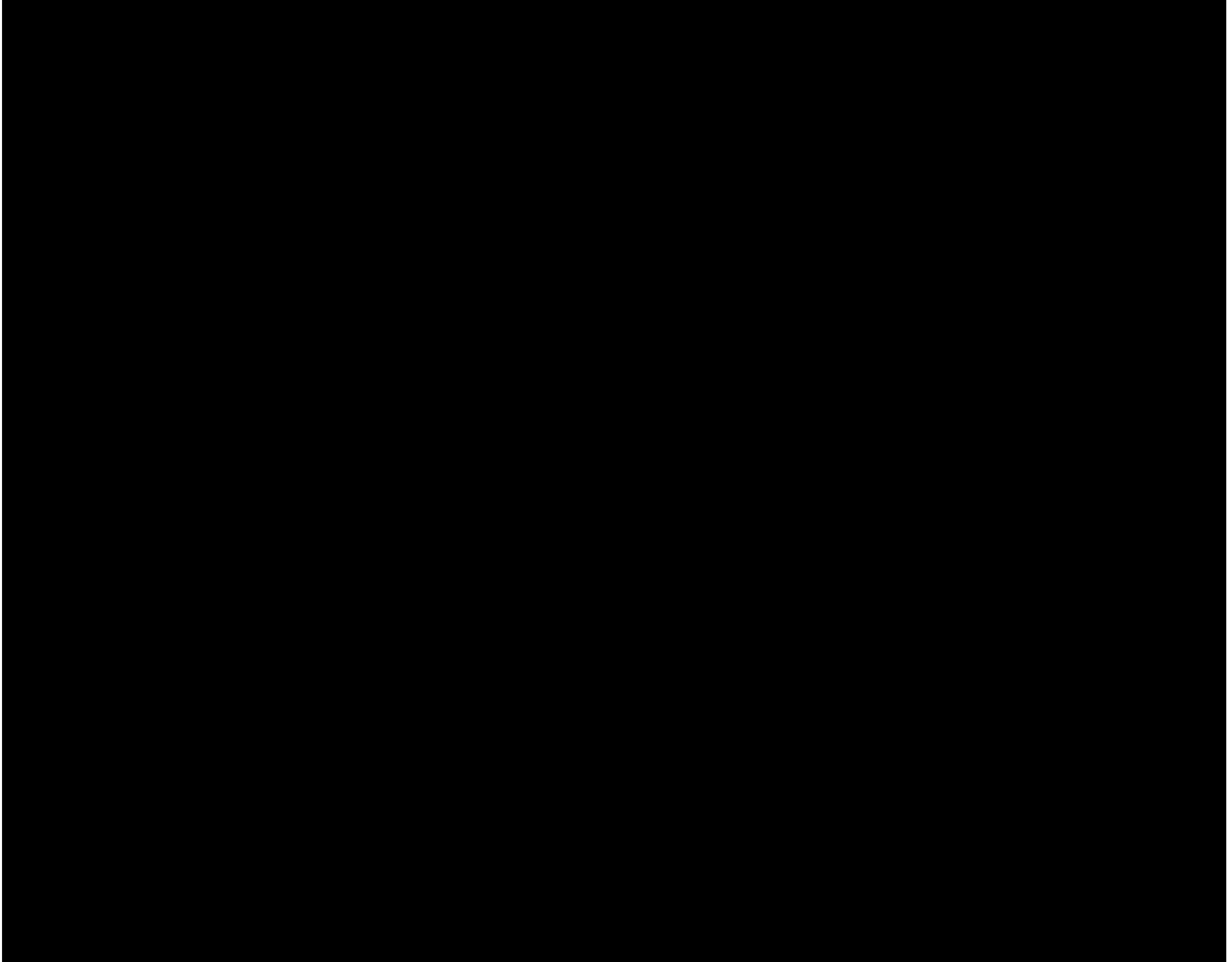
**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**



## **Monitoring Questions**

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**REPRESENTATION TO HILLINGDON COUNCIL'S LOCAL PLAN PART 2: DEVELOPMENT  
MANAGEMENT POLICIES – REVISED PROPOSED SUBMISSION VERSION (OCTOBER 2015)**

**On Behalf of Power Leisure Bookmakers Ltd**

**Introduction**

We write on behalf of our client, Power Leisure Bookmakers Ltd, to make representations on the Hillingdon Local Plan: Part 2 Development Management Policies (hereafter referred to as the 'DMP' document).

Section 19 of the Planning and Compulsory Purchase Act 2004 requires that development plan documents or any other local development document must have regard to national policy documents and guidance as in the NPPF. For reasons set out below, this draft document is plainly contrary to the NPPF.

Part 4 Regulation 8 of the 2012 Town and Country Planning (Local Planning) (England) regulations prescribes that that local plans must contain a reasoned justification of the policies. As set out in the NPPG (Paragraph 014. Reference ID: 12-014-20140306) "appropriate and proportionate evidence is essential for producing a sound Local Plan" and "evidence should be focused tightly on supporting and justifying the particular policies in the Local Plan". Paragraph 182 of the NPPF states that a local planning authority should submit a plan for examination which it considers is sound – namely that it is: positively prepared; justified; effective; and consistent with national policy. It is considered that the DMP is not justified, as it is not founded on a robust and credible evidence base, particularly in relation to betting shops.

The Council will also be aware that as a regulator they must comply with the Regulators' Code (April 2014), laid down in parliament in accordance with section 23 of the Legislative and Regulatory Reform Act 2006. The Code seeks to promote proportionate, consistent and targeted regulatory activity through the development of transparent and effective dialogue and understanding between regulators and those they regulate to reduce regulatory burdens on businesses. It also makes clear that regulators must take an evidence-based approach. It is not considered that the Local Plan has had due regard to the Regulators' Code.

Our representation letter focuses on Policy DMTC 2, DMTC 3, DMTC 4 and Paragraphs 3.20 to 3.22. We first look in turn at what each policy and paragraph states and we then turn to our objection. The policies / paragraphs are considered in the order they appear within the DMP document.

**Policy DMTC 2: Primary and Secondary Shopping Areas**

Part A of the policy seeks to control the type of uses at ground floor in Primary Shopping Areas and to ensure that A1 retail uses are protected. Specifically, the policy notes that uses such as retail, financial and professional activities and restaurants, cafes, pubs and bars will be supported provided 70% of the frontage is retained in A1 use (i), Use Class A5 hot food takeaways is limited to a maximum of 15% of the frontage (ii); the proposed use will not result in a separation of more than 12 metres between A1 retail uses (iii) and, the proposed use does not result in a concentration of non-retail uses which could be considered to cause harm to the vitality and viability of the town centre (iv).

Part B of the policy notes that within Secondary Shopping Areas, the same uses will be appropriate as mentioned under Part A with the addition of launderettes and other coin operated dry cleaners; community service offices, including doctors surgeries. The policy stipulations (i) to (iv) remain the same as above with the exception of (i) which states that a minimum of 50% of the frontage is retained in retail use.

**Policy DMTC 3: Maintaining the Viability of Local Centres and Local Parades**

Part A of the policy relates to protecting local centres and resisting proposals that may impact on their vitality and viability. It is stated that this can be ensured by retaining at least one in three or 70% of Class A1 shops (i), allowing proposals for a change of use of an A1 shop if the centre includes essential local shop uses sufficient in number, range and choice to serve local residents (ia) and the proposed use does

not provide a local service (iib). Again it is noted that A5 uses are limited to a maximum of 15% of the frontage (iii).

Part B of the policy relates to protecting local shopping parades and provides a similar policy outlook to local centres but states that 50% rather than 70% of the shopping parade should be retained in A1 use class (ii).

### **Paragraph 3.20**

As noted, Policy DMTC 2: Primary and Secondary Shopping Areas A (ii) and B (ii) and Policy DMTC 3: Maintaining the Viability of Local Centres and Local Parades A (iii) seek to ensure that Use Class A5 'hot food takeaways' are limited to a maximum of 15% of the frontage in Primary and Secondary Shopping Areas and in Local Centres and Local Parades.

However, during the current round of consultation, a new paragraph 3.20 has been added to the Local Plan which states:

*"In considering unacceptable concentration of hot food take aways, drinking establishments, betting shops, night clubs, casinos amusement centres and similar uses, the Council will apply the maximum threshold of 15% of primary and secondary frontages set out in criteria A ii) and B ii) of Policy DMTC 2: Primary and Secondary Shopping Areas A (ii) and DMTC 3: Maintaining the Viability of Local Centres and Local Parades A (iii)".*

### **Paragraphs 3.21 and 3.22 – Betting Shops**

The Council use the London Plan Town Centres SPG (please note this is no longer a draft) as a means to highlight the apparent problems with betting shops. Paragraph 3.21 states that the London Plan Town Centres SPG *"identifies the need to control the proliferation of betting shops"* and to highlight the *"issues affecting amenity and the continued success of town centres which justify planning authorities to consider the merits of proposals for betting shops"*.

At paragraph 3.22, the document states that betting shops are an 'A2' use and therefore can convert to A1 and A3 uses under permitted development rights.

### **Policy DMTC 4: Location Amenity and Concentration of Town Centre Uses**

Policy DMTC 4 states that A) proposals for restaurants and hot food takeaways, drinking establishments, betting shops, night clubs, casinos, amusement centres, minicab offices and other similar uses will only be supported provided that they: i) would not result in adverse cumulative impacts due to an unacceptable concentration of such uses in one area; ii) would not cause unacceptable disturbance or loss of amenity to nearby properties by reason of noise, odour, emissions, safety and security, refuse, parking or traffic congestion; and iii) would not detrimentally affect the character or function of an area by virtue of the proposed use or visual impact.

### **Objection Response**

#### **Policies DMTC 2 and DMTC 3**

Policy DMTC.2 does not provide an explanation as to why the A1 threshold figures have been set (70% and 50% respectively). In addition, there is no explanation as to why A5 uses should be limited to a maximum of 15% of the frontage, or why a separation distance of 12 metres between A1 units is appropriate (other than that it is *"broadly the width of two typical shopfronts"* para 3.9). Similarly to Policy DMTC 2, Policy DMTC 3 also remains silent on these matters.

We had expected the DMP document to provide an explanation as to why these specific threshold figures have been chosen to assess concentration of uses, but disappointingly the document is silent on this point. On review of the documentation online, there is no reference to an evidence base document which could

support the above policy controls. Planning Policy officers have confirmed that there is no evidence base for these policies which is concerning.

### **Paragraph 3.20**

It is also concerning that Paragraph 3.20 has been added to the document. Essentially, the Council is seeking to add a number of additional uses (that are not linked and are dissimilar to one another) into the 15% threshold policy criteria including betting shops, in order to avoid an over-concentration of such uses in those areas in the borough.

The supporting text does not explain how the figure of 15% of a Primary or Secondary shopping area or indeed of a Local Centre or Local Parade has been arrived at, and how this figure constitutes an over-concentration. Furthermore, there is nothing else in the supporting text explaining why such a threshold should be related to betting shop uses.

We also do not consider it is appropriate to group betting shops, hot food takeaways, night clubs, casinos, amusement centres and 'similar uses' (whatever they may be) together as each offers an entirely different service to their respective customers. These uses are all typical town centre uses and collectively they will no doubt amount to a high proportion of uses within existing centres. There has been no assessment of these uses within each existing centre in the borough and it is considered that the uses would no doubt comprise a higher figure than the 15% threshold set out in the policy and supporting paragraph at present. They all have an entirely different function and therefore different potential impacts (positive, not just negative impacts) on a centre. There is no evidence anywhere in the DMP that such existing uses are together causing adverse impacts on centres. Indeed, the evidence is to the contrary. Many centres across the country and in Hillingdon are healthy, despite having a high number of these uses.

There is a real danger that adopting such an approach will effectively put a moratorium on such new uses in centres and potentially encourage new operators and uses out of centres. Clearly such an approach is inappropriate and would fly in the face of the town centres first policy as set out in the NPPF which seeks to encourage town centre shops and services to locate within centres, rather than out of centre.

We strongly suggest that the Council revisits this proposed approach.

We are also concerned that the DMP document will conflict with paragraph 23 of the NPPF which states that policies should be positive and promote competitive town centres. Bullet point 4 of this paragraph states that LPAs should "*promote competitive town centres that provide customer choice and a diverse retail offer and which reflect individuality of town centres*". Clearly the DMP is likely to have a serious impact on particular industries and healthy competition between different operators by preventing new operators from locating within a particular centre.

Again, regard needs to be had to the very real impact that the DMP is likely to have on a number of different industries and the clear conflict that would arise with the NPPF.

### **Paragraphs 3.21 and 3.22 – Betting Shops**

Before turning to our comments, it should be noted that the London Plan Town Centres SPG is no longer in draft form (it was adopted in July 2014). We suggest that the Council update the DMP document to reflect this.

Given that no assessments have been carried out on the existing betting shops in the Borough and any potential impact that they may be currently having on centres and local residents, it is difficult to understand how the Council have arrived at this broad-brush conclusion which has simply been lifted from the London Plan and not explained in context of the borough. Indeed, it should be noted that Paddy Power is a responsible operator who invests a significant amount of money into the areas in which they operate, as well as providing active shopfronts, new jobs, and passive surveillance in the evening.

In addition, these paragraphs are factually incorrect. Betting shops now fall under the 'Sui Generis' use class (not A2) following the release of new legislation in April 2015. Permission therefore needs to be sought for Betting shop applications. The document needs to be updated to address this error.

## **Policy DMTC 4**

Policy DMTC 4 states that proposals for betting shops (and the other uses they are linked to) will be supported provided they would not result in an adverse cumulative impact due to an unacceptable concentration of such uses in one area.

It is considered that Policy DMTC 4 should have more regard to the London Plan Town Centres SPG. The SPG states (para 1.2.28) that it is only in the cases where *“concentration of a use has reached saturation levels where the negative impacts outweigh benefits”* that *“local authorities can set thresholds at this level of saturation”*. The policy needs to be supported by a robust evidence base (which Policy Officers have confirmed is unavailable) prior to thresholds being set and concentration / saturation levels being considered.

## **Conclusion**

In our view policies DMTC 2, DMTC 3, DMTC 4 and paragraphs 3.20 – 3.22 are not justified, as they are not founded on a robust and credible evidence base. Furthermore, the policy and subtext is not consistent with national policy or with the London Plan Town Centres SPG. The overly onerous approach taken by the Council in relation to betting shops is not compliant with the spirit and aspirations of the NPPF or with guidance set out in the London Plan Town Centres SPG. The policy therefore amounts to a conflict with Section 19 of the Planning and Compulsory Purchase Act 2004 and also conflicts with Part 4 Regulation 8 of the 2012 Town and Country Planning (Local Planning) (England) Regulations.

The text should therefore be removed and the policies re-worded, or as a minimum, significantly loosened to allow healthy competition between betting shops whilst also removing the unnecessary grouping of a variety of uses which are not intertwined.

We would be grateful if you would take the above comments on board in the preparation of the plan and request that you keep us informed on further progress and consultations.

Planning Policy Team  
LBH 3N/02  
Civic Centre  
High St  
Uxbridge  
Middlesex  
UB81UW

Sally Barter



**Re: Part 2 of the Local Plan Hillingdon Gypsy/ Traveller/Showmen/Roma Needs Assessment**

I write to comment and stress my concerns as regard the Hillingdon Gypsy/Traveller Needs Assessment which is included as a supporting document within the Local Development Plan.

I am an English Traveller and I am employed by Hillingdon Council, I previously worked within the Traveller education team and I have acted and been acknowledged by the local authority as a representative and spokesperson of my community for over 20 years. I have previously been a board member of Hillingdon Racial Equality Council and Hillingdon's Connecting Communities Forum as well as more recently the Hillingdon Traveller Forum. As a Traveller Forum member I have consistently expressed my concerns verbally at meetings and I have also emailed all other forum members. One particular meeting took place

On Friday 14<sup>th</sup> March 2014 and was attended by a Hillingdon planning officer, the planning officer when questioned, made reference to the Redbridge Traveller Accommodation Needs Study and confirmed Hillingdon were following this model to carry out their own study into the needs of Gypsies, Travellers and Travelling Show people. I was alarmed by this as from my own knowledge as a Traveller and community member I could immediately identify several issues and areas of concern as regard the use of this model. After being told this I felt I must pass these concerns to all forum members and via the medium of the forum inform the planning dept of the issues around the use of the proposed model. I wrote to all forum members and attached a copy of the Redbridge study, clearly pointing out areas of concern. I also highlighted (as below) particular differences between the Redbridge survey and the Traveller community in Hillingdon which I felt were of real significance.

I am afraid to say that I am very disappointed that most of these issues still exist and have not been addressed within the current Hillingdon Traveller Needs Assessment which has now been put forward as part of the Local Plan. Please see below some excerpts from the letter, dated Thurs 27<sup>th</sup> March 2014, which was forwarded to all Traveller Forum members- I attempted to point out the differences, which I believed, set the Redbridge study apart from Hillingdon:

***The initial summary on the Redbridge document states that Redbridge contains one authorised public Traveller site, as does Hillingdon. The council provided site in Hillingdon is Colne Park Traveller Site in West Drayton. This is however where the similarity ends as the Redbridge study goes on to clearly state that Redbridge does not contain any private***



**or unauthorised Gypsy and Traveller Sites and does not contain any yards for Travelling Show people.**

Immediately I could see that this could not be used as a model for Hillingdon and pointed out exactly why-

**It can therefore not stand as a comparable model for any study to be carried out in Hillingdon as the demographic is vastly different. In stark comparison Hillingdon has many private Gypsy and Traveller Sites. some of these sites have been in existence for generations and furthermore there are currently several families living unauthorised in caravans either on their own or rented property. In addition there are two yards for Travelling Show people in Hillingdon.**

To evidence this I attached details, as available, on Hillingdon Councils own planning portal as regard recent planning applications made by Gypsies and Travellers to Hillingdon Council.

I pointed out the facts as regard the situation as it was in Hillingdon:

**There are several families presently living on separate unauthorised developments who are under threat of eviction should their planning applications fail. All of these planning cases have yet to be decided yet none of the families have been contacted or consulted for the purpose of this survey. Neither have they been made aware of the need to be included in this Traveller needs assessment. This is of real concern as surely because of the circumstances these are the families who have the greatest need?**

I am aware that 3 families have since been consulted and I am pleased that this is the case. At the time I felt their needs had not been acknowledged and if the Redbridge model was followed there was a real danger that they would not be included.

Despite the fact that those 3 families who had made application for planning had not been contacted or consulted I was concerned, at that time, that a copy of the Redbridge study **was** included in the Councils supporting documents against the planning appeal of Mr William Smith (New Years Green Lane Harefield) which was, at the time, the most current Gypsy/Traveller planning case and despite the obvious differences which set them apart it had been submitted as a document of evidence by Hillingdon. Prior to that it had repeatedly been confirmed by the Councils own planning officers as the model they were following with regard to consultation with the Traveller community.

This was not a document which was specific to Hillingdon and its' own diverse Gypsy, Traveller, Showman and Roma community but a copy of the Redbridge Traveller needs assessment, which was in itself somewhat confusing.

Furthermore how was this justified when this family (Mr and Mrs Smith) had not been contacted and included in the consultation? I expressed my concern that this had been the case.

I also stated as below:

**There are many other families living in similar situations without planning permission but on permitted private sites in Hillingdon. Some of these sites are more recent but the majority date back to the war years when many Traveller families moved out of London to the surrounding suburbs. They are not hidden and local statistics as regard health and education clearly identify them. None of these families have been contacted or consulted**

***as regard their needs. Although the sites may now be permitted surely future need for younger family members should be taken into account? It is my understanding that this is the purpose of this consultation and the council are required to look at long term need and identify possible sites or locations for the future.***

I know this is still the case and the majority of Travellers in Hillingdon know nothing about the Traveller needs assessment or indeed the Local Plan.

I was worried that the Hillingdon Traveller Needs Assessment had not been carried out as extensively as the Redbridge study which was the identified model. From my own knowledge and from contact and conversations with friends and family in Hillingdon who currently live in caravans, and there are many, I can confirm none (apart from those 3 families currently in planning dispute and the Irish families residing on Colne Park Council Site) have been contacted or consulted for the purpose of this survey. Many of these live adjacent to the families which have been consulted but have told me they have no knowledge of the Traveller Needs Assessment or the importance of it.

I find the fact that they have no knowledge particularly worrying.

Within forum meetings I had previously suggested several mediums by which to reach the Traveller/Gypsy and Showman community and publicise this process. These included the Traveller Times magazine and website and the World's Fair (National newspaper of the Fairground community) I know these have been widely used both nationally and by neighbouring authorities to publicise the Traveller Needs Assessment process and inform the Traveller community of the need to get involved and have their say. I know Hillingdon did not publicise the process in this way.

Also I pointed out the facts below:

***The Redbridge Gypsy and Traveller Accommodation Needs Study is full and extensive and in the chapter 'Methodology' states – Structured interviews were conducted with officers from the council and officers from neighbouring authorities as well as other stake holders who represent the Gypsy and Traveller community.***

***I would consider myself, as a Traveller and employee of Hillingdon Council, to be within this group and I am disappointed and concerned that I have not been consulted for the purpose of the Hillingdon survey and my views have not been included.***

***I know also Mrs Celia Hilton, Traveller and representative of the Travellers living on Colne Park Site has written to express her concern at the way the survey has been conducted and asked to be consulted and included but has received no reply to this request.***

***I would therefore ask then for any evidence that points to the same interviews being carried out with relevant council officers from Hillingdon as well as the stake holders within the borough who represent the Gypsy and Traveller community.***

***In Redbridge, semi structured, in depth telephone interviews were conducted with representatives from the Housing Services, Childrens Services and Emergency planning Dept in addition to those which took place with Travellers on the authorised site.***

***I have heard or seen nothing which confirms Hillingdon has done this or made any attempt to do so with regard to following the Redbridge model.***

***Within the Redbridge study it was ensured that all the different distinct groups within the Traveller community were represented fairly. These being: Irish Travellers, English Gypsies, Travelling Showmen and Roma. To ensure this, interviews were carried out with 4 specific organisations that provide advice and support to Gypsies, Travellers and Show people within these different groups Redbridge consulted the Roma Support Group, London Gypsy and Traveller Unit, Showmen's Guild and Refugee and Migrant Forum.***

***I believe, in stark contrast, by consulting with those living on Colne Park Traveller Site, Hillingdon have only included a very small section of the Irish Traveller community in the borough and have not included others from the English Gypsy, Show men and Roma communities. This clearly does not follow the Redbridge model. There has also been no contact and consultation with any Travellers living within bricks and mortar.***

The Traveller needs assessment document states that there has since been limited consultation with housed Travellers, with 14 surveys in total. These surveys were completed via Bell Farm Christian Centre in West Drayton and I know that this means they would have been carried out with just a small number of the existing Irish Traveller community living within housing in this area. It is regrettable that the exact Traveller group which these participants belonged to was not recorded within the document. I believe this was really relevant for the purpose of the survey. There are many other Travellers living within bricks and mortar in Hillingdon and therefore the significant English, Showmen and Roma Traveller communities have not been consulted or represented.

I have either lived or worked within Hillingdon all of my life so I feel I have unquestionable knowledge of the local Traveller community.

I know there to be several areas of Hillingdon which are heavily populated by Travellers who have had no choice but to move into housing, in particular West Drayton, Yiewsley and Harefield. In more recent years many Roma families have settled in Hayes. Local authority statistics as regard health and education also support this. In the past Hillingdon has acknowledged this fact and been supportive of projects which have attempted to engage with these families and improve outcomes for them with regard to education and healthcare. After the Traveller Education team was disbanded a specific role – Traveller education worker was created at Bell Farm Centre in West Drayton. I believe this is funded by the local authority.

Also in 1999 a 5 yr lottery funded project, HOPE, (Health, Opportunities, Promotion and Education) was set up in response to policy aimed at reducing inequalities in health for particular vulnerable groups in Hillingdon. Travellers were amongst the main target groups.

I do not feel either of these initiatives would have been funded in the first place if there had not been great need; however this is clearly not reflected within the numbers in the survey.

I also have considerable concerns at the lack of understanding the Council has of the very different groups within the Traveller community. I do not feel this is acknowledged at all and that there is no acceptance of the different needs of Roma, English Romany, Showmen and Irish Travellers.

It is a requirement of the study to look at the **specific needs** of Travellers in Hillingdon.

Each different group has their own specific needs and clearly if there is no acknowledgement of the difference between English and Irish Travellers, for example, how can their **specific needs** be met?

All these groups live in large numbers within the borough and have different lifestyles and travelling patterns which reflect on their accommodation needs.

In contrast clear reference had been made to this in The Redbridge survey which makes it stand apart from Hillingdon.

In my letter to the Traveller Forum I wrote:

***It is interesting also to read that within the Redbridge study it is clearly noted that council officers acknowledged these very distinct groups and their differences and confirm that it would be unlikely that they would occupy sites together. I know this to be a fact many officers within Hillingdon do not accept and have little understanding of and I have experienced this previously and expressed my concern at this fact. When I attended the appeal hearing dated Tues 22<sup>nd</sup> Oct 2013 of Mr William Smith and I pointed out that the Councils only Traveller site, Colne Park West Drayton, is occupied solely by Irish Travellers and so therefore was not suitable provision for the English families living in Hillingdon I was told "You are only talking about nationalities". In comparison the differences between English and Irish Travellers and the fact that they would be unlikely to cohabitate has been clearly acknowledged and accepted by other boroughs. In this case Redbridge Hillingdon is clearly not following this as their model when this is not understood and it is dismissed and questioned.***

These differences, which exist between different Traveller groups, and the impact they have as regard planning the provision of accommodation for Gypsies and Travellers in Hillingdon have also been clearly recognised by the governments own appointed Planning Inspectors. In two separate planning appeals of Traveller families, both living in Harefield, the Inspector has made clear and unquestionable reference to this within his findings. With specific reference made to Colne Park Site as being occupied solely by Irish families and therefore being unsuitable accommodation for English families. (See attached document)

Therefore why has no reference to the Inspectors findings been made in Hillingdon's Traveller Needs Assessment?

For clarification I explained the consultation process as stated clearly in the Redbridge survey:

***The Redbridge Study goes onto state within the chapter- 'Additional Site Provision' that the next stage of the process is to assess how many households are likely to be seeking pitches in the area, groups included are-***

- **Unauthorised developments for which planning permission is not expected to be granted**
- **Currently overcrowded**
- **In housing but with a need for site accommodation.**
- 

*I would like to know how Hillingdon proposes to do this when they have not included any families living on unauthorised developments in the initial stages of the consultation, nor have they contacted any Travellers living in bricks and mortar. I have provided evidence that shows there are definitely families currently living in Hillingdon who have current need (as demonstrated by their planning applications) as well as in the future.*

*Within the chapter 'Unauthorised Developments and Encampments' the findings state- **Redbridge has no outstanding planning application for new sites in the area and Redbridge has little recorded history of unauthorised encampments or developments.** This is clearly not the case in Hillingdon and I have attached substantial evidence which proves otherwise. As well as the planning applications currently in process there are always unauthorised encampments by mobile Travellers in Hillingdon annually during the summer months.*

Another issue, which is of real concern, is that the Hillingdon Traveller Needs Assessment is not factually correct as regard existing Showman sites in the borough, this is despite the fact that I previously clearly highlighted the Showman yards and their exact whereabouts in my letter to the Forum.

I wrote:

*As regard the requirements of Show men or Travelling Show people, the Redbridge Study confirms there are **no yards for Showmen.** In contrast Hillingdon **has 2 very prominent and visible Showmen Sites.** One of these is in Horton Road, West Drayton, close to Colne Park Traveller Site. A second yard is along the very busy Uxbridge Road in Hayes. **There are many families living in caravans,** some are more mobile and travel to funfairs all over the country and use the site as winter quarters.*

*No families within either site has been contacted or consulted.*

***This therefore must mean neither their current or future needs has been taken into consideration.** This again clearly sets it apart from the Redbridge model.*

The Hillingdon Traveller Needs Assessment does not acknowledge the existence of either site; both are longstanding and have been there for generations.

I went on to express concern that, at this time, the council had only consulted with Irish families living on the sole site, Colne Park ( in this instance as in common with the Redbridge study)-

*I know the council has concentrated its' consultation with Gypsies and Travellers on the sole local authority site, Colne Park.*

*I am very concerned that by conducting this survey on the Councils site, Colne Park in West Drayton, and by only consulting with the **Irish Traveller families** living there the council believe they have met their obligation as regard consultation with Travellers in the*

**borough of Hillingdon. This is a fear I have had since the beginning of this process and one which I have voiced via the forum at every meeting. By doing this I am concerned that the survey is not being carried out in a full and fair manner and the needs of other Traveller groups -English Travellers, Roma and Travelling Show people are being excluded. Some of these families have lived in the borough for generations and a great number are in dire need of culturally appropriate accommodation.**

I stressed how important I felt the consultation process and the resulting findings would be-

**As I am sure you are aware the Housing Act of 2004 places a requirement on all local authorities to assess the accommodation needs of Gypsies, Travellers and Showmen living within their area with the objectives of developing fair and effective strategies to meet need and address under provision. The focus being on how many extra pitches or plots are required in at least the next 5years with estimates provided for the following 10 years. This is a necessary requirement in order to comply with the Planning Policy Document for Traveller Sites 2012.**

**This is clearly stated within the Redbridge study and the model Hillingdon has confirmed it is following with regard to this.**

**It is therefore essential that Hillingdon Council makes a robust and accurate assessment of the needs of Gypsies and Travellers, because crucially, this information informs them how many pitches will need to be provided or permitted. This figure will be taken from THIS Gypsy and Traveller and Show people Accommodation Needs Assessment and Hillingdon council must also ensure they include a target for the number of pitches needed. It is these figures which will feed into the Local Development Plan.**

I now find it very worrying when consultation has been so limited, how can realistic ideas of need be achieved?

I went on to point out-

**After the consultations have finished a Government Inspector will conduct an examination in public of the local plan and decide if it is sound. This includes considering the evidence with regard to Gypsy and Traveller Sites. If there are any concerns that the council has produced an unsound policy requests can be made to make representation at the examination.**

**It is clear with regard to the above requirements that sound policy is dependent on fair and robust evidence being put forward on the needs of Gypsies, Travellers and Show people living in Hillingdon.**

Finally I summed up my overall concerns-

**There are fundamental flaws in the suitability of the Redbridge Study around its use as a model for the Accommodation Needs Survey of Gypsies, Travellers and Travelling Show people in Hillingdon, I believe I have set these out and made these clear.**

**Furthermore using this as a model leaves Hillingdon in danger of severely underestimating the level of need for Gypsy and Traveller pitches as well as failing to consider, consult and ultimately meet the needs of Gypsies, Travellers and Show people in Hillingdon.**



I finished my letter with:

***I would really appreciate it if as members of the forum you could take the time to look at the attached Redbridge Study and all associated documents.***

***I would like these views to be put forward to those concerned within the planning department and I would expect a reply in regard to those areas I have highlighted and brought to your attention.***

I was very worried that Hillingdon Council was using the Redbridge survey as a model for their own Traveller Needs Assessment when I could identify so many potential differences between the two. I have included excerpts of my letter to the Traveller Forum to highlight these issues, of which many still exist.

I am very frustrated and worried that I still find myself with extremely serious concerns about the Hillingdon Traveller Needs Assessment and the inclusion of it as a suitable document of evidence within Part 2 of the Local Plan.

In summary I would like you to consider my views as follows:

- There has been a failure to fully consult with the Traveller Community in Hillingdon. How can the survey be considered robust evidence when the consultation which took place was so limited and no contact at all was made with groups such as Showmen or Roma Travellers? The council did not contact or consult with any other families who currently live in caravans in Hillingdon apart from those either living on their own Council provided site, Colne Park, or the 3 families who were in planning dispute. I have attached evidence which demonstrates this .Re- New Years Green Lane Harefield; Traveller families have lived here for over 70 years. There are actually 4 families living in 4 separate caravans in close proximity of each other (also evidenced within the attached Inspectors report) however, none of the occupants of the 3 other caravans have been included. This is just one example, but this was the case throughout the rest of Harefield and indeed the whole borough. It is common and a known fact that Travellers live within family groups.
- The council state the Traveller Forum have been contacted as part of the consultation process, I would like to make it clear that as a recognised community representative and Traveller Forum member I have never given my endorsement to any part of the consultation process or the resulting Traveller Needs Assessment. It is not representative of my views or knowledge as regard the needs of Travellers/Gypsies/Showmen and Roma families in Hillingdon.
- The council have not included the findings of relevant planning appeals and Inspectors remarks as regard the unmet need in Hillingdon and the unsuitability of Colne Park Caravan Site as alternative provision for English Traveller families. I have attached evidence of this which show the Inspectors remarks as regard existing adjacent plots/families (who have not been included in the needs assessment) as

well as the Inspectors report with regard to the Councils proposed provision, Colne Park Caravan Site.

- The council have not taken into account the full extent of existing need on Colne Park Caravan Site. The site is currently overcrowded (as stated in the survey by residents) and in a poor state and in reality if plots are added as proposed these would almost certainly be occupied by existing site members. This would result in unmet need.
- The Council did not meet their own deadlines for this consultation. The original deadline given by them was end Oct 2013. The main consultation for the Traveller Needs Assessment did not commence until after 20<sup>th</sup> May 2014 and only lasted for a very short period of time with the report scheduled for end of June 2014. I strongly question whether this was enough time to publicise, consult and gain suitable response to such an important document. I do not feel it was an appropriate time of the year to consult with Traveller families and when informed of this I could see immediately the difficulties as regard reaching the Traveller community during the summer months. This is also the period of time when major Gypsy Fairs- Stow, Epsom, Appleby and Cambridge are held and many families were away visiting these. In fact, as a Traveller, I would consider this to be the most favoured and preferred time of Travelling for all other Travellers in Hillingdon. As regard Showman families, living within the 2 yards in the borough, many would also be away in these summer months earning a living at funfairs.

I would appreciate it if you would consider my attached evidence plus the areas of concern which I have brought to your attention.

I am really worried that this Traveller Needs Assessment will now be included as a document of evidence within the Local Plan. I have had concerns about the process all along and made these clear in my previous letter.

The Traveller Needs Assessment does not reflect the real need of Gypsies, Travellers, Showmen and Roma in Hillingdon.

Yours Faithfully

Sally Barter

Please see below Inspectors Report dated 7<sup>th</sup> Feb 2014

- See details as recorded by the Inspector of Plot 1, (1 mobile home plus 1 touring caravan) Plot 2 (1 mobile home plus touring caravan) and also The Shrubs, New Years Green Lane, Harefield (2 mobile homes) confirming there are several caravans/Traveller families living in close proximity (but I can confirm only one family here consulted for the Traveller Needs Assessment)
- Repeatedly confirmed in Paragraphs 7/8/11/14/15/35 &36
- The Inspector acknowledges the differences between English and Irish Travellers and the fact that they would be unlikely to co-habitat on Colne Park Site
- The Inspector states “the Councils analysis of demand is limited entirely to satisfying the demands of the existing families on Colne Park and ignoring any other in the Borough” Paragraphs 22 & 23
- With regard to the above ,The Inspector states “ They have identified the likely demand for 4 pitches which they can accommodate however, I do not share their optimism over site allocation and consider when they do finalise their allocation policy, they may well find they need to make provision for more pitches or sites”

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# Report to the Secretary of State for Communities and Local Government

by Simon Hand MA

an Inspector appointed by the Secretary of State for Communities and Local Government

Date: 7 February 2014

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## TOWN AND COUNTRY PLANNING ACT

## THE COUNCIL OF THE LONDON BOROUGH OF HILLINGDON

## APPEALS BY MR RONALD AND MRS MAUREEN WEBB

Hearing held on 22 October 2013

Land at Plot 2, The Paddocks, New Years Green Lane, Harefield, Middlesex, UB9 6LX

File Ref(s): APP/R5510/C/13/2192003/04

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**Appeal A: APP/R5510/C/13/2192003**

**Land at Plot 2, The Paddocks, New Years Green Lane, Harefield, Middlesex, UB9 6LX**

- The appeal is made under section 174 of the Town and Country Planning Act 1990 as amended by the Planning and Compensation Act 1991.
  - The appeal is made by Mr Ronald Webb against an enforcement notice issued by the Council of the London Borough of Hillingdon.
  - The Council's reference is ENF/526/10.
  - The notice was issued on 19 December 2012.
  - The breach of planning control as alleged in the notice is the unauthorised use of the land for the stationing of a mobile home and touring caravan for residential purposes without the benefit of planning permission.
  - The requirements of the notice are (i) cease the use of the land for the stationing of the mobile home and touring caravan for residential purposes; (ii) remove the mobile home and touring caravan from the site; (iii) remove from the land all debris, items, fixtures and fittings, building materials, plant and machinery resulting from compliance with points (i) and (ii) above.
  - The period for compliance with the requirements is 6 months.
  - The appeal is proceeding on the grounds set out in section 174(2) (a) of the Town and Country Planning Act 1990 as amended.
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**Appeal B: APP/R5510/C/13/2192004**

**Land at Plot 2, The Paddocks, New Years Green Lane, Harefield, Middlesex, UB9 6LX**

- The appeal is made under section 174 of the Town and Country Planning Act 1990 as amended by the Planning and Compensation Act 1991.
  - The appeal is made by Mrs Maureen Webb against an enforcement notice issued by the Council of the London Borough of Hillingdon and is identical to appeal A.
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**Recommendation**

1. That the enforcement notice is corrected by the deletion of the address and its replacement with the words "Land at Plot 2, The Paddocks, New Years Green Lane, Harefield, Middlesex, UB9 6LX". That subject to this correction the appeals are allowed and the enforcement notice is quashed. Planning permissions be granted on the applications deemed to have been made under section 177(5) of the 1990 Act as amended, for the development already carried out, namely the use of the land for the stationing of a mobile home and touring caravan for residential purposes subject to the conditions contained in the annex attached to this report.

**Procedural Matters**

2. I recommend the site address is amended to better accord with the information provided by the appellant as to the actual address of the site.
3. The appellants are the landowners, Mr and Mrs Webb. They were represented at the hearing by Mr Joyce. However, the occupiers of the site are the Smiths who are the main protagonists in this appeal.

## Main issues

4. There are only appeals on ground (a), and the main issues are the impact of the caravans on the character and appearance of the area and on the harm to the Green Belt, whether the Council have a 5 year supply of sites, whether there are any alternative sites for the occupiers of the site, and the occupiers' personal circumstances.

## Reasons

5. The site is occupied by Mr and Mrs Smith and their three children. They live in a mobile home, and have a touring caravan on the site as well. Both are members of the Gypsy and Travelling community, although technically Mrs Smith is a travelling showperson. There is no dispute they are Gypsies as far as this appeal is concerned and lead a typical Gypsy lifestyle, involving working in scrap, travelling to fairs and in Mrs Smith's case, regular attendance at the fairs and shows open to her group of Middlesex based travelling showpeople.
6. The site lies in the Green Belt along New Years Green Lane which is a narrow country lane. Much was made of the character of this Lane. In a relatively short stretch it contains a council waste recycling depot, another private recycling yard and a pallet storage use, as well as several farms where outbuildings have been converted to form small commercial estates. However, each of these uses is self contained and in between them are stretches of attractive countryside, glimpsed in gaps in the thick hedges that line the lane, sometimes with long views.
7. One of these distinct groups of development consists of **the appeal site and its neighbours, which form a small enclave of dwellings and caravans.** From west to east, the first buildings are a pair of semi-detached houses, Nos 8 & 9 New Years Green Farm, which are set back from the road, with long front gardens. **Then the appeal site, plot 2, then Plot 1 and then The Shrubs.** Next to The Shrubs is a bridleway running due south, which provides pedestrian access to a parcel of land running behind the site. This land is largely overgrown and contains various buildings and structures associated with a use as a builders' yard.

## History of the site

8. The history of these plots of land is instructive. **The Shrubs would seem to have been the home for Gypsy families for many generations.** Mr Smith was born and brought up in The Shrubs, and **there are currently two mobile homes there. Plot 1 was originally both plots (1 & 2), and is home to the Beach family, who are travelling showpeople, Mr Beach is Mrs Smith's brother. They have a mobile home and a touring caravan on the site. Plot 2 is the appeal site, with a mobile home and tourer.** Nos 8 & 9 are permanent dwellings. This little group is surrounded by fields, but with the other intrusive recycling and commercial facilities spread out along the Lane.
9. The appellants, Mr & Mrs Webb, bought all the land including Nos 8 & 9, Plots 1 & 2 and the land to the rear, in the 1980s. They used the land to the rear and what is now Plots 1 and 2 as a builders' yard, or more accurately, for the storage of building materials. At some time Nos 8 & 9 were sold off and the original Plot 1 was created and occupied by the Beaches. It seems access to the rear land, which was still used for storage, was either through Plot 1 or from gates onto the



bridleway. The bridleway now has bollards across the end and there is no vehicular access from it to the rear land.

10. Mr & Mrs Smith lived at The Shrubs from 1998 when they were first married to 2005 when they were evicted by the Council. The reason given was that the Shrubs was not licensed for touring caravans so they had to go. They moved to a yard owned by Mrs Smith's Uncle, in Bracknell, where they lived in a touring caravan. When the Uncle's own son needed the site, roughly in 2007, the Smiths moved to Rickmansworth, again in the tourer, to a plot of rough land next to a busy access. Eventually, in 2010, this was sold to another Gypsy family and they came back to Harefield. Plot 1 was subdivided and they occupied Plot 2.
11. Apart from the dwellings at Nos 8 & 9, none of this development appears to be lawful. However, the Council have clearly tolerated The Shrubs for many years, and when evicting the Smiths treated the other families there as permanent. They have also investigated Plot 1, but decided it was not expedient to carry out enforcement action. It was only when Plot 1 was subdivided to create the appeal site they decided to take action solely against Plot 2. At the same time the builder's yard use would also seem to have been tolerated for many years.

#### *Impact on the countryside and the Green Belt*

12. I agree with the Council that the landscape of this area is attractive but fragile. There has already been considerable development that has degraded the countryside, but that makes the protection of what is left, which retains its separateness and quality, all the more important. As to the Green Belt, the development of a site for a Gypsy family is inappropriate development, this was not disputed and I shall attach substantial weight to it.
13. The builder's yard seems effectively to be dormant. Some materials were stored at the back of Plot 2, but the rest of the land was overgrown, and at the moment, there would seem to be no direct vehicular access to that land. It would be possible to get to the back of Plot 2 with a vehicle, but only with a lot of effort, removing a playhouse and all the vehicles parked on the plot. I am not convinced this use would resume on the site even if the notice were upheld. Plot 2 was part of Plot 1, but I have no evidence as to how the land was used when it was all one plot. The addition of the mobile home, tourer, various vehicles, two sheds and a playhouse, as well as domestic artefacts, have all clearly intensified the use.
14. However, in terms of the direct impact of the site on both the countryside and the openness of the Green Belt, the site is a narrow strip of land sandwiched in between other development. At present it is well screened from both sides and from the road by fencing, and given the tall hedges and narrowness of the lane, it is hardly noticeable. If all the structures and fences to the front and back of the site were removed, which they would be as a result of upholding the notice, the change to the countryside would hardly be noticed, even by people passing right in front of the site. Similarly, the openness of the Green Belt is hardly affected at all. Technically the site would be more open, but in practical terms any openness would be illusory. The surrounding cluster of dwellings, mobile homes and caravans would still appear to be the dominant features. In my view this relatively small slither of land has no useful Green Belt function.

15. I do not consider that the site is an extension into the countryside or into the Green Belt, but is contained within a larger area of development and seen very much in the context of **a small group of existing mobile homes and touring caravans**. Consequently, I do not consider its impact on the countryside to be any more than minor. There is a reduction of openness of the Green Belt, but this is minimal. However, even minimal harm and the fact that it is inappropriate development are matters to which I must apply substantial weight and the development is contrary to policy EM2 of the Council's Local Plan Part 1 (2012) and the National Planning Policy Framework on Green Belts.

*Five year supply of sites?*

16. The policy background is somewhat tangled. In 2008 the London Gypsy and Traveller Accommodation Needs Assessment was published. This estimated a demand for new pitches in Hillingdon of between 3 and 35 between 2007 and 2012 and between 3 and 8 between 2012 and 2017. The wide gap between the numbers was to accommodate the potential for some of the 150 or so Gypsies already living in Hillingdon in permanent houses who might wish to return to a Gypsy way of life because of their aversion to bricks and mortar. In 2009 the Mayor became involved and the Consultation Draft Replacement London Plan introduced a target of 22 pitches for Hillingdon for the period 2007-17. In 2010 minor alterations were made to reduce the target to 7, as it was decided to exclude any figures for those living in houses returning to caravans (the aversion to bricks and mortar issue) as this was impossible to plan for. Finally in 2010 another minor alteration was made to the draft to remove a target figure altogether, and leave it up to each Borough to determine their own figures and this remains the current situation.
17. **The Council's assessment of Gypsy and Traveller needs is due to start soon. Once this consultation process is concluded the figures will feed into part 2 of the Local Plan, this will need to process through the statutory procedures to be found sound and adopted.** There is no estimated date for this but the Council think 2-3 years would be reasonable. In the meantime they have a site specific policy, H3, in the Part 1 Plan which protects the current site at Colne Park, notes that targets will take into account need and availability and sets out four locational criteria for new sites. The appeal site does not meet those criteria, not least because it is in the Green Belt.
18. Planning Policy for Traveller Sites (PPfTS) is the up to date government advice on traveller sites and this requires Councils to identify a five year supply of sites against locally set targets. This the Council have not yet done, nor are they in any position to do for several years at least. Nevertheless, in anticipation of this problem the Council have carried out an initial analysis to determine, for development control purposes, the likely future needs in the Borough.
19. **There is one Gypsy site in Hillingdon at Colne Park which has 22 pitches. Based solely on the number and family make up of Gypsies living there, for the period of the Local Plan up to 2017, the Council estimate there are likely to be 4 grown up children wishing to stay on the site and form a new family unit, ie will want their own pitch. In the past 5 years 5 pitches have become available, assuming this rate continues in the future the Council consider they will have sufficient availability to accommodate the Gypsy and Traveller needs of the Borough and so they do have a 5 year supply.**

20. **I find this analysis to be wholly unconvincing. Firstly, the character of the Colne Park Site should be taken into account. It is dominated by Irish Travellers, who historically do not welcome English Gypsies** This was supported by evidence from the Hillingdon Travellers Forum and **was accepted by the Council.** However, the Council now argue that all Gypsies should go on the housing register, they are ranked according to housing need and when suitable places become available, including pitches at Colne Park they are offered on a needs basis, not dependant on ethnicity or relation to other families on the site. The Smiths had been told by the site manager they had no chance of getting on because they were not friends or relatives of the current occupiers.
21. **The only independent evidence I have is the minutes of the Hillingdon Traveller Forum from June this year. These record the long standing tensions within the Gypsy and Traveller community,** but note the recent change in Council policy regarding admissions to Colne Park. **In my own experience these tensions are typical, and it is not surprising to hear that non-Irish travellers are reluctant to apply for pitches on an Irish site, regardless of the Council's change in policy.** The Council had no information as to who the 5 new families who had moved onto the site in the last 5 years were, or how the pitches had become vacant, or even when. **It seems quite clear to me, that at least up until now, there has been little or no realistic possibility of non-Irish travellers either wanting or being able to access Colne Park.** At the same time the Council do not seem to have had any control or even interest in controlling admissions to Colne Park.
- 22. This means the Council's analysis of demand is limited entirely to satisfying the requirements of the existing families on Colne Park, and ignoring any other demand in the Borough.** The Council said they had 7 Gypsies or Travellers on their waiting list for pitches. There was no information as to who these people were or if they could be accommodated at Colne Park, or were already at Colne Park and wanted their own pitch. In any event it did not sit well with their view that 4 pitches represented a reasonable 5 year demand. **The Council were also ignoring the demand from Gypsies already in the Borough, but not at Colne Park. There are at least 4 families at The Shrubs and on Plots 1 & 2. I was also told Harefield had a considerable English Gypsy population. 30% of children at Harefield schools are Gypsy or Traveller children. Apart from those at the appeal site and its neighbours they either live in yards or on other unlawful sites around the area or are temporarily in housing. The fact they are not on the Council's waiting list does not indicate lack of demand, but rather that they consider there is no point. There can only ever be places at Colne Park, which is where they do not want to go. Furthermore, they do not think they will ever be offered a place there in the first place unless they are Irish.**
23. **None of these complexities or the clear latent demand for lawful sites seems to have been taken into account by the Council, and I was only given information about Harefield, which is only one part of the Borough, suggesting an even larger problem.** I am not suggesting these issues are easy to resolve, but in terms of Policy B of the PPfTS, I do not consider the Council can demonstrate a 5 year supply of sites.
-

### *Alternative sites*

24. If the appeal is upheld the Smiths maintain they will have nowhere else to go. The Council felt this was a stock response. There was no evidence of any effort to find anywhere else and they could go on the waiting list for Colne Park. Given the 5 pitches every 5 years turnover there was a good chance they would be offered a pitch within a year, and the Council were happy to extend the compliance period to 12 months to accommodate this.
25. The fact that I do not consider the Council have a 5 year supply of sites on its own suggest strongly there is nowhere else to go in the Borough. There is no evidence as to the actual frequency of vacancies at Colne Park so I do not accept the simplistic one a year vacancy rate. Even if I did, for all the reasons explained above, it is unlikely they would get offered a place there. Not least because the Council's own ranking system suggests that should any places actually become vacant they will go to the neediest family, not necessarily the Smiths.
26. The Smiths have tried, unsuccessfully, to find places outside of Hillingdon, their efforts have concentrated in Buckinghamshire and Hertfordshire as these could enable them to keep their children at the Harefield schools. There is no doubt they have a strong connection to the area, by birth, family, work and children, so it is not unreasonable to look across this area. In 2006 they applied for a place at The Orchard, which was supported by Hillingdon. The site is in Bucks, but close to Harefield, and unfortunately they were not successful in their application. They state they have been on the waiting lists for Bucks and Herts for 10 years, and I have evidence from Herts they are still on the waiting list with them and also from Bucks that they were intending to renew their application with them in 2009.
27. It seems that applications have to be renewed every year. The Smiths stated they had renewed their Bucks application, but had not brought the paper work with them. Although they could not prove it, I have no doubt they have been looking for the last 10 years, even if they have not actually been on a waiting list for every one of those 10 years for both counties. The Council suggested two particular sites that are relatively near to Colne Park, Mansion Lane in Iver and Foxborough Close in Slough. Both are in Bucks where the Smiths have been on the waiting list and have had no luck. They also explained that Mansion Lane, like so many Gypsy sites was available only for those with connections to the existing families, and Foxborough Close was a private site.
28. I am not surprised they have not been able to find anywhere else to stay, and it seems to me that they have been looking. Given this, and given the situation in Hillingdon I cannot but assume they would have nowhere else to go if turned off the site and I attach considerable weight to this.

### *Personal circumstances*

29. The Smiths have 3 children, Ireland, who is in year 10 at Harefield Academy, Dior at Harefield Junior school and Billy who is 20 months old. The two girls are settled in school and doing very well. There is a letter of support from the Junior School. I was informed that Harefield has an excellent reputation for supporting Gypsy and Traveller children. The Smiths have always been strongly supportive of the benefits of good education for their children, and have kept them in school,

generally at Harefield, despite having to move on regularly since Ireland was born.

30. Billy was a premature baby and has been monitored at Hillingdon hospital since birth. He has recently been diagnosed with glue-ear. I was informed he was due to meet a specialist on 31 October to determine whether an operation was necessary and where this might take place, either locally or at Great Ormond Street. The Smiths themselves were part of a campaign run by Hillingdon between 1999 and 2008 to address the inequalities in access to health care, and were on the promotional posters as an exemplar family. This suggests to me they are prepared to go to considerable lengths for the benefit of their children in terms of education and health.
31. While I consider every encouragement should be given to help the Smiths maintain continuity in education, there is no real sense in which the needs of their children are unusual, and the fact that they might have to change schools, no matter how well they are doing is regrettable, but would not necessarily undermine their education. However, I am aware of the historically low levels of educational achievement for Gypsy and Traveller children, that the Smiths are bucking this trend and that Harefield has a good reputation for helping Gypsy and Traveller children. This, and the inevitable disruption to the children's education, is a matter of concern given that the courts have held the interests of the children are a paramount issue.
32. The impact on Billy will be greater. I have no doubt that if they leave the site that will not be helpful in terms of continuity of treatment. If they move across NHS boundaries it might cause more delays. Again there is no suggestion that they will be denied access to appropriate healthcare but if they are forced back onto the road the disruption and possible consequences of delays are important matters of some weight.

#### *Other matters*

33. The neighbours at Nos 8 & 9 New Years Green Farm have objected to the site. Their main objections are that the site is unlawful and that it would set a precedent for the other land owned by the appellants to the rear of the appeal site. There is a distinct difference between the land at the rear which extends into the open countryside and adjoins a bridleway and the appeal site which is sandwiched in between existing development. The other land also now has no vehicular access to the road so development would be difficult.
34. The neighbours and the local MP also complain about rubbish on the road and traffic. I have no evidence that any rubbish has been deposited on the road. Given the use of the Lane by traffic visiting and servicing the various reclamation sites in the area there is no reason to suppose any rubbish is from the appeal site. In terms of traffic generation, although the lane is narrow it is heavily frequented by skip lorries and other vehicles, as I saw on my visits to the site. The additional traffic generated by one more family would be minor in comparison.
35. The Council were also concerned about views from the bridleway. On the site visit I saw it was impossible to see the site at all from the bridleway. The land in between is heavily vegetated but the Council suggested this might be cut down, opening up views. However, even if it was possible to see the site it would be

across the mobile homes and caravans in The Shrubs and Plot 1, and so would be hardly noticeable.

## Conclusions

36. The site is in the countryside and in the Green Belt. I do not find the impact on the countryside to be harmful, nor is there any great impact on the openness of the Green Belt. However, this and the fact that it is inappropriate development carries substantial weight. There are no other factors that weigh against the development. On the positive side, the site is visually very much a part of a larger group of buildings, mobile homes and caravans. It also occupies a brownfield site that has previously been used for the storage of building materials, albeit this use was unlawful. The Council cannot demonstrate a 5 year supply of sites. If the appeal is upheld the appellants will be made homeless and there is nowhere else for them go. This will disrupt their family life, their children's education and possibly affect the health of their youngest child.
37. Weighing this all in the balance, and bearing in mind I am obliged to give substantial weight to the fact the development is inappropriate in the Green Belt I consider the appeal is finely balanced. I do not think, therefore, there is a sufficiently strong case to allow a permanent Gypsy site at this location.

### *Temporary planning permission?*

38. The appeal is for a permanent planning permission but the use of a temporary permission was discussed at the Hearing. The Council are opposed to this because they do not consider anything will change in the future. **They have identified the likely demand for 4 pitches which they can accommodate. However, I do not share their optimism over site allocation, and consider that when they do finalise their allocation policy, they may well find they need to make provision for more pitches or sites.** In which case it might be possible at that time to use one of these alternative sites for the appellants.
39. I would be surprised if the Council are nearing completion of the local plan process in less than 3 years and a reprieve of 3 years would certainly help with Billy's health problems, and enable at least one of the girls to finish education locally. When considering a temporary planning permission, Policy H of the PPFTS states that the lack of a 5 year supply of sites should be a significant material consideration. Adding this into the equation, along with the benefits to the family, the substantial harm to the Green Belt is now clearly outweighed.
40. All of these issues taken together, the location of the site amidst other buildings, the lack of a 5 year supply of sites, the fact that the Smiths would be made homeless, the effect on the educational needs of their children and the health of Billy all together amount to the very special circumstances required to allow inappropriate development in the Green Belt on a temporary basis. Subject to the conditions discussed below, I shall recommend the notice is quashed and a temporary planning permission granted for 3 years.
41. I was invited at the Hearing to consider the potential infringement of the human rights of the Smiths. Given the acknowledged difficulties in finding a suitable alternative site within the locality, the personal circumstances of the appellants and their children and the likelihood that alternative sites could become available within the next 3 years, I consider that a temporary planning permission for a



period of 3 years is appropriate and reasonable in the circumstances. The protection of the public interest cannot be achieved by means which are less interfering of the appellants' rights. They are proportionate and necessary in the circumstances and would not result in a violation of their rights under The Human Rights Act 1998.

### **Conditions**

42. As well as a 3 year temporary condition, one restricting the site to Gypsies and Travellers and making it personal to the Smiths is required as their particular circumstances are one of the important factors in the appeal. A condition limiting the number of caravans is also important to prevent over crowding as is one to prevent commercial activities on the site and the parking of a vehicle over 3.5 tons.
43. The Council also suggested a detailed landscaping, boundaries and site development scheme to be agreed. Given this will be a temporary planning permission and the small size of the site there is little room for any of the caravans or structures to be other than where they are, nor is there a great deal of room for anything else on the site, certainly not landscaping. I consider that a simpler condition requiring a plan showing the number and position of structures and hardstanding on the site and the current boundary treatment, with a prohibition of adding to the current position would suffice to protect the Green Belt from any further encroachment. It was not clear to me how foul and surface water drainage was dealt with and a condition requiring this to be agreed with the Council is also necessary. If the Secretary of State is minded to allow the appeal then I recommend all these conditions, which are in the attached annex, should be included in the decision.

### **Recommendation**

44. My recommendation is set out in Paragraph 1 above.

*Simon Hand*

Inspector







# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |        |              |  |
|----------------------------|--------|--------------|--|
| Title                      | Mrs    |              |  |
| First name                 | Sally  |              |  |
| Last Name                  | Barter |              |  |
| Organisation (if relevant) |        |              |  |
| Unit                       |        | House number |  |
| House name                 |        |              |  |
| Address 1                  |        |              |  |
| Address 2                  |        |              |  |
| Town                       |        |              |  |
| County                     |        |              |  |
| Postcode                   |        |              |  |
| Telephone                  |        |              |  |
| Email                      |        |              |  |

| 2. Agent's Name and Address (if applicable) |  |              |  |
|---|--|--------------|--|
| Title                                       |  |              |  |
| First name                                  |  |              |  |
| Last name                                   |  |              |  |
| Company                                     |  |              |  |
| Unit  |  | House number |  |
| House name                                  |  |              |  |
| Address 1                                   |  |              |  |
| Address 2                                   |  |              |  |
| Town  |  |              |  |
| County                                      |  |              |  |
| Postcode                                    |  |              |  |
| Telephone                                   |  |              |  |
| Email                                       |  |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on proposed changes to: *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

Q2. Please indicate the Proposed Change on which you wish to comment:

|                               |            |
|-------------------------------|------------|
| Policy number;                | H3         |
| Paragraph number;             | 3.18/ 4.26 |
| Table or figure number; or    |            |
| Map number (Atlas of Changes) |            |

Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

***I have explained fully in my attached letter and also provided a document of evidence to support this -***

***There has been a failure to fully consult with all the specific groups of Gypsies, Travellers, Showmen and Roma living within Hillingdon***

***The Traveller Needs Assessment was not publicised or promoted amongst the Traveller Community, very few know of its existence or importance***

***The Traveller Needs Assessment does not record the views or concerns of representatives of Travellers in the borough***

***The Traveller Needs Assessment is not factually correct - Showman yards***

***The Traveller Needs Assessment overwhelmingly focuses on consultation with the Irish Traveller community***

***The Traveller Needs Assessment was completed at a time when the majority of the community were away at Fairs or working to earn a living which did not aid engagement***

***The Traveller Needs Assessment does not record the Inspectors findings re- relevant Traveller planning appeal cases in Hillingdon ( see attached)***

***The Traveller Needs Assessment does not reflect the need of Gypsies/Travellers/ Showmen and Roma living in Hillingdon***



Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | No, I do not want to participate in the oral examination |
| <input type="checkbox"/>            | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

|  |
|--|
|  |
|--|

A large empty rectangular box with a thin black border, intended for providing comments on the technical reports mentioned in the question below.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## PART C - Progress of the Local Plan Part 2

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                                     |          |   |
|-------------------------------------|----------|---|
| <input checked="" type="checkbox"/> | <b>X</b> | When the Local Plan Part 2 Plan has been submitted for independent examination.   |
| <input checked="" type="checkbox"/> | <b>X</b> | The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2. |
| <input checked="" type="checkbox"/> | <b>X</b> | The adoption of the Local Plan Part 2.  |



## Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

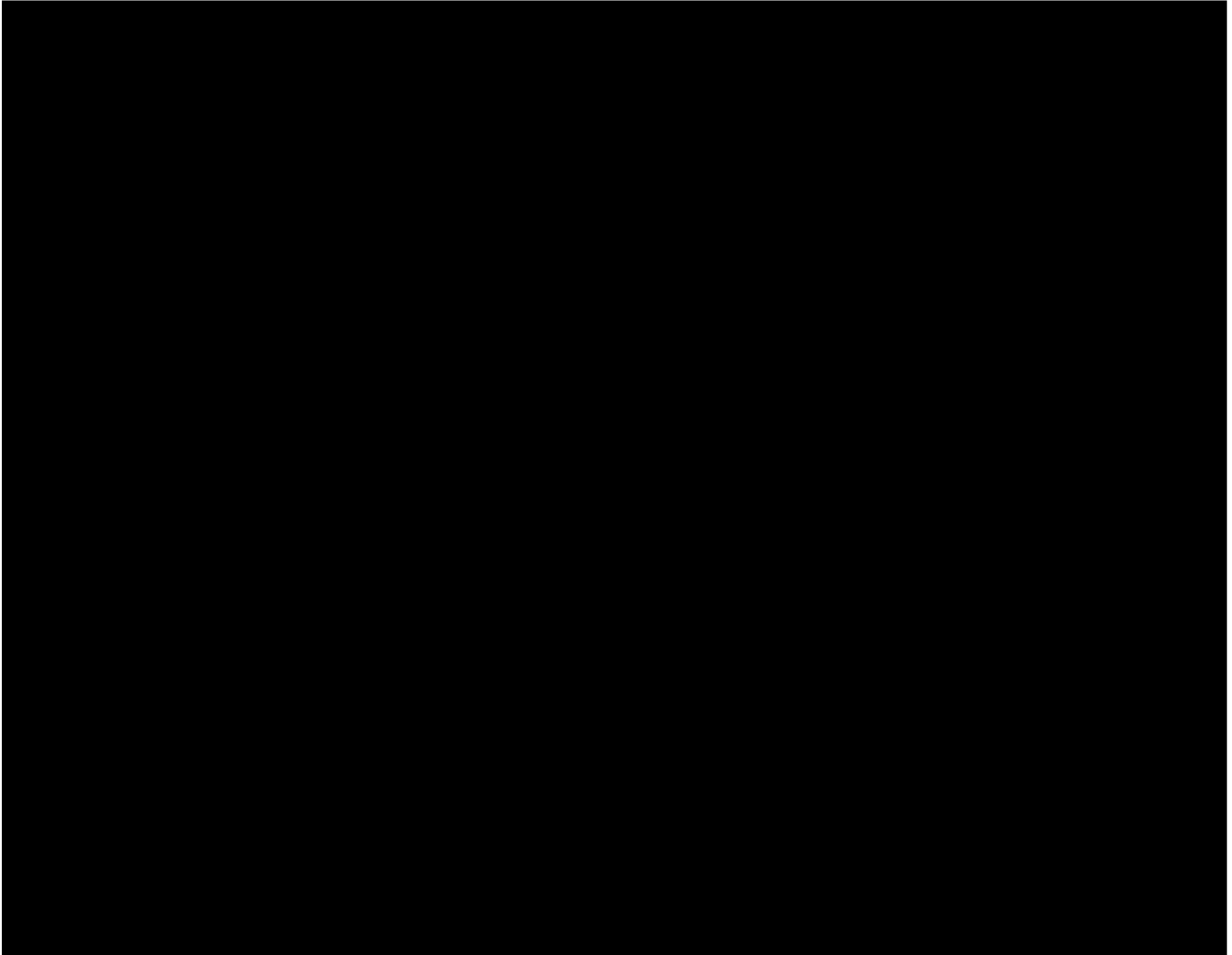
- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.







Local Plan &lt;localplan@hillington.gov.uk&gt;

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## COMMENTS ON PROPOSED CHANGES TO LOCAL PAN PART 2

2 messages

Marion Turner [REDACTED]  
To: localplan@hillington.gov.uk

6 December 2015 at 18:05

FAO James Gleave  
Planning Policy Team Manager  
Residents Services.

I am responding to your letter and attachment of 23 October 2015 – within your deadline of 8 December 2015.

I did download the Word version of the representation form to complete. However, this is inappropriately and onerously prescriptive and the boxes where you require a tick (or not) do not appear to be formatted in a way that I can insert any symbol from my PC (I have Windows 8.1/Word2013) so , as well as being very irritated, I have abandoned any further attempt to complete this.

But I would be grateful if you could include my comments:

1. I support the inclusion of a large number of brown-field ex-industrial sites being re-designated for housing. It is not clear how much of this housing will be affordable and what mix of unit size etc the Borough will require;
2. The inclusion of “mixed use” e.g. at Master Brewer, Northwood Station sites needs further thought. It is unclear whether this means shop units at ground floor – or more creative mixes. In other recent developments, ground floor shop units seem to remain vacant for long periods and//or there is a frequent turnover of occupants. It sounds good in theory but....Might it not be better explicitly to designate more as accessible units for wheelchair or other users incl. elderly (with appropriate security) to create more mixed communities?

Marion H Turner



Local Plan &lt;localplan@hillington.gov.uk&gt;

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## Hillingdon Local Plan Part 2: Emerging Site Allocations and Designations (Policy SA 37: Old Coal Depot, Tavistock Road)

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Gibson Guy [REDACTED]  
To: "localplan@hillington.gov.uk" <localplan@hillington.gov.uk>

28 October 2015 at 14:52

FAO: James Gleave – Residents Services.

Dear James,

I have been passed your letter dated 17/07/2017 regarding above consultation by my colleague Jenifer Cox. First, I must apologise for the delay in responding. Due to a misunderstanding it would appear that a whilst the following response was prepared it was not forwarded to the council.

*At present Network Rail (NR) lease the sidings to the south of the Old Coal Depot site to the freight operator Tarmac and the Old Coal Depot site itself is leased to Powerday.*

*The freight operation is proving particularly successful as a result of increasing business volumes and the shortage of this type of rail freight handling facility in such close proximity to the centre of London. Another important advantage of this particular freight site is that it is located on the north side of the main lines which facilitate access to the network whilst minimising disruption to other rail services. As part of NR's remit is to promote rail freight operations, NR are keen to support the growth of freight operations on the existing site and also ensure in the medium to long term that there is adequate land available to accommodate the future expansion of this activity beyond its current limits. To this end the Old Coal Depot is ideally positioned to accommodate future growth of the freight business and for this reason NR would not support the loss of the current employment designation on this land in favour of the uses envisaged in proposed Policy SA37.*

*Having stated NR current position, I'm sure you will appreciate that the future growth of rail services and freight operations in particular are very dependent on economic factors. Therefore future plans and operational requirements for this site may well change depending on prevailing economic conditions.*

Finally, I thank you for consulting Network Rail on this draft policy and hope that the above comments can still be taken into account.

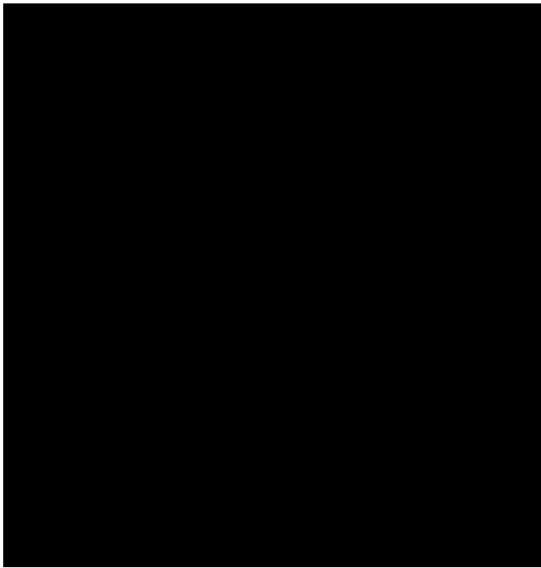
Kind Regards

Guy Gibson



Property

**Guy Gibson MA, Dip Arch Con, MRTPI, MCIAT.**



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Local Plan &lt;localplan@hillington.gov.uk&gt;

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## Local Plan: Part 2

2 messages

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**Bullock Lisa** [REDACTED]  
To: "localplan@hillington.gov.uk" <localplan@hillington.gov.uk>

7 December 2015 at 17:11

Dear Sir or Madam

Thank you for allowing us to comment on London Borough of Hillingdon's Local Plan: Part 2.

Network Rail has the following comments to make:

### Policy SA5

SA5 informs that the final overall quantum of uses and the number of residential units will be determined through discussions with key stakeholders and the development of a sustainable masterplan.

SA5 consist of 3 sites all of which could be developed in isolation with linkages to the others, as such it could be considered unreasonable to expect a developer to delay until such a time as developers of all 3 sites come together to formulate a master plan. Development of 1 or more of the 3 sites would be sustainable in isolation and so it would seem that this wording is unnecessary and may lead to a single site or 2 of the 3 sites being prejudiced.

Network Rail owns land within Site C where the criteria set is at 110 residential units, with 50% of the site containing B1 and B2 Light industrial uses. The site area is listed as 2.2 hectares. This does not include the area to the north of the site currently being used as for car parking. The addition of this area would increase the size of the site to 2.6 hectares and provide more flexibility, with parking being provided within the scheme if there is a necessity for it.

Site C has a PATL rating of 4. TFL's 2011 baseline data informs that the northern, central and western portions of Site C are within the level 5 (Very Good) PTAL zone, with the southern and eastern corners of the site shown as level 4 (Good). When Crossrail opens in 2017, there will be improvements to accessibility. These can be seen in TFL's PTAL projections to 2031, which show the station and a portion of the land adjacent to the railway as level 6a (Excellent), with the eastern and south western corners of Site C upgraded to 5 (Very Good), meaning that only the southern corner of the site would remain as level 4.

There is no clear evidence of how the proposed requirement for 50% of the site area to be used for employment has been calculated. Given that growth figures provided show job numbers required, it would seem that a more sensible approach would be for the site to provide, a net increase in jobs. In addition to this the recent Employment Land Study informs that there is a surplus of 18.5 hectares of employment land in the plan area. I would therefore suggest that the requirement for 50% of the site being used for B1 or B2 employment uses be replaced with an alternative more flexible approach seeking employment uplift.

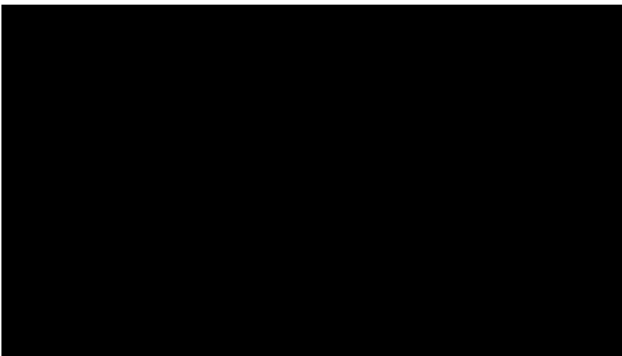
All new residential development should take account of the Residential Density Matrix contained in Table 5.2 which has a figure ranging from 50 units per hectare for detached dwelling up to 190 for flats. Surrounding development sites have achieved between 200 and 250dph. Therefore the indicative dwelling provision for Site

C should be increased to reflect densities achieved at the surrounding sites and the London Plan's guidance.

Yours faithfully,



**Lisa Bullock MRTPI**



[www.networkrail.co.uk/property](http://www.networkrail.co.uk/property)

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\*\*\*\*\*  
\*\*\*\*\*

**Local Plan** <localplan@hillingdon.gov.uk>

15 December 2015 at 10:39

To: Bullock Lisa [Redacted]

Dear Lisa

Thank you for your comments. These will be considered by the Council and forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination.



# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |  |
|----------------------------|--|
| Title                      |  |
| First name                 |  |
| Last Name                  |  |
| Organisation (if relevant) | THE OWNERS OF THE CROWN TRADING CENTRE |
| Unit                       | House number                           |
| House name                 |  |
| Address 1                  |  |
| Address 2                  |  |
| Town                       |  |
| County                     |  |
| Postcode                   |  |
| Telephone                  |  |
| Email                      |  |

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|---|-----------------|
| Title                                       | MRS             |
| First name                                  | HOLLY           |
| Last name                                   | MITCHELL        |
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## PART B - Your responses

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|-------------------------------------|-----------------------------------|
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| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|--|---|
| <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |     |
|-------------------------------|-----|
| Policy number;                | SA4 |
| Paragraph number;             |     |
| Table or figure number; or    |     |
| Map number (Atlas of Changes) |     |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |
|-------------------------------------|-------------------------------------|
| <input checked="" type="checkbox"/> | It has not been positively prepared |
| <input type="checkbox"/>            | It is not justified                 |

|                                     |   |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/>            | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

***Please see attached letter and transport assessment***

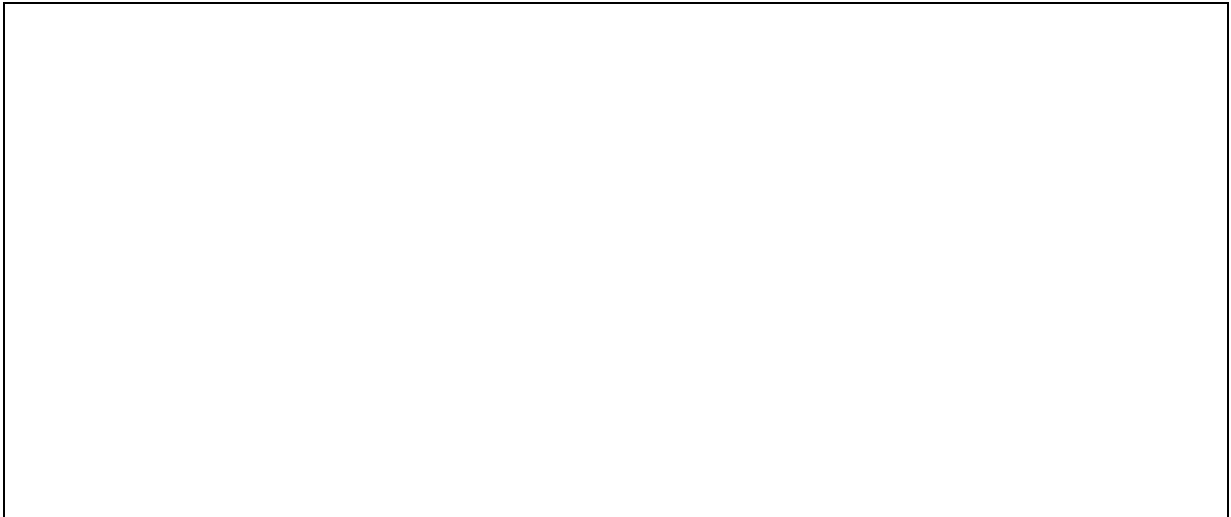
Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
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**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

The representation affects employment land provision and the regeneration of Hayes Town Centre and relates to the Council's lack of knowledge regarding the particular characteristics of the Crown Trading Centre. Our participation will ensure that the Crown Trading Centre is considered for alternative uses in accordance with Local Plan Part One.



**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

We comment on the updated Employment Land Report, please see attached letter.

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

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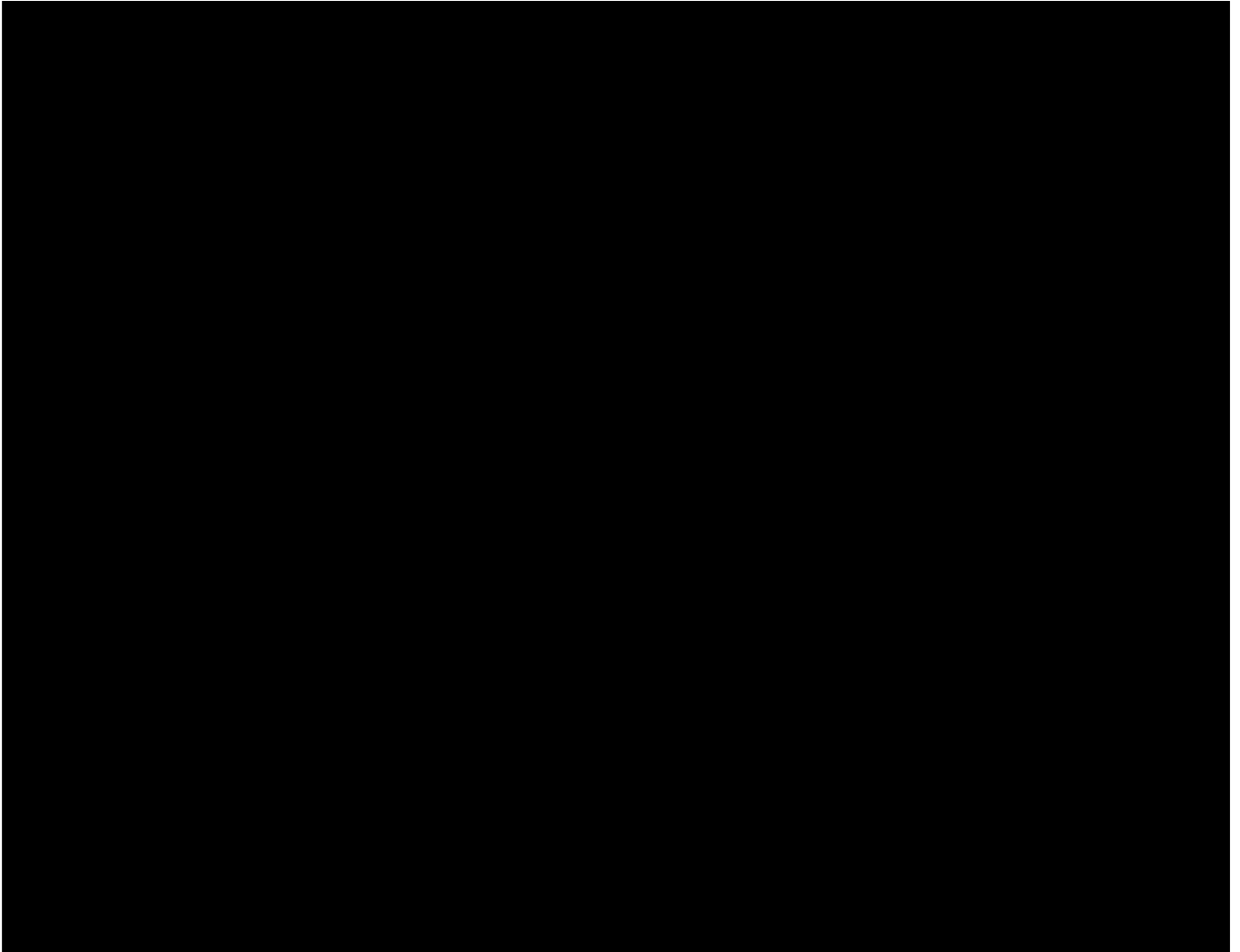
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**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**



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# HILLINGDON

LONDON

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Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

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| 1. Name and Address        |  |
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| Title                      |  |
| First name                 |  |
| Last Name                  |  |
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| Postcode                   |  |
| Telephone                  |  |
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| 2. Agent's Name and Address (if applicable) |                 |
|---|-----------------|
| Title                                       | MRS             |
| First name                                  | HOLLY           |
| Last name                                   | MITCHELL        |
| Company                                     | SIMPLY PLANNING |
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## PART B - Your responses

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| Local Plan Part 2                   |                                   |
|-------------------------------------|-----------------------------------|
| <input type="checkbox"/>            | Development Management Policies   |
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| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|--|---|
| <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                           | Consultation Statement                          |
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**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |      |
|-------------------------------|------|
| Policy number;                | DME1 |
| Paragraph number;             |      |
| Table or figure number; or    |      |
| Map number (Atlas of Changes) |      |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |
|-------------------------------------|-------------------------------------|
| <input checked="" type="checkbox"/> | It has not been positively prepared |
| <input checked="" type="checkbox"/> | It is not justified                 |

|                                     |   |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/>            | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

***Please see attached letter and transport assessment***

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

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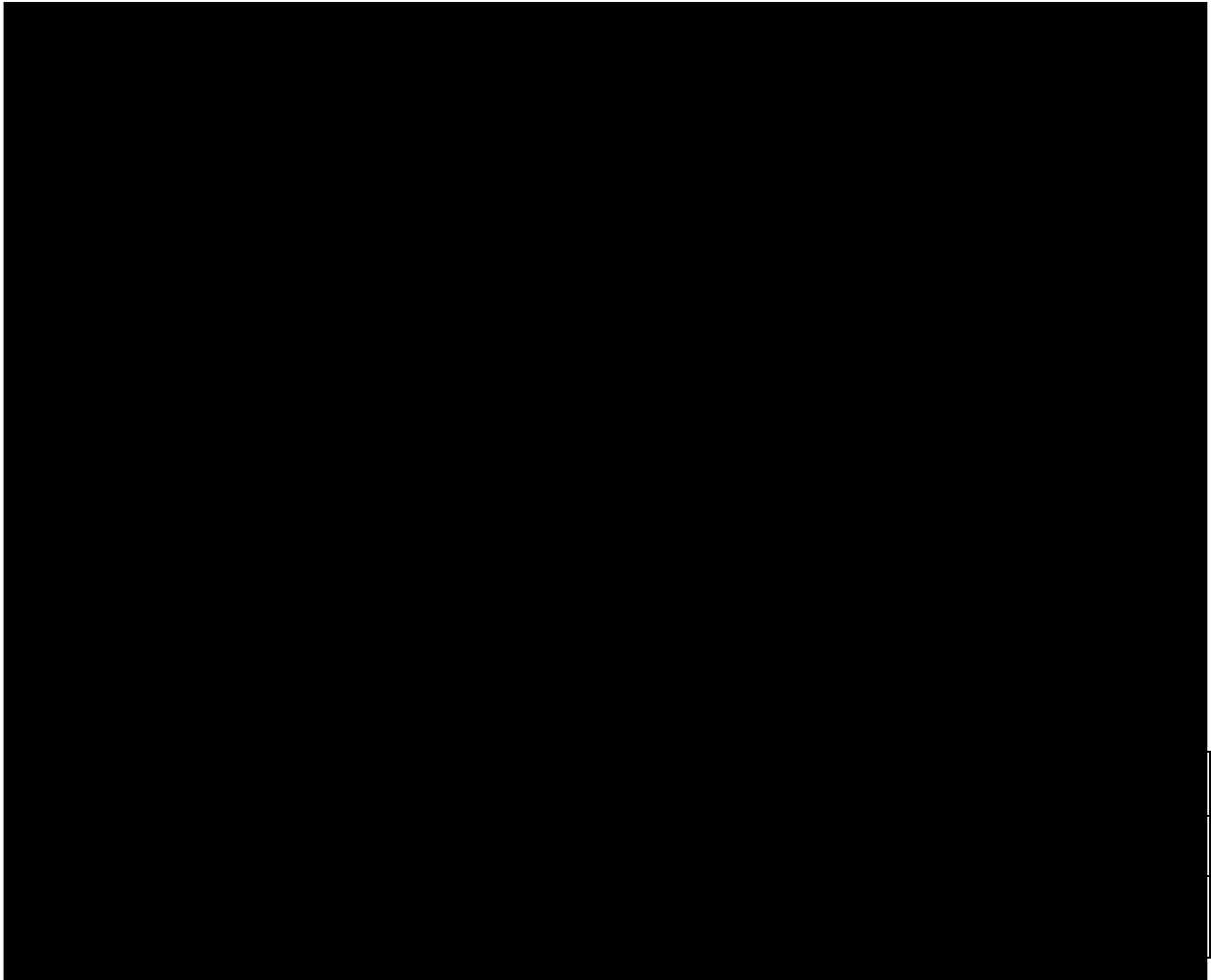
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|                               |      |
|-------------------------------|------|
| Policy number;                |      |
| Paragraph number;             |      |
| Table or figure number; or    |      |
| Map number (Atlas of Changes) | 19.4 |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
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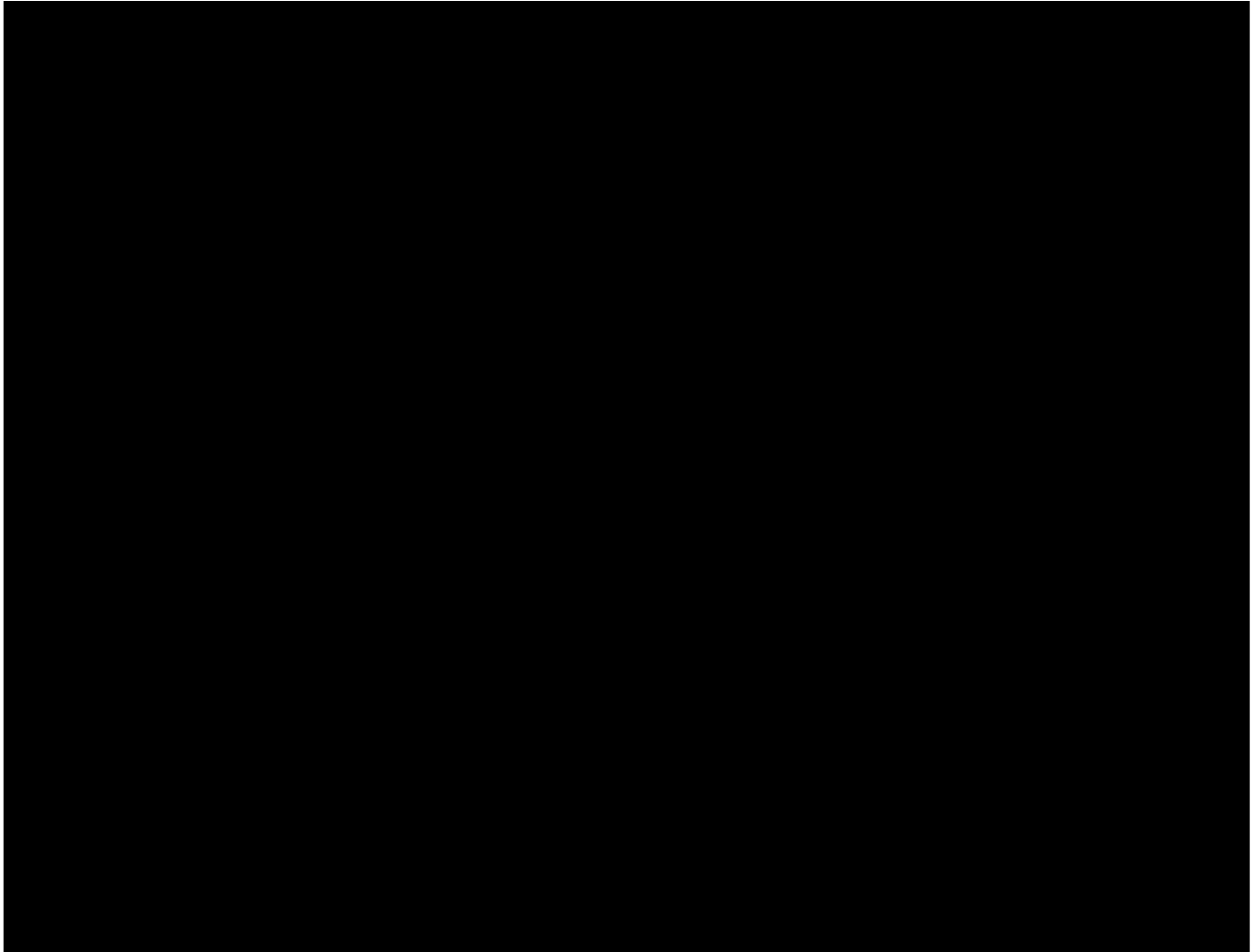
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**REPRESENTATIONS TO THE HILLINGDON LOCAL PLAN – PART 2  
ON BEHALF OF THE LANDOWNERS OF CROWN TRADING CENTRE, CLAYTON ROAD, HAYES**

**POLICY SA 4 – FAIRVIEW BUSINESS CENTRE  
MAP 19.4  
POLICY DME1**

---

**a) Summary**

This objection is submitted on behalf of the landowners of the Crown Trading Centre, Clayton Road, Hayes. The objection seeks an amendment to Policy SA.4 with corresponding map changes to 19.4, a new policy or amendments to Policy DME1 to recognise that the Crown Trading Centre be released for residential led mixed use within this Plan period to provide additional housing and significant regeneration benefits for Hayes Town Centre and the Grand Union Canal.

The Local Plan Part One is clear that Local Plan Part Two should fully examine sites along the Grand Union Canal for release for housing. We contend that part of the evidence base to assess these sites, the Employment Land Review (ELR), is flawed meaning that the Crown Trading Estate has not been properly considered at this stage.

This representation objects to the boundaries of Policy SA4 and Map 19.4 as these should be amended to include the Crown Trading Estate, removing the site from its current allocation as Strategic Industrial Land (SIL) in recognition that the site does not have the required characteristics to operate as SIL now or in the future. The site has:-

- Inadequate on-site parking and yard areas for the existing businesses;
- Inadequate and dangerous HGV access into and egress from the site;
- Carriage widths that are unsuitable for HGVs especially in an area of increased housing development where conflict with other users including cyclists and pedestrians is likely;
- A one way system on Clayton Road/Blyth Road which requires HGVs to follow a one way system into Hayes Town Centre and then back out along Blyth Road resulting in significant impact on residential amenity;
- Issues with drainage and flooding with units regularly flooding;
- Outdated and unsafe and unsustainable buildings and yard areas;
- Long term issues with letting units when they are vacated due to the above characteristics.

The Crown Trading Estate remains the last piece of allocated SIL within Hayes which is required to take access from Clayton Road, a heavily parked single lane, one way road.

Hayes is an area which is undergoing significant regeneration due to the arrival of Crossrail. The site is also in need of regeneration. Multiple small ownerships on the site have meant that it is difficult to maintain and improve the buildings and communal areas on the site leading to a site that is not fit for modern business purpose. The site also lies adjacent to the Grand Union Canal which is identified as an area with the potential to provide significant regeneration through the introduction of residential uses.

In accordance with the Local Plan Part One the Council should review the Crown Trading Centre for residential development. Hillingdon Borough Council has identified a surplus of industrial sites and it follows that the lowest quality sites in the locations that are best suited to residential and with the most potential for area regeneration should be released first. The site is one of the lowest quality employment sites in the area in one of the best locations for residential development. The area surrounding the site is changing and the redevelopment of the site would



significantly contribute to the regeneration of Hayes Town Centre and the Grand Union Canal and improve the residential environment in the surrounding streets.

**b) The Policy Context**

The London Plan identifies that SILs are London's main reservoirs of industrial land. Paragraph 2.80 states that SILs are given strategic protection because their scale and relatively homogenous character means they can accommodate activities which elsewhere might raise tensions with other land uses.

Paragraph 2.83 states that the boundaries of SILs should be defined in LDFs and there is a particular onus on boroughs to manage the differing offers of SILs through co-ordinated investment, regeneration initiatives, transport and environmental improvements.

Paragraph 2.85 considers the release of surplus SIL stating that this should be focused around public transport nodes and town centres to enable higher density redevelopment, especially for housing. It is noted that the release process must be managed carefully taking into account advice given at Policy 4.4.

Policy 4.4 of the London Plan concerns Managing Industrial Land and Premises. Regarding SIL the policy states that the Mayor will work with boroughs and other partners to provide a sufficient stock of different land and premises to meet the future needs of different types of industrial and related uses. The key policy requirement is to plan, monitor and manage release of surplus industrial land, where compatible with providing sufficient land, so that ***"it can contribute to strategic and local planning objectives, especially those to provide more housing, and in appropriate locations to provide social infrastructure and to contribute to town centre renewal."***

In preparing LDFs the London Plan states that LDFs should demonstrate how the stock of industrial land will be planned and managed in local circumstances, taking account of:-

- "a the need to identify and protect locally significant industrial sites where justified by evidence of demand***
- b strategic and local criteria to manage these and other industrial sites***
- c the borough level groupings for transfer of industrial land to other uses (see Map 4.1) and strategic monitoring benchmarks for industrial land release in supplementary planning guidance***
- d the need for strategic and local provision for waste management, transport facilities (including inter-modal freight interchanges), logistics and wholesale markets within London and the wider city region; and to accommodate demand for workspace for small and medium sized enterprises and for new and emerging industrial sectors including the need to identify sufficient capacity for renewable energy generation***
- e quality and fitness for purpose of sites***
- f accessibility to the strategic road network and potential for transport of goods by rail and/or water transport***
- g accessibility to the local workforce by public transport, walking and cycling***
- h integrated strategic and local assessments of industrial demand to justify retention and inform release of industrial capacity in order to achieve efficient use of land***
- i the potential for surplus industrial land to help meet strategic and local requirements for a mix of other uses such as housing and, in appropriate locations, to provide social infrastructure and to contribute to town centre renewal."***

The Hillingdon Local Plan Part One paragraph 5.10 states that there is more **employment land than is currently needed and identifies that surplus industrial land could be released to create opportunities for regeneration and provide much needed housing**. In accordance with London Plan policy 4.4 criterion i) the Hillingdon Local Plan Part One identifies at table 5.13 that Cross Rail and the Grand Union Canal have an important role in the regeneration of the Hayes/West Drayton corridor. Strategic Objective 15 states that the Council will specifically review sites along the Grand Union Canal and, where appropriate, sites along the canal frontage will be bought forward for residential led mixed-use development as part of the Local Plan Part Two.

Paragraph 5.13 of the Local Plan Part One identifies that:-

***‘Subject to the production of appropriate supporting evidence, the Council will consider the release of alternative sites of warehouse and industrial land as part of the production of the Hillingdon Local Plan Part 2’.***

The soundness of the Local Plan Part One relies on the Council undertaking further detailed assessments of land for release with the Local plan Inspector stating that:

***“The Council now recognises the fluidity of the situation. It is committed to annual monitoring, and to a review of the extent and location of land that might be considered for other uses. This process needs to be inclusive, and the Council will no doubt be receptive to other sources of evidence as they become available. In the interim, the minor changes proposed to the Local Plan provide this degree of flexibility, but do not alter the thrust of the E1 Policy approach.”***

The Crown Trading Centre lies on the Grand Union Canal frontage within walking distance to Hayes Town Centre and Crossrail. It is clear therefore that the Local Plan Part One, in acknowledging that there is surplus employment land, envisaged that Part Two would specifically consider the potential release of sites which, given its location, would include the Crown Trading Centre.

It is our contention that the Crown Trading Centre has not been properly assessed for suitability for residential led mixed use development in accordance with the Local Plan Part One.

In February 2014 URS published the Council’s Employment Land Study Update (ELR). As a background document to the Local Plan Part Two, and in accordance with Local Plan Part One, the ELR should have provided the background necessary to undertake a proper review of those employment sites that relate well to Crossrail and front the Grand Union Canal.

The consultants sought to assess the quantity, quality and viability of the industrial land by assessing land in clusters. The study assessed clusters as suitable for B2/B8 on key characteristics including availability of parking, servicing of businesses, topographical elements and access.

The Crown Trading Centre was included in the Blyth Road Cluster, the 2<sup>nd</sup> largest cluster of land, being 44.8 hectares. Due to the fact that the site was in such a large cluster we do not consider that the characteristics of the site were properly assessed. It was therefore concluded that Cluster 13, Blyth Road, containing the Crown Trading Centre:-

- Has adequate road access;
- Has adequate servicing;
- Is identified as having inadequate parking facilities;
- Is not identified as being in poor condition.

The ELR finds that, in relation to Hayes Industrial area, the SILs which make up around 65% of industrial land were **overall judged to have key strategic characteristics supportive of employment land activities, such as good/ very**

**good access to the strategic road network and are in adequate condition, very good/ good or average condition.**

If smaller clusters had been used within the ELR the Crown Trading Centre, assessed on its own merits, would have been found to have:-

- Inadequate servicing;
- Inadequate parking;
- Inadequate road access;
- Industrial units and internal roads that are in a very bad state of repair and not fit for modern standards of operation and safety;
- Significant impacts on the surrounding residential area and Hayes Town Centre due to the inadequate road access and HGVs having to pass a one way system to get back onto the road network;
- Significant regeneration potential linked to Hayes Town Centre regeneration and Cross Rail.

These are not the characteristics of a site that should be allocated as SIL. SIL is to protect the very best reservoir of industrial land in London and therefore has the very highest levels of protection. The flawed findings of the ELR with regard the Crown Trading Centre has meant that the site has not been specifically assessed and specifically reviewed for suitability for residential led mixed use development as required by the Local Plan Part One paragraph 5.13 and Strategic Objective 15.

The lack of detailed assessment in this Plan review is highlighted by the very late inclusion of text under Policy SA 4 which acknowledges that the release of the site may be still be appropriate:

***“The Council will also consider the release of the Crown Trading Estate to the west should this site become available, taking into account of relevant policies in the development plan and the conclusions of the latest evidence base.”***

Whilst we appreciate and support the identification of the site within the emerging plan, the Local Plan Part One is clear that sites with good access to Crossrail and fronting the Grand Union Canal should be assessed and considered within **this** Local Plan Part Two.

The following section sets out an assessment of the Crown Trading Estate and the key characteristics that make the site unsuitable for retention as SIL and appropriate as an allocation for residential led mixed use development. In accordance with the London Plan paragraph 2.83, if the Council seriously considers that this site should remain as SIL then the Local Plan Part Two needs to provide the policies, investment and regeneration to improve the site to ensure that it is able to operate as SIL. The Plan does not do this, in fact the plan provides policies and residential allocations on adjacent sites that will only exacerbate the problems already encountered.

### **c) The Site Today**

The site is 1.36 hectares and is owned by 10 owner occupiers and the communal areas are managed by a management company funded by the 10 owners. Set out below is a schedule of landholdings and employment numbers. The site currently employs approximately 95 people, with the majority of those employed by Universal Tyres who employ 45 people full time.

Universal Tyres report that they have outgrown the site and have sought solutions to support them to grow the business on another site in the vicinity. The site appears bust when people visit, but for a site of 1.3 ha , 95 employees is a fairly low density.

The majority of the uses on the site are sui generis uses such as tyre fitting and MOT testing, but other uses include steel fabrication and scaffolding. Significant numbers of units on the site have been vacant for a long time and owners find it difficult to let units at a market rate when they become vacant.

| Unit Number  | Ownership               | Occupied  | Number Employed FTE |
|--------------|-------------------------|---|---------------------|
| 1            | PH SERVICES             | OWNER OCCUPIED  | 2                   |
| 1A           | PH SERVICES -           | RENTED SHORT TERM TENANCY                               | 1                   |
| 11           | PH SERVICES –           | RENTED TO WHOLESALER                                    | 9                   |
| 2            | TOPLINE( METAL WORKERS) | OWNER OCCUPIED  | 7                   |
| 10           | PARK ELECTRICAL VACANT  | (SCREEN PRINTER HAVE SHORT TERM LET FOR FREE)           |                     |
| 3            | PARK ELECTRICAL VACANT  | VACANT FOR 2-3 YEARS                                    |                     |
| 4            | PARK ELECTRICAL VACANT  | VACANT FOR 2-3 YEARS                                    |                     |
| 9            | PARK ELECTRICAL VACANT  | VACANT FOR 2-3 YEARS                                    |                     |
| 12           | DANIEL MOTORS           |   | 7                   |
| 16           | DANIEL MOTORS           |   |                     |
| 17           | ALEXANDER PARTNERS      |   | 3                   |
| 18           | UNIVERSAL TYRES         |   | 46                  |
| 19           | UNIVERSAL TYRES         |   |                     |
| 36           | UNIVERSAL TYRES         |   |                     |
| 24           | HOLLOWAYS               | UTUSCO LTD VACATING MAY 2016                            | 2                   |
| 25           | MG BEERS                |   | 5                   |
| 27           | PIT STOP                | PIT STOP TYRES  | 6                   |
| 29           | PIT STOP                | PIT STOP TYRES  |                     |
| 23           | PIT STOP                | VACANT  |                     |
| 32           | PIT STOP                | LET TO LIGHTING COMPANY, SOON TO VACATE DUE TO FLOODING |                     |
| 33           | PIT STOP                | TENANT ADVISED VACATING DUE TO FLOODING                 |                     |
| 34           | PIT STOP                | VACANT OVER 3 YEARS                                     |                     |
| 44           | KV SCAFFOLDING          |   | 6                   |
| <b>TOTAL</b> |                         |   | <b>94</b>           |

Most of the owners have filled out a questionnaire about the site providing information on employment levels and reasons why the owners feel that the site has reached the end of its life as an employment site, why regeneration of the site is impossible whilst the site is occupied and why they are seeking to move to alternative premises.

The Hayes area has changed significantly and this has had a detrimental effect on the operation of the site. Whilst the site is currently partly occupied, this is because the owner occupiers have no choice. They are stuck in premises that are unsuitable and in some cases unsafe for their businesses. The occupiers of the site would, without exception, like to find new modern industrial premises that have better parking, access and modern insulated buildings and which lie in a predominantly industrial area.

i) Outdated Premises

The site contains a mix of offices, warehouses and communal open storage and parking areas. The buildings on site were all constructed in 1940s and were designed to be operated by a single business occupier, at the time, EMI and for a business that was not reliant on heavy car and HGV traffic.

The buildings on site are old, dilapidated and do not meet the needs of modern businesses. All of the roofs and most of the walls on site were built using asbestos. Due to the dangers of asbestos it is impossible for the occupiers to carry out extensive maintenance. Even minor repairs are costly the occupiers need to employ specialist contractors. As a result, the site is getting more and more run down. Due to weathering and the age of the buildings, many of the asbestos sheets have cracked and as a result, during rain, the water pours inside the buildings.

The buildings are not insulated. This applies to the roofs, walls and floors. Therefore it is impossible to keep the units warm and this is also very unsustainable and provides an unpleasant working environment.

The access road is constructed of concrete and it is breaking up. Across the site there are large and deep potholes. Many vehicles have been damaged whilst entering / leaving the estate, particularly when the potholes are filled with water and the depth of the holes is hidden. The communal nature of the access and surface areas means that repair is difficult to arrange, agree and fund.

The premises are no longer suitable for occupation. This is borne out by the fact that when units become vacant, they are difficult to let. The units on the site only remain occupied as the owners are trapped and unable to move to more modern premises. Some of the owners report looking for alternative premises, but the Trading Centre, in its current state, is not viable for reoccupation. Offices on the site remain empty despite units being offered for £1, and other units took over one year to let at a rate of £5 per sqft. This is clearly an unsustainable rent against an area average of approximately £12 per sqft.

Commercial agents have reportedly refused to market some units on the site due to lack of interest in other units on the site. It is clear from the current occupation of the site that the demand has been primarily from sui generis uses and not prime B2 or B8 uses. Whilst some sui generis uses are a suitable use of employment land, they are not accounted for within ELRs. Indeed the Council's ELR only assessed clusters against criteria to ascertain its suitability for B1(a) and B1b(c)/B2/B8 uses (paragraph 5.1).

ii) Access and Parking

These representations are accompanied by a letter from transport consultants JMP. Their conclusions are that:

***“Following a review of the site’s location in the context of the local highway network and the site access arrangements, it is considered that redeveloping the site for industrial purposes would present substandard access for HGVs, which could result in a highway objection on reasons of highway safety. This is a result of both the local highway infrastructure in its current form being unable to sufficiently accommodate significant HGV movements due to considerable on-street parking, and the access arrangements for the site itself from Clayton Road being unsuitable for HGVs. Furthermore, access to the site from the wider area requires vehicles to route along roads through residential areas with housing fronting onto both sides of the carriageway. These routes are unsuitable for high volumes of HGVs due to the detrimental impacts on residents in terms of noise, air quality and safety. This contravenes policy DMT2 of Part 2 of the Local Plan which requires development proposals to ensure no deterioration of the air quality, noise, local amenity or road safety for all road users.”***

Access and parking is one of the main concerns of the existing occupiers. The small and restricted access into the site and into the communal yard area means that there are major traffic problems every day exacerbated by the fact that the site is occupied by four motor trade garages on the estate that rely on car based trade. Universal Tyres alone operate 20 vehicles that come in and out of the site 48 times a day.

Deliveries to the site need to be made via Clayton Road. Lorries are often not able to turn into the site due to on-street parking and due to the small entrance into the site. Whenever a HGV enters the estate no other vehicles can enter or leave the estate. A single operator on the site reports that they take on average three scheduled deliveries from 40ft or 18 tonne lorries in addition to numerous 7.5 tonne lorries. Whenever a HGV delivers they have to reverse into the estate from Clayton Road or reverse out into Clayton Road. As Clayton Road is a one way road which is required for access into Hayes Town Centre and onto Blyth Road, there is heavy congestion created on Clayton Road. The police have had to respond to the site on occasion and cars have been damaged on Clayton Road as HGVs try to turn into the site.

On occasion HGVs are required to be turned away, or block the road whilst unloading. On occasion, vehicles are required to travel the wrong way down Clayton road just to access the site. At least once a month deliveries have to be removed as they simply cannot get into the site.

The occupiers on the site have reported more problems with on-street parking and access into the area and the site since the Council introduced parking restrictions closer to the Town Centre and the station pushing parking into the surrounding streets. The residential development of the Vinyl Factory, Enterprise House and the adjacent Fairview Estate will only exacerbate this problem further.

#### iii) Communal Areas, Drainage, Surfaces

The site has no surface water drainage, when it rains all the water from roofs builds up on the access road, pavements and parking spaces creating large pools. As there is no on-site drainage the water stays on the site for days.

Some of the units have floor levels up to 500mm below the outside road / pavement level. Therefore the units are regularly flooded and need to be drained using mechanical pumping. The occupiers of units 32 and 33 are moving out of the site specifically citing flooding issues.

#### iv) Solutions for Improvement

There are no viable solutions to improving the site and raising the standards of accommodation for the current occupiers. The cost of renovating the units would be prohibitive for the current occupiers particularly due to the asbestos.

There is no option for the current occupiers to renovate the site to provide them with the modern units that they require as logistically it would be impossible to continue trading during a development. Also, the site is simply not suitable for 10 separate businesses with the associated parking, servicing and access. Therefore the site is likely to deteriorate further.

It is very unlikely that the site will be bought and developed for industrial units as the site is in an area that is (will be) adjacent to residential units, has access that requires HGVs to pass significant planned residential development and Hayes Town Centre.

The site would be improved by the introduction of an area wide Controlled Parking Zone (CPZ) to restrict all on street parking but this would require a TRO and it is likely that residential properties would still need to be provided with opportunities to park on street and therefore the access and the width of the carriageway would not be improved.

#### d) Employment Land Supply

The Local Plan Part One identifies that there is an oversupply of employment land in Hillingdon of between 16.3 and 20.6 hectares. It follows that sites which have the best opportunities for regeneration but the lowest quality of employment characteristics should be released first.



Using GLA Employment land assessments the figure for land release is much higher at nearly 30ha.

**Table 7.10 Employment Densities Analysis**

|                   | <i>GLA Employment Projections – LBH 2026 (Net additional)</i> | <i>Employment Density (jobs per ha)</i> | <i>Source</i>                          | <i>Future Land Demand (ha)</i> |
|-------------------|---|---|--|--------------------------------|
| <b>Industrial</b> | -2,117  | 72                                      | GLA Industrial Land Baseline Table 4.3 | -29.4                          |

The Crown Trading Estate is 1.36 hectares and has employment of approximately 95 employees. It is proposed that a mixed use scheme could still provide in the region of 1,845 sqm which would result in a similar number of employees if the density was achieved 1 per 20sqm, in addition to providing significant numbers of housing.

The ELR recommends that with the exception of Nestle, the sites proposed for release amount to 16.2ha. With the release of The Crown Trading Estate this would result in the release of 17.56 hectares which is still within the range of industrial land assessed as surplus to demand within the range recommended by the background reports and even with the release of Nestle and the Crown Trading Centre the release is in line with the GLA employment land figures for release.

#### e) **The Need for Housing**

Policy 3.3 of the London Plan states that boroughs should seek to **achieve and exceed** the relevant minimum annual average housing target which for Hillingdon for the period of 2015 to 2025 is set as 559 dwellings per annum. The Hillingdon Local Plan covers the period 2011 to 2026. The minimum for this 15 year Plan period is 8,385 dwellings. It should be noted that this figure is a **minimum** and therefore any additional opportunities to provide additional housing in appropriate locations should be explored.

The Local Plan reports that 3,015 units have been completed 2011-2014. The Council seek to subtract this figure from the projections going forward, but as the London Plan applies these figures as a minimum, it would be appropriate to take an annualised housing figure, project it forward and seek to exceed the minimum figure in accordance with the London Plan. Therefore the Plan moving forward from 2014 should be planning for provision of at least 11 years of housing supply annualised at 559 units per annum which is a minimum of 6,149 from 2014 to 2026.

The Plan states that 2011-2016 the estimated housing delivery will be 6,659 – 6,879.

The emerging plan could be clearer with regard to minimum housing targets and numbers, but what is clear is that there is an growing need to house London’s growing population and that the Council has sought to plan only for the minimum provision of housing.

The attached plan demonstrates that the site has the ability to accommodate approximately 319 new residential units arranged over predominantly 5 floors with higher elements. The proposed scheme is also able to provide at least 1,845sqm of new modern B1 light industrial units.

#### f) **Regeneration Benefits**

The site lies in an area of significant change. The arrival of Crossrail to Hayes is significantly changing the entire area. The Local Plan Part 2 identifies that release of the Crown Trading Centre would make a greater contribution to the regeneration of Hayes:-

***“4.13 The land to the north (of Blyth Road) retains a diverse range of industrial activities, although it is considered that some sites along the canal frontage would make a greater contribution to regeneration in Hayes if they were***

***subject to mixed use development.”***

The site lies on the Grand Union Canal. The London Canal and River Trust would support the mixed use regeneration of this site, which along with the adjacent Fairview Business Centre would enable the Canal to be opened up and for a walkway to be achieved on this side of the Canal which would almost provide the linkages to Hayes Town Centre.

As previously stated the site is currently run down and provides an eyesore in an area of regeneration. The mixed use allocation of this site would offer regeneration to the site and the Canal and would also contribute to the wider regeneration of Hayes Town Centre.

This site is the only remaining allocated SIL which is accessed off Clayton Road south of Printinghouse Lane. The redevelopment of the site for mixed uses would significantly reduce the number of HGVs and vans that are required to go round the one way system and past the existing and planned residential properties on Clayton Road and Blyth Road. Enclosed is a petition from local residents. These signatures were collected within one morning only.

The site also lies within an Air Quality Management area. A mixed use allocation of the site will benefit the area as the current access arrangements mean that HGVs seeking to enter the site often block the road causing traffic jams. A mixed use allocation would also mean that HGVs would not have to travel into Hayes Town centre and via residential properties on the one way road system.

A mixed use allocation of the site would also enable better integration and increased housing numbers of the Fairview Business Centre site and a better residential environment for residents as the Crown Industrial Estate has no restrictions on hours of operation or noise.

**Recommended Changes**

1. It is recommended that Policy SA4 is amended to include the adjacent Crown Trading Centre as part of the allocation, rather than including reference to the land in the supporting text;
2. If the Council prefers to include the amended text as a separate allocation it is recommended that a new policy is included which states that:-

SA4(a)

The Council will support proposals for residential led mixed use development that will contribute to the regeneration of Hayes Town Centre and the Grand Union Canal and meet the following criteria;

- The provision of residential development at a density that is commensurate with the PTAL of the site. High densities may be appropriate subject to high quality design and townscape and visual assessment;
- The scheme will provide at least 1,000 sqm ground floor B1 light industrial units;
- The development will provide canal side improvements and contribute to the enhancement of the Strategic Canal and River Corridors in accordance with relevant policies on the Blue Ribbon network.

3. If it is not accepted that the Crown Trading Centre is allocated for mixed use residential development then at the very least it should be reallocated as a Locally Significant Industrial Site (LSIS) in recognition that the site has significant access issues, that redevelopment is unlikely for employment uses that require HGV access and the quality of industrial buildings on site is partially low.
4. It is recommended that Policy DME1 is amended to include a new criterion under iv) to permit alternative uses on designated employment sites where:-

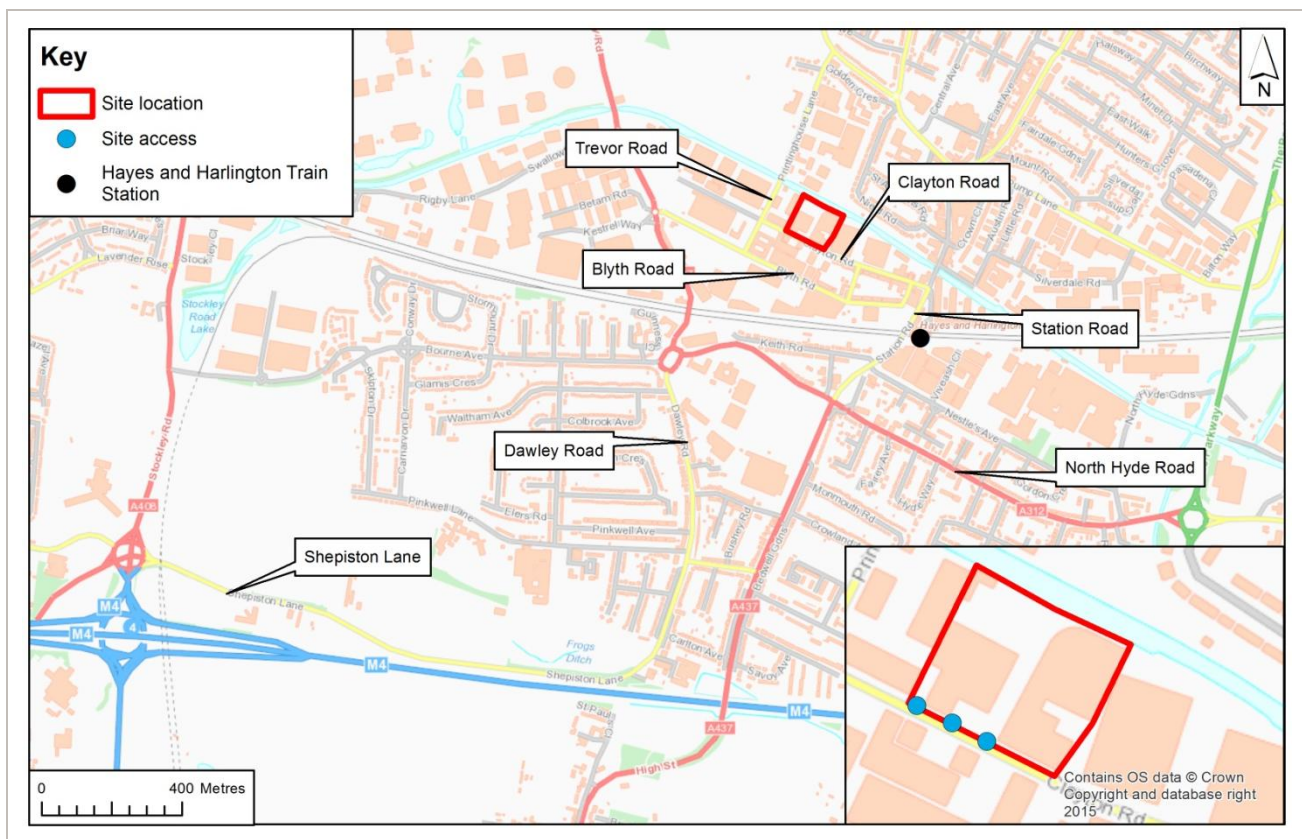
“or iv) the site is specifically identified within the Local Plan as suitable for future release due to regeneration benefits. In such cases applications will be determined on their merits and in accordance with the evidence available at the time.

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JMP Consultants Ltd have been commissioned by the landowners of Crown Trading Centre to provide transport consultancy services for a site located off Clayton Road in the London Borough of Hillingdon (LBH), with potential for a mixed-use planning application. The plan showing the location of the site in the context of the local highway network is provided as **Figure 1**. The site has an existing and emerging allocation as Strategic Industrial Location (SIL) as part of the Hayes Industrial Area and therefore any proposal for mixed-use will not be in accordance with the development plan.

**Figure 1: Site location in the context of the local highway network**



The area is typified by industrial and employment uses currently, however, the locality is evolving and a number of mixed-use schemes in the area have been granted planning permission. The character and nature of the environs in terms of transport and movement is therefore undergoing change and the SIL designation may no longer be appropriate. Clayton Road is itself, already a mix of residential and employment uses.

This note reviews the site's suitability for residential use in transport terms, and the reasons why industrial development is not preferable in this location and as a result why the SIL designation should be reviewed.

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## **POLICY REVIEW**

### **National Planning Policy Framework (NPPF) (2012)**

The NPPF outlines the national government's economic, environmental and social planning policies for England. The essence of the document is to support sustainable development, defined as 'meeting the needs of the present without compromising the ability of future generations to meet their own needs' (p.2).

Paragraph 34 seeks to ensure that 'developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised'. Patterns of growth should be actively managed to make the fullest possible use of public transport, walking, cycling and focus significant development in locations which are or can be made sustainable.

The plan goes on to state that developments should only be prevented or refused on transport ground where the residual cumulative impacts of development are severe (paragraph 32).

### **Further Alterations to the London Plan (FALP) (2015)**

The FALP sets out the Mayor's vision for the development of London up to 2031. It is an overall strategic plan, setting out an integrated economic, environmental, transport and social framework for the development of London.

The plan identifies Hayes Industrial Area as a Strategic Industrial Location (SIL) suitable for general industrial, light industrial, storage and distribution, waste management recycling, some transport related functions and other industrial related uses (policy 2.17).

Policy 6.1 states that the plan encourages patterns of development that reduce the need to travel, especially by car, and supports development that generates high levels of trips in locations with high public transport accessibility. The plan also requires that developments do not adversely affect safety on the transport network (policy 6.3).

### **Hillingdon Local Plan: Part 1 (2012)**

LBH's Local Plan was adopted in November 2012 and sets out the long-term spatial vision and objectives for the borough. The plan designates the Hayes Industrial Area as one of four SILs in the borough, which combined total around 270 hectares. Paragraph 5.10 of the plan states that there is more employment land than currently needed in the borough and that any surplus will need to be carefully managed to support both economic and residential regeneration.

Strategic Objective 12 of the plan states that new homes should be built in accessible locations, reducing reliance on the private car and promoting the use of safe and sustainable forms of transport. Throughout the plan there is a theme of sustainability and encouraging a shift towards public transport, walking and cycling.

Policy T1 considers 'Accessible Local Destinations' and states that development will be steered to the most appropriate locations in order to reduce their impact on the transport network. In doing this, freight road transport will be encouraged to use the highest order roads wherever possible.

### **Hillingdon Local Plan: Draft Part 2 (2015)**

The Draft Part 2 of LBH's Local Plan comprises Development Management Policies, Site Allocations and Designations, and is currently undergoing consultation. Policy DMT2 states that development proposals must

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ensure that safe and efficient vehicular access to the highway network is provided with no deterioration of the air quality, noise, local amenity or road safety for all users.

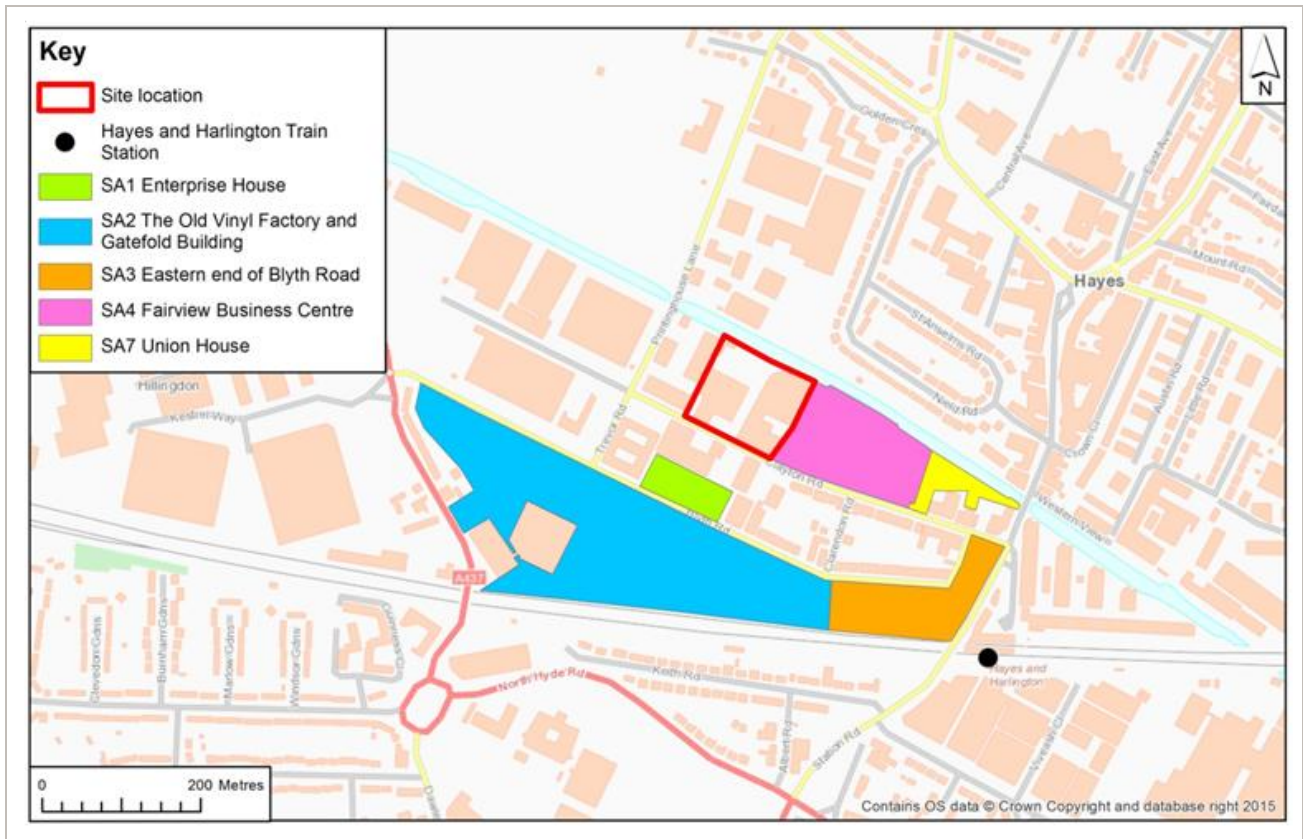
The plan states that it is considered that some sites along the Grand Union Canal frontage at Hayes would make a greater contribution to regeneration in the area if they were subject to mixed-use development rather than solely employment (p.127).

There are a number of mixed-use site allocations outlined in the Draft Part 2 in the vicinity of the Clayton Road site. These are summarised below and shown on **Figure 2**:

- SA 1 Enterprise House, Hayes: this site is part of the old EMI site and is proposed for mixed-use development including 96 residential units and office space;
- SA 2 The Old Vinyl Factory and Gatefold Building: this site is part of the old EMI site and is proposed for residential led mixed-use development including 510 dwellings at the Old Vinyl Factory and 132 at Gatefold;
- SA 3 Eastern End of Blyth Road, Hayes: this proposals for this site would see old offices converted to a mixed-use residential and office scheme, including 273 dwellings;
- SA 4 Fairview Business Centre: the site is proposed for redevelopment as a residential led mixed-use scheme including 119 dwellings; and
- SA 7 Union House, Hayes: this site has been granted planning permission for conversion of office space to a residential scheme of 46 units.

**Figure 2: Local Plan Site Allocations in the vicinity of the site**





## STRATEGIC INDUSTRIAL LOCATIONS

Land designated as SIL is considered to be the best reservoir of industrial capacity in London, and as such should have access to a transport network that is sufficient to accommodate its requirements. Areas of industrial-related employment are characterised by frequent trips by heavy goods vehicles (HGVs) and high proportions of employee and customer trips made by vehicle. As such, to satisfy the nature of these trips, the SIL should have the following characteristics with regards to transport:

- Site access arrangements designed to accommodate frequent HGV movements without conflicting with other road users;
- Adequate capacity on the surrounding local highway network to accommodate high volumes of light and heavy vehicle trips;
- Located close to motorways and trunk roads to minimise the impact on local roads;
- Located close to rail freight lines / depots, rivers and canals and safeguarded wharves which can be used to transport freight sustainably; and
- Located away from residential areas to minimise the impact of high volumes of traffic, including heavy vehicles, and the potential for anti-social deliveries at the site.

This note will address the suitability of the site at Clayton Road with regards to its ability to meet these characteristics.

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## LOCAL HIGHWAY NETWORK

The site is bounded by Clayton Road to the south, existing light industrial land to the east and west, and the Grand Union Canal to the north. The site is accessed via a simple priority junction onto Clayton Road, a one-way street that runs parallel to the Grand Union Canal. The site's location in the context of the local highway network is shown in **Figure 1**.

As shown on **Figure 3**, to access the site vehicles use Dawley Road, Blyth Road and Trevor Road. The junction of Clayton Road and Trevor Road takes the form of a four-arm mini roundabout, and the junction of Clayton Road and Blyth Road is a simple right- and left-in T-junction. Vehicles leaving the site and heading south from Clayton Road towards the M4 would use Station Road, the junction of which takes the form of a four-arm mini roundabout. Due to the compact nature of these junctions, HGVs would struggle to complete a tight left- or right-turn without overrunning their designated lane or highway space, increasing the potential for conflict with other road users.

Trevor Road connects the Hayes Industrial Area to the northern side of the Grand Union Canal and to Hayes Town. South of its junction with Clayton Road, Trevor Road has single yellow lines on both sides of the carriageway and restrictions on parking or waiting between 08:00-18:30 Monday to Saturday. There is a signalised one-way shuttle working over the Grand Union Canal to the north of its junction with junction with Clayton Road.

From the junction with Trevor Road, Clayton Road follows a south-east trajectory and has a one-way south-east bound traffic flow until it meets its junction with Blyth Road. In the vicinity of the site, the one-way road has a designed carriageway width of 7.5m. However, as a result of significant un-restricted on-street parking on both sides of the carriageway to the west of the residential area, has a useable width of only 3.5m. The eastern end of Clayton Road, within the residential area, also has significant on-street parking but is part of the HY1 Controlled Parking Zone (CPZ). **Figure 4** shows the road in the vicinity of the site access.

Figure 3: Access routes to the site

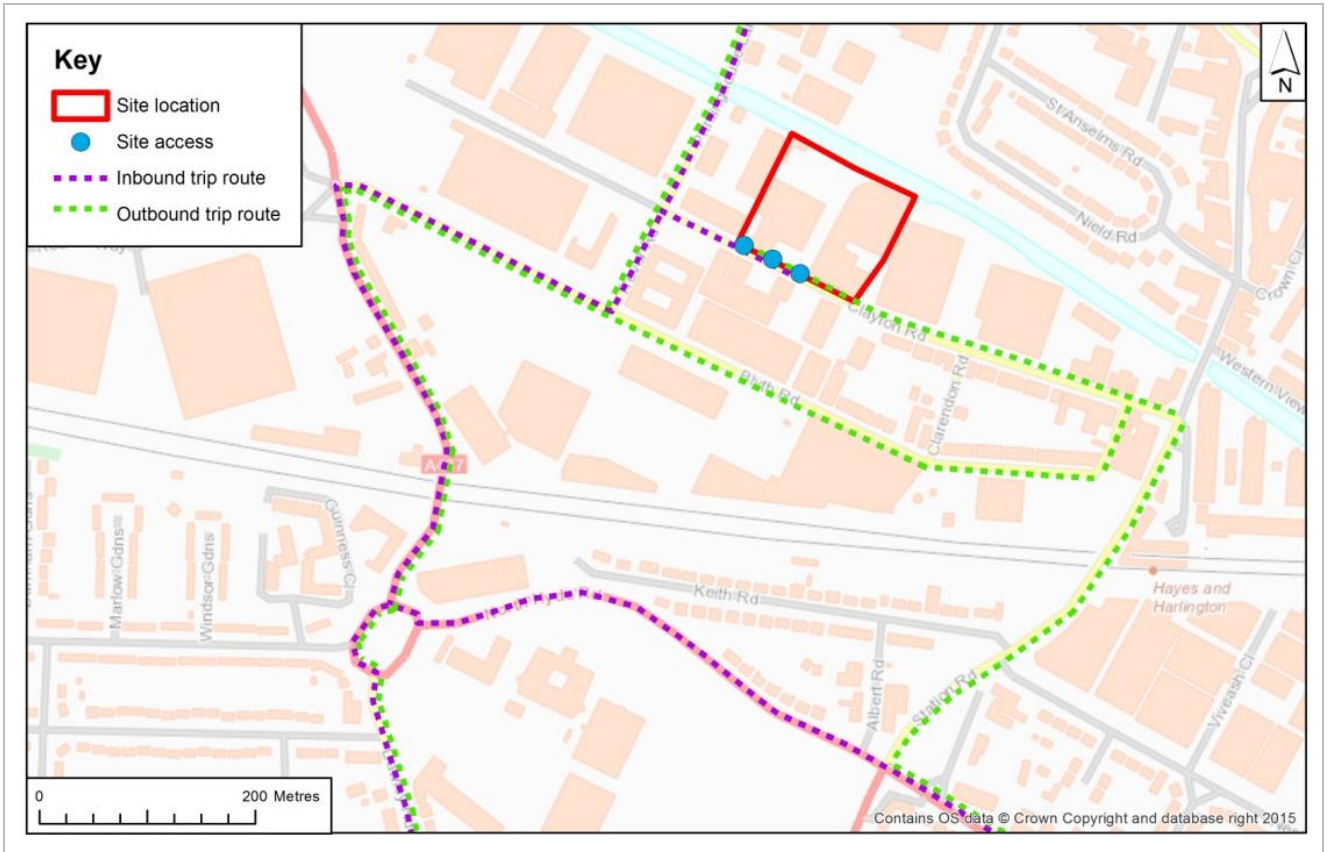


Figure 4: Clayton Road in the vicinity of the site access



Source: Google Maps



Blyth Road runs parallel to the south of Clayton Road, and has a one-way north-west bound traffic flow from its junction with Clayton Road to its junction with Trevor Road. Similarly to Clayton Road, Blyth Road experiences significant unrestricted on-street parking on both sides of the carriageway to the west of the residential area, leaving a decreased usable width of the carriageway. The eastern end of the road is residential and is part of the HY1 CPZ. **Figure 5** shows the level of on-street parking experienced on the street.

**Figure 5: Blyth Road on-street parking**



Source: Google Maps

The Freight Transport Association (FTA) design guidance 'Designing for deliveries' (2006) states that on straight sections of one-way access roads a carriageway width of 3.7m could be sufficient but is 'rarely practical'. The useable carriageway width on Clayton Road is 3.5m due to on-street parking, which is below this FTA guideline and therefore indicates the likelihood of conflicts between HGVs and parked cars. The reduced useable carriageway width due to on street parking, particularly in the vicinity of junctions and the site access on Clayton Road, makes access to industrial premises difficult, particularly for HGVs.

The on-street parking issues experienced on both Clayton Road and Blyth Road are a result of a number of factors in the local area. Large sections of the roads are not currently part of a CPZ and are therefore not restricted. Hayes and Harlington train station is located less than 500m to the south-east of the site and serves people travelling towards central London or to the West Country via Reading. The station car park has limited capacity for 124 vehicles and imposes a charge for users. As a result there is an overspill of parking onto surrounding roads, including Clayton Road and Blyth Road. Due to the dense nature of the surrounding industrial area, it is also likely that there is an overspill of parking from employees of these units. At the eastern extent of both roads are residential areas, with CPZs to control on-street parking.

If the HY1 CPZ on Clayton Road and Blyth Road were extended to include the areas currently affected by significant unrestricted on-street parking, the demand for parking would remain and the parking would be displaced to another unrestricted area. The extension of the CPZ would also not necessarily totally remove on-street parking from the area as permit holders would still be able to park within the zone. As such, the issue of a reduced usable carriageway width restricting the movement of HGVs would remain. It should also be noted that due to the requirement to consult with local residents and stakeholders as part of the Traffic Regulation Order (TRO) prior to extending a CPZ, it cannot be guaranteed that any extension would be approved.

Vehicles travelling to and from the M4 (junctions 3 and 4) to the site would route along a series of residential roads including Station Road, Dawley Road, Shepiston Lane and North Hyde Road. These roads are aligned through residential areas and have housing fronting onto both sides of the carriageway along much of their lengths. These routes are unsuitable for high volumes of HGVs due to the detrimental impacts on residents in terms of noise, air quality and safety.

As shown by **Figure 2**, the area around the site is increasingly residential with approximately 1,130 units allocated on Clayton Road and Blyth Road in the Draft Local Plan Part 2. The characteristics and nature of the pedestrian/cycle and vehicle movements in the area will change considerably as a result and will not be conducive to HGV movements. Therefore, in the interests of safety and air quality, the number of HGVs using the roads to access industrial areas should be minimised to reduce potential conflicts with other road users and vehicle emissions.

## SITE ACCESS

The site is currently used by a number of different occupiers, including four motor garages which undertake vehicle repairs and servicing. Due to the car-based nature of the trade it has a high vehicular trip generation as a result of customers dropping off and collecting their vehicles, and employees testing the vehicles following repairs. A number of deliveries by HGVs are undertaken at the site each day. One of the businesses on site takes approximately three scheduled deliveries by 40 foot lorries in addition to a number of 7.5 tonne lorries.

There are three accesses to the site from Clayton Road, with approximately 20m distance between each. **Figure 6** to **Figure 8** show the site accesses. This many accesses spaced so closely together increases the potential for conflicting movements between road users, including pedestrians and cyclists. To reduce conflicts in residential areas between road users, Manual for Streets (2007) suggests a minimum spacing of 60m between adjacent junctions. While this guidance is aimed at residential areas, it is reasonable to apply it to this industrial estate context due to the low vehicle speeds experienced. Based upon this current guidance it can be seen that a spacing of 20m between junctions is not sufficient to reduce conflicts between road users.

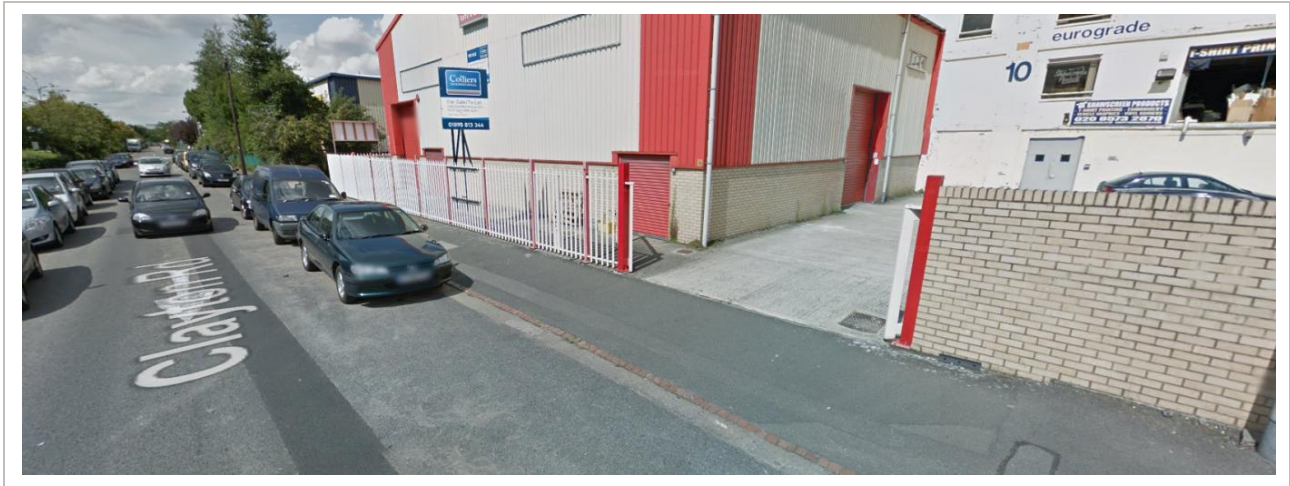
**Figure 6: Western site access**



Source: Google Maps



**Figure 7: Central site access**



Source: Google Maps

**Figure 8: Eastern site access**



Source: Google Maps

Due to the on-street parking and the small entrance to the site, HGVs are often not able to turn into the site. Due to its confined nature, HGVs are not able to turn around inside the site and therefore are required to either reverse into the access from Clayton Road, or reverse out onto the road. This presents a significant risk and can conflict with other road users, including the cars parked or waiting directly outside the access, cyclists and pedestrians. These manoeuvres are highly disruptive to the surrounding industrial estate causing heavy congestion and severe delays to road users and pedestrians on Clayton Road. Cars have been damaged on a number of occasions by HGVs carrying out these procedures, requiring the police to respond to the site.

Due to the constraints at the site access junctions HGVs are often unable to enter the site, resulting in them having to unload on the road outside the site access. This vehicles loading / unloading on Clayton Road disrupts the free



**Date** 2 December 2015 **Job No** ST16397

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**Subject** Crown Trading Centre, Hayes - Transport Matters

---

flow of traffic on the road and causes congestion. On occasion, vehicles have been observed travelling the wrong way down the one-way road in order to access the site, posing a significant risk to other road users safety.

Swept path analysis has been undertaken for the area around the principal site access (the eastern access) for an articulated vehicle (16.5m) and a rigid truck, both with and without the on-street parking. These assessments represent a 'best case' scenario for access to the site by HGVs.

As shown on JMP Drawings ST16397-02 and ST16397-04, with the on-street parking both the rigid truck and articulated vehicle can enter the site from the left without conflicting with any vehicles, albeit tightly. However, when exiting the site to the left, both types of heavy vehicles conflict significantly with the parked cars on either side of the carriageway to the east of the junction.

Due to their industrial nature, developments within SILs will be served by significant volumes of HGVs. The existing site is not considered appropriate for future development as a SIL due to restricted HGV access as a result of significant levels of on-street parking on Clayton Road and Blyth Road. As such redevelopment for industrial related employment purposes will present a highway safety issue due to the current substandard access for HGVs.

## PEDESTRIAN AND CYCLIST SAFETY

Land use and road user composition have a significant impact upon the safety of all road users, especially pedestrians and cyclists. The IEMA's Guidelines for the Environmental Assessment of Road Traffic provides broad principles of how to assess the impact of a scheme upon users, including the impact on fear and intimidation, amenity and accidents and safety.

The fear and intimidation of pedestrians and cyclists is dependent on the volume of traffic, the proportion of the volume comprised of HGVs, and the proximity of pedestrians and cyclists to the flow of traffic. As the footways on Clayton Road and Blyth Road are not shared cycle footways, cyclists are technically required to cycle on the carriageway with the one-way flow of traffic.

The London Cycle Design Standards (2014) state that the dynamic envelope of a moving cyclist is approximately 1.0m, which includes an average 0.75m static width plus an allowance for movement. The document states that the minimum safe clearance distance between the edge of a cyclist and the edge of a vehicle moving at 20mph is 1.0m, which increases to 1.5m for vehicles travelling at 30mph. Therefore for vehicles to overtake a cyclist, at least a further 2.0m is required in addition to the space that the vehicle takes up on the road. The useable width of carriageway on Clayton Road is 3.5m, which does not provide sufficient width for cyclists to be overtaken safely by a car or HGV. As such, vehicles may execute unsafe overtaking procedures or follow cyclists around the road network, increasing the fear and intimidation that they experience. The development of the site as a mixed-use scheme rather than industrial-related employment would reduce the number of vehicle trips, in particular HGVs, at the Clayton Road site, reducing the magnitude of fear and intimidation experienced by both pedestrians and cyclists.

Pedestrian and cyclist amenity relates to the pleasantness of a journey, and is affected by traffic flow and composition, and separation of the users from the traffic. Similarly to fear and intimidation, the development of the site as mixed-use would provide a more pleasant environment for pedestrians and cyclists, with fewer HGVs and light vehicles impacting upon their journey.

Due to the limited visibility of pedestrians, and especially cyclists, to HGV drivers, an increase in trips by these vehicles is likely to have a detrimental effect on the safety of vulnerable road users. This is a particular concern on

**Date** 2 December 2015 **Job No** ST16397

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**Subject** Crown Trading Centre, Hayes - Transport Matters

---

Blyth Road and Clayton Road which have significant levels of on-street parking and therefore would further reduce the visibility of any pedestrians or cyclists wishing to cross the road.

It should also be considered that the increasing residential development of the area will generate more pedestrians and cyclists passing the site to access the train station and local centre. As such, the development of the Clayton Road site as an industrial site, and the HGV movements associated with it, will have a detrimental impact on the level of fear and intimidation experienced by, and safety of, these users.

## OTHER ENVIRONMENTAL ISSUES

In addition to the impact upon pedestrian and cyclist safety, the retention of the site for industrial land uses would have a detrimental effect on the noise and air quality of the surrounding area, including the residential roads that are used to access the strategic road network, including the M4.

Furthermore, by reducing the level of industrial use in the Hayes Industrial Area, traffic and HGV numbers will be reduced. This meets Hillingdon's aspirations to reduce the NO<sub>2</sub> emissions in the Hillingdon Air Quality Management Area (AQMA).

## CONCLUSIONS

With regards to policy, the development of the site as a mixed-use scheme would support the NPPF and FALP's requirement for developments that generate significant movement, such as those with mixed-uses, to be located where the use of sustainable transport modes can be maximised. The location of the site within 500m of Hayes and Harlington train station, a key public transport interchange in the area, would better support the significant proportion of trips made by sustainable modes in mixed-use developments, than the more car/HGV dependent trips associated with industrial land uses. FALP also states that developments should not adversely affect safety on the transport network which, should the site be developed for industrial-related employment purposes, is likely to occur due to the unsuitable nature of the local highway network and site access arrangements for HGV movements.

Policy T1 of the Hillingdon Local Plan (Part 1) states that freight transport will be encouraged to use the highest order roads wherever possible. The development of the site for industrial purposes will lead to increased routing of HGV trips through unsuitable local and residential roads to access the site.

Following a review of the site's location in the context of the local highway network and the site access arrangements, it is considered that redeveloping the site for industrial purposes would present substandard access for HGVs, which could result in a highway objection on reasons of highway safety. This is a result of both the local highway infrastructure in its current form being unable to sufficiently accommodate significant HGV movements due to considerable on-street parking, and the access arrangements for the site itself from Clayton Road being unsuitable for HGVs.

Ease of access to sites for HGVs and adequate capacity on the surrounding local highway network are key factors required for industrial land uses to operate efficiently. The constrained access arrangements of the site for HGVs and light vehicles due to the one-way nature of Clayton Road and Blyth Road, and the restrictions imposed by significant on-street parking along these roads, are likely to affect the demand of potential occupiers considering the site. The current occupiers consider the access and servicing arrangements to be dissatisfactory and not fit for purpose.

**Date** 2 December 2015 **Job No** ST16397

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**Subject** Crown Trading Centre, Hayes - Transport Matters

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Furthermore, its requirement for vehicles to route along a network of residential and one way local streets to access major trunk roads and the motorway network make it unsuitable to be allocated as the highest quality of industrial land, due to the safety and environmental implications for other road users and local residents. Accessing the site from the wider area requires vehicles to route along roads through residential areas with housing fronting onto both sides of the carriageway. These routes are unsuitable for high volumes of HGVs due to the detrimental impacts on residents in terms of noise, air quality and safety. This contravenes policy DMT2 of Part 2 of the Local Plan which requires development proposals to ensure no deterioration of the air quality, noise, local amenity or road safety for all road users.

The development of the site for mixed-use purposes would reduce the volume of traffic, including HGVs, improving the fear and intimidation, safety and amenity for all road users, particularly pedestrians and cyclists. It would also lead to an improvement in air and noise quality for people in the vicinity of the site, and who live along routes to the strategic road network and motorways. A reduction in HGVs would result in a reduction in NO2 emissions, helping Hillingdon to achieve its AQMA aspirations.

Therefore, on transport and highway terms it is considered that the development of the site as a mixed-use scheme rather than industrial would be beneficial for the local community, local road users and the environment.

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**Distribution** Holly Mitchell

---

**Name/ Signed** Richard Stacey

---

**Date** 2 December 2015      **Job No** ST16397

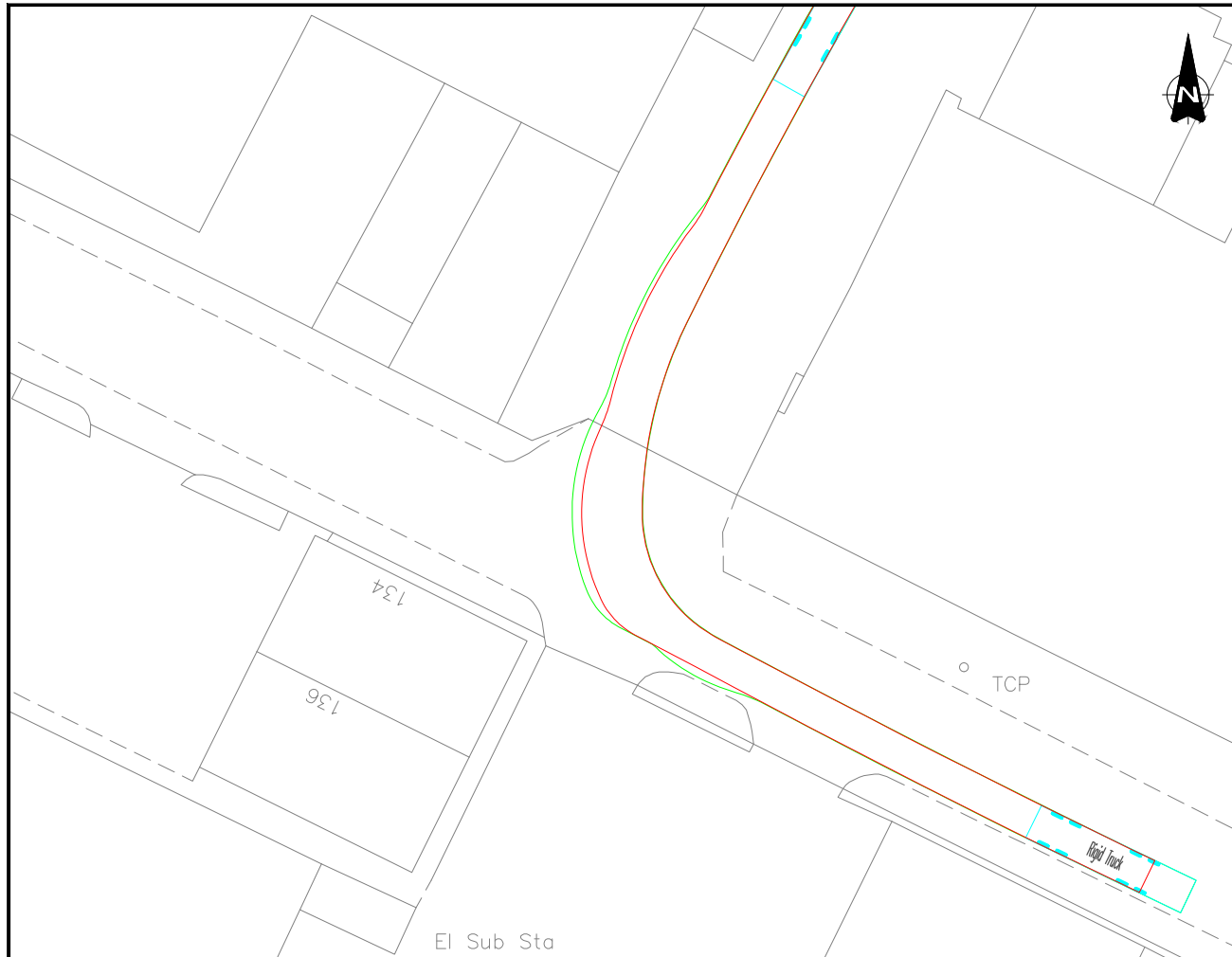
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**Subject** Crown Trading Centre, Hayes - Transport Matters

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## **Appendix A**

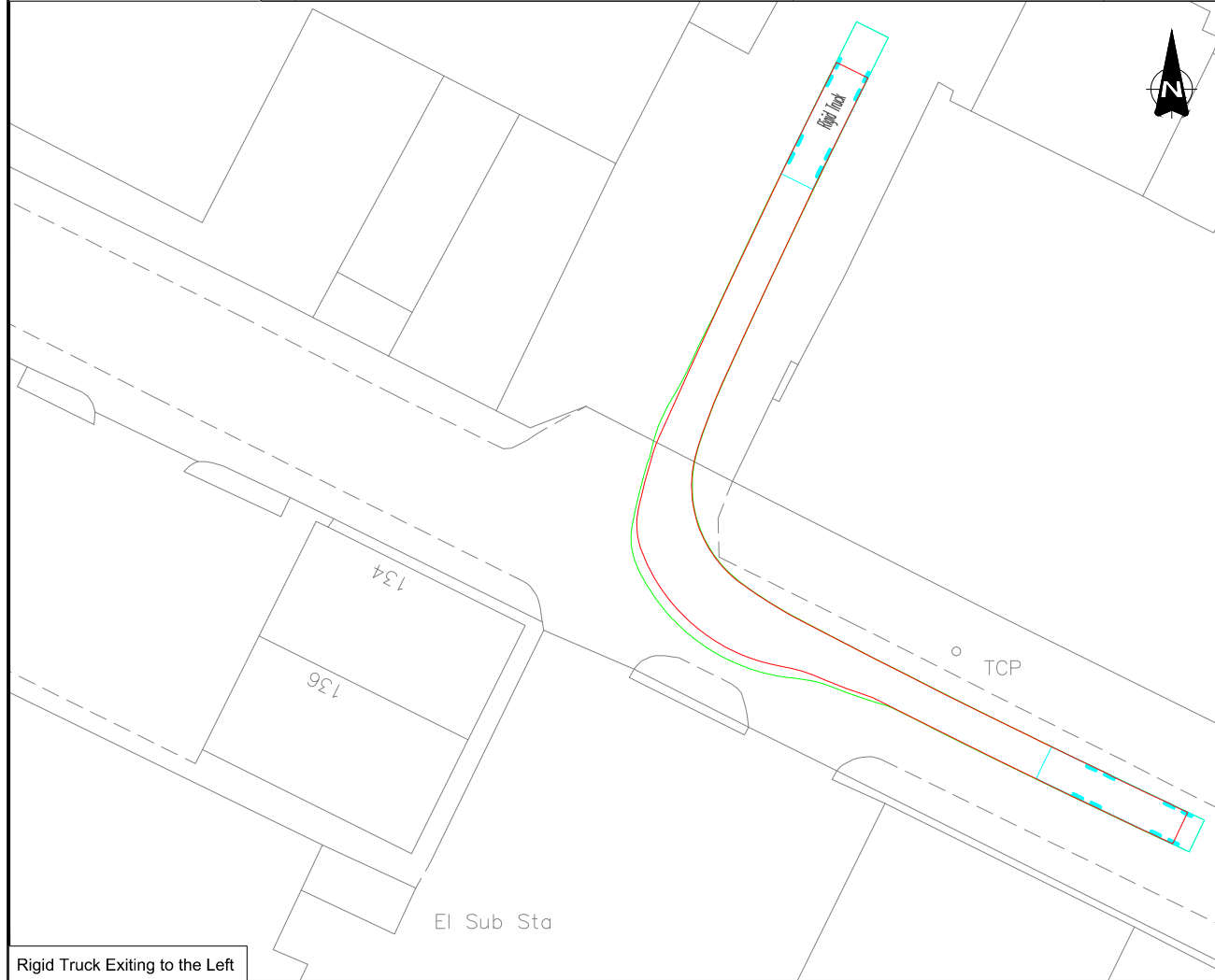
### **SWEPT PATH ANALYSIS DRAWINGS**



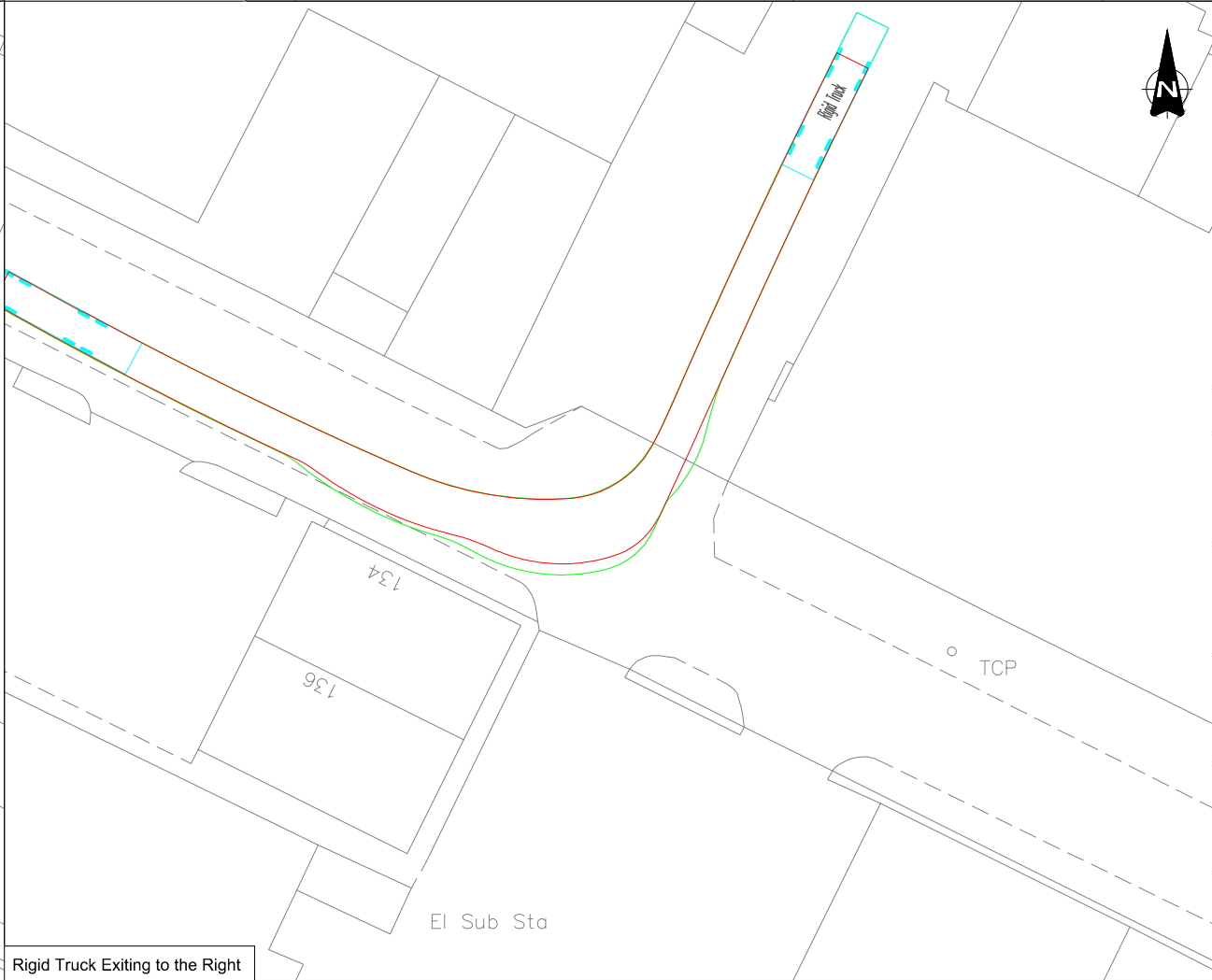
Rigid Truck Entering from Right



Rigid Truck Entering from Left

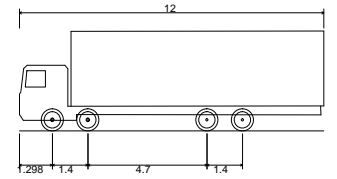


Rigid Truck Exiting to the Left



Rigid Truck Exiting to the Right

NOTE:  
This tracking is based on Ordnance Survey mapping only and no site checks have been made to corroborate road widths



Rigid Truck  
Overall Length 12.000m  
Overall Width 2.500m  
Overall Body Height 3.928m  
Min Body Ground Clearance 0.412m  
Track Width 2.471m  
Lock to Lock Time 6.00s  
Kerb to Kerb Turning Radius 11.900m

Contains Ordnance Survey data © Crown copyright 2015,  
Frank Reynolds Architects Licence number 100022432

| Rev. | Date | Revision details | Drawn | Checked | Approved |
|------|------|------------------|-------|---------|----------|
|      |      |                  |       |         |          |

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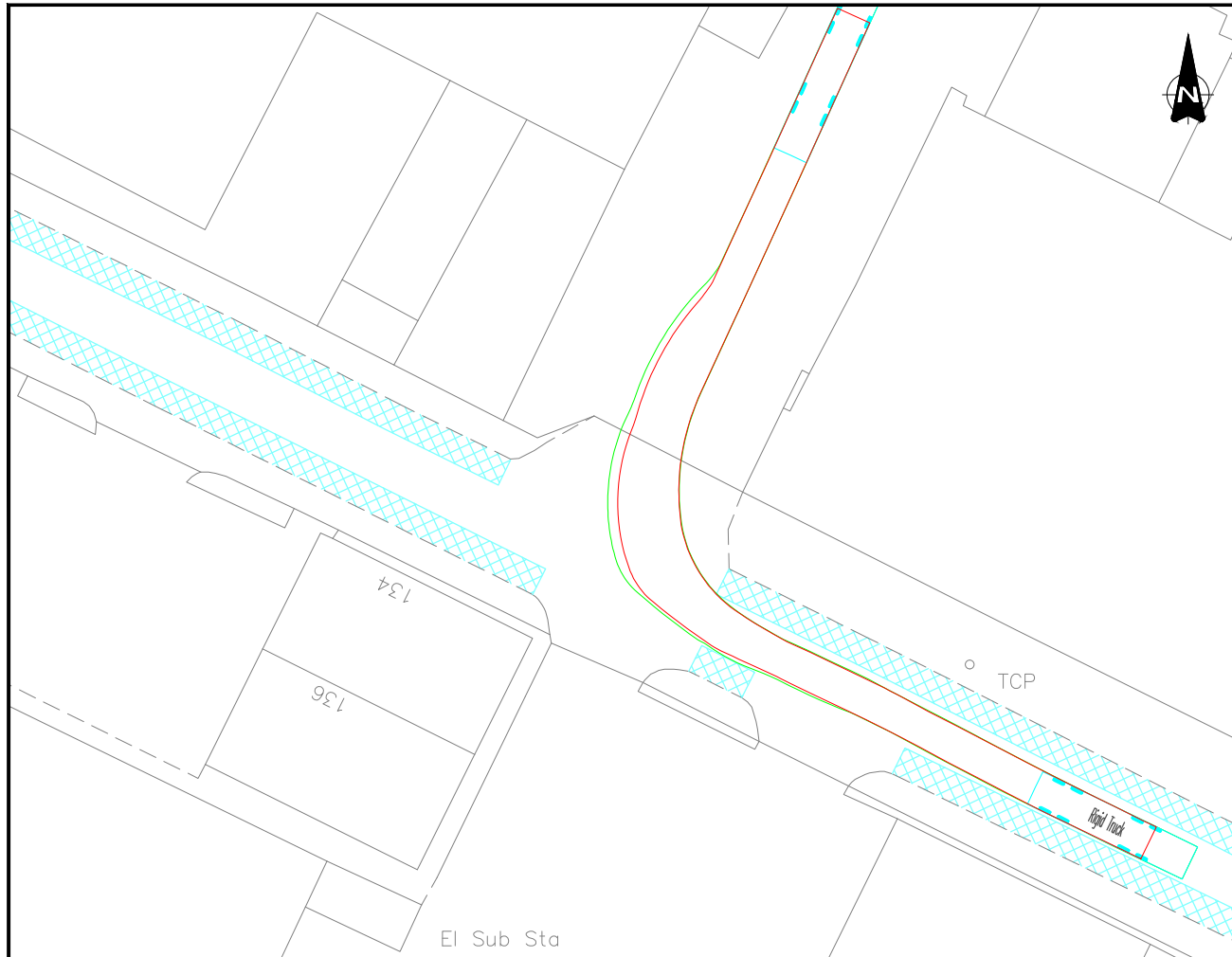


Client  
**Frank Reynolds Architects**

Project  
**Crown Industrial Estate**

Title  
**Swept Path Analysis  
Assuming No Parking in Clayton Road**

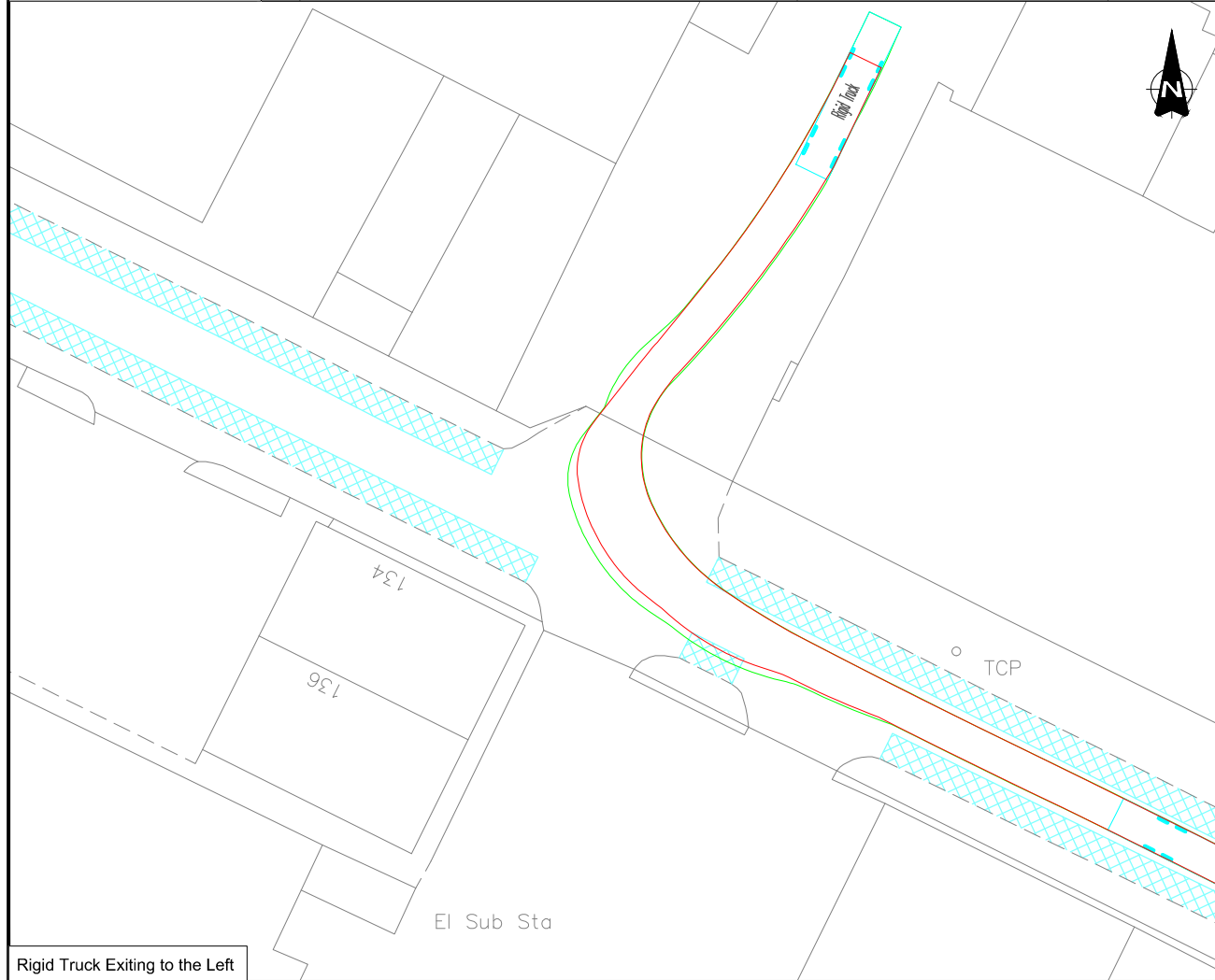
|                               |                              |                 |
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| Drawn<br>MIE                  | Checked<br>JC                | Approved<br>PWJ |
| Original drg. size<br>A3      | Date<br>Nov 2015             | Scale<br>1:500  |
| Drawing Status<br>Information | Drawing Number<br>ST16397-01 | Rev.<br>-       |



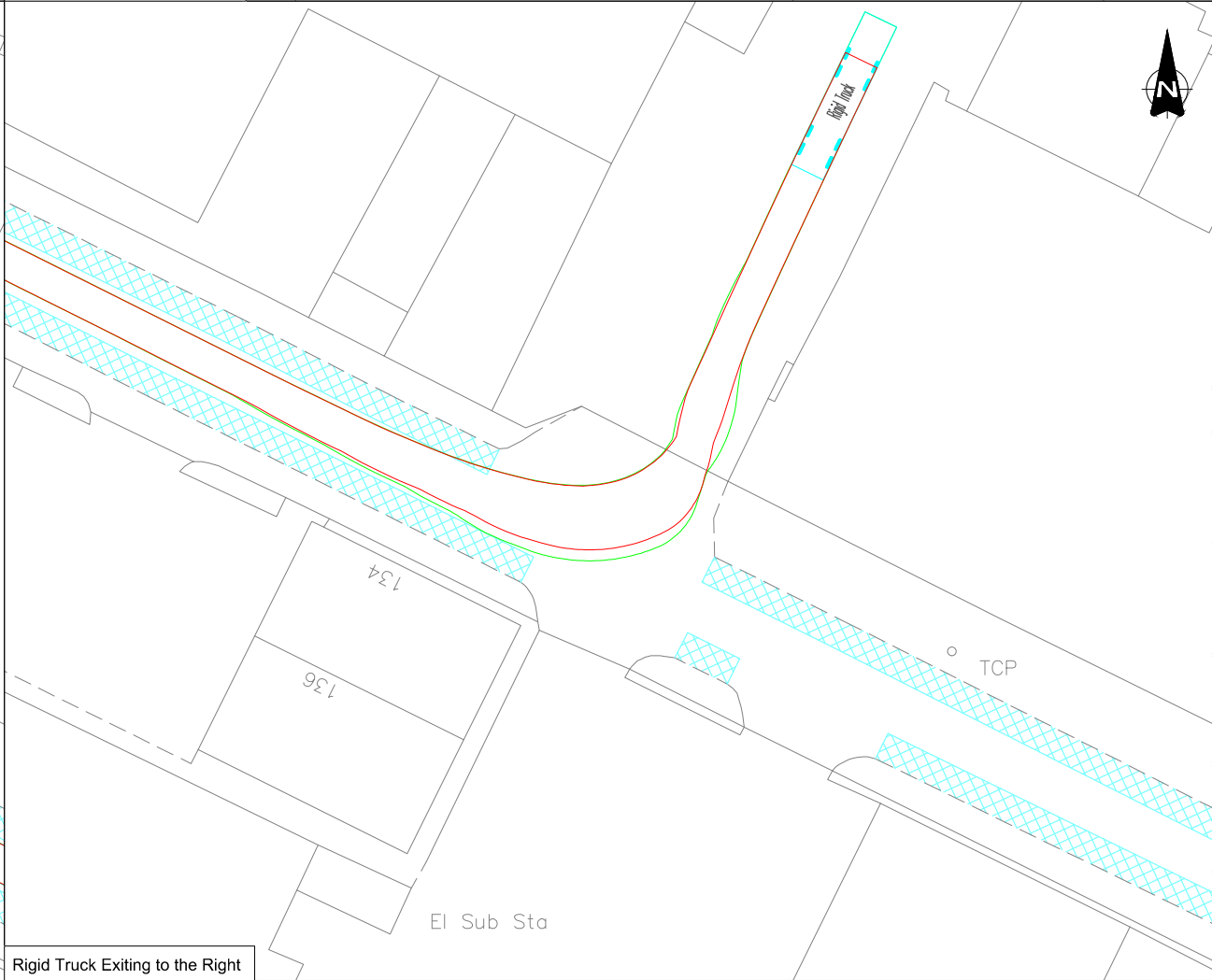
Rigid Truck Entering from Right



Rigid Truck Entering from Left



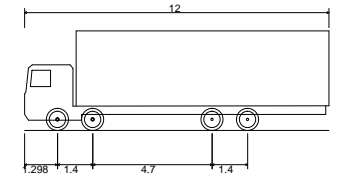
Rigid Truck Exiting to the Left



Rigid Truck Exiting to the Right

NOTE:  
This tracking is based on Ordnance Survey mapping only and no site checks have been made to corroborate road widths

KEY:  
 Parked vehicles



Rigid Truck  
 Overall Length 12.000m  
 Overall Width 2.500m  
 Overall Body Height 3.928m  
 Min Body Ground Clearance 0.412m  
 Track Width 2.471m  
 Lock to Lock Time 6.00s  
 Kerb to Kerb Turning Radius 11.900m

Contains Ordnance Survey data © Crown copyright 2015,  
 Frank Reynolds Architects Licence number 100022432

| Rev. | Date | Revision details | Drawn | Checked | Approved |
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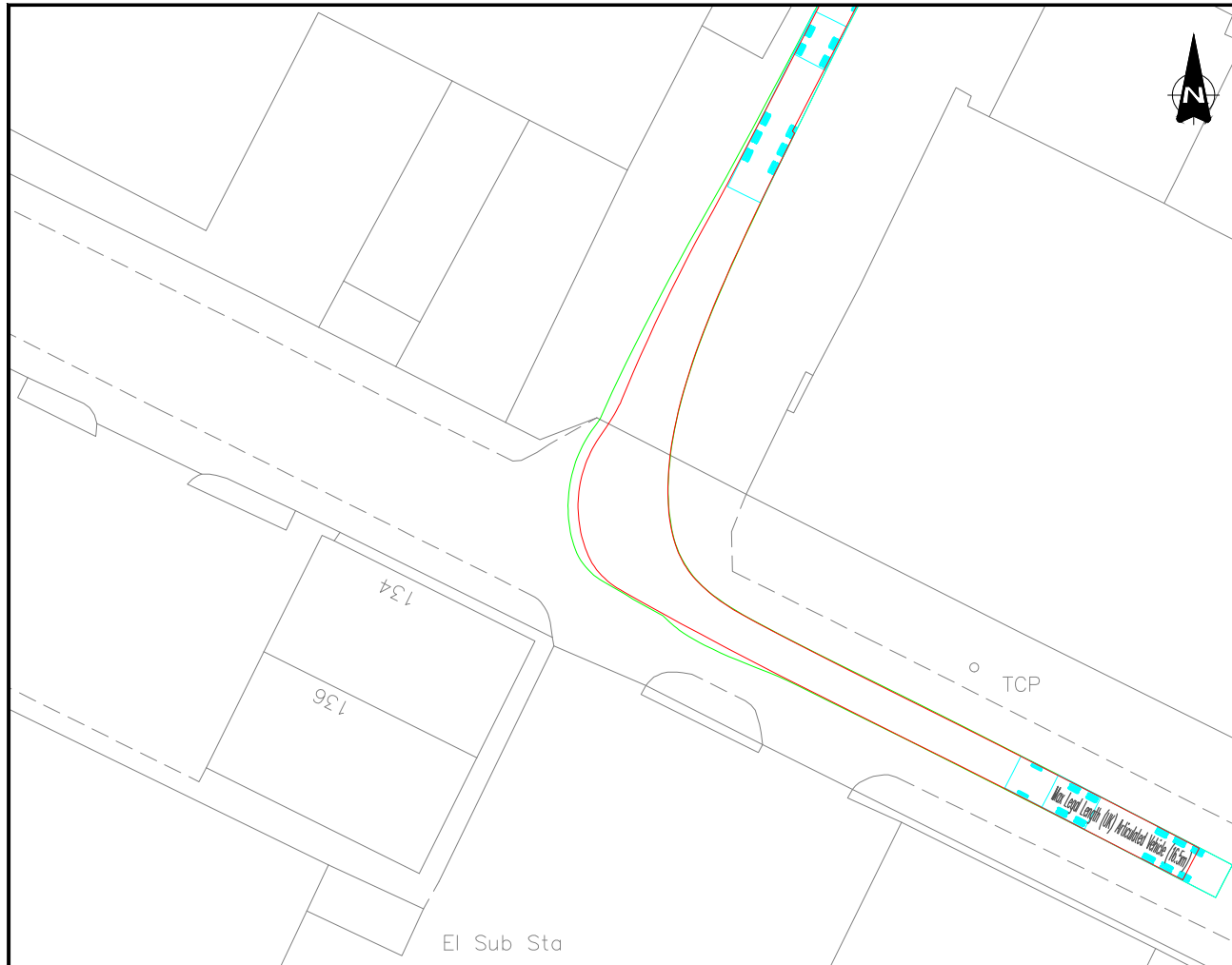
Client  
**Frank Reynolds Architects**

Project  
**Crown Industrial Estate**

Title  
**Swept Path Analysis  
 With Parked Vehicles in Clayton Road**

|                               |                              |                 |
|-------------------------------|------------------------------|-----------------|
| Drawn<br>MIE                  | Checked<br>JC                | Approved<br>PWJ |
| Original drg. size<br>A3      | Date<br>Nov 2015             | Scale<br>1:500  |
| Drawing Status<br>Information | Drawing Number<br>ST16397-02 | Rev.<br>-       |





Max Legal Length (UK) Articulated Vehicle (16.5m) Entering from Right



Max Legal Length (UK) Articulated Vehicle (16.5m) Entering from Left



Max Legal Length (UK) Articulated Vehicle (16.5m) Exiting to the Left



Max Legal Length (UK) Articulated Vehicle (16.5m) Exiting to the Right

**NOTE:**  
This tracking is based on Ordnance Survey mapping only and no site checks have been made to corroborate road widths

Max Legal Length (UK) Articulated Vehicle (16.5m)  
 Overall Length 16.500m  
 Overall Width 2.550m  
 Overall Body Height 3.632m  
 Min Body Ground Clearance 0.396m  
 Max Track Width 2.500m  
 Lock to Lock Time 6.00s  
 Kerb to Kerb Turning Radius 6.870m

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| Rev. | Date | Revision details | Drawn | Checked | Approved |
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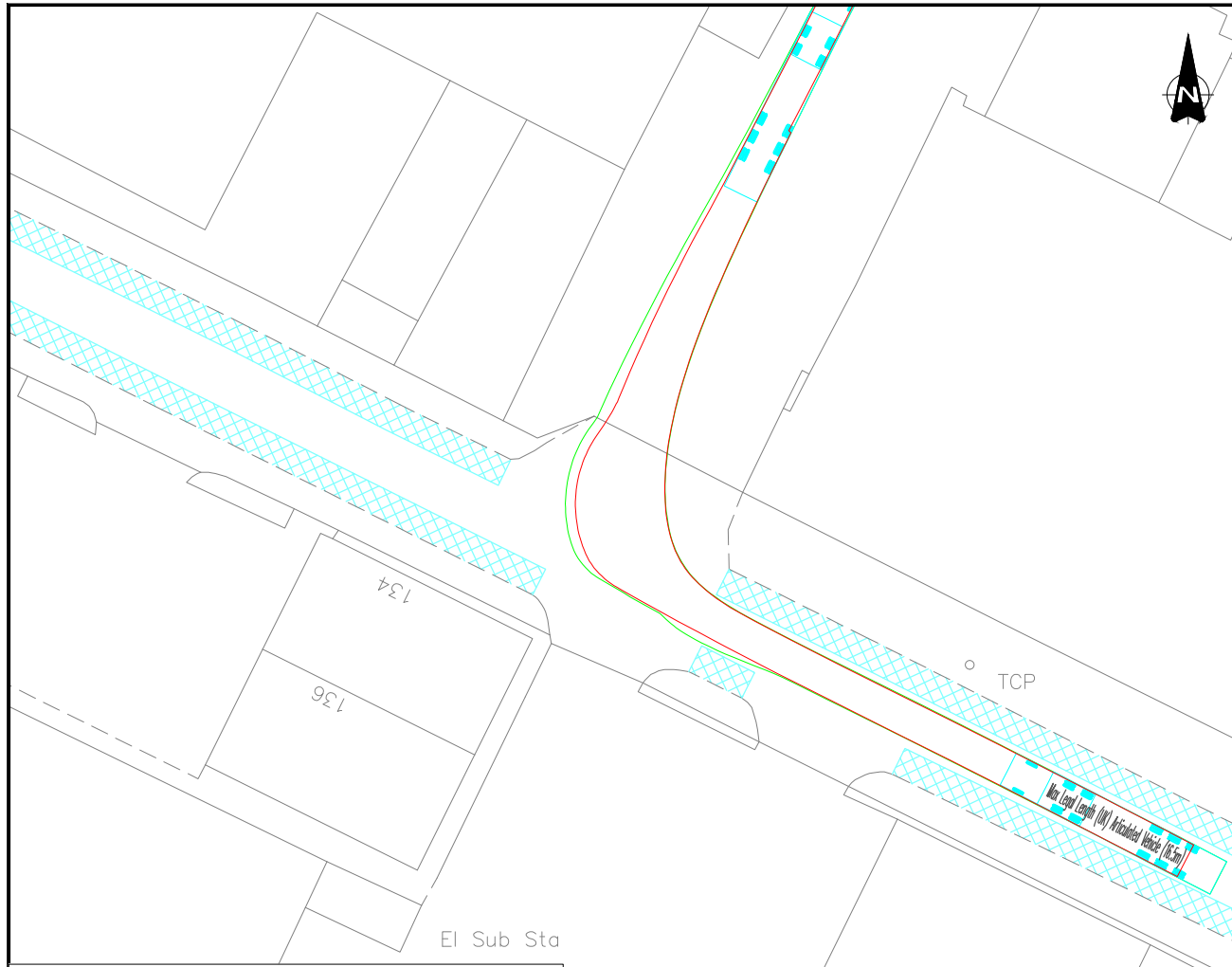


Client  
**Frank Reynolds Architects**

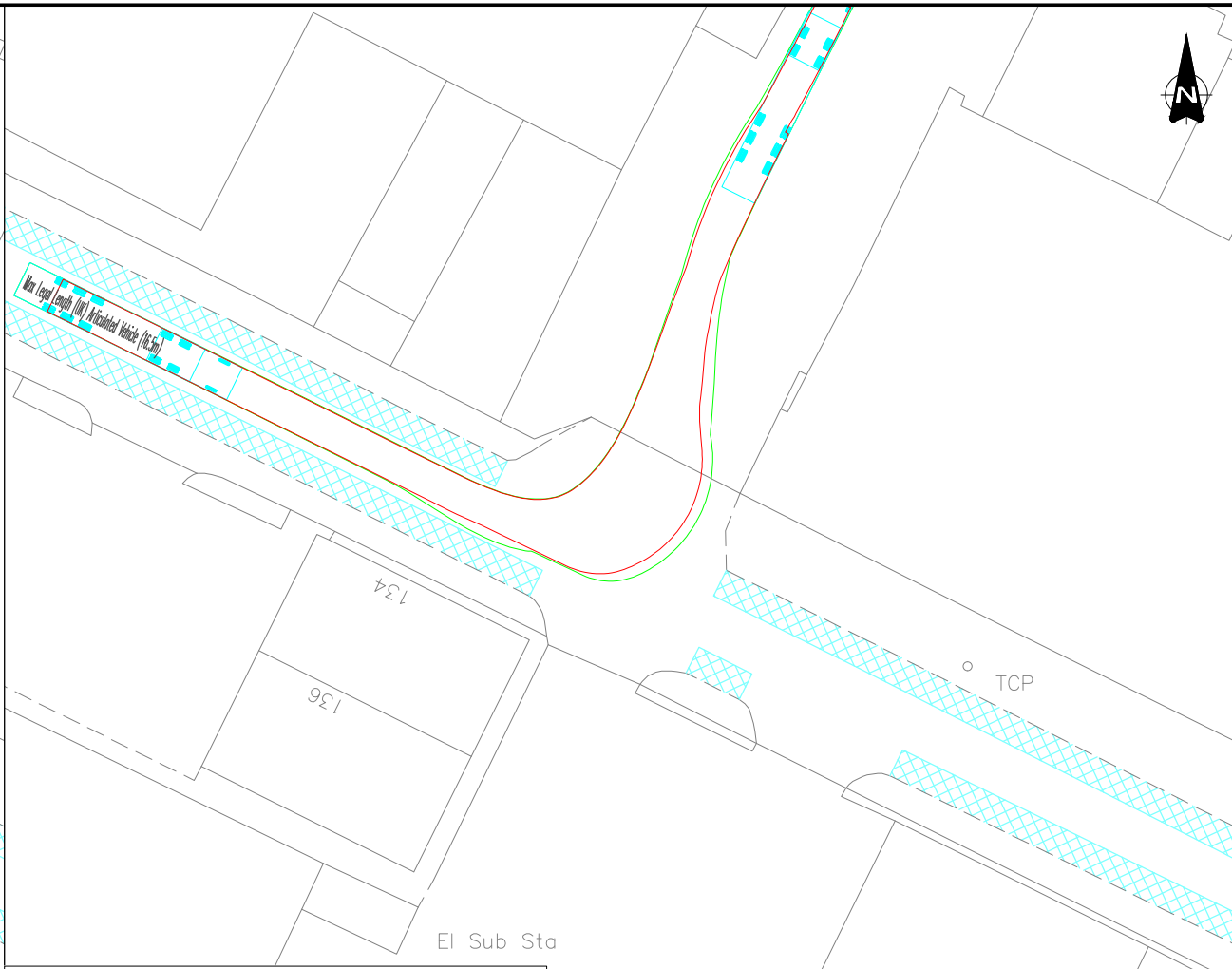
Project  
**Crown Industrial Estate**

Title  
**Swept Path Analysis  
 Assuming No Parking in Clayton Road**

|                               |                              |                 |
|-------------------------------|------------------------------|-----------------|
| Drawn<br>MIE                  | Checked<br>JC                | Approved<br>PWJ |
| Original drg. size<br>A3      | Date<br>Nov 2015             | Scale<br>1:500  |
| Drawing Status<br>Information | Drawing Number<br>ST16397-03 | Rev.<br>-       |



Max Legal Length (UK) Articulated Vehicle (16.5m) Entering from Right



Max Legal Length (UK) Articulated Vehicle (16.5m) Entering from Left



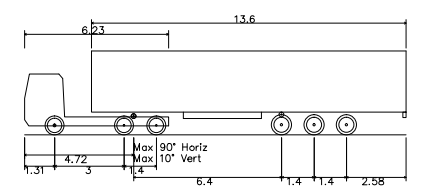
Max Legal Length (UK) Articulated Vehicle (16.5m) Exiting to the Left



Max Legal Length (UK) Articulated Vehicle (16.5m) Exiting to the Right

NOTE:  
This tracking is based on Ordnance Survey mapping only and no site checks have been made to corroborate road widths

KEY:  
 Parked vehicles



Max Legal Length (UK) Articulated Vehicle (16.5m)  
 Overall Length 16.500m  
 Overall Width 2.550m  
 Overall Body Height 3.632m  
 Min Body Ground Clearance 0.396m  
 Max Track Width 2.500m  
 Lock to Lock Time 6.00s  
 Kerb to Kerb Turning Radius 6.870m

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| Rev. | Date | Revision details | Drawn | Checked | Approved |
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Client  
**Frank Reynolds Architects**

Project  
**Crown Industrial Estate**

Title  
**Swept Path Analysis  
 With Parked Vehicles in Clayton Road**

|                               |                              |                 |
|-------------------------------|------------------------------|-----------------|
| Drawn<br>MIE                  | Checked<br>JC                | Approved<br>PWJ |
| Original drg. size<br>A3      | Date<br>Nov 2015             | Scale<br>1:500  |
| Drawing Status<br>Information | Drawing Number<br>ST16397-04 | Rev.<br>-       |

CROWN TRADING CENTRE PETITION

The owners of the Crown Trading Centre on Clayton Road are requesting that the Council reallocate the site for mixed use housing. The site regularly causes blockages on Clayton Road due to HGV access and volume of business traffic. The site also requires high numbers of HGVs to pass residential properties on Blyth Road. We support the allocation of the site for housing:

We the undersigned request that the Council reallocate the Crown Industrial Estate for residential development

NAME

R. Próchno

A. SASIDIHARAN }  
S. SADANANDAN }

Sanu

ANMOL RAI

RANJANA RAI

Furnell

Lucas

Mrs Samani

K. KRISHNAKY

N. RINPATH

G. Costa

Peter Barreto

Helleni Joachim

n Joachim

BEATRICE OSKI

Na I Barbosa



**CROWN TRADING CENTRE PETITION**

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We the undersigned request that the Council reallocate the Crown Industrial Estate for residential development

| NAME        |  |  |
|-------------|--|--|
| AHMET OZCAN |  |  |
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- GENERAL NOTES
1. DO NOT SCALE FROM THIS DRAWING.
  2. ALL DIMENSIONS TO BE CHECKED ON SITE.
  3. ANY DISCREPANCIES SHOULD BE REPORTED TO THE ARCHITECT / CONTRACT ADMINISTRATOR.



GROUND FLOOR PLAN

- 1 BED FLAT
- 2 BED FLAT
- 3 BED FLAT



UPPER FLOOR PLANS

REVISION DATE DESCRIPTION

**FRANK REYNOLDS ARCHITECTS**  
 26-27 Great Sutton Street  
 Clerkenwell  
 London  
 EC1V 0DS  
 T: +44 (0)20 7812 8454  
 www.frankreynoldsarchitects.com

CLIENT  
**CTC OWNERS**

PROJECT  
**CROWN TRADING CENTER**

DRAWING NAME  
**ACCOMMODATION SCHEDULE**

|          |          |             |          |
|----------|----------|-------------|----------|
| STATUS   |          |             | DATE     |
|          |          |             | NOV 15   |
| DRAWN BY | CHECK BY | SCALE       | SIZE     |
| ASR      | FR       | 1:1000      | A3       |
| JOB NO.  |          | DRAWING NO. | REVISION |
| 5500     |          | SK01        | A        |

16<sup>th</sup> November 2015

**Crown Trading Center –**

**Accommodation Schedule** to be read in conjunction with massing and plan drawings

|              | 1B2P       | 2B4P       | 3B6P      | Total      |
|--------------|------------|------------|-----------|------------|
| Ground       | 8          | 12         | -         | 20         |
| First        | 20         | 32         | 6         | 58         |
| Second       | 20         | 32         | 6         | 58         |
| Third        | 20         | 32         | 6         | 58         |
| Fourth       | 20         | 32         | 6         | 58         |
| Fifth        | 12         | 18         | 4         | 34         |
| Sixth        | 12         | 14         | -         | 26         |
| Seventh      | 4          | 3          | -         | 7          |
| <b>Total</b> | <b>116</b> | <b>175</b> | <b>28</b> | <b>319</b> |

Total GIA Residential: 26293m<sup>2</sup> (includes all internal walls, circulation and servicing)  
Total GIA Car parking: 2448m<sup>2</sup>  
Total GIA Commercial: 1845m<sup>2</sup>















# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |                   |
|----------------------------|-------------------|
| Title                      | Dr                |
| First name                 | Jonathan          |
| Last Name                  | Marx              |
| Organisation (if relevant) | Northwood's Voice |
| Unit                       |                   |
| House name                 |                   |
| Address 1                  |                   |
| Address 2                  |                   |
| Town                       |                   |
| County                     |                   |
| Postcode                   |                   |
| Telephone                  |                   |
| Email                      |                   |

| 2. Agent's Name and Address (if applicable) |              |  |
|---|--------------|--|
| Title                                       |              |  |
| First name                                  |              |  |
| Last name                                   |              |  |
| Company                                     |              |  |
| Unit  | House number |  |
| House name                                  |              |  |
| Address 1                                   |              |  |
| Address 2                                   |              |  |
| Town  |              |  |
| County                                      |              |  |
| Postcode                                    |              |  |
| Telephone                                   |              |  |
| Email                                       |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2        |                                   |
|--------------------------|-----------------------------------|
| <input type="checkbox"/> | Development Management Policies   |
| <input type="checkbox"/> | Site Allocations and Designations |
| <input type="checkbox"/> | Policies Map (Atlas of Changes)   |

| Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|--|---|
| <input checked="" type="checkbox"/>                  | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |  |
|-------------------------------|--|
| Policy number;                |  |
| Paragraph number;             |  |
| Table or figure number; or    |  |
| Map number (Atlas of Changes) |  |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                       |
|---|--------------------------|--------------------------|
| Sound?  | <input type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |
|--------------------------|-------------------------------------|
| <input type="checkbox"/> | It has not been positively prepared |
| <input type="checkbox"/> | It is not justified                 |

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not consistent with national policy |



**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*



**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

**In Table 3, on page 34 of the Local Plan Part 2 – Addendum to Sustainability Appraisal SA 16 refers to Northwood Station, Green Lane. This item should be removed from Table 3 Appraisal of Site Allocations. Council officers, or others, may wish to replace it with another site or sites within Hillingdon.**

**The Sustainability Appraisal Objectives for SA 16 are, when viewed in the light of the very recent TfL Planning Application for this site, not viable and may be considered misleading. As a summary, the overarching sustainability impacts are likely to be strongly negative. For example:-**

**“provide new public space” – the inference is that this is a substantial space, but in reality it will be small in order to achieve economic viability – and much smaller (about half) than that shown to residents in the various “exhibitions” in the run-up to the recent Planning Application. It is questionable whether “public space” is meaningful in this context.**

**“improve the vitality of Northwood as a Local Centre” - a highly judgemental comment and should not have been included. The reality is that 17 existing small businesses are at risk of being destroyed by this proposed development and many others are at risk from being destroyed (a) during knock-on effects of the construction period (b) in the aftermath caused by the centre of gravity of Northwood being moved eastwards along Green Lane and away from many other existing small businesses. These downsides are not referred to in the document.**

**“scores positively against social and economic objectives” – a highly judgemental comment and should not have been included. The reality will be more the opposite (see comments immediately above this).**

**“increase accessibility through funding the provision of step-free access at Northwood Underground Station” - this represents a monumental overkill to suggest that all the proposed site development and destruction is the only way to achieve step-free access at the station. Such step-free access could very realistically be provided for a fraction of the cost being proposed by TfL and would be just as effective.**

**There is a high risk that any developer of the site will be seeking to render development of this (difficult to develop) site economically viable, by maximising his**

gain by cramming as many properties into the site as is possible and by using the cheapest possible means of design and construction. The site is on a pronounced slope, near a major railway bridge and immediately adjacent to major rail links – all of which mitigate against this site being a likely development prospect with sustainable benefits.

Due to the above reasons it is very premature to include the site at Northwood Station as a well considered and well argued part of the Sustainability Objectives.

This site, referred to as SA 16, should be removed from the Local Plan Part 2 – Addendum to Sustainability Appraisal – as its appraisal in the document is one sided and does not meet sustainability objectives.

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|          |  |
|----------|--|
| <b>X</b> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <b>X</b> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <b>X</b> | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

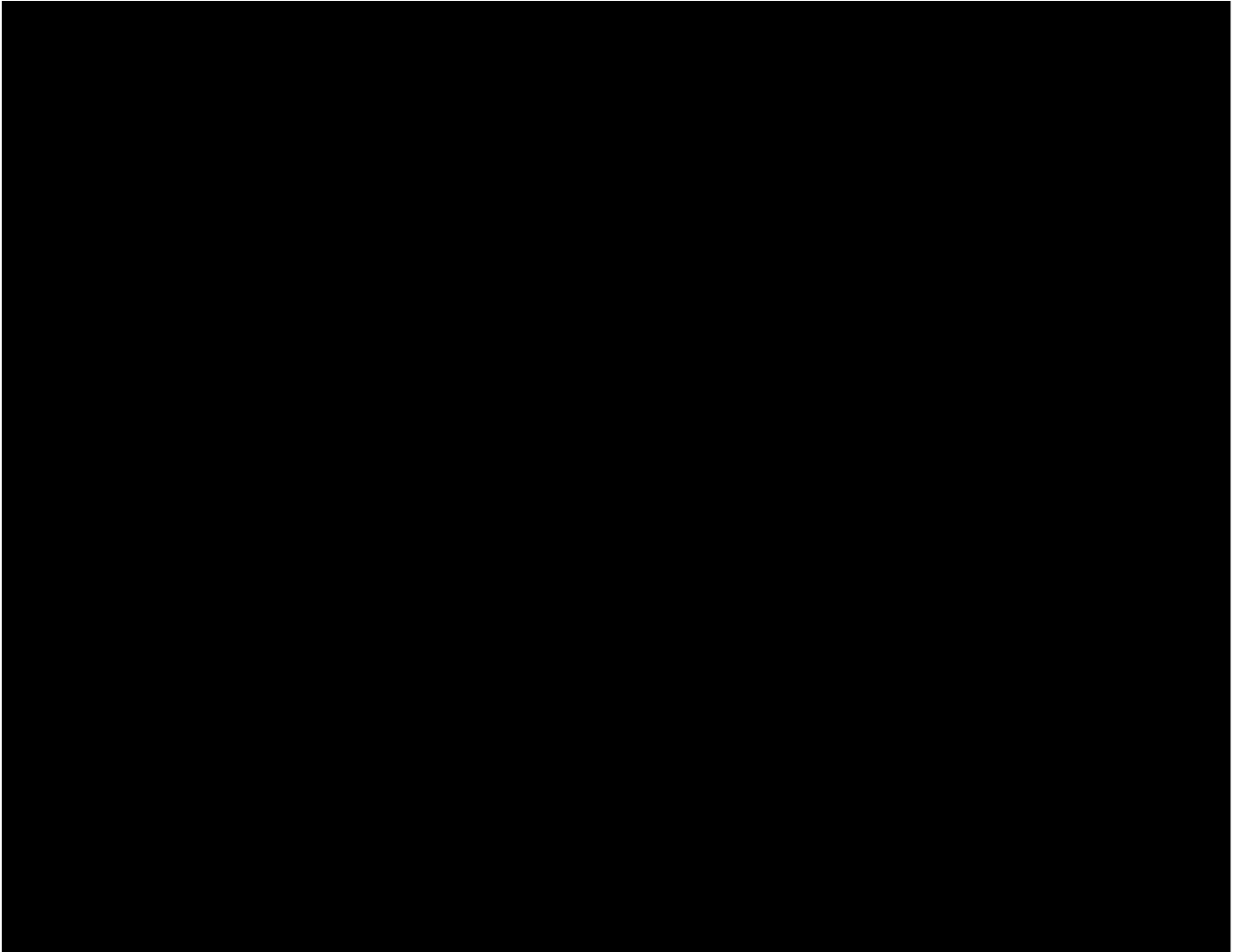
**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**



## **Monitoring Questions**

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.





# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |                     |
|----------------------------|---------------------|
| Title                      | Mr.                 |
| First name                 | J                   |
| Last Name                  | Moore               |
| Organisation (if relevant) | London Meat Company |
| Unit                       |                     |
| House name                 |                     |
| Address 1                  |                     |
| Address 2                  |                     |
| Town                       |                     |
| County                     |                     |
| Postcode                   |                     |
| Telephone                  |                     |
| Email                      |                     |

| 2. Agent's Name and Address (if applicable) |        |
|---|--------|
| Title                                       | Mr.    |
| First name                                  | J      |
| Last name                                   | Bailey |
| Company                                     | WYG    |
| Unit  |        |
| House name                                  |        |
| Address 1                                   |        |
| Address 2                                   |        |
| Town  |        |
| County                                      |        |
| Postcode                                    |        |
| Telephone                                   |        |
| Email                                       |        |

## PART B - Your responses

Please complete Part B **for each representation** you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input checked="" type="checkbox"/> | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                                    |
|-------------------------------|------------------------------------|
| Policy number;                | Green Belt, Metropolitan Open Land |
| Paragraph number;             | 5.12                               |
| Table or figure number; or    |                                    |
| Map number (Atlas of Changes) | South Sheet                        |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/>            | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

***Removal of The Elms (371A, High Street, Harlington), from the Green Belt. Please see enclosed letter for further information.***

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

To ensure a consistent approach is taken to the application of Green Belt policy throughout the Borough.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

N/A

Please continue on a separate sheet if necessary



## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

### 1) What is your gender?

Male  Female

### 2) To which age group do you belong?

under 15  25 – 44  65 – 85  
 15 - 24  45 - 64  85+

### 3) Do you consider yourself to be a disabled person?

No  Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |



Our Ref: A095334  
Your Ref:

7<sup>th</sup> December 2015

Planning Policy Team  
London Borough of Hillingdon  
3N/02 Civic Centre  
High Street  
Uxbridge  
Middlesex  
UB8 1UW

Dear Planning Policy team,

**Re: Hillingdon Local Plan Part 2 – Site Allocations and Designations  
The Elms, 371A High Street, Harlington, UB3 5EE**

I am writing to you on behalf of The Elms Estate Harlington LLP, to make representations relating to the Council's Local Plan, Part 2: Site Allocations and Designations Revised Proposed Submission Version October 2015.

**Background**

WYG acts on behalf of the owners of the land at 'The Elms', which is two parcels of land centrally located to Harlington, on the eastern side of Harlington High Street. This area, historically known as Palmers Farm, comprises of a number of buildings and hardstanding, predominantly in commercial use. The site comprises buildings in both commercial and residential uses. The commercial element has been in existence since the mid-1980's, following permission to construct a dwelling (known as The Elms), on land to the north.

The lawfulness of the commercial uses on the site was established in 1993. This was achieved via a range of planning permissions, as set out below:

- Planning permission: 19758AC/93/1601  
Change of use of the former agricultural building to use for the storage and sale of ornamental fish;
- Planning permission: 19758/AE/93/1604  
Change of use of part of the meat cutting and packaging building to use for the preparation of food;
- Planning permission: 56598/APP/2001/1924  
Change of use from preparation of food to Class B1 (offices) incorporating creation of a new entrance (Retrospective application).

Further permissions were then sought and granted in 2014 to regularise the then existing use of the units on the site, as follows:

- Planning permission: 19758/APP/2014/823  
Change of use of Unit 1 to mixed use, including offices (Class B1a) and storage & distribution (Class B8) (Retrospective application).



- Planning permission: 19758/APP/2014/835  
Change of use to dog grooming (Class sui generis), (Retrospective application).
- Planning permission: 19758/APP/2014/834  
Change of use to food preparation with no retail or sales element (Class B1c) (Retrospective Application).
- Planning permission: 19758/APP/2014/833  
Change of use of premises offices (Class B1a) and/or storage & distribution (Class B8)
- Planning permission: 19758/APP/2014/831  
Change of use of premises from to retail (Class A1) and ancillary storage (Class B8), (Retrospective Application)
- Planning permission: 19758/APP/2014/838  
Change of use of vacant, former agricultural building to use for packaging, storage and pallet manufacture (Class B2- General Industrial)
- Planning permission: 19758/APP/2014/828  
Change of use of premises from storage and packaging of materials (Class B2/B8), to light industrial (Class B1c), and ancillary storage (Class B8) (Retrospective application)
- Planning permission: 19758/APP/2014/791  
Change of use of existing building to meat cutting, packing and distribution (Class B2) (Retrospective application) - 19758/APP/2014/791
- Planning permission: 19758/APP/2014/826  
Change of use of Unit 9 to storage and distribution (Class B8), (Retrospective application)

The effect of these planning permissions has been to regularise previously unauthorised uses and to establish uses in other units that were previously vacant.

Prior to 2014, an outline application was submitted for the residential development of the site (application ref. 19758/APP/2006/3377). This was refused in 2007 and dismissed on appeal in January 2008.

The commercial site is identified in the annotated aerial photograph contained in **Appendix 1** as 'Site 1.' In addition to this, the existing dwellings on land immediately to the north of The Elms complex (site 2), are also the subject of these representations. It is asserted that both sites should be excluded from the Green Belt due to their intensively developed character and interrelationship with the existing built form comprising the setting of Harlington.

Site 2 is currently in residential use and functions as a separate planning unit from the commercial site immediately to the south.

### **Scope of Representations**

These representations are submitted in order to highlight the inappropriate and ineffective Green Belt designation at Harlington; specifically the inappropriateness of including the site at The Elms within the Green Belt. It is asserted that the site does not meet the purposes or functions of including land within the Green Belt and the inappropriate designation of the land adversely affects the significance of this key national policy designation.

In addition, it is asserted that the ongoing presence of long-established commercial uses on the site, the fact that it adjoins the existing settlement of Harlington and that it is intensively developed and enclosed rather than open in character, that the site at The Elms should be excluded from the Green Belt.

These representations therefore seek the addition of this site within the list of Green Belt Deletions. In light of the current status of the site as Green Belt, it is also proposed that an additional Green Belt Deletion is added to the section entitled Green Belt; Metropolitan Open Land; Green Chains; Nature Conservation, following on from the proposed Green Belt Deletions at 470 Bath Road, Longford, Former Perry Oaks Sludge Works, Heathrow, and Land at Stockley Road adjoining the Grand Union Canal, Hayes.

The continued application of the Green Belt designation at The Elms appears to be the result of a failure to consistently apply the criteria used to review the Green Belt boundaries in the Borough. Given the approach taken to the revision of the Green Belt boundaries elsewhere in the Borough it is asserted that an inconsistent approach is taken throughout the review of sites which do not serve the purposes of Green Belt land as defined by the National Planning Policy Framework (NPPF) 2012.

Given its close proximity to and relationship with the existing settlement, it is asserted that the site now represents a developed part of the village of Harlington, which should (for the purposes of the consistent application of policy), be included within a revised settlement boundary.

## **Green Belt Policy**

The NPPF represents the starting point for examining whether the current Green Belt boundaries should be reviewed. Paragraph 80 sets out the five purposes of the Green Belt. It is noted that none of these five purposes are served by designating land at The Elms, Harlington as Green Belt. This is explored in more detail below.

Paragraph 83 of the NPPF confirms that it is the role of the Local Plan process to critically examine the role of the Green Belt and seek to ascertain whether the existing boundaries are appropriate in light of changes in circumstances since the Green Belt boundaries were defined. The key considerations outlined in Paragraph 83 are whether the boundaries are sufficiently defensible to be of permanence. Paragraph 83 reads as follows:

*"Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period."*

It is clearly evident from the current position of the Green Belt boundaries around Harlington that these do not correspond with permanent, defensible boundaries. The absence of this site from the list of proposed Green Belt Deletions in the Local Plan Part 2, Revised Proposed Submission Version, October 2015), is inconsistent with the requirement for Green Belt boundaries to reflect features of particular permanence (this is discussed in full below). It is also the case that the existing Green Belt boundary around Harlington is inherently inconsistent with itself and requires urgent clarification. With particular reference to the Green Belt boundary along the eastern side of Harlington, the two backland properties (numbers 389-391 High Street, to the rear of numbers 385-387 High Street) are outside the Green Belt, whilst the much larger built form of older, existing commercial properties and an existing residential property to the north are within the Green Belt. A significant proportion of the existing commercial buildings are situated no further away from existing village as the backland properties and the Green Belt cuts across the rear gardens of these backland properties (where there is no defensible boundary). Given the existing commercial buildings at The Elms are as close to the rest of the village as other properties along the eastern side of the High Street, it is asserted that the Green Belt designation in this location has been inconsistently and inaccurately drawn, contrary to the clear guidance set out in the NPPF. The residential property adjacent to the north of The Elms (which finds itself within the Green Belt) is physically closer to the existing built form of land adjacent outside the Green Belt than the backland properties (numbers 389-391 High Street) and more directly inter-related to existing buildings (outside the Green Belt) than the above backland properties. Thus, it is asserted that the Green Belt boundary on the eastern side of Harlington at 389 to 371A High Street is inconsistent and fails to meet Green Belt objectives.

It is therefore proposed that the current boundary is redrawn to correct this inconsistency and achieve compliance with the objectives of including land within the Green Belt.

This representation now describes the reasons why designating the site as Green Belt is inappropriate and fails to meet any of the five purposes (as per NPPF paragraph 80).



## The five purposes of the Green Belt

1. To check the unrestricted sprawl of large built-up areas;
2. To prevent neighbouring towns merging into one another;
3. To assist in safeguarding the countryside from encroachment;
4. To preserve the setting and special character of historic towns; and
5. To assist in urban regeneration.

In relation to the first Green Belt purpose, it is illogical in light of the established commercial uses at the site of The Elms for these to remain within the Green Belt. It is acknowledged that the Local Plan does not propose additions to the existing settlement at Harlington in the form of allocations for new housing or commercial development. The general direction of the Part 1 Local Plan is to retain the extent of the Green Belt in the area to the north of Heathrow and more generally not to consider major adjustments to Green Belt boundaries to accommodate growth. However, Paragraph 8.24 of the Part 1 Local Plan states that: *"minor adjustments to the boundary will be undertaken in the Hillingdon Local Plan Part 2 – Site Specific Allocations Local Development Document (LDD)."* This is entirely the approach that is being advocated in the Part 1 Local Plan and, it is asserted, is necessary and appropriate in this case.

The Local Plan Part 2 Site Allocations and Designations (Revised Proposed Submission Version, October 2015), does not allocate any land in Harlington for future development. Whilst the village is directly connected to larger urban areas to the north and south, in itself the village of Harlington is not a large built-up area. Given that there are no proposals to increase its size, or significant proposals by the London Borough of Hillingdon in the vicinity, the retention of intensively developed land within the Green Belt in this location does nothing to check the unrestricted sprawl of the existing built-up area.

In relation to the second purpose, the existing urban area of Harlington has already merged, to some extent, into the wider urban area including Heathrow Airport. In order to prevent Cranford and Harlington village from merging entirely however, an area of land is designated Green Belt between the two existing settlements and the M4 and Bath Road (A4), which form clear, defensible boundaries to the north and south. The Green Belt follows the edge of the built-up area of Cranford (situated on the northern side of Bath Road), which again are clear and defensible boundaries. The Green Belt designation then follows the edge of the built-up area of Harlington along Bath Road and north, around the built-up area of the village to the east of the High Street. At this point, the designation becomes muddled and inconsistent with the rest of the designated land. As noted above, it does not follow clear, defensible boundaries; some existing buildings in the village are outside the Green Belt and some within. The designation of developed land containing commercial and residential buildings adjacent to the existing built-up area and well-related to Harlington village does not serve the purpose of ensuring Harlington and Cranford do not merge into one another. A more appropriate Green Belt boundary would be to follow the clear and defensible boundary of The Elms (371A High Street), as shown in **Appendix 4**.

The third purpose is to safeguard the countryside from encroachment. The majority of the land occupied by The Elms relates more closely to the existing built-up area of Harlington village and has a well-defined boundary. There are no proposals to develop any land not previously developed and therefore the inclusion of the land within the Green Belt does not safeguard the countryside from encroachment, as the site of the The Elms is lawful previously developed land.

The NPPF defines previously developed land as *"land which is or was occupied by a permanent structure, including the curtilage of the developed land... and any associated fixed surface infrastructure."*

The fourth purpose is to preserve the setting and special character of historic towns. It is asserted that the setting and character of both Harlington and Cranford would be preserved and there would be no significant impact on the setting of heritage assets by excluding The Elms from the Green Belt. The nearest Listed

Buildings to the site are The Dower House and Forecourt Wall to the Dower House (both Grade II). It is understood The Dower House is currently in a state of disrepair following a fire.

The setting of The Dower House and Forecourt Wall to the Dower House is suburban in nature with residential development on both sides of the site and opposite, on the western side of the High Street. The properties adjacent to the north and south are in very close proximity to the Listed Buildings. Largely due to the position of existing development (and partly the well-treed nature of the sites), there is no intervisibility between The Elms and The Dower House and Forecourt Wall to the Dower House. As a result, it is asserted that there would be no adverse impact on the setting of The Dower House and Forecourt Wall to the Dower House by removing The Elms from the Green Belt.

There are no other Listed Buildings within the vicinity that would be affected by the removal of The Elms from the Green Belt.

The fifth and final purpose of the Green Belt is to assist in urban regeneration. The Elms is lawfully previously developed land and therefore including it within the Green Belt actually has the opposite effect in regard to this purpose. The inclusion of such previously developed land within the Green Belt could well have the effect of frustrating urban regeneration and therefore rather than meeting this aim, the designation is more likely to work against it.

Thus, the designation of The Elms within the Green Belt does not serve any of the five purposes of the Green Belt as set out in the NPPF and is actually at risk of contradicting the fifth purpose. It is concluded the site is inappropriately designated and this matter should be addressed through this Site Allocations and Designations Local Plan review.

### **Clearly defined boundaries**

The requirement for Green Belt boundaries to be clearly defined and to correspond to readily recognisable and permanent physical features is set out in Paragraph 85 of the NPPF, which is as follows:

*“When defining boundaries, local planning authorities should:*

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- not include land which it is unnecessary to keep permanently open;*
- where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”*

In accordance with the London Plan, the Local Plan directs development to previously developed (brownfield) sites. The Implementation of Policy H1 (p. 67 of the Plan) explains that to meet and exceed its minimum strategic dwelling requirement (as set out in Policy H1), the Council will ensure that development makes the most efficient use of brownfield land. Clearly, the continuing designation of brownfield land as Green Belt is wildly inconsistent with this policy and the Council should urgently review the matter.

It is also noted the village of Harlington lies just north of the Heathrow Opportunity Area, as identified in the London Plan. The Hillingdon Local Plan Part 1 (paragraph 4.14) states that the area is:

*"... capable of accommodating a proportion of the 12,000 new jobs and over 9,000 new homes... the GLA's SHLAA identifies that a total of 318 dwellings could be accommodated in the Heathrow area, excluding Hayes and West Drayton."*

Clearly, The Elms site is not of a sufficient size to contribute significantly to the 318 dwellings identified by the GLA and in any case would not have been included in the SHLAA due to its Green Belt designation. However, it is noted that the GLA SHLAA (2013) post-dates the Local Plan Part 1 (which was adopted in November 2012). The GLA SHLAA states that:

*"1.3. The 2011 Census found that the population of London was 8.17m, which means London's population is growing significantly faster than was projected when the 2011 London Plan was published. The most recent GLA projections suggest London's population could grow to 10.1 million by 2036, which will have significant implications for the numbers of new homes required. GLA projections suggest that household growth will be circa 40,000 homes per annum between now and 2036. Shorter term DCLG projections are higher, projecting household growth of 53,000 a year in London between 2011 and 2021. Neither of these figures takes account of current (backlog) housing need, second homes or vacant units.*

*1.4. Alongside the SHLAA, the GLA has carried out a SHMA to provide an objective assessment of London's need for market and affordable housing<sup>5</sup>. The SHMA uses GLA's population and household projections and includes an assessment of the number of households currently in need (backlog) as well as projected future growth. The SHMA estimates London's need for additional new homes is 49,000 homes a year, or as high as 62,000 if current housing need is met more quickly.*

*1.5. This demonstrates that for London to meet its housing need, at least 49,000 additional homes need to be delivered each year between now and 2036, significantly more homes than the 32,210 per annum minimum provision target in the current London Plan." (London Strategic Housing Land Availability Assessment 2013)*

On this basis, there is an even greater need for new dwellings than previously planned. This is confirmed in the Further Alterations to the London Plan, which requires a significant increase in housing supply above the target set in the 2011 Plan (see paragraph 1.18 of the London SHLAA 2013).

Paragraph 9.49 of the Local Plan Part 1 explains that the capacity of existing schools is becoming increasingly limited due to high birth rates with population projections indicating this will continue. There is already an acceptance in the Plan that it may be necessary to release Green Belt sites to accommodate new forms of entry.

The Council has stated the most pressing need *in the short term* is to provide an estimated 18 new forms of entry in Hillingdon's primary schools (Local Plan Part 1 paragraph 9.49). This means approx. a third of the primary schools in the Borough will need to be extended/ expanded. Given that many schools are located in existing built-up areas and/ or on constrained sites this limits the potential to extend. The Local Plan Part 2 proposes to remove one school from the Green Belt as it has been developed and the site no longer performs a function as Green Belt land.

It is noted, however, that the site of William Byrd Primary School in Harlington is designated Green Belt. This provides further evidence/ another example that the Council has simply not properly assessed the Green Belt around Harlington in relation to Green Belt policy and its clearly stated needs. The Council is not applying Green Belt policy in a consistent manner.

It is concluded that the removal of the Green Belt designation is consistent with the Local Plan strategy.

Also, of particular importance is the second criterion, which directs local planning authorities not to include land within the Green Belt that it is unnecessary to keep permanently open. On this basis, it is clear that the Green Belt designation which currently applies to The Elms is inappropriate and out of date. The designation

should be removed. The presence of large, permanent buildings throughout the majority of the site clearly and unequivocally results in the land not being open in character.

Bullet points three and four relate to safeguarded land, which is an option open to the local planning authority for this site, particularly in light of the below.

The fifth criterion is relevant in this case and requires consideration. The local planning authority is required to examine whether the Green Belt boundaries would need to be altered at the end of the plan period. The landowner has confirmed that in the medium-term future, the commercial buildings on the site would require replacement and given their age and the nature of the uses, redevelopment is highly likely to be the only viable option to ensure compliance with the relevant standards (particularly in relation to food preparation).

Thus, there is a strong likelihood of a proposal coming forward for the redevelopment of the site *before* the end of the Plan period (2026). As a result, it is asserted that the local planning authority should take the opportunity to consider removing the site from the Green Belt, in order to ensure compliance with the fifth criterion of NPPF paragraph 85.

Finally, as referred to above, the absence of clearly defined boundaries which relate to readily recognisable physical features and which have a degree of permanence is clearly contrary to the requirement in criterion six that requires Green Belt boundaries to correspond to features which represent permanent limits to the extent of development. The Green Belt boundary currently runs along the western boundary of The Elms, excluding the residential properties in Harlington to the west of this from the Green Belt, whilst the designation continues to apply to the commercial buildings and residential properties (in some cases closer to the High Street than residential dwellings outside the Green Belt designation, in the immediate vicinity). The position of the boundary as shown on Map A3.12 does not correspond with the extent of development to the east of Harlington which is more clearly defined by the limits of the previously developed land at The Elms. It is asserted that these clearly definable (recognisable) and permanent physical features represent a more appropriate position for the Green Belt boundary to follow, and it is proposed that this is amended to exclude both areas from the Green Belt and include these within the village of Harlington.

It is acknowledged that the continued relevance of the land at The Elms to meeting the objectives of the Green Belt was considered as part of the update to the Council's Green Belt Assessment published in September 2013. In considering the site against the five purposes of the Green Belt, as set out in the NPPF (paragraph 80), the Council acknowledges that the site does not serve the following four purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns.

The Council's Green Belt Assessment concluded that the site does meet one of the five purposes of Green Belt land. The extract from this part of the evidence base (included within **Appendix 2**) states that:

*"There are other alternative sites available which would encourage the recycling of other derelict or urban land. The site therefore merits its current Green Belt designation."*

This is clearly an erroneous conclusion, given that it is accepted by all parties that the site does not serve four of the five Green Belt purposes and, as demonstrated above, including the site in the Green Belt is contrary to the objective of the fifth purpose.

The clear conclusion is that the site is inappropriately designated as Green Belt and this should be removed to comply with national planning policy and to ensure a consistent approach is taken to the definition of the boundary.

The development of land at The Elms would not compromise the objectives of the Local Plan or prevent previously developed land coming forward for development elsewhere, which is integral to urban regeneration initiatives. On the contrary, as previously mentioned the site is likely to come forward for later on in the Plan

period, after key allocated sites and other brownfield sites are developed. To reiterate, there are no proposals to alter the use of the site in the short-term.

It is asserted that in the medium to long term, this previously developed and centrally located site within the village would facilitate and complement the regeneration of Harlington, providing an opportunity for new development in an area where none is currently proposed during the plan period, and where the Green Belt boundaries correspond with the existing limits of development. Without additional sites such as that at The Elms, there is insufficient capacity within Harlington to meet local needs for housing and provide sustainable development.

The Green Belt Assessment (last updated in September 2013) has overstated the role of the site at The Elms, and indeed others, in encouraging the recycling of derelict and other urban land. This was the only one of the five purposes of the Green Belt to which this site was considered to be consistent by the Council. The size of the site limits its development potential and the quantum of housing it could accommodate would not be of a scale sufficient to compromise the delivery of other regeneration initiatives elsewhere. In addition, it is asserted that the existence of other sites that provide opportunities for recycling of derelict land is insufficient justification (on its own) for retaining the site within the Green Belt.

It is important to note that since the publication of the latest Green Belt Assessment in September 2013, the lawful use of the site for a range of commercial uses has become established through the approval of several planning permissions in June 2014. This reflects a material change in circumstances that formally recognises and establishes the presence of these commercial uses, which represent inappropriate development in the Green Belt, as opposed to the previous lawful use of the site for agricultural purposes which would not in itself have been inappropriate development in the Green Belt.

In light of the above considerations, it is considered that the continued presence of the Green Belt designation at The Elms would not be consistent with the objectives of the NPPF, and that these would be better achieved through the revision of the current Green Belt boundaries to exclude the land and buildings at The Elms to the east of Harlington which are currently in residential and commercial uses. This would ensure that the Green Belt boundaries reflected the logical extent of the settlement and lead to consistency with the permanent physical features that form the extent of development in this area.

There is also potential to provide for longer-term development needs in the village and in the south of the Borough through the identification of land immediately to the north of The Elms as safeguarded land. The extent of this land and its relationship to Sites 1 and 2 at The Elms, is shown on the annotated aerial photograph enclosed at **Appendix 3**.

## **New Homes**

Section 3 of the Local Plan: Part 2 - Site Allocations and Designations, identifies and allocates land for up to 6,879 dwellings on a total of 41 sites throughout the Borough. A number of these sites represent major redevelopments of redundant, former employment sites in order to provide housing. These representations are not seeking to challenge the merits of these developments in their own right but to recognise that an appropriate balance needs to be found in terms of housing provision throughout the Borough. The absence of any allocations in Harlington indicates that the future development needs of a settlement which is highly accessible by public transport and in close proximity to a range of employment opportunities are inadequately provided.

The absence of an acknowledgement of the role of Harlington as a location for new development fails to recognise the benefits of providing new housing in areas which are in close proximity to existing employment areas and those locations where it is anticipated that there will be significant growth in jobs (i.e. the Heathrow Opportunity Area and Hayes/ West Drayton Corridor). Whilst Harlington is among the smaller settlements in the south of the Borough, it clearly has potential to provide additional homes in locations close to employment opportunities which are well-served by public transport links (as highlighted in the accompanying Transport Statement). The allocation of new housing sites in Harlington would reduce the need to travel and commuting

distances between homes and employment areas, which would represent a sustainable pattern of development in the context of the Borough.

It is therefore considered that the lack of recognition afforded to the development potential of Harlington represents a failure to plan positively for growth throughout the Borough and maintain an appropriate balance between the locations of new homes and new jobs. In this respect, the Part 2 Local Plan is not considered to be "sound."

It is also unclear whether adequate consideration has been given to meeting unmet housing need arising elsewhere within the wider housing market area. The location of Hillingdon at the western edge of Greater London means it can be considered in the context of local planning areas beyond the administrative extent of London. The neighbouring Boroughs of Spelthorne (Surrey), Slough (Berkshire), and South Bucks (Buckinghamshire), are all areas where the pressure for housing provision is particularly acute, which like the London Borough of Hillingdon are constrained by Green Belt. Unlike the area adjoining the current limits of Harlington, these areas are subject to additional physical constraints to the provision of land for new housing, including flood risk, landscape and other environmental designations which severely limit their capacity to provide new housing sites.

Given the relationship between the London Borough of Hillingdon and these areas, it is considered that a more critical analysis of the potential of land within the Borough to provide new housing is needed in order to satisfy the 'duty to co-operate' with neighbouring local authorities. It is not sufficient for the Hillingdon Local Plan to merely satisfy its own requirements for housing provision, which incidentally have not been verified through the production of an up-to-date assessment of housing need (the GLA SHLAA post-dates the Local Plan Part 1).

Therefore, where there are new opportunities for the provision of housing on sites which are not currently allocated, these should be identified and safeguarded in order to provide additional land for new housing should it be required during the Plan period, unless other physical constraints demonstrate otherwise.

It is considered that greater flexibility in terms of accommodating housing growth in Harlington is required in order to provide for a significant boost in the housing supply (as required by Paragraph 47 of the NPPF). Without these provisions, Part 2 of the Local Plan may not be considered "sound."

### **Rebalancing Employment Land**

The redevelopment of the site for a mix of uses would provide the opportunity to improve the relationship of the site with neighbouring residential properties, its environmental quality and its sustainability. The retention of an element of employment use at the site may be preferable to a development consisting entirely of housing. As such, it is considered that an appropriate mix could be provided that would better reflect its position in relation to the settlement and the nature of the neighbouring uses.

### **Development Potential of The Elms**

The two areas of land identified on the enclosed plan (see **Appendix 1**), include the existing commercial site (Site 1), extending over an area of 0.6 hectares, and the existing residential use with associated outbuildings on land immediately to the north (Site 2). Both of these sites provide opportunities to extend and add to the limits of the existing settlement in a sustainable and logical manner. Whilst at present the various commercial uses and the existing dwelling remain in situ and are lawful uses carried on in close proximity to Harlington High Street, this land represents an opportunity to provide uses that better accord with the existing pattern of development. The enclosed plan at **Appendix 3** illustrates how the proposed revision of the Green Belt boundaries would alter the extent of development to the east of Harlington and ensure that it corresponds to the physical limits of development rather than arbitrarily cutting across the site. The proposed position of the



boundary would accord with recognisable and permanent physical features, in accordance with Paragraph 83 of the NPPF.

The revision of the Green Belt boundary as shown in **Appendix 3** and described above would facilitate the redevelopment of the site at The Elms in a manner which would be complementary to the existing settlement. Such an approach could provide a source of land for new housing, commercial development or a mix of residential and commercial uses commensurate with the location. The presence of existing buildings presents a source of previously developed land immediately adjacent to the settlement, representing a sustainable location for future development.

The following paragraphs describe various other relevant factors why this site would be appropriate for redevelopment.

*i) Access and Parking*

The accompanying Transport Statement prepared by Development Transport Planning confirms that the redevelopment of both areas of land at The Elms would not result in adverse impacts resulting from additional traffic volumes. The presence of existing employment uses provides a context and a baseline level of traffic using the site which would not be exceeded if the site was redeveloped for housing at a density of approximately 30 dwellings per hectare. It is notable that in terms of traffic generation the site can accommodate a greater number of dwellings without adverse impacts on vehicle circulation or parking. The latter would be accommodated within the site, with the location of vehicle parking spaces being subject to detailed design considerations that would be determined as part of a planning application.

*ii) Archaeology*

The extract from the Local Plan Proposals Map (**Appendix 4**), which relates to Harlington confirms the presence of an Archaeological Priority Area and an Archaeological Priority Zone which extends throughout Harlington and includes the site at The Elms.

Whilst these areas have been identified as a potential archaeological resource, there is little prospect of any active investigation into its potential without the redevelopment of the area. The form of any redevelopment would ultimately be influenced by the presence or otherwise of any features of archaeological interest.

Any redevelopment proposal will include measures to record and preserve any features of archaeological interest.

*iii) Residential Amenity*

The proximity of the existing commercial uses to existing dwellings suggests that there are opportunities to improve this relationship through the redevelopment of the site in a manner that would provide uses that are more consistent with a predominantly residential area. Whilst there is clear separation between the existing housing to the west of The Elms, the redevelopment of the existing commercial area would result in improvements to the relationship between the residential and non-residential uses.

*iv) Impact on Character and Appearance*

The character and appearance of the existing buildings on the site are poor and of no architectural merit. As a result they do not constrain the redevelopment potential of the site. On the contrary, redevelopment of land at the Elms presents the opportunity to enhance the character and appearance of the site, with benefits to the wider landscape. In landscape terms, any redevelopment should be well-contained and screened to minimise its visual impact, particularly to the north and east. In terms of the design and external appearance of new buildings and the relationship with adjacent buildings,

the redevelopment of the site would be likely to achieve significant improvements to the quality of the environment at The Elms.

v) *Trees, Landscape and Ecology*

The boundaries of the site at The Elms are lined with a mix of native and non-native mature trees and hedgerows. There are also a limited number of small trees within the area identified as Site 2. A Tree Preservation Order Area covers part of the site, although the position of the trees does not preclude development since these would be retained and safeguarded as part of any redevelopment scheme.

In landscape terms, the site is well-contained and the redevelopment of the site for housing would not result in any adverse visual impacts. Indeed, a residential development would present clear benefits in terms of the external appearance of the buildings.

As a previously developed site, the site has a low ecological value. However, there are a limited number of features (including a pond within the grounds of the existing dwelling at Site 2), which may support protected species. An ecological assessment would be undertaken prior to the submission of a planning application for the redevelopment of the site.

vi) *Flooding and Drainage*

The site is within Flood Zone 1, which has the lowest probability of flooding. There are therefore no constraints to the development in terms of flood risk.

**Proposed Changes**

In light of the shortcomings highlighted above, it is proposed that the Part 2: Local Plan should be amended as follows:

- Add Policy SA42: The Elms, Harlington (As per **Appendix 1** – enclosed)
- Add Green Belt Deletion 5: The Elms, High Street, Harlington (As per **Appendix 2** – enclosed)

Based on the format of the existing policies and proposals as set out in the Local Plan Part 2, the proposed additional policies and proposals should take the form of that set out below:

**POLICY SA42 – NEW HOMES**

**To follow Policy SA 41: 21 High Street, Yiewsley (Page 118).**

**POLICY SA 42: The Elms, High Street, Harlington**

The existing commercial buildings will be redeveloped to provide a development of a mix of dwellings or a mix of housing and employment uses which are compatible with the predominantly residential character of Harlington. The removal of the Green Belt designation reflects the presence of commercial and retail uses adjoining residential areas to the east of High Street, Harlington.

**Site Information**

|                  |  |
|------------------|--|
| <b>Site Name</b> | <b>The Elms, High Street, Harlington</b> |
| <b>Ward</b>      | Heathrow Villages                        |

|  |   |
|--|---|
|  |   |
| <b>Location</b>                                | High Street, Harlington   |
| <b>Area (ha/sqm)</b>                           | 0.92 ha   |
| <b>PTAL Rating</b>                             | 4   |
| <b>Proposed Development</b>                    | Residential/Residential led mixed-use   |
| <b>Designations</b>                            | Archaeological Priority Area<br>Archaeological Priority Zone  |
| <b>Existing Use</b>                            | Commercial/ retail (use classes B2, plus B1, B8, A1 and sui generis); plus existing residential use (Class C3)  |
| <b>Relevant Planning History (Most Recent)</b> | June 2014: Change of use of Unit 1 to mixed use, including offices (Class B1a) and storage & distribution (Class B8) (Retrospective application); Change of use to dog grooming (Class sui generis), (Retrospective application); Change of use to food preparation with no retail or sales element (Class B1c) (Retrospective Application); Change of use of premises offices (Class B1a) and/or storage & distribution (Class B8); Change of use of premises from to retail (Class A1) and ancillary storage (Class B8), (Retrospective Application); Change of use of vacant, former agricultural building to use for packaging, storage and pallet manufacture (Class B2- General Industrial); Change of use of premises from storage and packaging of materials (Class B2/ B8), to light industrial (Class B1c), and ancillary storage (Class B8) (Retrospective application); Change of use of existing building to meat cutting, packing and distribution (Class B2); Change of use of Unit 9 to storage and distribution (Class B8), (Retrospective application). |
| <b>Proposed Number of Units</b>                | To be confirmed   |
| <b>Existing Units</b>                          | 1   |
| <b>Net Completions</b>                         |   |
| <b>Infrastructure Considerations</b>           | To be negotiated as part of any planning application  |
| <b>Indicative Phasing</b>                      | 2021 – 2026   |
| <b>Other Information</b>                       | None  |

## **PROPOSED GREEN BELT DELETION (WITHIN CHAPTER: GREEN BELT; METROPOLITAN OPEN LAND; GREEN CHAINS; NATURE CONSERVATION**

**To Follow Proposed Designations as set out on Page 153:**

### **PROPOSED DESIGNATIONS**

#### **GREEN BELT DELETIONS**

1. 470 Bath Road, Longford
2. Former Perry Oaks Sludge Works Site, Heathrow
3. Land at Stockley Road adjoining the Grand Union Canal, Hayes
4. Lake Farm School, Hayes
5. The Elms, High Street, Harlington

**To follow details of Proposed Green Belt Deletion: 4) Lake Farm School, Hayes (Page 159).**

#### **4). The Elms, High Street, Harlington**

##### **Recommendation:**

##### **Delete from the Green Belt**

Reason for Recommendation: The site does not meet any of the purposes of including land in the Green Belt as identified in the NPPF at Paragraph 80, e.g. it does not:

- Check the unrestricted sprawl of large built-up areas;
- Prevent neighbouring towns merging into one another;
- Assist in safeguarding the countryside from encroachment;
- Preserve the setting and special character of an historic town; or
- Assist in urban regeneration.

The site is previously developed land comprising of large, permanent buildings in commercial and residential use, physically adjacent to the existing built up area of Harlington. The deletion of the Green Belt boundary in this location is consistent with national planning policy, the Council's Local Plan and the wider objective of sustainable development. There is no benefit to urban regeneration from designating the site as Green Belt. The site is well contained and enclosed by clearly recognisable and permanent boundary features, which form the revised Green Belt boundary.

##### **Conclusions**

In light of the considerations outlined above, it is proposed that the land at The Elms should be removed from the Green Belt in order to facilitate its redevelopment in the medium to long term.

The Local Plan process provides the appropriate opportunity for the potential of this site to be recognised and for the current Green Belt designation to be removed in order to facilitate development. Whilst the Local Plan Part 1 does not make provision for any new housing allocations in Harlington, it is clear that the village benefits from existing infrastructure which would enable it to accommodate either new housing, new

commercial development or a mix of both which would maintain the role of Harlington and contribute to its sustainable development.

Whilst the housing land supply situation in the London Borough of Hillingdon is such that the Council appears able to meet its housing targets in the short-to-medium term, the Local Plan represents an opportunity to plan strategically for longer-term growth and to make provision for land that may be needed to provide for development needs arising as a result of continued growth in the demand for housing throughout the Borough. The absence of any housing allocations in Harlington where these would be well-related to the anticipated growth in jobs, appears to be contrary to the objectives of the Part 1 Local Plan and the principles of sustainable development more generally. This is particularly the case, given the potential for future employment growth at Heathrow airport.

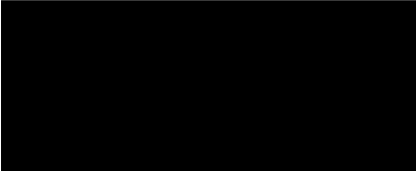
The more general requirement to significantly boost the housing supply nationally, and more specifically in London, along with the environmental constraints present elsewhere in the Green Belt are all firm indications that the Council should either allocate land or allow flexibility in their Plan to accommodate a higher level of housing than planned for in the Local Plan Part 1.

Given that the site at The Elms is previously developed land adjoining an existing settlement and with few environmental constraints, it is considered that its removal from the Green Belt to facilitate development would be entirely appropriate and indeed beneficial in terms of Green Belt policy. In terms of its potential contribution towards the supply of housing in Hillingdon and elsewhere within the wider housing market area, the site at The Elms is a suitable location for development and would be available for development during the Plan period.

If you have any further queries, please do not hesitate to contact me.

I look forward to hearing from you.

Yours faithfully,



**Jim Bailey**  
Director

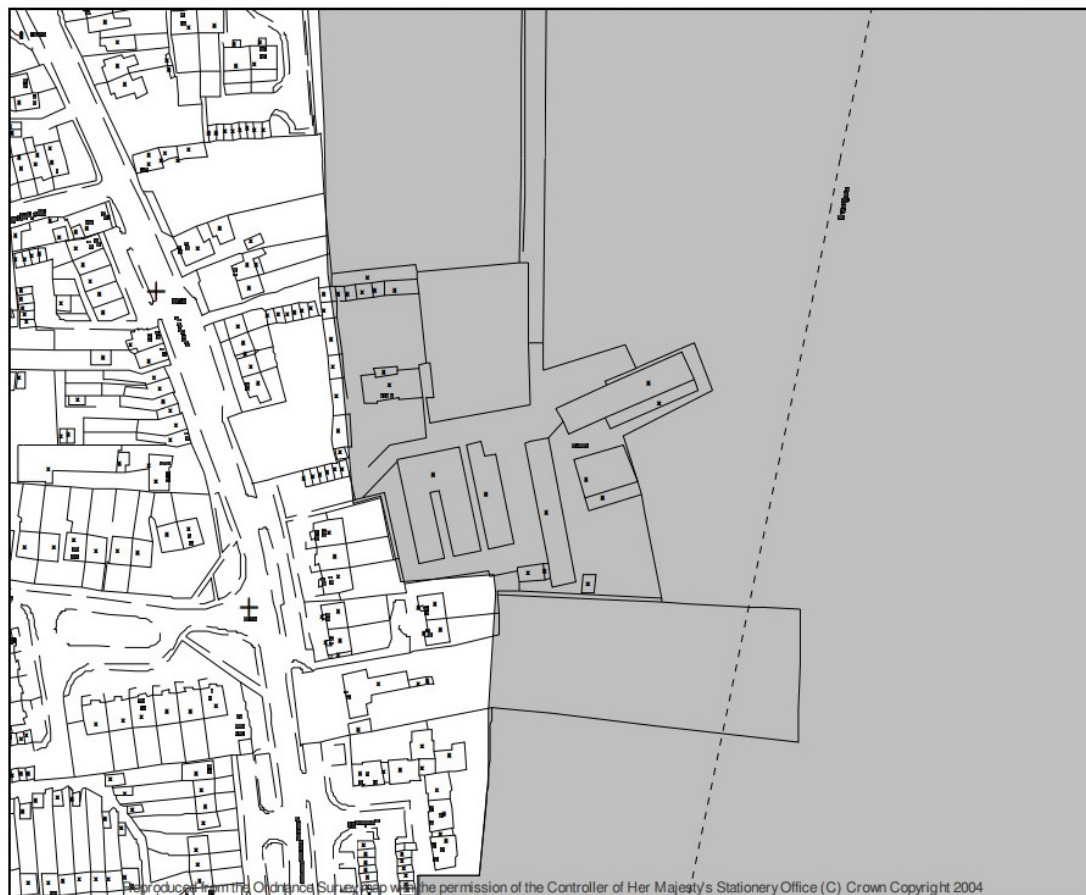
Encs.

**APPENDIX 1: Extent of the land at The Elms**






**APPENDIX 2: Extract from Green Belt Assessment (September 2013) showing the current extent of the Green Belt boundaries.**



Map 39 – Palmer's Farm, 371 High Street, Harlington

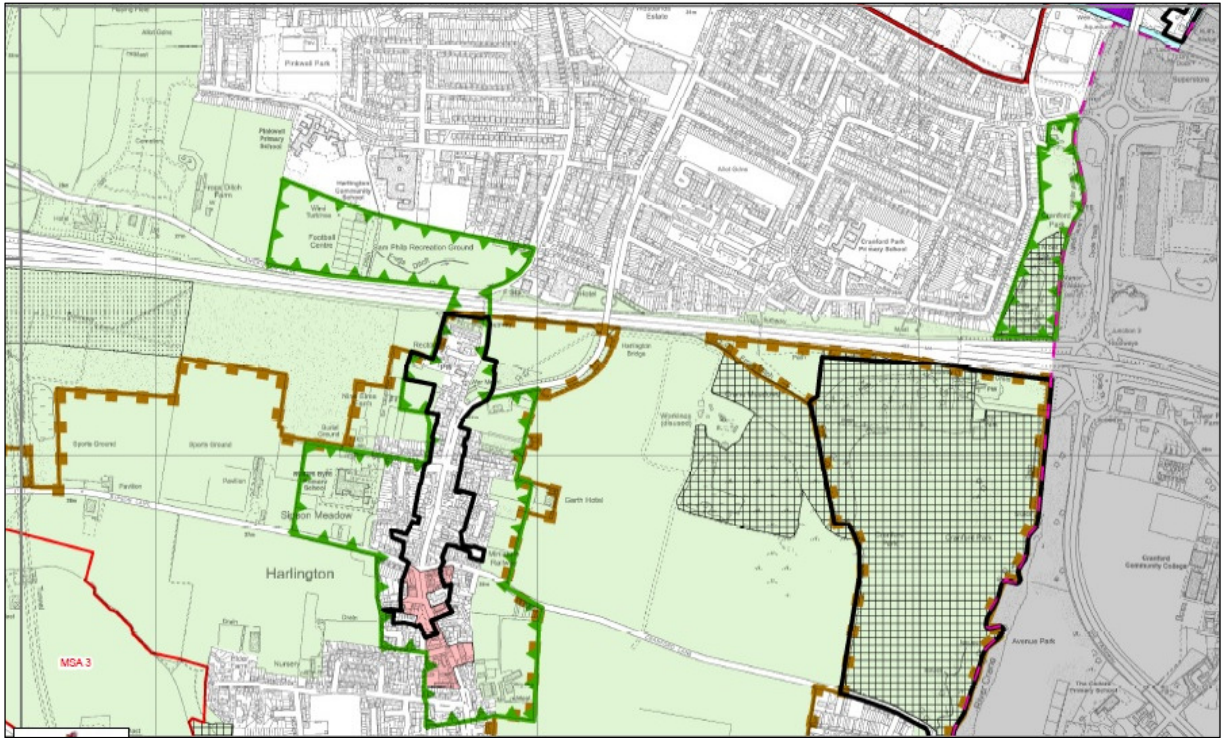
| <b>LEGEND</b>  |   |
|--|---|
| Existing Green Belt<br>   |   |
| <b>Green Belt Assessment</b>   |   |
| 1) To check the unrestricted sprawl of large built-up areas;   | ▪ |
| 2) To prevent neighbouring towns from merging into one another;  | ▪ |
| 3) To assist in safeguarding the countryside from encroachment;  | ▪ |
| 4) To preserve the setting and special character of historic towns;  | ▪ |
| 5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land  | ▪ |
| <b>Recommendation:</b>   |   |
| • <b>Retain Current Green Belt Designation</b>   |   |
| <b>Reason for Recommendation:</b> This site meets at least one purpose of including land in the Green Belt as identified by the NPPF. There are other alternative sites available which would encourage the recycling of other derelict or urban land. The site therefore merits its current Green Belt designation. |   |

### APPENDIX 3: Proposed Revision of Green Belt Boundaries





**APPENDIX 4: Harlington Policies Map (Atlas of Changes) showing the extent of Archaeological Priority Area (green) and Archaeological Priority Zone (brown)**





# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |          |
|----------------------------|----------|
| Title                      | Dr       |
| First name                 | Jonathan |
| Last Name                  | Marx     |
| Organisation (if relevant) |          |
| Unit                       |          |
| House name                 |          |
| Address 1                  |          |
| Address 2                  |          |
| Town                       |          |
| County                     |          |
| Postcode                   |          |
| Telephone                  |          |
| Email                      |          |

| 2. Agent's Name and Address (if applicable) |              |  |
|---|--------------|--|
| Title                                       |              |  |
| First name                                  |              |  |
| Last name                                   |              |  |
| Company                                     |              |  |
| Unit  | House number |  |
| House name                                  |              |  |
| Address 1                                   |              |  |
| Address 2                                   |              |  |
| Town  |              |  |
| County                                      |              |  |
| Postcode                                    |              |  |
| Telephone                                   |              |  |
| Email                                       |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                              |
|-------------------------------|------------------------------|
| Policy number;                | DMHD 3: Basement Development |
| Paragraph number;             | A1.35 to A1.43               |
| Table or figure number; or    |                              |
| Map number (Atlas of Changes) |                              |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/> unsure     |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                                     |   |
|--------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/>            | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

The proposed revision to Policy DMHD 3: Basement Development (pages 190 and 191 in Appendix A of the Revised Proposed Submission Version: October 2015) is extensive and contains many features which are to be welcomed. I particularly have in mind paras A1.37, A1.38 and A1.39 on pages 190 and 191 in Appendix A.

My submission here is one of process – in that my experience has shown that the existing Council processes robustly to implement the above changes are somewhat lacking. In summary, its no good having such basement policies if their implementation through any process is suspect, perceived to be suspect or plain inadequate.

Consider the following – the existing Council Planning Committees are comprised of elected Councillors with no specific qualification regarding the structural engineering consequences, in this case regarding basements, of advice which they are receiving from Council Officials. Councillors may be familiar with design considerations of matters above ground level (where everyone has a view on what may be acceptable) and whether such design considerations may or may not conform with Policy. However, regarding matters below ground level the situation changes dramatically in that aesthetics and design conformity with local neighbourhood styles does not apply. “Out of sight is out of mind” is my concern where non expert Councillors are relying on advice from Officials.

It has been my experience that when considering planning applications involving basements the direct neighbour concerns relate primarily to the structural engineering considerations of the proposed basement – rather than, say, its aesthetics. In other words will the proposed basement have some serious effect on the stability of the neighbouring properties ? This may relate to disturbance of neighbouring properties as perhaps caused by excavation, construction or perhaps by changes to water courses (thus causing flooding or erosion of neighbouring gardens or property foundations). It should be remembered that Party Wall Act considerations may or may not apply – it would depend on the particular situation.

A possible response to the above risks to neighbours is that, if consequential damage is incurred by construction of a basement, then the aggrieved neighbour has recourse to the courts for remediation. However, most residents will not have the financial resources to risk legal action in matters where evidence by way of concrete proof is far from certain. Have neighbours’ flooded gardens or foundation erosion been caused by the new basement or by other local factors or perhaps by variation in rainfall ? It should be remembered also that some of the longer term effects to neighbours of basement construction may be such that the original owner or developer is long gone or may even be out of business. What recourse does the aggrieved neighbour then have even in law if the basement owner is perhaps dead, moved to another country or has ceased trading ? Thus the “defence” of relying on the courts is a frightening and impractical one to most neighbours.



Thus in my view, it behoves the Council to take every reasonable step practically to make sure that the risks which neighbours face are minimised when it comes to any Council approval of underground (basement) construction. At present questions which arise in Councillors' minds or which are raised on the spot by petitioners at Committee Meetings cannot be professionally and properly handled by Council officials whose only expertise or qualification may be solely in planning matters. To rely on this process is unsafe in my view in very important matters concerning basements which have probable huge consequences and can give rise to subsequent grievances by petitioners and the like – even though resolution may be improbable for the reasons given above.

In my view a Council official with suitable expertise (structural engineer) should be present at Planning Committee deliberations involving basements. This would eliminate the present unsatisfactory practice of unreliable guidance being offered to Councillors during Planning Committee meetings.

An alternative process would be to allow the petitioner to bring a structural engineer along to a Planning Committee meeting (if the presence of a Council expert is denied) such that the structural engineer may answer questions which may arise in Councillors' minds or which are raised on the spot by petitioners.

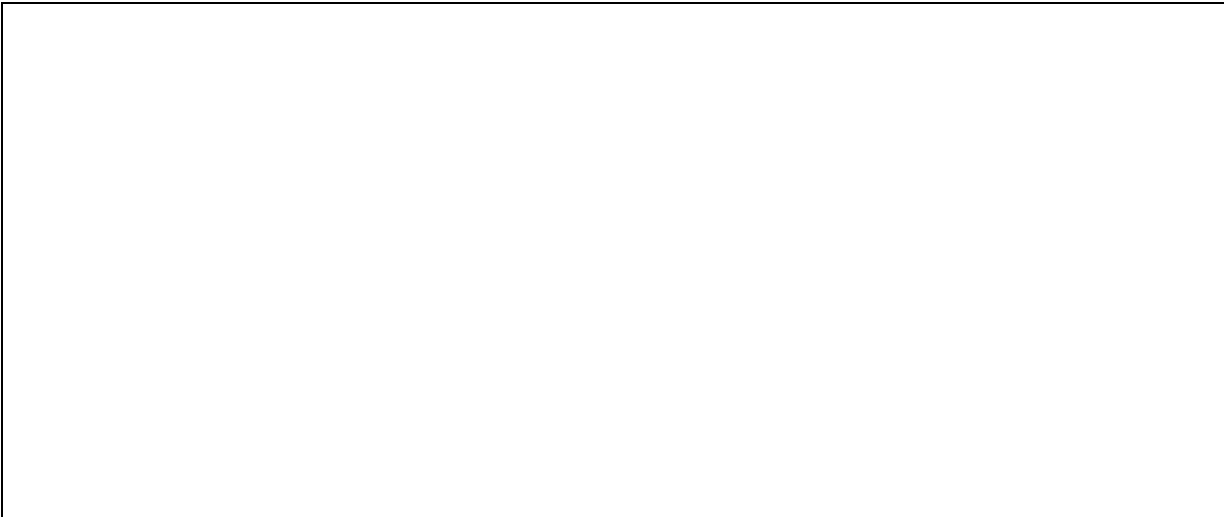
Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*


|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

I would like to attend the oral hearing as my submission concerns one of process and I feel that without a suitable degree of exposure during the oral hearing, then my point will be swept aside.



**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**



Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | When the Local Plan Part 2 Plan has been submitted for independent examination.   |
| <input checked="" type="checkbox"/> | The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2. |
| <input type="checkbox"/>            | The adoption of the Local Plan Part 2.  |

## Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

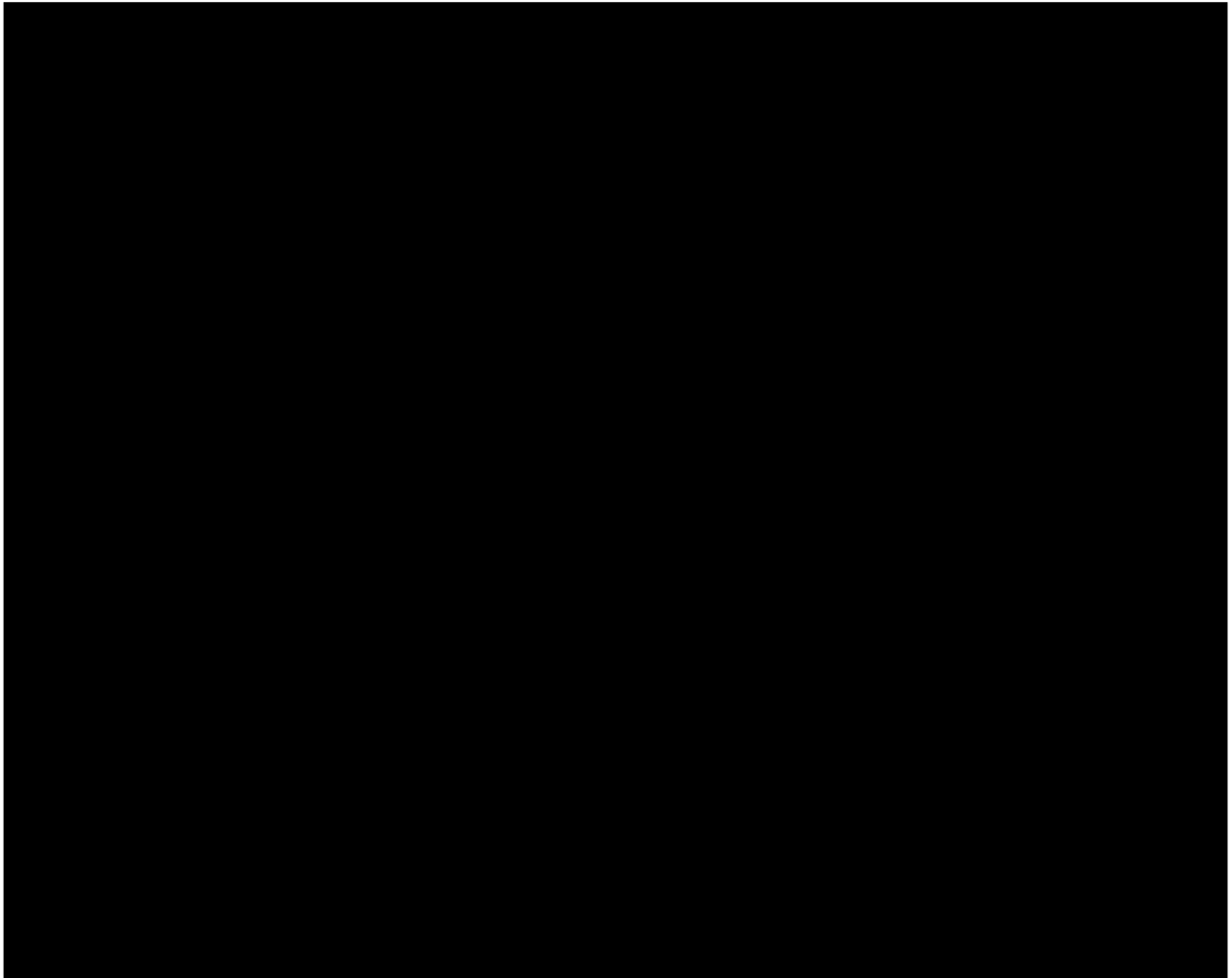
- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.







Planning Policy Team,  
London Borough of Hillingdon,  
3N/02 Civic Centre,  
High Street,  
Uxbridge,  
MIDDLESEX. UB8 1UW

25315/A3/GC/dw

**BY EMAIL & BY POST: [localplan@hillingdon.gov.uk](mailto:localplan@hillingdon.gov.uk)**

7<sup>th</sup> December, 2015

Dear Sir or Madam,

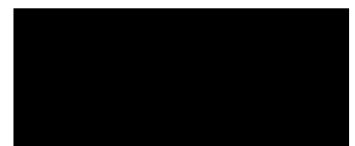
**HAREFIELD GROVE ESTATE, UXBRIDGE**  
**REPRESENTATIONS TO THE LOCAL PLAN PART 2 - SITE ALLOCATIONS AND DESIGNATIONS**  
**- REVISED PROPOSED SUBMISSION VERSION (OCTOBER 2015) (PROPOSED CHANGES)**  
**ON BEHALF OF COUNTESS GODA ESTATES LTD.**

We write on behalf of our client, Countess Goda Estates Ltd. (CGE) in response to the current consultation on the London Borough of Hillingdon Local Plan Part 2 ('the Local Plan Part 2'). CGE has strategic land interests within the London Borough of Hillingdon, most notably at the site known as Harefield Grove Estate, Uxbridge. For ease of reference a Site Location Plan is enclosed at **Appendix 1** to this submission.

The key objective of this submission is to indicate the availability of the Site to the Council for housing, and to ensure that the local planning authority is aware of its development potential moving forwards. We make no comment on the overall soundness of the document or the appropriateness of the housing figures contained therein.

Initial masterplanning work indicates that the Site has capacity for up to 650 residential units coupled with the potential for leisure and recreational uses to the north. There are a number of options currently under consideration, all of which have the potential to deliver new housing alongside high quality facilities to serve the needs of the existing and prospective new community. The Site is largely unconstrained in environmental terms giving rise to a number of opportunities to deliver a wholly sustainable scheme.

CGE recognise that the Local Plan Part 2 is now at a very advanced stage of the planning process, however in the interests of positive engagement and the need to ensure early dialogue, CGE wish to record the availability of the site and the intention to actively promote the Site in greater detail through future Local Plan processes.



## The Site and Surroundings

The Site is situated adjacent to the village of Harefield to the north west of London, and lies within the Green Belt. Some of the land falls under the jurisdiction of Three Rivers District Council (TRDC). The Site comprises six parcels (totalling approximately 66ha), the majority of which constitutes pasture and woodland (Pearson's Wood).

The Site is bordered by three roads - Rickmansworth Road, Northwood Road and Woodcock Hill, all of which provide access on to the Site. The nearest railway station is Denham Station, 2.5 miles away, which is accessible by bus (no 331) that runs every 20 minutes from Harefield to Denham. Services to London Marylebone run four times an hour from Denham Station, and the London Underground can be accessed at West Ruislip (Central Line), Hillingdon (Metropolitan and Piccadilly Lines) and Rickmansworth (Metropolitan Line). Junction 1 of the M40 is 5 miles away.

The surrounding area to the north, west and east of the Site is predominantly rural in character interspersed with farm buildings and small groups of cottages. Harefield Village is located on the south site of the site, providing a selection of shops and eateries with the nearby larger settlements of Beaconsfield and Watford offering a wider choice of shopping and commercial services.

## Growth Requirements for Hillingdon

CGE recognise that the Local Plan Part 2 has two key components, i.e. the Development Management Policies and the Site Allocations and Designations document. These representations relate primarily to the Site Allocations and Designations document (SAD).

The Local Plan Part 1 - Strategic Policies (adopted November 2012) ('the Local Plan Part 1') sets the growth figures to inform the allocation of sites for housing and employment within the SAD. The Local Plan Part 1 indicates at Table 4.1 that a **minimum of 6,375 new dwellings** are required over the period 2011 - 2026.

The SAD sets out sites for development to meet the Borough's needs to 2026 based on the level of growth and general locations set out in the Local Plan Part 1. Paragraph 3.2 of the SAD is clear that the Spatial Development Strategy for London Consolidated with Alterations Since 2011 (the London Plan) was published in March 2015, and increased Hillingdon's overall housing target for the ten year period between 2011 - 2021 to 5,590 dwellings. Rolled forward to 2026, this target equates to a **minimum of 8,385 dwellings** over the plan period and an annual monitoring target of 559 dwellings per annum.

CGE note the contents of paragraph 3.3 of the SAD which confirms that whilst the Local Plan Part 2 has been prepared within the framework of the Local Plan Part 1, the SAD identifies development sites for new housing and mixed use development with capacity to meet the increased housing target. We understand the sites were selected from a range of different sources including the London Strategic Housing Land Availability Assessment (SHLAA) and more pertinently a Green Belt Assessment (September 2013), both of which form part of the evidence base for the various Local Plan documents. We note that the Green Belt Assessment proposes additions and deletions from the Green Belt but that the study '*...does not seek to undertake a major review of Green Belt in the borough. Instead, it provides an assessment of the proposed additions and deletions.*'

Although the NPPF requires local authorities to identify a supply of sites or only broad locations for growth for years 6-10 and, where possible, for years 11-15, the SAD document identifies specific deliverable development sites for years 6-10 and years 11-15. Paragraph 3.9 of the SAD recognises however that given the complexities of the London land market there is a significantly greater certainty of site deliverability for those sites identified for delivery in years 1-5 and years 6-10 than those likely to come forward in years 11-15.

As such, there is a need to review the SAD in advance of 2021, at which point CGE will be looking to engage further with the local planning authority having regard to new evidence in respect of housing requirements for the Borough at that time, and more pertinently any resultant requirement for a full and thorough Green Belt review.

### **Concluding Remarks**

We would welcome confirmation that these comments have been duly received and considered, and await the outcome of the Local Plan Part 2 Examination with interest. Furthermore, we look forward to engaging further with the Council as matters progress in respect of the Local Plan Part 1 Review.

Should you have any queries on any of the above, please do not hesitate to contact the writer.

Yours faithfully,



**GEMMA CARE**  
Associate

Encs.



# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |  |              |  |
|----------------------------|--|--------------|--|
| Title                      |  |              |  |
| First name                 |  |              |  |
| Last Name                  |  |              |  |
| Organisation (if relevant) |  |              |  |
| Unit                       |  | House number |  |
| House name                 |  |              |  |
| Address 1                  |  |              |  |
| Address 2                  |  |              |  |
| Town                       |  |              |  |
| County                     |  |              |  |
| Postcode                   |  |              |  |
| Telephone                  |  |              |  |
| Email                      |  |              |  |

| 2. Agent's Name and Address (if applicable) |                 |              |  |
|---|-----------------|--------------|--|
| Title                                       | Miss            |              |  |
| First name                                  | Gemma           |              |  |
| Last name                                   | Care            |              |  |
| Company                                     | Barton Willmore |              |  |
| Unit  |                 | House number |  |
| House name                                  |                 |              |  |
| Address 1                                   |                 |              |  |
| Address 2                                   |                 |              |  |
| Town  |                 |              |  |
| County                                      |                 |              |  |
| Postcode                                    |                 |              |  |
| Telephone                                   |                 |              |  |
| Email                                       |                 |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |          |
|-------------------------------|----------|
| Policy number;                |          |
| Paragraph number;             | 3.2, 3.3 |
| Table or figure number; or    |          |
| Map number (Atlas of Changes) |          |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

Please refer to covering letter





**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

### 1) What is your gender?

Male  Female

### 2) To which age group do you belong?

under 15  25 – 44  65 – 85  
 15 - 24  45 - 64  85+

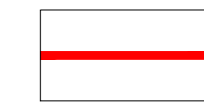
### 3) Do you consider yourself to be a disabled person?

No  Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |



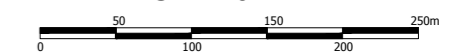
 Site Boundary  
 - 66.05Ha / 163.21Ac



Project  
**Harefield Estate,  
 Hillingdon**  
 Drawing Title  
**Aerial Location Plan**



|                     |                       |                  |                  |
|---------------------|-----------------------|------------------|------------------|
| Date<br>01.12.15    | Scale<br>1:5000@A2    | Drawn by<br>M.D. | Check by<br>G.C. |
| Project No<br>25315 | Drawing No<br>RG-M-10 | Revision<br>-    |                  |



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**Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version**

**Site and Allocations and Designations October 2015**

**Policy SA23 Silverdale Road/Western View**

**and**

**Development Management Policies October 2015**

**Policy DMH 2: Housing Mix**

**Prepared by Savills on behalf of Hurlington**

# Site and Allocations and Designations October 2015

## Policy SA23 Silverdale Road/Western View

- 1.1 These representations are prepared on behalf of our client Hurlington in response to the London Borough of Hillingdon's (LBH) formal consultation on Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Site and Allocations and Designations October 2015.
- 1.2 The representations are made specifically in connection to draft site allocation of Policy SA23 Silverdale Road/Western View.
- 1.3 For ease of reference Policy SA23 Silverdale Road/Western View states:

*Silverdale Road / Western View is considered suitable to be released for residential led mixed use development, including residential development at a density range of 120 – 135 units per hectare, subject to the following criteria:*

### **Site A**

- *The net provision of up to 60 residential units, taking account of the Council's latest evidence of housing need.*
- *The junction of Station Approach/Western View should provide a focus for high value retail and other uses that promote the vitality and viability of Hayes Town Centre, including active frontages onto both roads. Suitable retail development for this key town centre site may include a mix of A1 - A4 uses and specific proposals will need to be discussed and agreed with the Council prior to the submission of a planning application.*
- *An appropriate play space should be provided on site.*

### **Site B**

- *The provision of up to 141 residential units, taking account of the Council's latest evidence of housing need.*

### **Site A and B**

- *The Council will expect comprehensive development across the whole site and consideration should be given to the feasibility of linking both site elements to Hayes Town Centre.*
- *Proposals should include a heritage assessment which considers the retention and reuse of Listed and Locally Listed structures.*
- *Amenity space and car parking should be provided in accordance with the standards set out in the Council's Development Management Policies document.*
- *Development should include active frontages at ground floor level and be designed to maximise the canal frontage.*
- *Development should incorporate canal side improvements to be agreed with the Council and enhance the Strategic Canal and River Corridor, in accordance with relevant policies on the Blue Ribbon network.*

- 1.4 We consider that the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version of the Local Plan requires amendments to the proposed site allocation of the site at Policy SA23 Silverdale Road/Western View. Without amendments we do not consider that the site allocation is deliverable.
- 1.5 The allocation is split into Sites A and B. Site B is owned by Hurlington and one other land owner. Site A is within the ownership of the Council.
- 1.6 We consider that the site allocation is unsound as it is not justified, deliverable or consistent with National Policy. Our concerns relates to the density and housing mix that is proposed and the delivery restrictions proposed by the site allocation.

### **Density**

- 1.7 The NPPF sets out a number of measures to “boost significantly the supply of housing” and in accordance with paragraph 49 of the NPPF, housing applications should be considered in the context of the presumption in favour of sustainable development. The general thrust of national, regional and local policies is to secure sustainable patterns of development and re-use previously developed urban land. As the site is previously developed urban land we consider the site allocation should be maximising development potential rather than restricting it.
- 1.8 The majority of the site has a PTAL rating of 5 and part of the northern end of the site is PTAL 4 (we believe the draft allocation, which refers to a PTAL rating of 3 and 4, is incorrect on this point). A site with a PTAL rating 4/5 is considered to have excellent public transport accessibility and as such according to the London Plan, higher density development is considered appropriate in these locations. This is even more important given that the new Crossrail station will shortly be opening at Hayes, a very short distance from this site. This should be correctly reflected within the site allocation.
- 1.9 The initial site allocation within the draft Proposed Site allocations 2013 was for approximately 300 units across the whole site. As part of the new draft Policy SA23 Silverdale Road/Western View, the site has been split into two parcels. The indicative number of units for Site A is now 60 and 141 for Site B, a total of 201 which is a reduction of 99 units.
- 1.10 Given the reduction in units which is proposed, we consider that the site allocation is unsound as it is contrary to the NPPF which seeks to “*boost significantly the supply of housing*” on *previously developed land*.
- 1.11 Furthermore, as set out with table 3.2 of the London Plan, sites within an urban location with PTAL ratings of 4-6 should achieve 200-700 hr/ha or 70-260 u/ha. This is considerably greater

than the site allocation which seeks a density of 120 – 135 u/ha. As such the proposed density of 120 – 135 u/ha is not justified as it is contrary to the London Plan.

- 1.12 The site is within a short walk to Hayes and Harlington Station where Crossrail services are due to commence in 2019, connecting to central London, to Reading and Heathrow.
- 1.13 We consider that the site is ideally placed for the delivery of high density development in accordance with table 3.2 of the London Plan. It should be noted that the site adjacent at Highpoint Village was approved with a density of 191 u/ha.
- 1.14 In the light of the London Plan density guidelines, the arrival of Crossrail and the approved development adjacent we consider that the proposed site allocation which has a suppressed density of 120 – 135 u/ha is not justified or consistent with Paragraph 49 of the NPPF. Neither does the site reflect the surrounding developments within the area.

#### **Restrictive Delivery**

- 1.15 The draft site allocation states that the Council will expect comprehensive development across the whole site including both Sites A and B. The site is owned by multiple land owners and therefore it will be challenging to deliver the whole site as one comprehensive development.
- 1.16 The Council's land in site A contains Local Authority housing, whose occupiers will need to be relocated before site A can be developed. If these are to be relocated to new accommodation within site B, it will be necessary to develop site B before site A comes forward.
- 1.17 The indicative phasing has been identified for the period 2021-26, and there is no explanation as to why this should be necessary. Subject to agreement on an appropriate design, the majority of Site B is viable, deliverable and achievable in the short term but at present the wording of the draft policy is highly restrictive. Again this approach is unsound as this approach is not consistent with the NPPF which states that local authorities should plan positively. Paragraph 17 of the NPPF states that *“Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities”*.
- 1.18 It is also relevant to review whether or not it is sensible to attempt to bring forward the land within site B as it is currently defined on the site allocations plan. In particular the site as defined in the plan includes a building known as BM House, to the east of the canal basin. This building is occupied by BM Coaches who use the building in connection with its occupation of

the adjacent warehouse building which is outside the allocation. BM house is needed by BM coaches and it would not be possible to include this land within any development scheme without causing major disruption to BM Coaches (or a wholesale relocation of the business which would leave the warehouse vacant).

- 1.19 For these reasons it will be necessary to redraw the boundary of the site allocation to remove BM House. If this is the case it would make sense also to exclude Chalfont House, which is on the east side of the basin, to keep a sensible division between the residential development scheme and the existing industrial uses to the east of the canal basin. Residential development at Chalfont House would also need to share an access with the existing industrial estate, which would not create an attractive residential environment.
- 1.20 Our client can prepare an indicative masterplan for sites A and B which can be developed in negotiations with the Council however we strongly object to the requirement to deliver a comprehensive development.
- 1.21 We request that the reference comprehensive development is removed and the indicative phasing should be reinstated as per the original draft allocation at 2016-2021. We also request that the site boundaries are redrawn to ensure that BM House and Chalfont house are excluded from the requirement to deliver comprehensive development at the site.
- 1.22 In order to make the policy 'sound' we propose the following changes.

*Silverdale Road / Western View is considered suitable to be released for residential led mixed use development, including residential development at a density range of 120 – 260 units per hectare, subject to the following criteria:*

**Site A**

- *The net provision of up to 100 residential units, taking account of the Council's latest evidence of housing need, **site constraints and market signals**.*
- *The junction of Station Approach/Western View should provide a focus for high value retail and other uses that promote the vitality and viability of Hayes Town Centre, including active frontages onto both roads. Suitable retail development for this key town centre site may include a mix of A1 - A4 uses and specific proposals will need to be discussed and agreed with the Council prior to the submission of a planning application.*
- *An appropriate play space should be provided on site.*

**Site B**

- *The provision of up to 312 residential units, taking account of the Council's latest evidence of housing need **site constraints and market signals**.*

**Site A and B**

- *The Council will expect ~~comprehensive development across the whole site and~~ consideration should be given to the feasibility of linking both site elements to Hayes Town Centre.*

- *Proposals should include a heritage assessment which considers the retention and reuse of Listed and Locally Listed structures.*
- *Amenity space and car parking should be provided in accordance with the standards set out in the Council's Development Management Policies document.*
- *Development should include active frontages at ground floor level and be designed to maximise the canal frontage.*
- *Development should incorporate canal side improvements to be agreed with the Council and enhance the Strategic Canal and River Corridor, in accordance with relevant policies on the Blue Ribbon network.*

Indicative phasing 2016-2021

## Development Management Policies October 2015

### Policy DMH 2: Housing Mix

2.1 We consider that the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version of the Local Plan Development Management Policies October 2015 and specifically Policy DMH 2: Housing Mix is unsound as it is not justified, deliverable or consistent with National Policy for the following reasons as set out below.

2.2 For ease of reference Policy DMH 2:Housing Mix is set out below:

*Policy DMH 2: Housing Mix*

*The Council will require the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need.*

*Table 4.1 Housing Requirements by Type and Size*

| <i>Tenure</i>          | <i>1 bed %</i> | <i>2 bed %</i> | <i>3 bed %</i> | <i>4 bed %</i> |
|------------------------|----------------|----------------|----------------|----------------|
| <i>Private Market</i>  | 0              | 4              | 56             | 40             |
| <i>Intermediate</i>    | 19             | 24             | 45             | 12             |
| <i>Affordable Rent</i> | 20             | 7              | 48             | 25             |

2.3 The policy requires the provision of housing units of different sizes to reflect the Council's latest information on housing need. We agree that developments should provide a balanced mix of housing units of different sizes however the percentages that are set out in table 4.1 are completely unachievable.

2.4 Table 4.1 seeks a provision of 96% family accommodation equating to 56% 3 bedroom and 40% 4 bedroom for private dwellings. We consider that the policy is unsound as it would not be viable to deliver such a high percentage of private family accommodation on every site. Some sites are more suited to smaller units and some sites are suited to larger family units. As such a



balanced mix is required based upon site constraints and market signals to accord with both Paragraph 17 and 50 of the NPPF.

- 2.5 NPPF paragraph 17 states that *“Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities”*.
- 2.6 Paragraph 50 of the NPPF also states that *“in order to boost the supply of housing... LPA’s should deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should....plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community”*.
- 2.7 If the current policy is applied this would result in the delivery of low density housing developments. This would result in an under provision of housing delivery on development sites which would be contrary to the NPPF. In order to make the policy ‘sound’ we suggest the following amendments

*Policy DMH 2: Housing Mix*

*The Council will require the provision of a **balanced** mix of housing units of different sizes in schemes of residential development to reflect the Council’s latest information on housing need.*

~~Table 4.1 Housing Requirements by Type and Size~~

| <del>Tenure</del>          | <del>1 bed %</del> | <del>2 bed %</del> | <del>3 bed %</del> | <del>4 bed %</del> |
|----------------------------|--------------------|--------------------|--------------------|--------------------|
| <del>Private Market</del>  | <del>0</del>       | <del>4</del>       | <del>56</del>      | <del>40</del>      |
| <del>Intermediate</del>    | <del>19</del>      | <del>24</del>      | <del>45</del>      | <del>12</del>      |
| <del>Affordable Rent</del> | <del>20</del>      | <del>7</del>       | <del>48</del>      | <del>25</del>      |

# Enclosure 1- Site Location Plan

Site Location Plan



Polley SA23 Boundary ———

Proposed Site Ownership Boundary ———



# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |                |
|----------------------------|----------------|
| Title                      | Mr             |
| First name                 | Harry          |
| Last Name                  | deLotbiniere   |
| Organisation (if relevant) | Hurlington Ltd |
| Unit                       |                |
| House name                 |                |
| Address 1                  |                |
| Address 2                  |                |
| Town                       |                |
| County                     |                |
| Postcode                   |                |
| Telephone                  |                |
| Email                      |                |

| 2. Agent's Name and Address (if applicable) |         |
|---|---------|
| Title                                       | Mr      |
| First name                                  | Ben     |
| Last name                                   | Thomas  |
| Company                                     | Savills |
| Unit  |         |
| House name                                  |         |
| Address 1                                   |         |
| Address 2                                   |         |
| Town  |         |
| County                                      |         |
| Postcode                                    |         |
| Telephone                                   |         |
| Email                                       |         |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |  |
|-------------------------------|--|
| Policy number;                | Policy SA23 Silverdale Road/Western View and Policy DMH 2: Housing Mix |
| Paragraph number;             | All of policy SA23 and Policy DMH 2: Housing Mix                       |
| Table or figure number; or    |  |
| Map number (Atlas of Changes) |  |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below *(Tick relevant box/es)***

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

Please refer to attachments

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

**Please refer to attached sheets.**

Please continue on a separate sheet if necessary

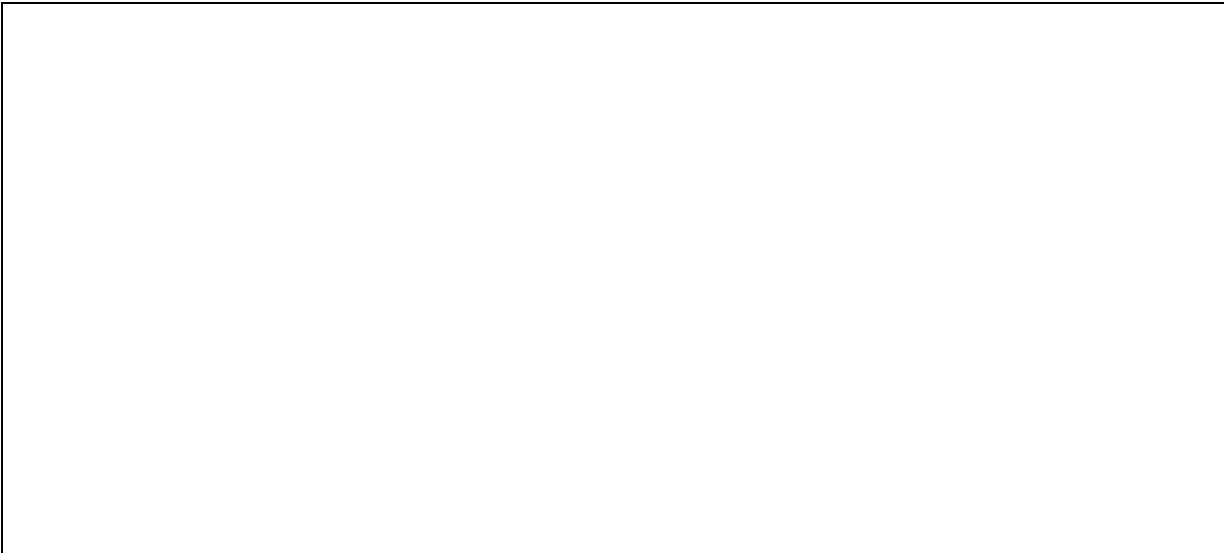
**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

The representations relate to complex issues which require more detailed explanation.





**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**



Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

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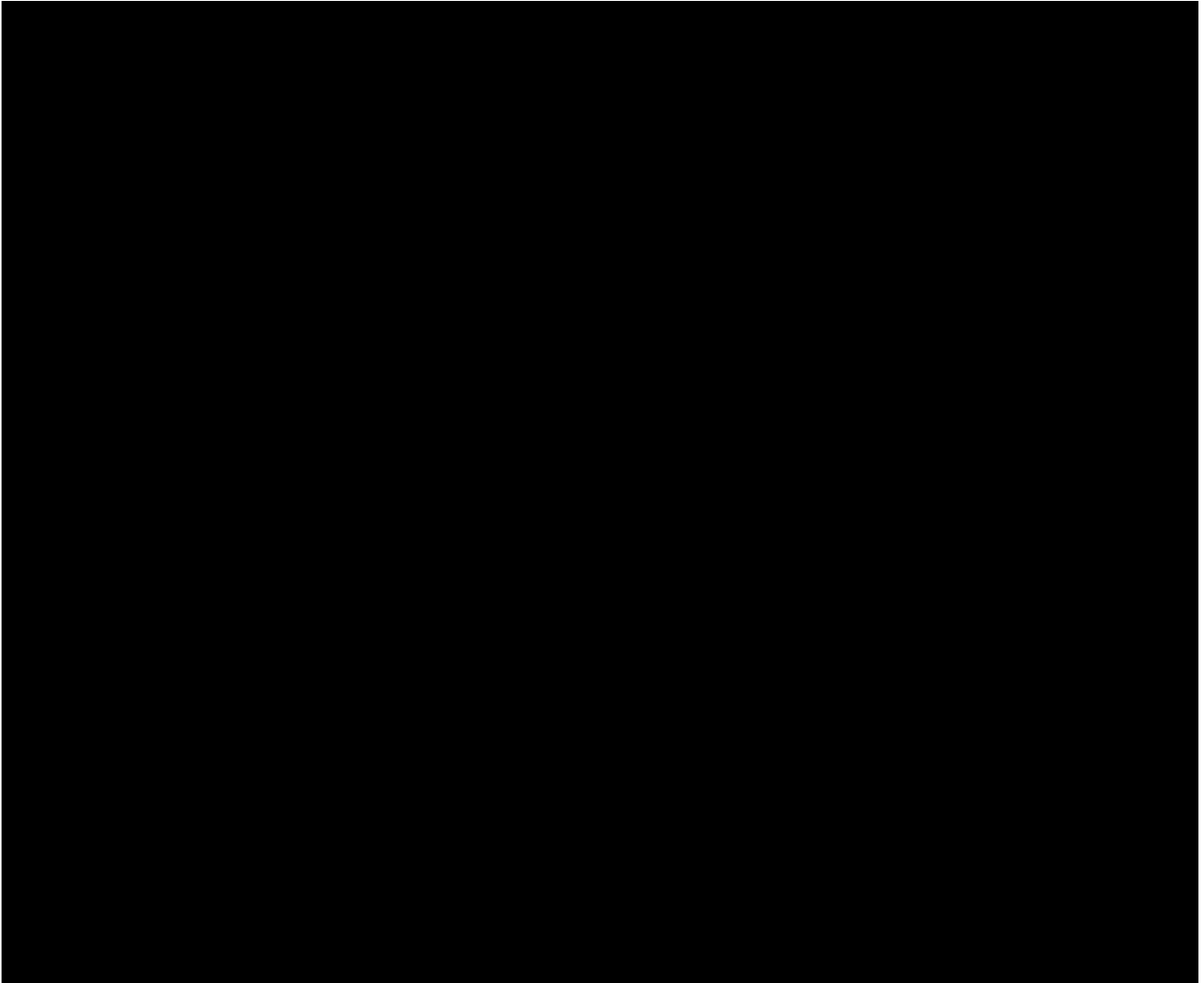
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# HILLINGDON

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| Town                       |                  |              |  | Town  |                                |
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| Email                      |                  |              |  | Email                                       |                                |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |        |
|-------------------------------|--------|
| Policy number;                | DMTC 2 |
| Paragraph number;             |        |
| Table or figure number; or    |        |
| Map number (Atlas of Changes) |        |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                                     |   |
|--------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/>            | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |



**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

**Please see covering letter (Ref. 10252169v1)**

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not want to participate in the oral examination |
| <input checked="" type="checkbox"/> | Yes, I would like to participate in the oral examination |

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**There are important issues raised in our letter that need to be debated.**

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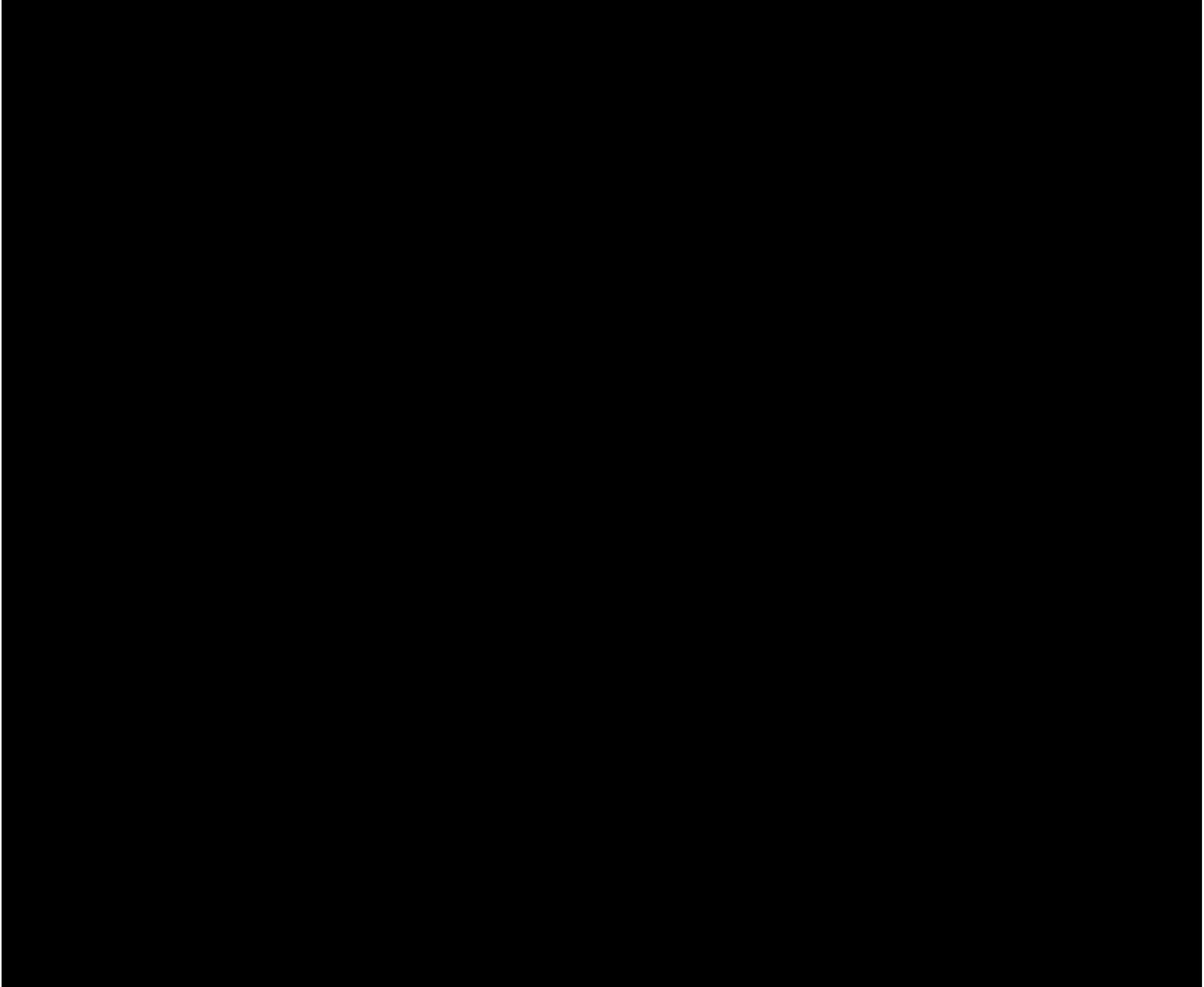
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**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |       |
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| Policy number;                | DMH 2 |
| Paragraph number;             |       |
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**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                          |   |
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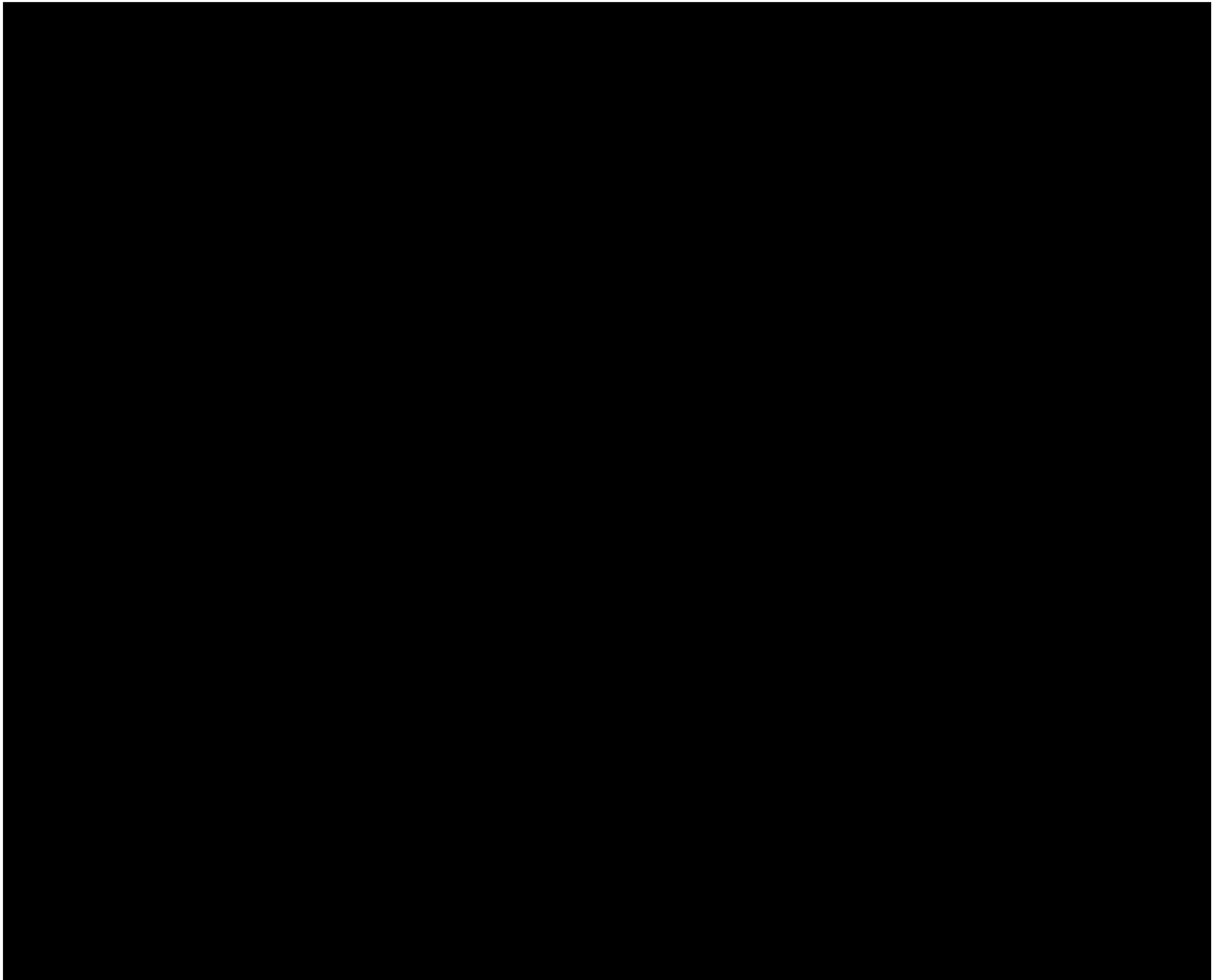
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| Paragraph number;             |         |
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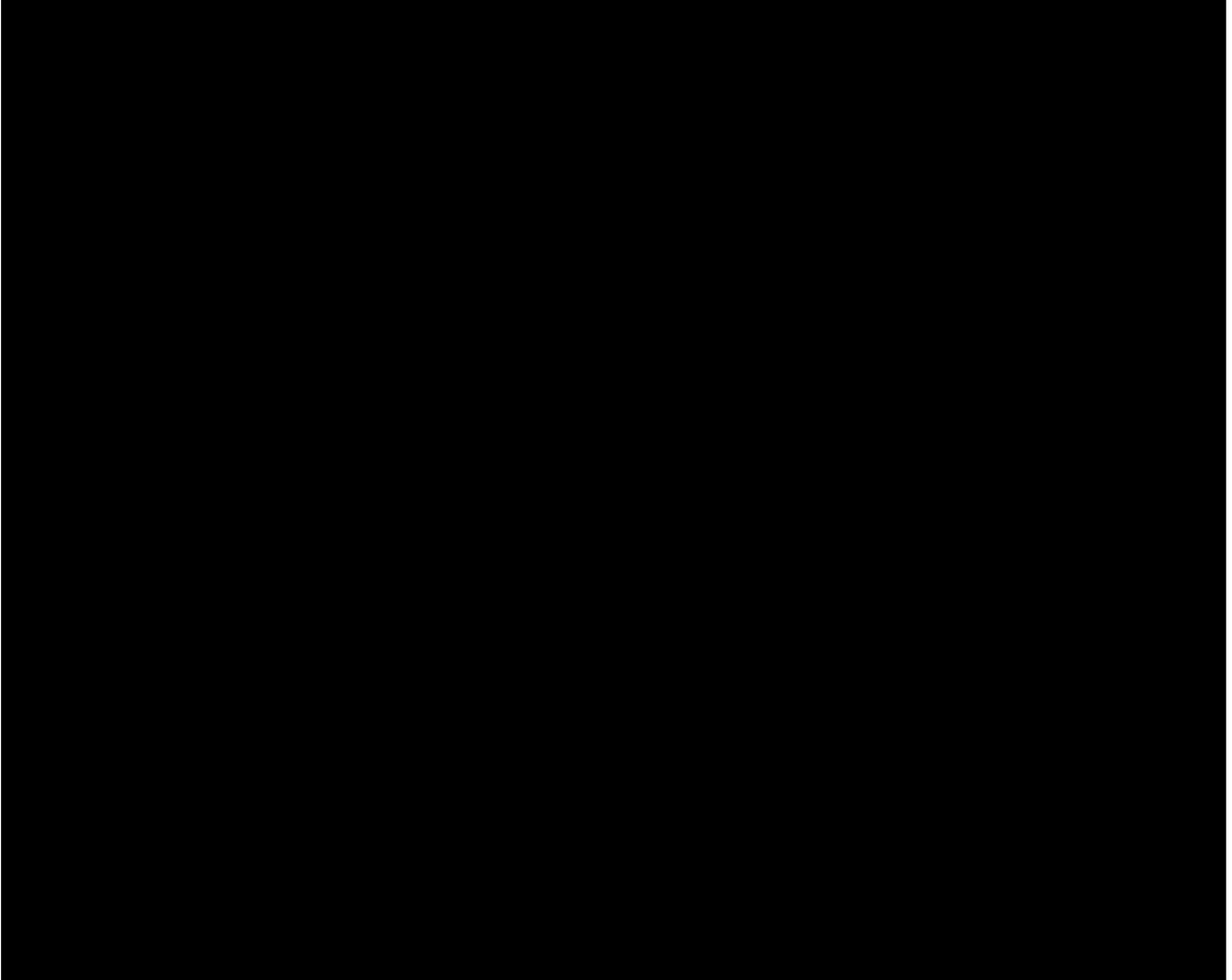
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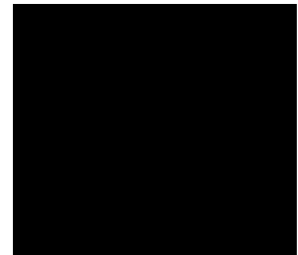
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Planning Policy Team  
London Borough of Hillingdon  
3N/02 Civic Centre  
High Street  
Uxbridge  
Middlesex  
UB8 1UW



Date 1 December 2015  
Our ref 14703/SSL/BE/10252169v1  
Your ref

Dear Sir/Madam

## London Borough of Hillingdon: Local Plan Part 2 - Development Management Policies - Revised Proposed Submission Version

On behalf of our client, Inland Homes Plc (“Inland”), we provide comments on the Local Plan Part 2 - Development Management Policies - Revised Proposed Submission Version.

### Background

Inland specialises in urban regeneration projects and operates across the South of England. In particular, their focus is bringing under or unused brownfield sites back into use, usually as part of a residential-led mixed use development.

Inland has recently acquired the former Randalls department store and associated parking area, warehouse and Old Fire Station building with a view to delivering a residential-led mixed use development on the site. Randalls department store closed on 31 January 2015. It is Inland’s intention to retain the 1930s Randalls department store building and ground level commercial uses on Vine Street. The first floor of the Randalls building will be converted into residential use, with new residential blocks to the rear.

### Scope of Representations

Our representations have regard to the National Planning Policy Framework (NPPF, 2012) paragraph 182, which states for a draft Local Plan to be considered “sound”, it is necessary for it to be:

- Positively prepared;
- Justified;
- Effective; and





- Consistent with national policy – *“specifically the plan should enable the delivery of sustainable development in accordance with the policies in this framework.”*

Our comments focus on draft policies DMTC 2, DMH 2 and DMHB 18.

## Policy DMTC 2

Draft policy DMTC 2, which relates to primary and secondary shopping areas, sets out a number of policy tests that proposals for the ground floor use of premises for retail, financial and professional activities, restaurants, cafes, pubs and bars etc are required to meet. It states that in secondary shopping areas, a minimum of 50% of the frontage should be retained in retail use; A5 uses are limited to a maximum of 15% of the frontage; the frontage of the proposed use should not be any more than 12m between class A1 shops; and the proposed use should not result in a concentration of non-retail uses which could be considered to cause harm to the vitality and viability of the town centre.

Paragraph 3.1 recognises that as a result of competition both from other town centres and from out of town retail developments, as well as the changing retail behaviour of residents (with an increasing use of internet shopping), many town centres are looking to diversify their roles.

Paragraph 3.8 recognises that whilst the Council is seeking to encourage vitality and viability, different retail functions will take place within its town centres. In this respect, we consider that the policy tests placed on proposals in secondary shopping areas are unduly onerous and are inconsistent with paragraphs 3.1 and 3.8, which recognise the need for town centres to diversify.

This changing retail behaviour and changing nature of town centres is also recognised in the NPPF and the London Plan (2015). Paragraph 23 of the NPPF states planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. Competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres should be promoted. It also adds that local planning authorities should

*“recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites”*

London Plan Policy 2.15 requires local planning authorities to ensure that local retail capacity requirements take realistic account of changes in consumer expenditure and behaviour including the impact of internet and multi-channel shopping. Local planning authorities should also proactively manage the changing roles of centres, especially those with surplus retail and office floorspace, considering the scope for consolidating and strengthening them by encouraging a wider range of services and promoting diversification, particularly through high density, residential led, mixed use re-development. The London Plan states *“a wide range of uses will enhance the vitality and viability of town centres.”*

The policy tests placed on proposals in secondary shopping areas are therefore also inconsistent with the NPPF and the London Plan (2015) and as such are considered unsound. We note that the requirement for the proposed use not to result in a separation of more than 12 metres between A1 retail uses is also a policy test for proposals in primary shopping areas. We consider that this approach is unsound because the policy tests for primary and secondary shopping areas should reflect the differing roles of each area, in addition to the changing nature of town centres in line with the aims and objectives of the NPPF and the London Plan. An objective of the NPPF





(paragraph 17) is to take account of the different roles and character of different areas, promoting the vitality of the main urban areas. As secondary shopping areas are primarily areas where more retail service uses are located (due to the need for town centres to diversify), the policy tests for secondary shopping areas should not be as restrictive as the policy tests for proposals in primary shopping areas. Therefore, to ensure that this policy is sound, we suggest that the wording of the policy is amended as follows:

*“...b) In secondary shopping areas, the Council will support the ground floor use of premises for retail; financial and professional activities; restaurants, cafes, pubs and bars; launderettes and other coin operated dry cleaners; community service offices, including doctor’s surgeries **and residential** provided that:*

- i) ~~a minimum of 50% of the frontage is retained in retail use; and~~*
- ii) Use Class A5 hot food takeaways are limited to a maximum of 15% of the frontage; and*
- iii) ~~the frontage of the proposed use is no more than 12m between Class A1 shops; and~~*
- iv) the proposed use does not result in a concentration of non retail uses which could be considered to cause harm to the vitality and viability of the town centre.”*

## **Policy DMH 2**

Draft policy DMH 2, which relates to housing mix, requires the provision of a mix of housing units of different sizes in residential developments to reflect the Council’s latest information on housing need. Paragraph 4.7, however, recognises that town centres are appropriate locations to provide one and two bed residential units, suited to those who wish to live in close proximity to town centre uses, employment opportunities and public transport.

The NPPF, paragraph 50, requires local planning authorities to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities by planning for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community and identifying the size, type, tenure and range of housing that is required in particular locations, reflecting local demand. Policies should be sufficiently flexible to take account of changing market conditions over time.

In this respect we consider that the policy, as currently worded is unsound, and we request that Policy DMH 2 should acknowledge that the mix of housing units will depend on the setting/location of the development and the demand for differing sizes of housing units in different locations. For example, town centre locations are appropriate locations to provide more one and two bed residential units. This approach would therefore ensure that the policy is consistent with paragraph 4.7 of the Local Plan and the NPPF. To ensure the policy is sound we therefore request that the policy is reworded to state:

*“The Council will require the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council’s latest information on housing need. **The Council will however recognise that the mix of housing units will be influenced by the setting/location of the development and that smaller units would be more appropriate in town centres.**”*



## DMHB 18

Draft policy DHMB 18 relates to private outdoor amenity space, and Part A states that all new residential development and conversions will be required to provide good quality and useable private outdoor amenity space. It advises that amenity space should be provided in accordance with the standards set out in Table 5.2. Table 5.2 sets out that studios and one bed flats should have a minimum of 20 sqm of amenity space, two bed flats should have at least 25 sqm and three+ bed flats should have at least 30 sqm.

We consider that the wording of this policy is unduly restrictive and risks prejudging the acceptability or otherwise of potential development schemes. We consider that the policy should be instead worded to recognise that in some instances, for those sites which are more constrained due to their location (i.e. town centre locations), the provision of outdoor amenity space of that size may not always be realistically achievable or feasible.

Part C of draft policy DHMB 18, states that any ground floor and/or basement unit that is not street facing should have a defensible space of not less than 3 metres in depth in front of any window to a bedroom or habitable room. We note that the previous iteration of the policy only required a defensible space of 1.5 metres or more. We note there is no justification for this increase and we consider that doubling the required defensible space may prejudice otherwise acceptable design solutions, therefore potentially constraining development.

To ensure the policy is sound we therefore request that the policy is reworded to state:

- a) *“All new residential development and conversions will be required to provide good quality and useable private outdoor amenity space. Amenity space should be provided in accordance with the standards set out in Table 5.2. **The Council will be flexible in consider amenity space provision in town centres taking into account site specific constraints when assessing proposals.**”*
- b) *Balconies should have a depth of not less than 1.5 metres and a width of not less than 2 metres.*
- c) *Any ground floor and/or basement floor unit that is non-street facing should have a defensible space of not less than ~~3~~ **1.5** metres in depth in front of any window to a bedroom or habitable room. However, for new developments in Conservation Areas, Areas of Special Local Character or for developments, which include Listed Buildings, the provision of private open space will be required to enhance the street scene and the character of the buildings on the site.*
- d) *The design, materials and height of any front boundary must be in keeping with the character of the area to ensure harmonisation with the existing street scene.”*

## Summary

We trust the comments provided in this letter are helpful and that these are considered in the preparation of the Local Plan Part 2. If you require any further information please contact me or my colleague, Pauline Roberts.



Nathaniel Lichfield  
& Partners

Planning. Design. Economics.

Yours faithfully



**Bethany Evans**  
Planner

Copy

Matt Corcoran, Inland Homes



# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |                     |              |  |
|----------------------------|---------------------|--------------|--|
| Title                      |                     |              |  |
| First name                 | C/O AGENT           |              |  |
| Last Name                  |                     |              |  |
| Organisation (if relevant) | TOYOKO INN CO. LTD. |              |  |
| Unit                       |                     | House number |  |
| House name                 |                     |              |  |
| Address 1                  |                     |              |  |
| Address 2                  |                     |              |  |
| Town                       |                     |              |  |
| County                     |                     |              |  |
| Postcode                   |                     |              |  |
| Telephone                  |                     |              |  |
| Email                      |                     |              |  |

| 2. Agent's Name and Address (if applicable) |                 |
|---|-----------------|
| Title                                       | MISS            |
| First name                                  | EMMA-LISA       |
| Last name                                   | SHIELLS         |
| Company                                     | BARTON WILLMORE |
| Unit  |                 |
| House name                                  |                 |
| Address 1                                   |                 |
| Address 2                                   |                 |
| Town  |                 |
| County                                      |                 |
| Postcode                                    |                 |
| Telephone                                   |                 |
| Email                                       |                 |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2        |                                   |
|--------------------------|-----------------------------------|
| <input type="checkbox"/> | Development Management Policies   |
| <input type="checkbox"/> | Site Allocations and Designations |
| <input type="checkbox"/> | Policies Map (Atlas of Changes)   |

| Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|--|---|
| <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                               |
|-------------------------------|-------------------------------|
| Policy number;                | See attached Representations. |
| Paragraph number;             | See attached Representations. |
| Table or figure number; or    | See attached Representations. |
| Map number (Atlas of Changes) | See attached Representations. |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                       |
|---|--------------------------|--------------------------|
| Sound?  | <input type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |
|--------------------------|-------------------------------------|
| <input type="checkbox"/> | It has not been positively prepared |
| <input type="checkbox"/> | It is not justified                 |

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

See attached Representations.



Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

See attached Representations.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

See attached Representations.

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                          |  |
|--------------------------|--|
| <input type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

**LOCAL PLAN: PART 2 REVISED PROPOSED SUBMISSION VERSION, OCTOBER 2015**  
**REPRESENTATION BY TOYOKO INN CO. LTD.**

**Introduction**

1. We act on behalf of Toyoko Inn Co. Ltd ("Toyoko") in relation to the above Site. Toyoko is a successful Japanese hotel operator and market leader and is looking to open new, well-located facilities in the UK as part of a European investment programme. London and in particular Heathrow has been identified as an ideal location for investment. We have been instructed to submit the following representations to the Hillingdon Local Plan Part 2 (October 2015).
2. Toyoko is the land owner of Capital House, Bath Road and has identified the Site's redevelopment potential for a new hotel. Toyoko is currently formulating a Scheme for redevelopment of the Site for a hotel given their market requirement within the Heathrow area. As such, Toyoko is well placed to comment on the Local Plan: Part 2.

**Representation**

***Local Plan Part 2 Policies Map and Policies Map Atlas of Changes***

3. We note the changes within the Policies Map that includes allocating a number of sites along Bath Road for "Hotel and Office Growth" as illustrated on Map 6.1 and more specifically Map 6.6 which illustrates Toyoko's site, comprising Capital House which is located at the junction of Bath Road and High Street, Harlington.
4. Given the location of the Site in close proximity to Heathrow and the provision of other hotels within the immediate vicinity of the Site, the emerging hotel allocation is considered to be acceptable and is supported by Toyoko.

***Site Allocations and Designations***

5. The emerging Plan proposes to release identified employment sites for other uses. This includes hotel use as there is an identified need for hotel use within the Borough as set out in Paragraph 4.42. This is supported by Toyoko.
6. Policy SEA 2: Hotel and Office Growth Locations highlights that the 'Heathrow Perimeter' (outside of the Bath Road LSEL), as illustrated on Map O, are designated for hotel and office growth. This is supported, given the location of the area in close proximity to Heathrow wherein hotel accommodation is suitable and required for visitors to the airport and wider Heathrow area. The hotel use in this location will complement the existing provision near to the Site. This is also consistent with the Local Plan Part 1 which identifies general areas on the Heathrow Perimeter for hotel and office growth.
7. It is noted, however, that there is an error in the text at Paragraph 4.48, this refers to 'Map N', when in fact it should refer to 'Map O', for the avoidance of doubt this should be amended.

### ***Development Management Policies***

8. Policy DME 2: Employment Sites Outside of Designated Employment Areas sets out the criteria for proposals which involve the loss of employment floorspace or land outside designated employment areas. Policy DME 3: Office Development sets out criteria for new office floorspace and the loss of office floorspace. These policies should be reworded to allow sufficient flexibility to ensure that they are consistent with Policy SEA 2 of the Site Allocations and Designations Document which encourages hotel and office use within designated sites.
9. The policies are not considered to be positively prepared in line with Paragraph 182 of the National Planning Policy Framework. They should be amended to provide more flexibility for employment sites and office development on sites that are allocated for another use, to ensure that they do not need to demonstrate compliance with the criteria set out in Policies DME 2 and DME 3.
10. Given the allocation of some existing employment sites for hotel or office use and the suitability of the sites at these locations for such an alternative use, the significant number of jobs they provide and the need identified there should not be a requirement to demonstrate compliance with Policy DME 2 and Policy DME 3. In addition, hotels provide a significant number of jobs and benefits to the economy which any proposed scheme would seek to achieve. We set out recommended change to this policy below.
11. Policy DME 5 supports the provision of a range of visitor accommodation, conference and related uses in accessible sustainable locations subject to a number of development control criteria. This policy is supported as there is an identified need for visitor accommodation in the Borough (as set out in Paragraph 2.25 of the Development Management Policies Document). This visitor accommodation helps to support the local economy and provide employment opportunities for local residents which should be encouraged.

### ***Recommended Changes to Policy DME 2***

12. With consideration of the above, Policies DME 2 and DME 3 should be amended as follows (New text is now in **bold**).

#### *Policy DME 2: Employment Sites Outside Designated Employment Areas*

*Proposals which involve the loss of employment floorspace or land outside of designated employment areas will normally be permitted if:*

- i. **The existing use negatively impacts on local amenity, through disturbance to neighbours, visual intrusion or has an adverse impact on the character of the area; or***
- ii. **The site is unsuitable for employment reuse or development because of its size, shape, location or lack suitability of access; or***
- iii. **Sufficient evidence has been provided to demonstrate there is no realistic prospect of land being reused for employment purposes; or***
- iv. **The new use will not adversely affect the functioning of any adjoining employment land.***

***Where a site is currently or was most recently in employment use but is identified as part of the 'Hotel and Office Growth Location' compliance with criteria i-iv above is not required.***



*Policy DME 3: Office Development*

- A) *The Council will support proposals for new office development in the preferred locations of the Heathrow Perimeter, Stockley Park and Uxbridge Town Centre, as defined in the Site Allocations and Designations Document.*
- B) *Proposals involving loss of office floorspace in preferred locations for office growth, which fall outside of the existing permitted development procedures, should include information to demonstrate that:*
- i. The site has been actively marketed for two years;*
  - ii. The site is no longer viable for office use, taking account of the potential for internal and external refurbishment; and*
  - iii. Surrounding employment uses will not be undermined.*
- C) *Proposals for smaller scale new office floorspace within designated town centres, including proposals within mixed use scheme, will be supported where:*
- i. The mixed use element of the scheme meets the requirements of policies related to town centre development in this Plan; and*
  - ii. The scale of the provision is appropriate to the role and function of the town centre.*
- D) *Proposals involving the loss of office floorspace within designated town centres should be supported by evidence of continuous vacancy and marketing over a 12 month period.*
- E) *Proposals for office uses in LSEs will be permitted, subject to the provision of satisfactory evidence to demonstrate that the proposals will not result in the loss of light industrial accommodation, where there is a demand for these uses.*
- F) *Proposals for office outside town centres and identified office growth locations will generally not be permitted.*

***Where a site is currently or was most recently in employment use but is identified as part of the 'Hotel and Office Growth Location' compliance with criteria Bi-iii, C i-ii, D and E above is not required.***

13. The policies should be updated to reflect the changes set out above.

#### **Next Steps**

14. We trust the above will assist in the formulation of the Local Plan Part 2 and request that these recommendations are reflected within the next Stage. In the meantime, we would be happy to discuss these representations in more detail with your Officers.
15. Please confirm receipt of these representations and keep us informed of the progress of the Local Plan: Part 2. If you have any queries or require any further information please do not hesitate to contact Emma-Lisa Shiells or Mark Harris at this office.

**BARTON WILLMORE LLP, 8<sup>th</sup> December 2015**

## Representations on LB of Hillingdon Local Plan

### Part 2 – Development Management Policies

*Submitted on behalf of*

Leigh Brothers &  
Auris Construction Ltd

### **Policy DMH 6 Garden & Backland Development**

The “*presumption against the loss of back gardens*” is unreasonable and inappropriate. It unnecessarily prejudices the opportunity to secure the LPA’s housing objectives and to address local housing need. There is inadequate local justification for this restrictive approach, which is thus inconsistent with National Policy, with the London Plan and indeed with Part 1 of the Local Plan. It establishes an unreasonably negative starting point, and thus has “*not been positively prepared*”.

Part 1 policy BE 1 (Built Environment) makes ref to the avoidance of “*inappropriate development of gardens*” (BE 1 para 9). This is less restrictive. It provides scope for a value judgement to be made through the dev management process as to whether any particular proposal is inappropriate in the individual circumstances of the case. The suggested Part 2 policy goes further and sets a negative starting point presuming that all back gardens should be retained but for exceptional cases.

Conflict with Part 1 policy BE 1.9 only arises where an individual proposal can be said to “*erode the character and biodiversity of a suburban area and increase the risk of flooding .....*”. The introduction into DMH6 of other matters, such as the need to “*maintain amenity space*” and “*the amenity of residents*” takes the criteria further than is intended in BE1. The first bullet-point’s insistence on retaining land which contributes to the amenity of residents or provides wildlife habitats, will surely be seized on to prevent most new garden development, however limited the impact.

The wording confuses back garden development and backland development. The two are not necessarily the same. There are many locations where a corner property has a long return road frontage which could be developed (perhaps with adjoining gardens) in a manner which does not result in backland development in the accepted sense. It would not give rise to tandem development or other difficulties, and would not prejudice other objectives.

This form of rear garden development can be highly sustainable, making use of established infrastructure, eg highway frontage, utility services, etc. Such sites are usually within established residential areas and are often close to support facilities (shops, schools and other amenities) and accessible to public transport. This and other forms of rear garden development are often capable of being assimilated into the area without serious conflict in terms of character, biodiversity or flooding.

The NPPF requires that “*housing applications should be considered in the context of the presumption in favour of sustainable development” (para 49). Among other things, this means that:*

*“local planning authorities should positively seek opportunities to meet the development needs of their area ..... ;*

The Framework identifies 12 Core planning principles. These include the provision that planning should:

*“pro-actively drive and support sustainable economic development to deliver the homes ..... that the country needs. Every effort should be made objectively to identify and then meet the housing ..... needs of an area and respond positively to wider opportunities for growth”*  
(NPPF para17).

The housing shortage in London as a whole is well-documented, and is now a high-profile political and planning issue. The Local Plan is prepared in the context of the adopted London Plan 2011, which provides a minimum target figure of just 425 new dwellings pa for Hillingdon. However, the increasing housing need is reflected in the draft Further Alterations to the London Plan (FALP) 2014, which have recently been through their EiP. They point out that:

*“there is clear evidence that London’s population is likely to increase significantly more than was anticipated in the past ..... by up to 2 million in the 25 years to 2036 ..... significantly above that assumed in the 2011 Plan. ..... the number of households in London could rise by 1 million by 2036”. (FALP 2014 para 3.16).*

The above figure of 2 million replaces the previous figure of just 1.3 million in the adopted London Plan 2011. The FALP therefore proposes substantially increased Housing targets for the Boroughs. The annual figure for Hillingdon is shown to be raised by over 31%, from 425 pa to 559 pa.

Hillingdon Council has objected to this increase, saying that it “*reflects an unrealistic allowance for small sites (sites less than 0.25ha)*” (LBH reps on FALP 2014). However the Mayor of London has not seen fit to modify the figure for the EiP. The higher target therefore stands at this stage.

Part 1 of the Local Plan confirms that:

*“The Council will meet and exceed its minimum strategic dwelling requirement, where this can be achieved in accordance with other Local Plan policies.” (HLP policy H1)*

This is entirely appropriate, but the introduction of stricter Part 2 policies – including a presumption against back garden loss – will militate against the achievement of this objective, both for the 2011-based figure, and for any proposed increase in this figure.

A key component of the LPA’s housing target is an allowance for ‘small sites’ ie under 0.25 ha. The Council points out that *“an average of 174 units pa have been delivered in Hillingdon from sites of this size”*. The LPA relies on this as a *“sound basis”* for a windfall allowance and it thus multiplies this figure by 5 to provide a figure of *“870 units to be delivered from windfall sites”* in the first 5 years of the plan (SA&D para 3.9). To maintain this figure, I suggest that development management policies must be no stricter than previously.

Not only will policy DMH 6 reduce opportunities for housing provision but it will also reduce dwelling choice. Rear gardens can often accommodate individual family-sized dwellings with private gardens (albeit modest ones), thus addressing the identified need (LP Part 1, para 6.12). They also provide the opportunity for new family homes in lower-density residential locations suitable for those who prefer not to live in the allocated larger-scale higher-density schemes in more central locations.

Finally, these small plots are the lifeblood of many smaller builder-developers, who cannot compete for, or manage, the development of larger sites. They include small family businesses such as my clients. This conflicts with policies to support the needs of different sectors of the economy including SMEs, who are considered *“especially important for local regeneration in suburban areas”* (Part 1 para 5.47 & policy E6).

For the above reasons, the Part 2 Plan is considered unsound and should be reworded to reflect my above submissions.

**Robin Bretherick** FRICS DipTP MRTPI

**Robin Bretherick Associates**



3 November 2014

RAB/PC4/Hillingdon Loc Plan objection



Local Plan <localplan@hillington.gov.uk>

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## Local Plan Reps

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**Robin Bretherick** [REDACTED]  
To: Local Plan <localplan@hillington.gov.uk>

8 December 2015 at 14:17

### Local Plans Team

I attach a representation on your revised Local Plan Part 2 (Dev Man Policies) - policy DMH 6.

Please also refer to my earlier (2014) representations which, I consider, remain applicable especially given that the higher housing targets are now adopted through the London Plan.

I would be happy to discuss this further if required.

Regards



**Robin Bretherick** FRICS DipTP MRTPI

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### Robin Bretherick Associates

*Town Planning Consultants*



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 **Local Plan Reps Dec 2015.pdf**  
1407K



# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

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### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |                |              |  |
|----------------------------|----------------|--------------|--|
| Title                      |                |              |  |
| First name                 | Leigh Brothers |              |  |
| Last Name                  |                |              |  |
| Organisation (if relevant) |                |              |  |
| Unit                       |                | House number |  |
| House name                 |                |              |  |
| Address 1                  | c/o Agent      |              |  |
| Address 2                  |                |              |  |
| Town                       |                |              |  |
| County                     |                |              |  |
| Postcode                   |                |              |  |
| Telephone                  |                |              |  |
| Email                      |                |              |  |

| 2. Agent's Name and Address (if applicable) |                         |              |  |
|---|-------------------------|--------------|--|
| Title                                       | Mr                      |              |  |
| First name                                  | Robin                   |              |  |
| Last name                                   | Bretherick              |              |  |
| Company                                     | Robin Bretherick Assocs |              |  |
| Unit  |                         | House number |  |
| House name                                  |                         |              |  |
| Address 1                                   |                         |              |  |
| Address 2                                   |                         |              |  |
| Town  |                         |              |  |
| County                                      |                         |              |  |
| Postcode                                    |                         |              |  |
| Telephone                                   |                         |              |  |
| Email                                       |                         |              |  |



## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1.** I am commenting on proposed changes to: *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2.** Please indicate the Proposed Change on which you wish to comment:

|                               |                  |
|-------------------------------|------------------|
| Policy number;                | DMP Policy DMH 6 |
| Paragraph number;             |                  |
| Table or figure number; or    |                  |
| Map number (Atlas of Changes) |                  |

**Q3.** Do you consider that as a result of the proposed changes, the Local Plan Part 2 is *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4.** If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

***The further restrictions imposed by policy DMH 6, as revised, will militate against the achievement of the new (2015) London Plan housing targets, including the loss of windfall and other small housing sites, at a time when there is a serious housing shortage in London. They cannot be justified in this context.***

***These small sites are the lifeblood of small housing developers, and should not be unreasonably constrained.***

***My representations on this same policy dated 3 Nov 2014 remain applicable. Please refer.***



**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

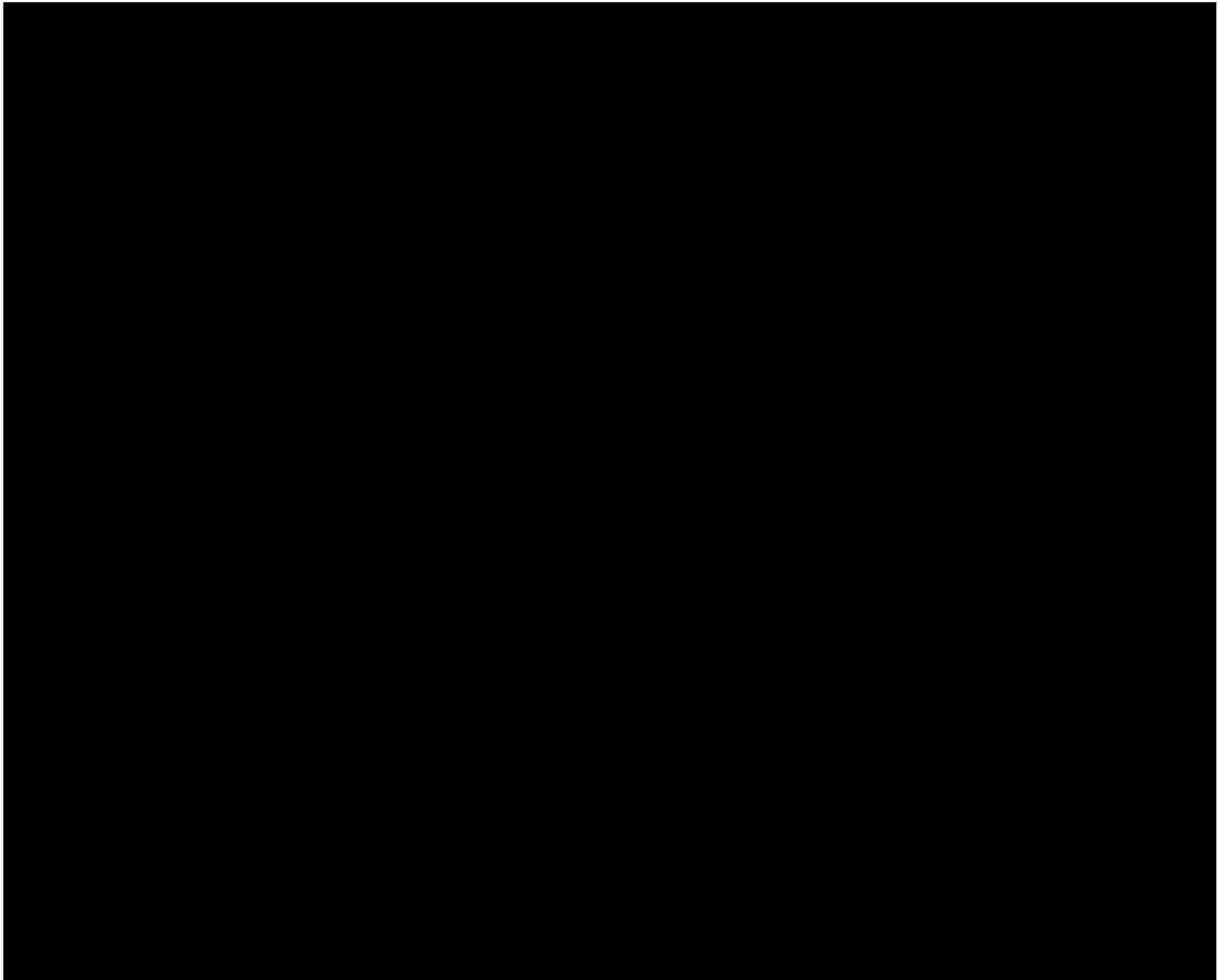
## PART C - Progress of the Local Plan Part 2

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                                     |   |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | When the Local Plan Part 2 Plan has been submitted for independent examination.   |
| <input checked="" type="checkbox"/> | The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2. |
| <input checked="" type="checkbox"/> | The adoption of the Local Plan Part 2.  |

## Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.







Local Plan <localplan@hillington.gov.uk>

# LB Hillingdon Local Plan: Part 2

2 messages

**Maureen Prescott** [redacted] 8 December 2015 at 15:06  
To: localplan@hillington.gov.uk  
Cc: kath harrison [redacted] sue janota <[redacted]>

Thank you for consulting Surrey County Council.

We have the following comments with regard to proposed **Policy MIN 4 Re-use and Recycling of Aggregates**:

- The intentions of Policy Min 4 are fully supported. This seeks to encourage the production of recycled aggregates from the recovery of those elements of the construction, demolition and excavation (C,D&E) waste stream that are capable of being re-used or processed to produce alternative aggregates. Surrey exports a significant quantity of its excavated land-won sand and gravel to London. However, the amount exported will diminish in future as the county is likely to run out of exploitable resources of land-won sand and gravel around 2030 placing greater reliance on alternative aggregates and marine imports.
- 
- Only certain elements of the C,D&E waste stream are suitable for the manufacture of recycled aggregates (i.e. 'hard' C,D&E waste such as concrete, masonry, hardcore, rock etc). Other elements of this waste stream are more suitable as restoration materials (i.e. clay, soils). As currently worded, clause B(ii) implies that where 'hard' C,D&E waste is not capable of being recycled and re-used on site, it is equally acceptable to either re-use the material off-site or use it for land restoration purposes. It is argued that it would be more sustainable to encourage 'hard' C,D&E waste to be taken off-site to an authorised aggregates recycling facility for processing prior to re-use rather than to transport it off-site for use in a land restoration project. It is therefore considered that Clause B(ii) should be reworded as follows: "process and re-use the recyclable material on-site as recycled aggregate, and where this is not possible, transport the material off-site to an aggregates recycling facility for processing."
- Suggest renaming the final paragraph as clause "C".

Kind Regards

Maureen Prescott  
Spatial Planning Team  
Surrey County Council



\* \* \* \* \*

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Our ref: 15/4159

James Gleave  
Planning Policy Manager  
Hillingdon Council  
Civic Centre  
High Street  
Uxbridge UB8 1UW

Transport for London



08<sup>th</sup> December 2015

Dear James,

**Revised Proposed Submission Version 2015 - Hillingdon Local Plan Part 2 – TfL's comments**

Thank you for consulting TfL this latest version of Part 2 of Hillingdon Local Plan, please see below comments and recommendations from TfL following the review of the documents:

**Site Allocations & Designations**

The draft Local Plan identifies specific sites to be redeveloped for commercial and residential uses, alongside one site for primary school use. TfL notes that future secondary school sites have been removed from the previous draft and are to be studied separately.

**Chapter 6 (Public Transport Interchanges)**

It is welcomed that the site allocations specify boundaries for future public transport interchanges in order to safeguard them. In addition, TfL however requests that Hillingdon consider safeguarding sites, land and route alignments required for any future strategic schemes, such as High Speed Rail 2.

**Chapter 7 (Schools)**

It is important to emphasise the importance of good public transport links and therefore accessibility should be a key selection criteria to the site allocation, in line with London Plan policy 6.1 'Strategic Approach'. This will help to minimise school runs traffic pressure on both the local highway network and the Transport for London Road Network, thus assisting TfL in its duty to 'Keep London Moving'. Such an approach should also encourage a positive contribution towards promoting sustainable travel by pupils and staff. TfL would expect to be consulted in the due course on the school site identification study..

**Development Management Policy Document**

**Part 7 - Community Infrastructure**

Para 7.35 advises that The Mayor's CIL Charging Schedule specifies a rate within Hillingdon of £35 per square metre of net increase in floorspace. For the avoidance of doubt should rates change in the future, it would be helpful to include the date of the Mayor's CIL charging schedule. Therefore, the sentence could read:

*The Mayor's CIL Charging Schedule (February 2012) currently specifies a rate within Hillingdon of £35 per square metre of net increase in floorspace.*

In respect of the draft policy DMCI 7 itself, paragraph A states that “*Infrastructure requirements will be predominantly addressed through Council's Community Infrastructure Levy*”. It is however understood this is not the case in Hillingdon as the borough infrastructure funding gap is higher than what can be collected from the borough CIL. Decisions on CIL allocations are not linked to any particular development site. TfL therefore strongly cautions against over-reliance on CIL funding to deliver the majority of the borough's infrastructure requirements, and would rather suggest this wording should be removed from the policy.

## Part 8 Transport

### *DMT1 and Table 8.1 – Transport assessment and travel plan*

Paragraph B refers to Table 8.1 which sets out the minimum floorspace or unit number thresholds for transport assessment (TA) and travel plans. TfL however requests that a transport statement (TS) may be submitted for developments if deemed required assessing highway and transporting impact of the proposal. TfL also requests that the threshold for travel plan needs to be updated to reflect the current TfL guidance available from: <https://www.tfl.gov.uk/info-for/urban-planning-and-construction/travel-plans/planning-requirements>; where the threshold for D1 class for place of worship and schools should be based on the number of members or staff/pupils respectively.

### *DMT5 and Appendix A Table 1 – Cycle Parking*

Draft policy DMT5 includes cycle parking standards for multiple land uses including retail, residential units and office. These are all stated incorrectly as ‘maximum requirements’ and should all be amended to ‘minimum requirements’ to ensure conformity with latest 2015 London Plan cycle parking standards.

The B1 office cycle parking standard currently specifies 1 space per 250 sqm. This does not comply with those contained within the latest 2015 London Plan, which requires staff parking ratio at 1 space per 90sqm for inner London and 1 space per 150 sqm for outer London; along 1 space per 500sqm for short stay visitors. TfL would like to draw attention to the footnote to table 6.3 in the London Plan that states that cycle parking standards in town centres that have high public transport accessibility, such as Uxbridge, should have cycle parking standards that match inner/central London.

TfL notes that the current C1 residential cycle parking requires a minimum of 1 space per studio, 1 and 2 bed unit and 2 spaces for all other dwellings. Again, regrettably this is below the London Plan minimum standards, which require all units with 2 beds or above to be provided with a minimum of 2 spaces. In addition, the proposed Hillingdon cycle parking standards for class D use does not correspond to the London Plan requirement for the provision on short term cycle parking for visitors.

TfL emphasises the importance of providing adequate and sufficient cycle parking in development, in line with London Plan policy 6.9 to encourage and facilitate cycling mode in London, hence reducing reliance on short trips by cars, which helps to reduce traffic congestion particularly in town centres, such as Uxbridge, which already suffer from high level of local congestion.

TfL does not feel there is sufficient justification to undercut London Plan's cycle standards and therefore requests that Hillingdon review those to reflect the Mayor's requirement.

TfL also requests that Policy DMT5 promote the Legible London walking scheme as an initiative to assist in providing well signposted pedestrian and cycle routes.

#### *DMT6 and Appendix A Table 1 – Car Parking*

Despite TfL's previous request, Hillingdon's maximum car parking standards for C1 residential use are still not in accordance with the 2015 London Plan maximum standards. For residential units, it proposes that 2 spaces should be provided per 3 bed unit, and 1-1.5 spaces per 1 and 2 bed units; this is higher than the London Plan standards which allow up to 1.5 spaces for 3 bed units and less than 1 per unit for 1- 2 bed units respectively.

Maximum car parking standards should be read in the context of London Plan policies as a whole. This will allow for local flexibility taking into account accessibility; type, mix and use of development; public transport and local car ownership. The London Plan states that a balance is to be struck between promoting new development and preventing car parking provision that can undermine cycling, walking and public transport use. This flexibility is emphasised further as London's diversity is recognised and a flexible approach to identifying appropriate levels of car parking provision is identified. The 2015 London Plan also includes a density matrix which provides an indicative shading to emphasise the flexibility in the London Plan's parking standards. These can be used to establish the parameters for a broader appraisal of local circumstances.

TfL considers that an inherent flexibility already exists in London Plan car parking standards which has been further emphasised in the way that these are presented in the 2015 London Plan. There is scope within the standards to reflect local characteristics and therefore TfL requests that the residential car parking standards be amended to align with the London Plan maximum standards. Furthermore, policy DMT6 should clearly state that development in areas of high PTAL should aim for significantly less than 1 space per unit.

For B1 office use, Appendix A Table 1 proposes that 1 car parking space per 50-100 sqm of B1 office floorspace should be provided. Similarly, this exceeds the London Plan standard of 1 space per 100-600 sqm of outer London B1 office floorspace. TfL recognises that the London Plan does allow for flexibility in setting office parking standards and allows for a standard of 50-100sqm of B1 office floorspace provided it can be justified in line with the process contained within the London Plan Town Centre SPG and summarised in policy 6.13 (d). This should be site specific rather than borough wide, with a more detailed justification to allow TfL to assess the impact and consider the extent of conformity with London Plan policy. Therefore, the current approach adopted by Hillingdon to apply the relaxed standards across the entire borough is not acceptable.

With regards to Hillingdon's statement in paragraph 8.30 that Uxbridge should enjoy a more generous office car parking standards in order to compete with neighbouring local authorities outside London. TfL does not currently accept this as justifiable circumstances because it failed to provide evidence to demonstrate that such approach would not cause significant adverse impact to congestion or air quality,

considering that local highway network is often congested at peak hours; and Uxbridge Town Centre is currently well served by public transport.

TfL also noted that the proposed parking standards requires visitor car parking to be accommodated on site. The London Plan does not make any allowance for providing car parking to visitors. Although TfL acknowledges that in areas of low PTAL, sustainable transport options for visitors could be limited, this does not apply to more accessible locations such as town centres or locations with higher PTAL. On this basis, TfL considers such provision may only be allowed with sites of a very low PTAL rating.

TfL notes that the requirement to provide electric vehicle charging points in accordance with the current London Plan parking standards has been completely omitted from draft policy DMT6 and Appendix A Table 1. This does not conform to the 2015 London Plan and should therefore be amended. The 2015 London Plan parking standards specifies electric vehicle charging points should be provided in accordance the requirements set out in various tables contained in Parking Addendum to Chapter 6. TfL therefore requests that the Hillingdon's parking standards be revised to reflect and comply with the London Plan requirement.

For residential development, draft policy DMT6 requires car parking to include 10% of spaces suitable for wheelchair users. This does not align with the London Plan Housing SPG which recommends that each designated wheelchair accessible dwelling should have a Blue Badge space.

## **Summary**

TfL supports Hillingdon's approach to include public transport interchanges in its Site allocation and Designations, which will facilitate the delivery of transport improvements in future. TfL however requests that public transport accessibility be taken into count when identifying future secondary school sites in the near future.

With regards to the proposed Development Management Policies (DMPD) and the associated car and cycle parking standards, TfL considers there is a gulf between the proposed standards and current 2015 London Plan standards. TfL is concerned not only that the proposed policies and standards depart significantly from the London Plan, but they are likely to further encourage car travel, when London's future ties in encouragement of sustainable transport modes which produce better air quality and reduce congestion. TfL does not support the proposed approach to higher ('relaxed') parking standards being applied to borough wide, whether or not they have reasonably good public transport access, walking and cycling connectivity. Analysis and evidence that it has been used to satisfy meeting the criteria for allowing higher levels of parking that are set out in Policy 6.13 part d should be provided.

TfL therefore requests Hillingdon Council to further review the proposed Local Plan re-submission, especially in respect of high parking levels, ensuring they are consistent with London Plan policies.

Please do not hesitate to contact me if I can be of any further assistance.

**Kind regards**

PakLim Wong





# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |                                       | 2. Agent's Name and Address (if applicable) |                   |
|----------------------------|---------------------------------------|---|-------------------|
| Title                      |                                       | Title                                       | Mr                |
| First name                 |                                       | First name                                  | Matthew           |
| Last Name                  |                                       | Last name                                   | Dugdale           |
| Organisation (if relevant) | Orbit Developments (Southern) Limited | Company                                     | The Emerson Group |
| Unit                       |                                       | Unit  |                   |
| House name                 |                                       | House name                                  |                   |
| Address 1                  |                                       | Address 1                                   |                   |
| Address 2                  |                                       | Address 2                                   |                   |
| Town                       |                                       | Town  |                   |
| County                     |                                       | County                                      |                   |
| Postcode                   |                                       | Postcode                                    |                   |
| Telephone                  |                                       | Telephone                                   |                   |
| Email                      |                                       | Email                                       |                   |



## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |             |
|-------------------------------|-------------|
| Policy number;                | DME1 part D |
| Paragraph number;             |             |
| Table or figure number; or    |             |
| Map number (Atlas of Changes) |             |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/>            | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

Orbit object to Policy DME1 part D's proposed requirement for employment sites to have been vacant and consistently marketed for a period of two years before other uses will be considered acceptable.

This policy approach is not justified and is not supported by any evidence document that the Council is relying upon. Indeed, the issue of marketing of employment sites is absent from the Employment Land Study Update (February 2014) and is not a recommendation from any other report. The required two years appears to have been chosen arbitrarily by the Council, rather than being founded upon robust evidence.

The approach is not effective as the blanket requirement for two years of marketing across all designated employment sites is disproportionate and is not reflective of the sites' role and status within the Local Plan. According to paragraph 5.6 of the Local Plan Part 1 (November 2012), Hillingdon has four regionally important Strategic Industrial Locations, which were designated through the London Plan. However, by their very definition, Locally Significant Employment Locations and Locally Significant Industrial Sites are of more local importance. Therefore, it is inappropriate to treat all employment sites with the same equal status when they clearly hold different levels of importance and operate at different scales.

Table 1: Neighbouring Authority Required Marketing Periods

| <b>Neighbouring Authority</b>                   | <b>Marketing Period</b>  |
|---|--|
| Ealing (Development Management, Dec 2013)       | None   |
| Harrow (DM Policies, July 2013)                 | <u>Industrial &amp; business land:</u><br>To be agreed with LPA<br><u>Offices:</u> 12 months |
| Hounslow (Local Plan, Sept 2015)                | <u>Key Locations:</u> 2 years<br><u>Other locations:</u> 12+ months                          |
| Slough (Core Strategy, Dec 2008)                | None   |
| South Bucks (Core Strategy, Feb 2011)           | To be agreed with LPA  |
| Spelthorne (Core Strategy & Policies, Feb 2009) | None   |
| Three Rivers (Core Strategy, Oct 2011)          | None   |

Of the neighbouring authorities who require marketing periods (see Table 1 above), Harrow and Hounslow both apply a proportionate marketing period that is reflective of a site's status and importance within the plan. Orbit consider that if a marketing period

is considered necessary by the Planning Inspector, then a similarly proportionate approach should be applied in Hillingdon.

The consequences of not applying this approach are that prospective businesses will instead choose to locate to alternative premises/sites, which may be located in a neighbouring Borough where such requirements are less stringent or, indeed, non-existent. Policy DME1 part D as currently worded will place Hillingdon at a significant locational disadvantage when compared against its neighbouring authorities, which is not effective.

The current approach is also not consistent with national policy as the required marketing of such locally significant sites will place a significant financial burden upon commercial property owners and developers. Not only are there considerable costs involved in the marketing of sites and premises, but of greater concern is the fact that relief from business rates only applies to empty buildings for a period of three months.

However, NPPF paragraph 21 states that “Investment in business should not be overburdened by the combined requirements of planning policy expectations...” and also in the third bullet point that “...Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances” [our emphasis].

NPPF paragraph 22 states that “Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospective of a site being used for that purpose...Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities” [our emphasis].

NPPF paragraph 173 states that “Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened...” [our emphasis].

NPPF paragraph 174 further states that “Local planning authorities should set out their policy on local standards in the Local Plan...In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle...” [our emphasis].

Finally, NPPF paragraph 193 states that “Local planning authorities should publish a list of their information requirements for applications, which should be proportionate to the nature and scale of development proposals and reviewed on a frequent basis. Local planning authorities should only request supporting information that is relevant, necessary and material to the application in question” [our emphasis].

Therefore, Orbit consider that, in the absence of any evidence to the contrary, a marketing period of 6-9 months for locally significant sites would be more equitable

and proportionate to their importance within the Local Plan. In addition, the policy should be re-worded to be more in keeping with the NPPF.

Consequently, Orbit request that Policy DME1 part D be amended as follows:

*“D) Proposals for other uses will be acceptable in SILs, LSEs and on LSIS only where:*

- i) There is no **reasonable** prospect of the land being used for industrial or warehousing purposes in the future; and*
- ii) Sites have been vacant and consistently marketed for a period of:
  - a. 2 years for SILs; or**
  - b. 6-9 months for LSEs and LSIS; and***
- iii) The proposed alternative use does not conflict with the policies and objectives of this Plan.”*

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | No, I do not want to participate in the oral examination |
| <input type="checkbox"/>            | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                 |
|-------------------------------|-----------------|
| Policy number;                | DME2 part (iii) |
| Paragraph number;             |                 |
| Table or figure number; or    |                 |
| Map number (Atlas of Changes) |                 |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/>            | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

In line with the objection and requested changes in respect of Policy DME1 part D, Orbit consider that Policy DME2 part (iii) and its footnote should reflect the proposed minimum period of marketing that would be required (i.e. 6 months), in order to ensure it is justified and effective.

The current policy approach is not consistent with national policy and should reflect the actual wording of the NPPF paragraph 22 which states that "Planning policies should avoid the long term protection of sites allocated for employment use where there is no **reasonable** prospective of a site being used for that purpose..." [our emphasis].

Therefore, Orbit request that Policy DME2 part (iii) and its footnote be reworded as follows:

*"(iii) Sufficient evidence has been provided to demonstrate there is no **reasonable** prospect of land being reused for employment purposes<sup>2</sup>; or"*

*<sup>2</sup> Note that sufficient evidence should include details of marketing of the site for a minimum period of **6** months."*

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | No, I do not want to participate in the oral examination |
| <input type="checkbox"/>            | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**



## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |             |
|-------------------------------|-------------|
| Policy number;                | DME3 part B |
| Paragraph number;             |             |
| Table or figure number; or    |             |
| Map number (Atlas of Changes) |             |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/>            | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

Orbit object to Policy DME3 part B's proposed requirement for proposals involving the loss of office floorspace in preferred locations for office growth to demonstrate that they have been actively marketed for a period of two years and to prove that the site is no longer viable for office use before other uses will be considered acceptable.

This policy approach has doubled the period of marketing from the previous iteration of the policy without any justification and is not supported by any evidence document that the Council is relying upon. The issue of marketing of employment sites is absent from the Employment Land Study Update (February 2014), whilst the requirement for demonstrating that the office use is no longer viable does not feature in the Whole Plan Viability Study (October 2014).

The approach is not effective as it is not clear exactly what information will be required to demonstrate that offices are no longer viable and how this will be assessed by the Council. Such information would typically be found in the policy's supporting text or in a Supplementary Planning Document, but in this case, the information is absent.

This approach is not consistent with national policy as the requirement for marketing of such sites, in addition to requiring viability information, will place a significant financial burden upon commercial property owners and developers. Not only are there considerable costs involved in the marketing of sites and premises, but of greater concern is the fact that relief from business rates only applies to empty buildings for a period of three months. The viability test will also add further uncertainty for developers.

However, NPPF paragraph 21 states that "Investment in business should not be over-burdened by the combined requirements of planning policy expectations..." and also in the third bullet point that "...Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances" [our emphasis].

NPPF paragraph 22 states that "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospective of a site being used for that purpose...Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities" [our emphasis].

NPPF paragraph 173 states that *“Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened...”* [our emphasis].

NPPF paragraph 174 further states that *“Local planning authorities should set out their policy on local standards in the Local Plan...In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle...”* [our emphasis].

Finally, NPPF paragraph 193 states that *“Local planning authorities should publish a list of their information requirements for applications, which should be proportionate to the nature and scale of development proposals and reviewed on a frequent basis. Local planning authorities should only request supporting information that is relevant, necessary and material to the application in question”* [our emphasis].

Orbit consider that, in the absence of any evidence to the contrary, a marketing period of 6-9 months for proposals involving the loss of office floorspace in preferred locations for office growth sites would be more appropriate. In addition, the requirement for demonstrating that the site is no longer viable for office use should be deleted.

Therefore, Orbit request that Policy DME3 part B be amended as follows:

*“B) Proposals involving loss of office floorspace in preferred locations for office growth, which fall outside of existing permitted development procedures, should include information to demonstrate that:*

- i) the site has been actively marketed for **6-9 months; and***
- ii) **surrounding employment uses will not be undermined.**”*

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | No, I do not want to participate in the oral examination |
| <input type="checkbox"/>            | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |             |
|-------------------------------|-------------|
| Policy number;                | DME3 part F |
| Paragraph number;             |             |
| Table or figure number; or    |             |
| Map number (Atlas of Changes) |             |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                                     |   |
|--------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/>            | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

Orbit object to Policy DME3 part F, which states that proposals for offices outside town centres and identified office growth locations will generally not be permitted, as it is not consistent with national policy.

Whilst offices are defined as a “main town centre use” by Annex 2 (Glossary) of the NPPF, this does not expressly limit them to only being located in town centre or in locations defined by the Local Plan (i.e. identified office growth locations). Offices can be located outside such locations, subject to satisfying the sequential approach to main town centre uses as set out by NPPF paragraph 24.

NPPF paragraph 24 states that: “Local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale.” [our emphasis].

Therefore, Orbit request that Policy DME3 part F be reworded as follows:

**“F) Proposals for offices outside town centres and identified office growth locations should be in accordance with the sequential approach to main town centre uses as set out by Policy DMTC1.”**

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | No, I do not want to participate in the oral examination |
| <input type="checkbox"/>            | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**



## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |           |
|-------------------------------|-----------|
| Policy number;                | DMTC3     |
| Paragraph number;             |           |
| Table or figure number; or    | Table 3.2 |
| Map number (Atlas of Changes) |           |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/>            | It has not been positively prepared | <input type="checkbox"/>            | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

Orbit object to the absence of the designation of Sovereign Court, Sipson Road as a Local Parade in Table 3.2 of Policy DMTC3.

Sovereign Court, Sipson Road currently consists of retail, leisure and commercial uses on the ground floor with office accommodation on the floors above. Orbit consider that the parade provides valuable amenities for the benefit of the local businesses, residents and visitors to the airport. The parade should be recognised as such in Table 3.2 and be allocated on the Proposals Map.

The policy approach is not justified as Policy DMTC3 is supported by the Local Parades Background Technical Report (September 2006), which at over nine years old is clearly obsolete and cannot be considered up-to-date.

This approach is also not consistent with national policy. NPPF paragraph 158 states that “Each local planning authority should ensure that the Local Plan is based on adequate, **up-to-date** and relevant evidence about the economic, social and environmental characteristics and prospects of the area...” [our emphasis].

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | No, I do not want to participate in the oral examination |
| <input type="checkbox"/>            | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |       |
|-------------------------------|-------|
| Policy number;                |       |
| Paragraph number;             | 4.33  |
| Table or figure number; or    |       |
| Map number (Atlas of Changes) | Map I |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

|   |
|---|
| Orbit support the designation of Heathrow Boulevard, 282 Bath Road within the Bath Road, Hayes Locally Significant Employment Site (Map I). |
|---|

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | No, I do not want to participate in the oral examination |
| <input type="checkbox"/>            | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

|  |
|--|
|  |
|--|

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

|  |
|--|
|  |
|--|

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |               |
|-------------------------------|---------------|
| Policy number;                | SEA2          |
| Paragraph number;             |               |
| Table or figure number; or    |               |
| Map number (Atlas of Changes) | Map O & Map Q |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

Orbit support the proposed designation of Sovereign Court, Sipson Road and Strata House, 264-270 Bath Road within the Bath Road Hotel and Office Growth Location (Map O, Cluster 5).

Orbit also support the designation of Heathrow Boulevard, 282 Bath Road within the Heathrow Perimeter (Bath Road LSEL) Office Growth Location (Map I).

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | No, I do not want to participate in the oral examination |
| <input type="checkbox"/>            | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**



## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input checked="" type="checkbox"/> | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                         |
|-------------------------------|-------------------------|
| Policy number;                |                         |
| Paragraph number;             |                         |
| Table or figure number; or    |                         |
| Map number (Atlas of Changes) | Map 2.4, 4.2, 6.1 & 6.5 |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

Orbit support the designation of Heathrow Boulevard, 282 Bath Road within the Bath Road, Hayes Locally Significant Employment Site (Map 2.4).

Orbit support the designation of Heathrow Boulevard, 282 Bath Road within the Bath Road, Hayes Office Growth Location (Map 4.2).

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

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|  |  |
|--|--|
| <input checked="checked" type="checkbox"/> | No, I do not want to participate in the oral examination |
| <input type="checkbox"/>                   | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

## PART C - Progress of the Local Plan Part 2

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                                     |   |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | When the Local Plan Part 2 Plan has been submitted for independent examination.   |
| <input checked="" type="checkbox"/> | The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2. |
| <input checked="" type="checkbox"/> | The adoption of the Local Plan Part 2.  |

### Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** [localplan@hillingdon.gov.uk](mailto:localplan@hillingdon.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillingdon.gov.uk](mailto:localplan@hillingdon.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

# THE EMERSON GROUP

EST. OVER 55 YEARS

PLANNING DEPARTMENT

GRAHAM A BEE BSc DipTP MRTPI  
MATTHEW T DUGDALE BA MCD MRTPI  
KERREN J PHILLIPS BSc  
TOM LOOMES BA DipTP MRTPI  
ANGELA DC PENNY

Planning Policy Team  
London Borough of Hillingdon  
3N/02  
Civic Centre  
High Street  
Uxbridge  
Middlesex  
UB8 1UW

Our ref: MD/Planning

08 December 2015

Dear Sir/Madam,

**RE: FURTHER CHANGES TO THE HILLINGDON LOCAL PLAN PART 2 (OCTOBER 2015) – CONSULTATION RESPONSE ON BEHALF OF ORBIT DEVELOPMENTS (SOUTHERN) LIMITED**

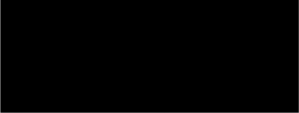
I am writing to submit representations on behalf of Orbit Developments (Southern) Limited regarding the above.

Orbit own and manage a number of commercial properties close to Heathrow Airport, as illustrated by the enclosed plans, including:

- Heathrow Boulevard – a business park comprising five office buildings;
- Sovereign Court – a mixed use office development and retail/leisure parade;
- Strata House – a four storey office building.

Orbit welcome the opportunity to participate in Hillingdon's preparation of its Local Plan and request that the enclosed completed representation forms could be taken into account by the Council prior to submitting for independent Examination by a Planning Inspector. Should you require any further information, please do not hesitate to contact me.

Yours faithfully,

  
**Matthew Dugdale**  
**Planner**

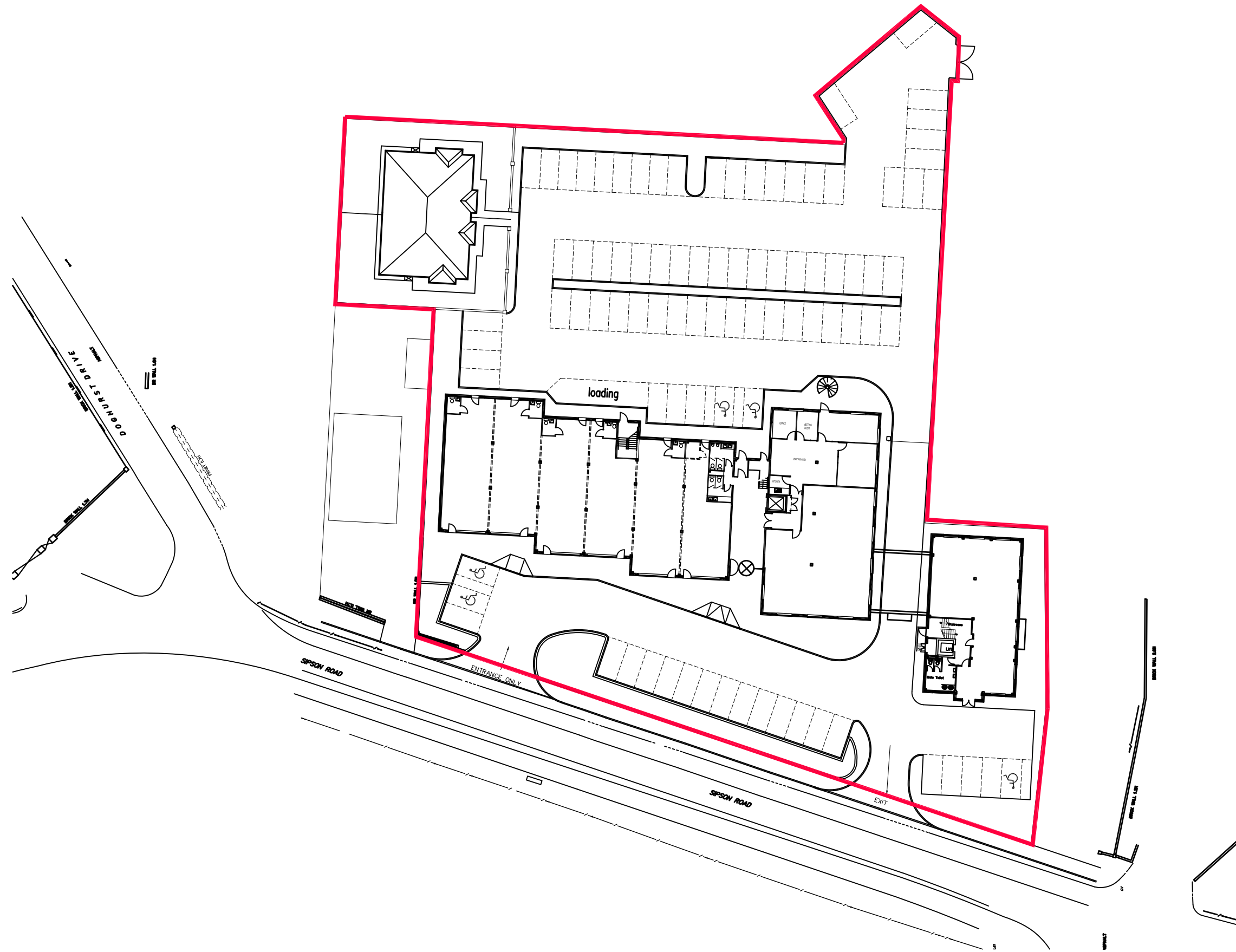
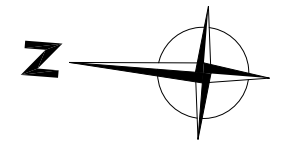
Encs : Heathrow Boulevard Location Plan (190-PLA-2001)  
Sovereign Court Location Plan (436-PLA-2000)  
Strata House Location Plan (718-PLA-2000)  
Representation Forms

DIRECTORS: PE JONES OBE (CHAIRMAN) ME JONES (DEPUTY CHAIRMAN)  
AE JONES AC WEATHERBY BA (Law) (SECRETARY) J EDWARDS BSc (Hons) FCMA CGMA (FINANCIAL)  
SP WILSON JP BURGESS BA (Hons) Law MST ROYLE BA (Arch) JR CLABER BSc (Hons)  
NON-EXECUTIVE DIRECTORS: AJ WHITE BEng A JONES THE LORD LEE OF TRAFFORD DL FCA JP ALLEN ACIB DipFS

EMERSON DEVELOPMENTS (HOLDINGS) LTD

REGISTERED OFFICE: EMERSON HOUSE HEYES LANE ALDERLEY EDGE CHESHIRE SK9 7LF REGISTERED No. 1170304 (ENGLAND & WALES)

The Contractor is responsible for checking dimensions and any discrepancy to be verified with the Architects before proceeding. Figured dimensions to be worked to only. Subject to all Local Authority and Statutory approvals.  
DO NOT SCALE



| REV | DESCRIPTION | DATE |
|-----|-------------|------|
|-----|-------------|------|

EMERSON HOUSE, HEYES LANE,  
ALDERLEY EDGE,  
CHESHIRE SK9 7LF  
Tel: (01625) 588400. Fax: (01625) 588276



Location  
**SOVEREIGN COURT  
SIPSON LANE**

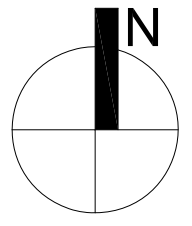
Site  
**OVERALL SITE PLAN**

| scale      | ref    | checked | date     |
|------------|--------|---------|----------|
| 1:500 @ A3 | C.P.H. |         | 05/11/10 |

drawing no.  
**436-PLA-2000**



The Contractor is responsible for checking dimensions and any discrepancy to be verified with the Architects before proceeding. Figured dimensions to be worked to only. Subject to all Local Authority and Statutory approvals.  
DO NOT SCALE



OW  
ard

26m

EMERSON HOUSE, HEYES LANE,  
ALDERLEY EDGE,  
CHESHIRE SK9 7LF  
Tel: (01625) 588400, Fax: (01625) 588276



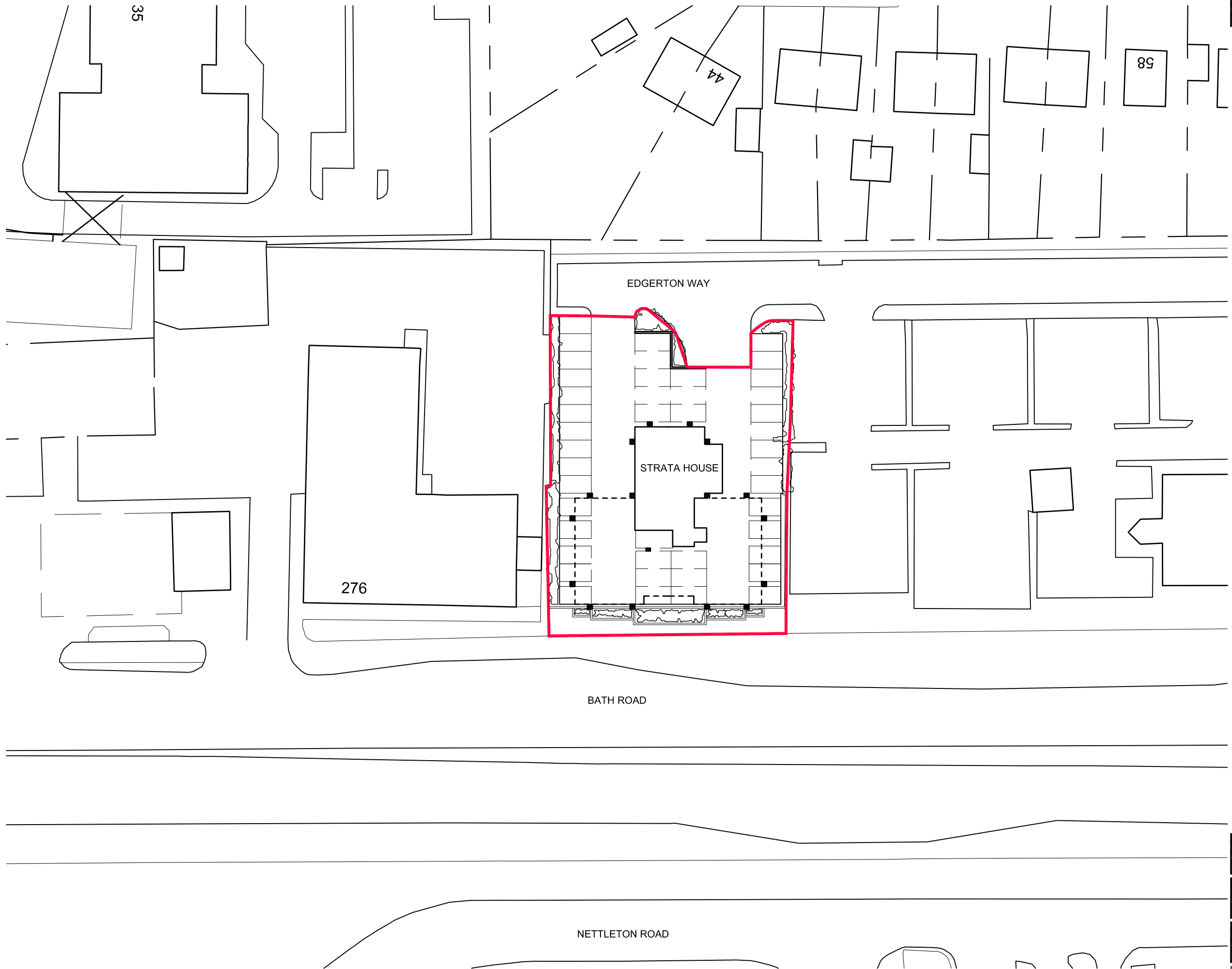
location  
**HEATHROW BOULEVARD  
BUILDING TWO**

title  
**SITE LOCATION PLAN**

|                      |               |         |                  |
|----------------------|---------------|---------|------------------|
| scale<br>1:2500 @ A3 | ref<br>C.P.H. | checked | date<br>30.06.14 |
|----------------------|---------------|---------|------------------|

drawing no.  
**190 - PLA - 2001**

The Contractor is responsible for checking dimensions and any discrepancy to be verified with the Architects before proceeding. Figured dimensions to be worked to only. Subject to all Local Authority and Statutory approvals.  
DO NOT SCALE



SITE PLAN - 1:500

EMERSON HOUSE, HEYES LANE,  
ALDERLEY EDGE,  
CHESHIRE SK9 7LF  
Tel: (01625) 588400. Fax: (01625) 588276



location  
**STRATA HOUSE  
EGERTON WAY, HEATHROW**

title  
**SITE LOCATION PLAN**

|                     |     |         |                  |
|---------------------|-----|---------|------------------|
| scale<br>1:500 @ A3 | ref | checked | date<br>04-12-15 |
|---------------------|-----|---------|------------------|

|                                 |
|---------------------------------|
| drawing no.<br>718 - PLA - 2000 |
|---------------------------------|





Our ref: J:\Planning\Job Files\J034935 - Master Brewer Hillingdon (plng central)\Letters\FMBS\_SADDPD\_Representations\_Dec 15.docx

Your ref: LPP2 – Site Allocation and Designations Consultation Draft Dec 15

Planning Policy Team,  
London Borough of Hillingdon,  
3N/02 Civic Centre,  
High Street,  
Uxbridge,  
UB8 1UW

**BY EMAIL ONLY:** [localplan@hillingdon.gov.uk](mailto:localplan@hillingdon.gov.uk)

7 December 2015

Dear Sirs,

**Former Master Brewer Motel site, Freezeland Way, Hillingdon  
London Borough of Hillingdon Council – Local Plan Part 2 - Site Allocations and Designations  
(Proposed Submission Version, October 2015), Policies Map Revised (North Sheet) (Proposed  
Submission Version, October 2015) and Policies Map - Atlas of Changes (Proposed Submission  
Version, October 2015) - Written Representations on behalf of Meyer Bergman**

On behalf of our client, Meyer Bergman, we hereby submit written representations to the Council's emerging Local Plan Part 2 (LPP2) - Site Allocations and Designations, Policies Map Revised (North Sheet) and Policies Map - Atlas of Changes (Proposed Submission Versions, October 2015) in respect of the Former Master Brewer Motel site situated at the junction of Freezeland Way and Long Lane, Hillingdon (hereinafter referred to as 'the site') (Ref. SA14).

Our Client welcomes the opportunity to comment on the LPP2 and considers that the updated proposed Site Allocation for the site presents a positive policy context for a residential-led, mixed use development that will help to meet a number of the Council's objectives for North Hillingdon Local Centre and overall housing delivery. It is acknowledged that a comprehensive approach to the development of the area between Western Avenue, Long Lane and Freezeland Way at North Hillingdon has been an objective of the Council for some time and our Client is committed to the development of the site.

## The Site

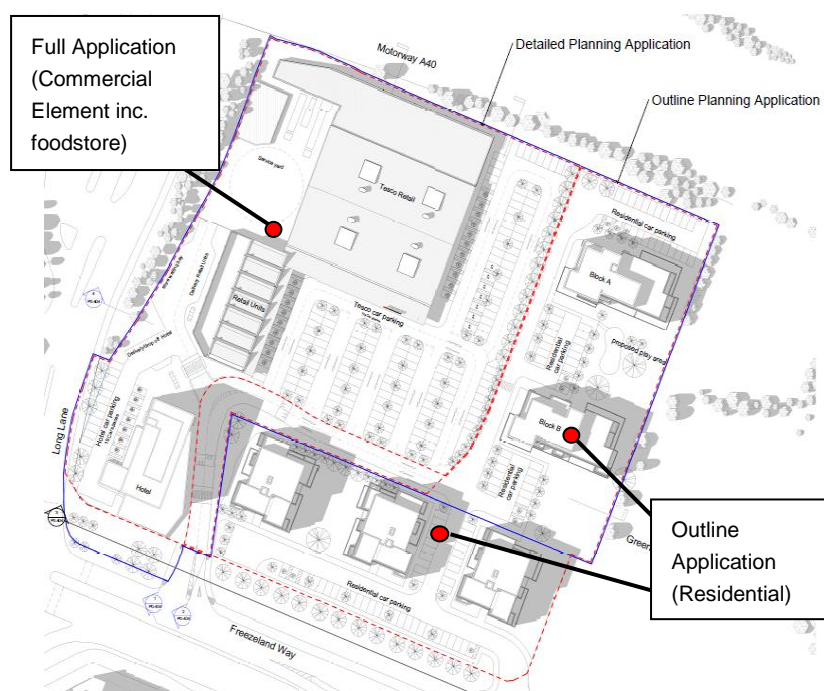
The site (as shown at **Appendix A**) is located to the west of Central London and south of the A40/Western Avenue in Hillingdon.

The site, which measures 2.99 ha, was formerly occupied by the Master Brewer Motel, a public house/motel with 106 bedrooms, conferencing and restaurant facilities and 200 parking spaces. Currently the site comprises hard standing and semi mature vegetation with large advertising boards located on the boundary adjacent to Long Lane. Semi-mature and mature boundary planting envelopes the site on each of its boundaries.

Vehicular access to the site is provided via an entrance/exit point onto Freezeland Way, with an additional exit point available on Long Lane, albeit the site accesses have been blocked with temporary concrete bollards and fencing.

## Background

The site has been subject to a number of previous retail-led, mixed-use schemes as outlined at **Appendix B**. The most recent application for 'Hybrid' planning permission (submitted in 2014) was presented to the Council's Planning Committee in August 2014. The scheme comprised "Mixed use redevelopment of the former Master Brewer Hotel comprising the erection of a foodstore, measuring 3,543 sq m (GIA) (use class A1), with 179 car parking spaces and 32 cycle spaces; an additional 3 retail units, measuring 1,037 sq m (GIA), (use class A1 to A5); a 70 bed hotel (use class C1) and 19 car parking spaces and 4 cycle spaces; 125 residential units (use class C3) with 100 car parking spaces and 138 cycle parking spaces and associated highways alterations together with landscape improvements (Application references: 4266/APP/2014/518 and 4266/APP/2014/519) as shown in Figure 1.1 below.



**Figure 1.1: 2014 Hybrid Planning Proposal (Application references: 4266/APP/2014/518 and 4266/APP/2014/519)**

The Committee resolved to grant planning permission subject to the completion of a section 106 Agreement.

Following the sale of the site in September 2015, a revised proposal for a residential-led, mixed-use development is being explored as an alternative development option for the site (as a whole). A proposal has not been formally submitted to the Council for formal consideration. However, pre-application discussions have been undertaken with the Planning Department, Housing Department and Estates Department to understand whether the revised proposal would align with the aspirations of LB Hillingdon's Development Plan.

## Site Allocation and Designations

The allocation of development sites forms part of a strategic approach to guiding and managing growth in the Borough. In allocating sites the Council seeks to promote development and the flexible use of land for sites which could potentially come forward for development as 'developable and deliverable' within the next 15 years (in line with the requirements of NPPF paragraphs 47). The site, referred to as Policy SA14 within the Site Allocations and Designations document has been identified as part of the Council's strategic approach

for some time. The area comprises two sites of approximately the same size ('Site A' Hillingdon Circus and 'Site B' Master Brewer), situated in close proximity to Hillingdon Station, the strategic road network (A40) and a key north/south route in the Borough. A copy of the allocation site boundary is provided at **Appendix C**.

## Emerging Policy SA14

The proposed Site Allocation Policy sets out a number of criteria that will need to be considered as part of any future application for the site to enable the Council to support residential-led, mixed use proposals. As currently drafted Policy SA14 states the following objectives (proposed revisions identified within the Submission draft are included in red):

### **"Site B**

*Development within the Green Belt should:*

- Reinforce and enhance the Green Belt Landscape to improve its visual function;
- Improve access to Freezeland Covert to promote open space of recreational value;
- Secure effective management, including planting of woodland at Freezeland Covert and the pond;
- Enhance ecological and wildlife interest on land west of Freezeland Covert; and
- Enhance pedestrian access between the Green Belt areas east and west of Long Lane.

*Development within the developed areas should:*

- Secure substantial planting and landscaping in association with any development;
- Promote a mix of uses that takes advantage of the north/south east/west communications network to serve Borough-wide and community interests;
- Environmental improvements and landscaping as necessary to enhance the local shopping and residential environment; and
- Result in public transport improvements particularly North/South links.

*Should proposals come forward that involve the development of Sites A and B for predominantly residential purposes, the following key principles will need to be considered.*

- A range of housing types and tenure will need to be provided on the site, to reflect the conclusions of the Council's latest Housing Market Assessment.
- The key urban design principles should result in the creation of a neighbourhood with clearly defined links to the main shopping area in North Hillingdon, where the scale and massing of buildings reflects local character and the PTAL rating of the site.
- Whilst the nature of the scheme will be predominantly residential, the Council will accept a proportion of other uses that are appropriate to the site's location within the North Hillingdon Local Centre, including a hotel, restaurant and small scale retail.

**All proposals across Sites A and B should:**

- Be of a scale that is in keeping with the Local Centre; and
- Form a comprehensive development scheme across the whole site.

*The cumulative impact of any proposed retail or leisure development on this site and the adjoining Master Brewer site will be taken into account by the Council when considering any future proposed scheme; in particular in terms of their likely effects on surrounding residential areas and shopping centres, public transport services and the local road network".*

As part of this Policy, site information is provided which sets out base line information for the allocation as summarised overleaf.

| <b>Site Name</b>                                     | <b>Site B Master Brewer</b>  |
|--|--|
| <b>Ward</b>  | <i>Uxbridge North</i>  |
| <b>Location</b>                                      | <i>Long Lane/ Freezeland Way</i>   |
| <b>Area (ha/sqm)</b>                                 | <i>3.2 ha</i>  |
| <b>PTAL Rating</b>                                   | <i>3</i>   |
| <b>Proposed Development</b>                          | <i>Mixed use</i>   |
| <b>Current UDP Designations</b>                      | <i>Local Centre, Green Belt</i>  |
| <b>Proposed New Designation</b>                      | <i>Nature Conservation Site of Metropolitan or Borough Grade 1 Importance.</i>   |
| <b>Existing Use</b>                                  | <i>Site is currently vacant</i>  |
| <b>Relevant Planning History (Most recent)</b>       | <i>Extant permission for the erection of 125 residential units (Use Class C3) with 100 car parking spaces and 138 cycle parking spaces and associated highways alterations, together with landscape improvements</i> |
| <b>Proposed Number of Units</b>                      | <b>125</b>   |
| <b>Existing Units</b>                                | <i>0</i>   |
| <b>Net Completions</b>                               | <b>125 units</b>   |
| <b>Infrastructure Considerations and Constraints</b> | <i>To be determined through the planning application process.</i>  |
| <b>Flood Risk</b>                                    | <i>Flood Zones 3b, 2 and 1; sufficient developable area in Flood Zone 1; flood plain areas to be retained for open space.</i>  |
| <b>Contamination</b>                                 | <i>Any potential contamination will be addressed through the implementation and discharge of a suitable planning condition.</i>  |
| <b>Indicative Phasing</b>                            | <i>2016-2021</i>   |
| <b>Other Information</b>                             | <b>Site identified in Hillingdon's Housing Trajectory to deliver 125 units.</b>  |

Whilst our Client supports these objectives, as the emerging proposals will depart from the 2014 approved scheme, certain details provided to support the objectives of Policy SA14 need to be reviewed including the proposed number of units, proposed new designations and criteria for sites A and B. These specific items are explored in more detail below.

We would highlight that the description provided in relation to 'Relevant Planning History (Most recent)' is incomplete. Please refer to page 2 ('Background') for the full proposal description.

## Planning Policy Considerations

### Housing - Proposed Number of Units

By way of background, the Council, through the adoption of its Local Plan Part 1 (LPP1) – Strategic Policies in 2012, has established the long term development requirements for the Borough including housing provision from 2011 – 2026. In line with the London Plan, LPP1 sets out a ten year housing target of 4,250 dwellings for the first ten years of the plan period, 2011 – 2021 (Policy H1). The LPP1 states that the Council's target, rolled forward to 2026, will equate to a minimum provision of 6,375 dwellings over the period of the Plan. Sites that will help to achieve this target will be identified as part of the LPP2.

It is noted that the strategic objective for housing delivery in Hillingdon was updated as part of the Greater London Authority's (GLA) Further Alterations to the London Plan in March 2015, which saw the Borough's minimum 10 year housing target increase from 4,250 (425 dwelling per annum) to 5,593 (559 dwellings per annum). Rolled forward to 2026, this target equates to a minimum of 8,385 dwellings over the plan period (equating to an additional 2,010 units).

The Council has prepared an Assessment of Housing Land Supply (2014 – 2019) (March 2015), which forms part of the Council's Evidence Base and identifies that based upon current completions beginning in April 2011, the Council will need to deliver a minimum of 1,810 units to 2021, which is considered to be achievable.

As part of the Council's assessment of sites with the potential to deliver housing, site typologies have been identified to classify developable areas including; sites under construction; sites with unimplemented planning permissions; sites with planning permission pending s106 agreements; adopted sites; and emerging sites. These typologies equate to 6,087 net additional homes, 2,973<sup>1</sup> of which are identified as 'likely to be delivered in 5 years'. Looking at these figures more closely, it is noted that 2,029 are currently under construction, with only 944 identified to be delivered over the next 5 year period.

The site, subject of these representations, currently contributes to 'sites with planning permission pending s106 agreements' and 'emerging sites' following a committee resolution to grant outline planning permission in August 2014 for 125 residential units. However owing to a change of site ownership, neither these units nor the anticipated foodstore will come forward as part of the permitted retail-led mixed-use development, as identified within the emerging Site allocations and Designations Document (Site Ref. SA14).

This movement away from a retail-led development has subsequently resulted in the re-appraisal of the site and its capacity to deliver a higher number of residential units (site wide excluding Green belt land to the east). This exercise is considered particularly important owing to the site's sustainable location within an established local centre and close proximity to public transport.

Although there is still a commitment to deliver a mix of uses to compliment Hillingdon's established local centre, it is anticipated that a higher number of residential units could be delivered to assist the Council to meet and exceed its minimum strategic dwelling target and maximise the potential of this site to deliver additional housing capacity.

Based upon the site's location within an urban/suburban location and its PTAL rating of 3, it is argued that a density of 142 units per hectare or 420 habitable rooms per hectare would be achievable at the site (equating to 341 dwellings), having consideration for GLA standards. The GLA's density matrix (Policy 3.4 and Table 3.2) identifies density ranges taking into account local context and character and notes that density standards should be applied flexibly. In this regard, based upon the site's close proximity to public transport and key routes; and North Hillingdon's evolving context, the provision of approximately 341 units will be appropriate and achievable.

**In this regard, to ensure that the site is safeguarded for future development that can maximise its potential, it is respectfully requested that the Council review the proportion of net completions anticipated for the site in line with the emerging residential-led, mixed-use proposal and replace the current stated 125 units with '341 units'.**

We would welcome an opportunity to discuss this further with the Council to identify a range or higher number of projected net completions for the site, commensurate to the area of developable land available for residential development and its sustainable location.

---

<sup>1</sup> Assessment of Housing Land Supply (2014 – 2019) (March 2015) Table 2 identifies the 'Number of Units Likely To Be Delivered In 5 Years' as 2,781 units. However, this appears to be a miscalculation of the total identified (2,973).

### **Nature Conservation - Proposed New Designations**

It is acknowledged that the Council has identified part of the site to be protected as one of the Borough's nature conservation sites of Metropolitan or Borough grade 1 importance. Having considered the emerging Policies Map Revised (North Sheet), it is noted that this designation will relate to an area of designated Green Belt land situated to the east of the site. Our client has no objection to this proposed new designation and recognises that this measure will further enhance and protect this valuable piece of land.

However, we would highlight that having reviewed the LPP2 there is a degree of inconsistency between each of the documents in relation to this proposed allocation. Although the designation is identified within the site information summary under Policy SA14 and as part of the Policies Map Revised (North Sheet), specific supplementary information in relation to the site is not provided within Chapter 5 of the Site Allocations and Designations Document or as part of the Atlas of Changes Proposed Document. Should this proposed designation be taken forward, we request that further clarification be provided in line with the details outlined for other proposed sites of Grade 1 importance for consistency and for the avoidance of doubt.

### **Proposals across Sites A and B – Comprehensive Development**

It is noted that the proposed allocation includes 2no. criteria that should be considered across the wider site allocation, encompassing Site A and B including:

- *“Form a comprehensive development scheme across the whole site”*

This criterion is unreasonable as the sites that comprise this allocation are subject to various ownership interests and are unlikely to be delivered at the same time or as part of one masterplan. We would request that this criterion is removed.

Should the Council consider that some form of wording is necessary in this regard then we would be happy to discuss options with you. However, we cannot support the form of wording as proposed.

We look forward to the acknowledgement of receipt of these representations in due course.

In the meantime please do not hesitate to contact me with any queries.

Yours faithfully,



**Sarah Hiscutt**  
Senior Planner





**Appendix A: Aerial photograph of application site and surrounding area (approximate site boundary shown in red)**

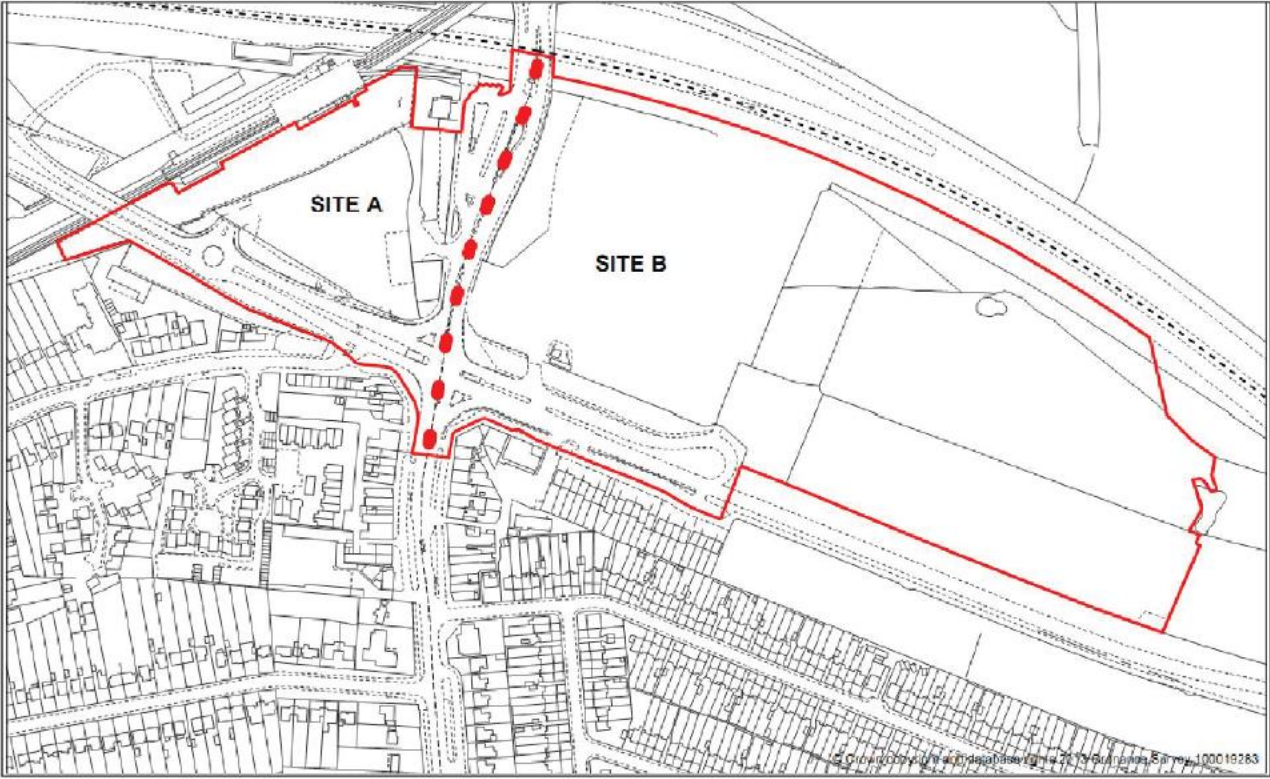




## Appendix B: Planning History Summary

|                                       | 2004 Proposal                            | 2005 Proposal                            | December 2010 Consultation   | 2011 Proposal                         | 2012 Submission                        | 2014 Submission                        |
|---------------------------------------|--|--|--|---------------------------------------|--|--|
| <b>Foodstore (GFA)</b>                | 8,819 sq.m                               | 7,673 sqm                                | 3,312 sqm  | 3,312 sqm (exc BoH and Delivery Area) | 3,543 sq.m (inc BoH and Delivery Area) | 3,543 sq.m (inc BoH and Delivery Area) |
| <b>Hotel</b>                          | None                                     | None                                     | 120 rooms  | 84 rooms                              | 84 rooms                               | 70 rooms                               |
| <b>Independent Retail Units (GIA)</b> | 805 sq m                                 | 1,244 sq m                               | 998 sq m   | 1,034 sq m                            | 1,037 sq m                             | 1,037 sq m                             |
| <b>Homes</b>                          | 220 units (circa 30% affordable housing) | 205 units (circa 30% affordable housing) | 142 units (53 – Spenhill land and 89 – Council owned land (% affordable housing TBD) | 53 units (0% affordable housing)      | 125 units (15% affordable housing)     | 125 units (15% affordable housing).    |
| <b>Community Facility (GFA)</b>       | None                                     | None                                     | Safer Neighbourhood Unit – 100 sq.m  | Safer Neighbourhood Unit – 100 sq.m   | Safer Neighbourhood Unit – 100 sq.m    | None                                   |
| <b>Parking</b>                        | <b>768</b>                               | <b>614</b>                               | <b>297</b>   | <b>319</b>                            | <b>298</b>                             | <b>298 (Overall)</b>                   |

**Appendix C: Site Allocations and Designations (Proposed Submission Version, October 2015)  
Policy SA14 – Hillingdon Circus and Master Brewer**





# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |            |
|----------------------------|------------|
| Title                      | Ms         |
| First name                 | Julie      |
| Last Name                  | Hunter     |
| Organisation (if relevant) | Home Group |
| Unit                       |            |
| House name                 |            |
| Address 1                  |            |
| Address 2                  |            |
| Town                       |            |
| County                     |            |
| Postcode                   |            |
| Telephone                  |            |
| Email                      |            |

| 2. Agent's Name and Address (if applicable) |              |  |
|---|--------------|--|
| Title                                       |              |  |
| First name                                  |              |  |
| Last name                                   |              |  |
| Company                                     |              |  |
| Unit  | House number |  |
| House name                                  |              |  |
| Address 1                                   |              |  |
| Address 2                                   |              |  |
| Town  |              |  |
| County                                      |              |  |
| Postcode                                    |              |  |
| Telephone                                   |              |  |
| Email                                       |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                                       |
|-------------------------------|---------------------------------------|
| Policy number;                | SA10 269-286 Field End Road, Eastcote |
| Paragraph number;             |                                       |
| Table or figure number; or    |                                       |
| Map number (Atlas of Changes) |                                       |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/>            | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

Half of the draft allocation (building no. 281) 269-285 Field Road is in the ownership of Home Group and sits within the development programme for 2018-2021. The site is currently occupied by office buildings and associated car parking.

Home Group is fully supportive of the allocation and can confirm that the intention is to develop the site in the short term. Our concern is that the proposed policy wording restricts the capacity of the site to the extent that would make the viability uncertain. Home Group has carried out various feasibility studies and concluded that a yield of at least 30-35 units is deliverable and achievable on our portion of the site alone without considering the area of the neighbouring building that makes up the remainder of the allocation area. We would therefore request that the policy is reworded to reflect the evidence available. In unduly restricting the capacity of the site it is considered that the policy has not been prepared positively and does not therefore comply with the core principles of the NPPF.

One of the 12 core land use principles contained within paragraph 17 of the NPPF encourages the effective use of land by reusing land that has previously been developed (brownfield land). Brownfield land that is deliverable, developable and achievable in the short term is a scarce resource and such it is important that it is reused effectively. The draft proposals and subject of previous pre-application discussions ref: PE/00140/2012 show an indicative scheme that does not exceed parameters of the existing built form but would provide much needed design led residential accommodation in a range of sizes and tenures.

It is unclear where the indicative yield of 23 units contained within the draft policy is derived from and therefore it appears to be unjustified. However, taking account of the previous pre-application response it is anticipated that it is linked to Policy 3.4 (Optimising Housing Supply) of London Plan and in particular table 3.2 (density matrix) which provides guidance on density linked to PTAL rating. It is important to note that in this respect the London Plan is clear that the PTAL density matrix is guidance only and should not be applied mechanistically when determining planning applications. Indeed, the policy clearly states that the guidance allows local authorities to refine the approach to density requirements based upon context. In all situations in order to be compliant with the Local Plan and the overarching NPPF there is the inherent requirement to optimise the potential of the precious resource that is, brownfield land.

In relation to the density matrix, is it widely considered that it has provided a useful benchmark for consideration when assessing particular schemes. However, it is clear as the policy ages that the matrix fails to capture the complexity of London. The matrix, taken literally, would preclude the development of high density schemes in certain areas thus curtailing the delivery of much needed housing. In practice several of these restricted areas are already delivering high density schemes without compromising on design or quality. This suggests that local authorities must use their extensive knowledge of their own areas to formulate an area specific response to the matrix. Thus allowing additional density where appropriate.

Recent data within the London Plan AMR 2011-2014 show a substantial proportion of schemes approved for residential development in London do not fall within the ranges suggested in the London Plan 2015 density matrix. Fifty percent of all homes permitted in 2013/14 were above the indicative density matrix range and this percentage is slightly higher still for schemes of more than 15 homes. Therefore, precedence exists for local authorities to digress from the density matrix guidance.

The site is in a sustainable location close to public transport links, employment opportunities and with a prosperous, growing community. As such, the site is an important project within Home Group's development programme. To ensure that it remains a viable prospect for delivery the policy cannot be unduly restrictive with regards to capacity. Home Group is committed to delivering high quality mixed tenure schemes that reflect the needs of the community. We have a strong design ethos and are keen to engage with the local authority in progressing this scheme. Further information relating to the proposed scheme and design evolution is available for discussion.

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | <b>No, I do not want to participate in the oral examination</b> |
| <input type="checkbox"/>            | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**



**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

n/a

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

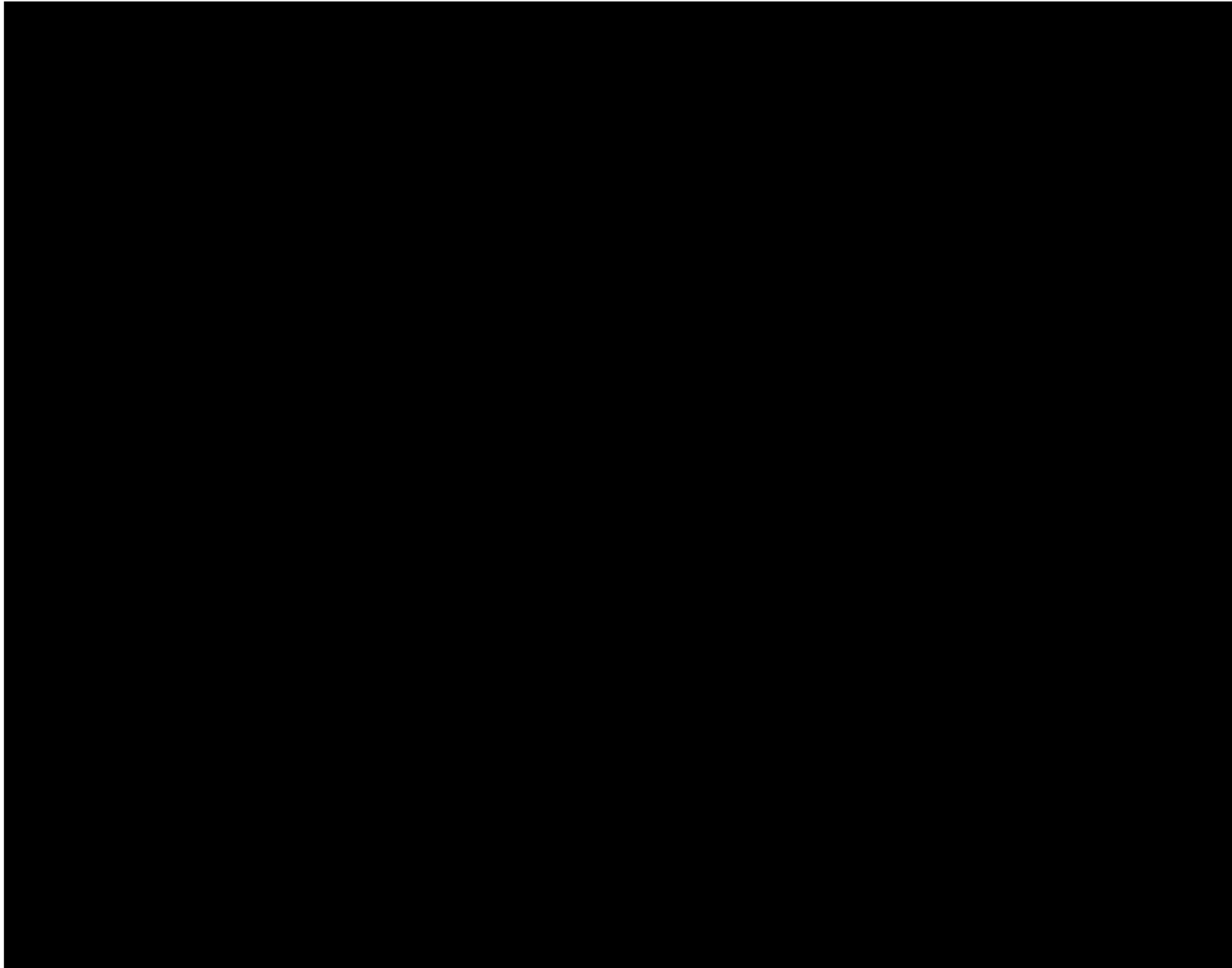
- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## **Monitoring Questions**

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.





# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

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### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |  |              |  |
|----------------------------|--|--------------|--|
| Title                      |  |              |  |
| First name                 |  |              |  |
| Last Name                  |  |              |  |
| Organisation (if relevant) | Access Self Storage and Buccleuch Property |              |  |
| Unit                       |  | House number |  |
| House name                 | C/O Agent                                  |              |  |
| Address 1                  |  |              |  |
| Address 2                  |  |              |  |
| Town                       |  |              |  |
| County                     |  |              |  |
| Postcode                   |  |              |  |
| Telephone                  |  |              |  |
| Email                      |  |              |  |

| 2. Agent's Name and Address (if applicable) |              |              |  |
|---|--------------|--------------|--|
| Title                                       |              |              |  |
| First name                                  |              |              |  |
| Last name                                   |              |              |  |
| Company                                     | Carter Jonas |              |  |
| Unit  |              | House number |  |
| House name                                  |              |              |  |
| Address 1                                   |              |              |  |
| Address 2                                   |              |              |  |
| Town  |              |              |  |
| County                                      |              |              |  |
| Postcode                                    |              |              |  |
| Telephone                                   |              |              |  |
| Email                                       |              |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   |
|-------------------------------------|-----------------------------------|
| <input type="checkbox"/>            | Development Management Policies   |
| <input checked="" type="checkbox"/> | Site Allocations and Designations |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|--|---|
| <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |            |
|-------------------------------|------------|
| Policy number;                | Policy SA5 |
| Paragraph number;             | N/A        |
| Table or figure number; or    | N/A        |
| Map number (Atlas of Changes) | N/A        |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |
|-------------------------------------|-------------------------------------|
| <input type="checkbox"/>            | It has not been positively prepared |
| <input checked="" type="checkbox"/> | It is not justified                 |

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

While we support the allocation of Site SA5, we propose the revisions included on the accompanying document.



Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

To provide further detail on the proposed site allocation.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

N/A

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                          |  |
|--------------------------|--|
| <input type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## London Borough of Hillingdon – Local Plan Part 2

### Site Allocations and Designations (Revised Proposed Submission Version, October 2015)

#### Policy SA5

##### Introduction

These representations are submitted on behalf of my clients – Access Self Storage and Buccleuch Property – in respect of Policy SA5 (Land to the South of the Railway, including the Nestle Site) in the draft Local Plan Part 2.

My clients are promoting this land for residential led mixed-use development and together with Network Rail – the owner of the remaining parcel of land within Policy SA5 and who will be submitting separate representations – a planning application for redevelopment of the site will be submitted in 2016.

These representations are consistent with and are based on previous representations that my clients have submitted.

For ease of reading, we deal with each point separately and in the same order that these are set out in the draft policy.

##### Comprehensive Development with Site B

While we support the separation of the site into three development parcels, the introductory text to the Policy references both a ‘comprehensive development scheme’ and a ‘sustainable masterplan’. Currently these references are ambiguous and unclear.

We understand that a comprehensive approach in some form is likely to be beneficial. However, we consider that there should be scope for the three sites to come forward independently to allow efficient delivery under changing circumstances.

Similarly, it is unclear what is meant by a “development of a sustainable masterplan”. Either the procedure or mechanism for this masterplan should be clarified or it should be deleted from the background text.

We therefore urge the Council to clearly define these terms or to clarify the policy background text on page 34 of the document.

##### Boundary of Policy SA5

The development opportunity should include the land immediately to the south of the station, which is owned by Network Rail and currently used as grade level car park. As a result, the area of site C would increase from 2.2ha to 2.6ha.

We attach a plan that indicates the extent of this land to be incorporated within Site C.

##### Employment Uses

The Policy and accompanying site information table should acknowledge the breakdown of uses on each site. The predominant employment generating land use of Site C is B8. Access Self Storage is a B8 use, while other uses include vehicle rentals (sui generis), the London Motor Museum (D1) and some workshop uses (B2). This breakdown emphasises

that the site has a mixed use with some uses that are not typically considered employment generating uses.

The above uses typically generate very large ratios of floorspace to employment. Re-provision of employment rather than floorspace or site areas is likely to allow for a more efficient use of space.

We consider that the proposed target stating that 50% of the site area should contain employment generating uses is too simplistic. Instead we suggest that the policy should seek the maximum amount/ or appropriate amount of employment having regard to location next to the station.

Notwithstanding the above view, we note that a figure of 20% is specified for Site A and we consider that if such a percentage must be specified, the more realistic value of 20% should apply to all elements of the wider allocation.

We also note that Access Self Storage is likely to re-provide premises on site as part of the redevelopment scheme.

As with Site A, any scheme should have small scale commercial uses to animate squares but it is agreed this should be limited in scale to protect Hayes town centre.

## Proposed Residential Use

In line with our previous comment on appropriate balance of land uses, we consider that the proposed number of units for Site C as included in Policy SA 5 and the accompanying site information table should be increased to substantially. Further feasibility work has been undertaken on the potential development scheme, which indicates that between 700 and 800 dwellings could be accommodated on site.

Site C is immediately adjacent to the site of the new Crossrail station and is in a prominent location on approach into the town. This highly sustainable and accessible location has the potential to deliver a much greater density than currently envisaged.

The provision of 110 dwellings on a 2.6ha site would equate to a density of 42 dwellings per hectare, which would not be appropriate for a urban site (where a mix of dwelling sizes are provided) with a PTAL of 4 to 6 according to the London Plan's Sustainable Residential Quality Matrix.

| Site                                | PTAL<br>(2011) | PTAL<br>(2031) | Dwellings  | Site Area<br>(hectares) | Density<br>(dph) | Site C Equivalent<br>Provision |
|-------------------------------------|----------------|----------------|------------|-------------------------|------------------|--------------------------------|
| Old Vinyl Factory                   | 1-3            | 2-4            | 510        | 2.69                    | 224              | 582                            |
| Station Goods Yard                  | 4-5            | 4-6a           | 471        | 2.20                    | 214              | 556                            |
| 20 Blythe Road                      | 5              | 5-6a           | 120        | 0.48                    | 250              | 650                            |
| <b>Site C (Proposed Allocation)</b> | <b>4-5</b>     | <b>4-6a</b>    | <b>110</b> | <b>2.60</b>             | <b>42</b>        | <b>110</b>                     |

The above three comparable sites have achieved the upper ranges of the London Plan sustainable densities for urban sites in PTAL 4 -6 areas. While we acknowledge the desire to

provide a mix of uses, these examples emphasise that Site C is suitably located to provide a residential density some 5 times greater than currently envisaged by the Council.

The adopted Local Plan Part 1 supports such an approach, stating that higher densities will be most appropriate in sustainable locations with high levels of public transport accessibility (paragraph 6.24), while Policy H1 of the document seeks to ensure that developments make the most efficient use of brownfield land.

These regional and local planning policy considerations, together with the contextual factors discussed above support the delivery of a higher residential density at Site C.

## Existing uses

The inclusion of the land adjacent to the railway, not only increases the area of the site by almost 20%, but also provides a portion of land that is currently under used and highly accessible due to its immediate proximity to the railway station and future Crossrail Station.

This would enable the location of land uses that are less noise sensitive, allowing a more efficient use of land adjacent to existing residential uses, together with improving accessibility to the station and connectivity across the wider site allocation.

## PTAL

The Site Information table states that the PTAL rating for Site C is 4. According to TFL's 2011 baseline data, the northern, central and western portions of Site C are in fact within the level 5 (Very Good) PTAL zone, with the southern and eastern corners of the site shown as level 4 (Good).

When Crossrail opens in 2017, there will be improvements to accessibility. These can be seen in TFL's PTAL projections to 2031, which show the station and a portion of the land adjacent to the railway as level 6a (Excellent), with the eastern and south western corners of Site C upgraded to 5 (Very Good), meaning that only the southern corner of the site would remain as level 4.

## Timetable for development

The Site Information table on page 36 of the document together with Table 3.3 on page 15, which schedules the Borough's proposed housing delivery, states that the development of Site C would be phased during 2021-2026.

As stated in previous representations and confirmed above, it is anticipated that a planning application for redevelopment of site C will come forward in 2016, meaning that delivery between 2016 and 2021 is considered more realistic.

The early delivery of Site C would bolster the Borough's 5 year housing land supply, particularly with the increased quantum of residential development promoted by this submission. This in turn would make a significant contribution to the regional housing target of 6,375 new dwellings over the plan period as set by the London Plan (2011), while providing local employment and broader economic benefits

Due to its prominent location, the site has the potential to act as an important catalyst to the regeneration of the wider site allocation.



## Other information

The delivery of Site C is not constrained by multiple land ownership as the landowners are working together and a planning application will be submitted in 2016.

In the introductory text to the policy, it states that the Council is “seeking to bring forward a comprehensive development scheme that includes the adjoining site (Site B)”. It goes on to state that the final quantum of uses and numbers will be determined through the development of a “sustainable masterplan”. Exactly how this will be delivered is not explained.

In respect of the component parts, the main elements to note are:

### **Site A:**

- *Up to 500 units*
- *Residential density higher than 80dph will be acceptable subject to good design*
- *Employment: 20% minimum should be used for employment generating uses (B1 and B2).*
- *10% of the site to be open space*
- *Education facilities (not specified)*
- *Community facilities*

### **Sites B and C):**

- *Site B to provide up to 97 units and Site C to provide 110 units (this is an increase from 171 in the draft)*
- *Proposals should take account of lower suburban densities to the south*
- *Each site should contain a minimum of 50% employment generating uses (B1 and suitable B2 light industrial).*

It goes on to state that:

**as a preference** (our emphasis), the three sites should form a comprehensive development scheme which:

- *Sustains and enhances the significance of the heritage assets;*
- *Provides pedestrian links to Hayes Town Centre and key transport nodes; and*
- *Reflects the Council’s latest evidence of housing need in terms of the type and tenure of residential units.*

As the gateway site within the wider allocation, Site C has the potential to drive the longterm regeneration of this quarter of the town and it is important that this is not constrained.

## Summary

In broad terms, we support the continued promotion of the wider allocation for high density residential-led development and the acknowledgement that higher density may be acceptable.

We summarise the key amendments to the policy that we seek as follows:

1. Network Rail's land should be included in the allocation.
2. The percentage of employment generating uses is too high at 50%. This figure should be removed and replaced with a qualitative target.
3. The indicative dwelling provision for Site C should be increased to reflect densities achieved at the surrounding sites and the London Plan's guidance.
4. No justification is provided for the reference to lower suburban densities just applying to Sites B and C, a consistent approach to density should be stated in the Policy.
5. No detail is provided on how a comprehensive development scheme is to be realised, this should be clarified.
6. No detail is provided on what is meant by a sustainable masterplan, this should be clarified.
7. No explanation is provided on why the development is assumed to be delayed to the period 2021-2026, this should be amended to 2016-2021.

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Planning Policy  
London Borough of Hillingdon  
3N/02 Civic Centre  
Uxbridge High Street  
London  
UB8 1UW

24552/A3/DO/RM

8 December 2015

**BY POST & EMAIL:** [localplan@hillingdon.gov.uk](mailto:localplan@hillingdon.gov.uk)

Dear Sir/Madam

**LB Hillingdon Local Plan Part 2 – Revised Proposed Submission Version  
Development Management Policies and Site Allocations and Designations  
Comments on Behalf of Barratt London and SEGRO PLC**

1. We write on behalf of SEGRO and Barratt London (BL), to provide comments on the current LB Hillingdon Local Plan Part 2 Development Management Policies and Site Allocations and Designations consultation.

**Background**

2. In 2012, Nestlé announced the planned closure of the Hayes plant and the transfer of the whole of its UK coffee operation, including manufacturing, filling and packing to Tutbury in Derbyshire, where a new manufacturing facility has been built to provide the flexibility in production that the UK requires.
3. SEGRO purchased the factory site from Nestlé earlier this year and it has since sought a development partner to deliver residential uses alongside its own commercial development as part of the redevelopment of the former Nestlé factory site. BL has been selected as development partner and is working with SEGRO to deliver a comprehensive site wide masterplan, which seeks to deliver new homes and employment for the Borough together with other benefits, including enhanced open space and respecting the history of the site.
4. Pre-application discussions have been held with LB Hillingdon over a number of months and the proposed masterplan for the site's redevelopment has been presented to officers. Detailed discussions have subsequently taken place on the emerging scheme, including on the quantum of development and proposed land uses. The scheme proposals have been well received by the Council and, based on discussions held to date, the proposed masterplan reflects the Council's aspirations for the site. It is intended that a planning application will be submitted in 2016.



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5. This site is complex because of its history, constraints, heritage, and opportunities. It is uncertain yet what the optimal approach for the redevelopment of the site might be as there are many different potential outcomes. In such circumstances, the objective of policy should, in our view, be to provide:
  - a. the LPA with a strong basis for determining planning applications and securing key objectives for the site the LPA desires and can justify;
  - b. clarity for applicants and third parties to understand what is required and how applications will be judged; and
  - c. all parties with sufficient flexibility to enable evolution of design to occur without policy stifling what might otherwise be considered good outcomes.
6. Our comments below are therefore made in the context of our emerging masterplan proposals to redevelop the entire former Nestlé factory site.

### **Site Allocation Policy SA5 – Land to the South of the Railway, Including Nestlé Site**

7. SEGRO and BL support the identification of land at Nestles Avenue for development in the Site Allocations and Designations Local Plan Part 2 (Revised Proposed Submission Version, October 2015) (Policy SA 5, "Site A") for mixed use residential and employment purposes.
8. The site is a key strategic site, which has been identified to be delivered to assist with the provision of new homes in the Borough. Site A can deliver the Council's aspirations in terms of mixed-use employment and residential uses and is in a more sustainable location compared to other sites given its close proximity to Hayes town centre and existing transport infrastructure. The aim of policy on a strategic site should be to optimise housing output in line with the London Plan and good design.
9. Whilst this is supported, SEGRO and BL are concerned about the way in which policy and supporting text is proposed to be worded, specifically the lack of preciseness and the lack of needed definitions to interpret the policy as intended. In identifying our areas of concern we also provide some suggested replacement text to address the concerns.

#### Extent of Site A

10. The proposed division between Site A and B is inaccurate. The Plan should reflect the land interest as per the plan enclosed with this letter.

#### Comprehensiveness

11. Whilst the desire to see sites A, B and C be brought forward together comprehensively is appreciated, the reality is that the sites are owned by different organisations and individuals. We are of the view that there is no overwhelming reason why an acceptable redevelopment cannot be achieved for the sites independently and on different timescales as this often happens with larger sites. Policy and development control decisions require back to back coordination, but this can be achieved. Approached carefully, the Council can ensure that the sites can be brought back into active and beneficial use as soon as possible. The policy should reflect practicalities whilst at the same time safeguarding key outcomes it would like to see that might cross over more than one site or landownership.
12. Whilst comprehensive redevelopment maybe be preferable for all of the allocated sites, it should not be a requirement of the land use policy as this could potentially delay any development, particularly as Site A will come forward in 2016, which is far sooner than the

timescales proposed in the accompanying Regulation 19 Statement, which states that it does not anticipate the site coming forward within the next five years.

#### Residential Capacity

13. The Policy, as currently worded, states that up to 500 new residential units should be provided on site. The present wording of the policy would mean that where a higher number is proposed it would be contrary to policy. The ultimate capacity of the site will be dependent on many factors, including the approach taken to the amount of employment land to be retained and the approach to retention of existing buildings and structures on site. Given the proximity of existing transport infrastructure, the opening of Crossrail (which will increase the PTAL rating of the site), the revised additional dwellings target the Further Alterations to the London Plan identifies for LB Hillingdon and the opportunity to maximise density through good design, we are of the view that the current identified residential capacity on site could be increased.
14. The evolving masterplan for the site indicates that significantly more than 500 dwellings can be developed in an acceptable manner – our architects have shown that around 1,200 dwellings can be accommodated and this number could be comfortably exceeded without detracting from the overall quality of the proposals. We consider it would be beneficial to the objective of seeing the site redeveloped for maximum community benefit to consider re-wording the policy to provide more flexibility.

#### Open Space and Sports Pitch

15. The draft policy makes reference to the requirement to provide a sports pitch. No definition of this is provided. In addition, there would not appear to be an evidenced need for the sports pitch requirement.
16. The existing site has a number of assets that could be enhanced for the benefit of the community that relate to open space use. These include the canal side areas and the existing main area of open space in front on the main entrance to the historic building. Rather than requiring a formal sport pitch provision, for which no evidence appears to be provided, we consider a more flexible approach would be beneficial. This could be to set out a required minimum amount of open space that the site must include, and the requirement to provide community wide access to the site. How the required open space is used can evolve from the masterplan design and community engagement and be secured via planning condition.

#### Education and Community Facilities

17. There is no requirement for a primary or secondary school on the site. This was confirmed by officers in a meeting with SEGRO/BL on 4 December 2015. The reference to education use should therefore be deleted.

#### Revision of Policy Wording

18. With the above comments in mind, SEGRO and BL propose that Policy SA5 Should be re-worded as follows:

#### ***"POLICY SA5 – Land to the South of the Railway, including Nestlé Site***

*This is an important strategic site for Hayes town and the Borough as a whole. The Council will support proposals that meet the following criteria.*

### Site A

1. *A heritage assessment should accompany any planning application to support the approach being proposed for the retention, reuse, or removal of Locally Listed structures on the site.*
2. *A minimum of 20% of the site (2.4ha) is to be used for employment generating uses. Suitable uses will include Class B1 and elements of Class B2 and other employment generating uses that are compatible with the residential element of the schemes and the surrounding existing residential area,*
3. *A minimum of 10% of the site should be retained as open space. The open space area providing the setting for the existing driveway leading off of Nestles Avenue to the existing main entrance to the main building, shall be retained and provided as informal public open space for the enjoyment of residents within and beyond the redevelopment.*
4. *The provision of circa 850 – 1,200 residential units, subject to meeting required policy on design and layout standards of buildings and open spaces, the approach taken to retention of existing buildings and structures, the amount of employment floorspace provided, and an acceptable approach on all other policy requirements. The ultimate number of dwellings acceptable on the site will principally be determined by the acceptance or otherwise of the detail of the scheme proposed.*
5. *Small scale retail (less than a total of 1,000 sqm GEA), small scale leisure, and other community uses, such as a nursery, that support the residential and business activities proposed for the site will be encouraged.*
6. *Proposals should include measures to enhance the Strategic Canal and River Corridors in accordance with relevant policies on the Blue Ribbon network.*
7. *Proposals should include high quality design that integrates the Grand Union Canal, ensures canal-side improvements and makes use of the canal's recreational potential.*

### Sites A, B and C

1. *Whilst it is a preference of the Council to see the sites A, B and C come forward together in a comprehensive manner and at the same time, it is acknowledged that the sites may be brought forward through the planning application system independently at the same or at different times. Whichever approach occurs, each application will be required to demonstrate how it achieves or does not frustrate the following principles:*
  - a. *Reflects and maintains the significance of the heritage of the overall site;*
  - b. *Provision of pedestrian links through the sites connecting to Hayes Town Centre and key transport nodes;*
  - c. *Does not unacceptably restrict the development potential of adjoining sites through the location and height of buildings or uses proposed; and*
  - d. *Suitably reflects the Council's latest evidence of housing need in terms of the type and tenure of residential units."*

## **Development Management Policies – Revised Proposed Submission Version, October 2015**

19. We have reviewed the draft policies in the Development Management Policies document. There are a number of matters that we wish to raise, relating to the following policies:

1. Policy DME1: Employment Uses in Designated Employment Sites;
2. Policy DMH2 Housing Mix;
3. Policy DMH7 Provision of Affordable Housing;
4. Policy DMHB3: Locally Listed Buildings;
5. Policy DMHB4: Conservation Areas;
6. Policy DMHB16: Housing Standards;
7. Policy DMHB17: Residential Density;
8. Policy DMHB18: Private Outdoor Amenity Space;
9. Policy DMEI8: Waterside Development;
10. Policy DMCI5: Children's Play Areas;
11. Policy DMT6: Vehicle Parking and Parking Standards set out in Appendix A.

### National Planning Policy Framework (March 2012)

20. Paragraph 182 of the National Planning Policy Framework March 2012 (NPPF) identifies the 'tests' for examining local plans. Paragraph 182 also identifies that the role of the independent inspector is to assess whether a plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound.

21. To be considered sound, the NPPF (para 182) states that a local plan should be:

- Positively prepared;
- Justified;
- Effective; and
- Consistent with National Policy.

22. Please find our comments set out below.

### Policy DME1: Employment Uses in Designated Employment Sites

23. Section D of the emerging policy states that other uses will be acceptable in LSIS and LSES only where:

- There is no realistic prospect of the land being used for industrial or warehousing purposes in the future;
- Sites have been vacant and consistently marketed for a period of 2 years; and
- The proposed alternative use does not conflict with the policies and objectives of this plan.

24. Paragraph 22 of the NPPF seeks to avoid the long-term protection of employment sites where there is no reasonable prospect of the site being used for that purpose. Paragraph 22 encourages local planning authorities to consider alternative uses of land or buildings on their merits having regard to market signals and the need for different land uses to support sustainable local communities. Having to market a vacant site consistently for a period of 2 years is excessive and contrary to the NPPF. The second bullet point relating to marketing should therefore be removed.



### Policy DMH2: Housing Mix

25. The emerging policy states that the Council will require the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need. The table in supporting paragraphs identifies the current housing types and sizes for different types of tenure. However, express reference should be made that the mix will be applied on a site by site basis and the character and nature of the site and scheme will be taken into account.

### Policy DMH7: Provision of Affordable Housing

26. We note the policy states a minimum of 35 percent of all new homes must be affordable with a tenure split of 70 percent social / affordable rent and 30 percent intermediate. The flexibility to adjust quantum and tenure to reflect site circumstances (site location and scheme characteristics as well as viability) is essential. Policy wording should be changed.

### Policy DMHB3: Locally Listed Buildings

27. The Policy states that extensions and alterations to locally listed buildings will be expected to preserve their local identify and character, and be of appropriate design, scale and materials.
28. In assessing the significance of various buildings consideration should be given to the measures contained within the NPPF – namely whether their loss would result in no harm, less than substantial harm or substantial harm (Section 12).
29. In determining planning applications, local planning authorities should take account of Paragraph 131 of the NPPF:
- "The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
  - The desirability of new development making a positive contribution to local character and distinctiveness."
30. There are provisions within the NPPF, Paragraph 133, which facilitate a total loss or substantial harm to a heritage asset, provided the requirements of that Paragraph are met and demonstrated in full:
- "Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
- The nature of the heritage asset prevents all reasonable uses of the site;
  - No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
  - Conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
  - The harm or loss is outweighed by the benefit of bringing the site back into use."

31. The policy should therefore reflect that a locally listed building can be demolished where tests set out in Paragraph 133 of the NPPF can be met.

#### Policy DMHB4: Conservation Areas

32. Emerging policy states that new development within a conservation area will be expected to preserve or enhance its significance by making a positive contribution to its character and appearance. As is the case for draft policy DMHB5, policy DMHB6 should reflect Paragraph 133 of the NPPF, as set out above, to provide more flexibility when considering comprehensive redevelopment, such as that proposed at the former Nestle site.

#### Policy DMHB16: Housing Standards

33. Table 5.1: Minimum floorspace standards sets out the Council's proposed housing standards. Having assessed these standards against the Mayoral Housing Supplementary Planning Guidance (SPG) (November 2012), we note that these accord. In addition, we note that all homes must meet 'Lifetime Homes Standards', provide at least 10 percent of new housing as accessible or easily adaptable for wheelchair users and support the 'Building for Life' design principles. These proposed standards also accord with the Mayoral Housing SPG (November 2012). This policy must be flexible to take into account changes in national standards.

#### Policy DMHB17: Residential Density

34. The NPPF highlights the importance of achieving high quality design and inclusive environments. Policy 3.4 and 3.5 of the London Plan seek residential densities that optimise the housing output of sites whilst ensuring that they are of the highest quality internally and externally.
35. It is important to note that residential density is a useful guide to the nature and intensity of a development but cannot be used as the only indicator of acceptability of proposals.
36. Whilst we note that LB Hillingdon seeks to categorise locations, the PTAL rating is key when establishing suitable densities in a location. PTAL provides flexibility and allows for future changes in local circumstances, i.e. Crossrail. The column referring to different locations should therefore be removed. Furthermore, there is no justification for a deviation from the London Plan density matrix (Table 3.2). Policy DMHB20 should therefore refer to the density matrix as set out in the London Plan.

#### Policy DMHB18: Private Outdoor Amenity Space

37. We note that proposed private outdoor amenity space standards are set out in Table 5.2: Private Outdoor Amenity Space Standards. In summary, emerging standards are as follows:
- 1 bedroom house: 40 sqm;
  - 2/ 3 bedroom house: 60 sqm;
  - 4+ bedroom house: 100 sqm;
  - Studio 1 bedroom flat: 20 sqm;
  - 2 bedroom flat: 25 sqm; and
  - 3+ bedrooms flat: 30 sqm.
38. The Mayoral Housing SPG (adopted November 2012) sets out the following planning policy in relation to amenity space provision:

"A minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant."

39. The proposed standards significantly exceed the Mayoral Housing SPG. The LB Hillingdon Open Space Strategy 2011-2026, which comprises part of the Local Plan evidence base, states that: "overall at a Borough wide level the amount of open space is about right" (section 3.2.1, page 18). Although some wards within Hillingdon have open space deficiencies, others do not.
40. Residential developments differ in terms of local circumstances and the character and nature of the site and scheme. To ensure housing sites can be "optimised" (London Plan Policy 3.4), whilst achieving high quality design, LB Hillingdon should seek to bring forward new developments in accordance with the Mayoral private outdoor amenity space standards as set out above.
41. Policy should be amended to reflect the London Plan. There are no LB Hillingdon special circumstances that warrant different standards.

#### Policy DMEI8: Waterside Development

42. We note that any development located in or adjacent to watercourses should enhance the waterside environment, by demonstrating a high quality design which respects the historic significance of the canal and character of the waterway, and provides access and improved amenity to the waterfront.

#### Policy DMCI5: Children's Play Areas

43. Emerging policies relating to children's playspace provision are repeated. Policy DMCI5 should be incorporated into policy DMHB21.
44. For all major development proposals, the Council seeks to apply its own child yields and the London Plan SPG entitled 'Providing for Children and Young People's Play and Informal Recreation'. In areas of deficiency, the policy states that there will be a requirement for new provision to be made to meet the benchmark standards for accessibility to play provision.
45. The Policy should be amended to make reference to London Plan child yield calculations. There is no justification for deviation. Any policy referring to children's playspace provision should adopt a flexible approach. Taking into consideration the nature of the site, it may be appropriate to provide playspace on site or make a financial contribution to existing facilities in the nearby area. New residential developments should meet the playspace requirements for the new development alone and not the existing deficit.

#### Policy DMT6: Vehicle Parking and Parking Standards

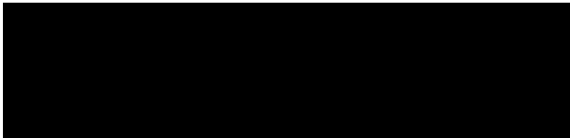
46. Parking standards as set out in Appendix A are:
  - B1(b) (c): 1 space per 250 sqm;
  - B2 –B8: 1 space per 500 sqm;
  - Dwellings with curtilage: 1 space per 1 or 2 bed units and 2 spaces per 3 or more bed units;
  - 3-4 or more bedroom flats: 2 spaces per unit;
  - 1-2 bedroom flats: 1.5-1 space per unit;
  - Studio: 1 space per 2 units.

47. These standards exceed those set out in the London Plan (2011). When applying car parking standards to a scheme, a range of matters should be considered including local circumstances and the character and nature of the site and scheme. Parking standards should reflect PTAL and be expressed as maximums.

## **Conclusion**

48. We wish to reserve BL and SEGRO's right to attend the Examination in Public on the Local Plan Part 2 to further represent their comments. We trust the above is helpful and will be taken into account. We would be happy to discuss further, should this be required.

Yours faithfully

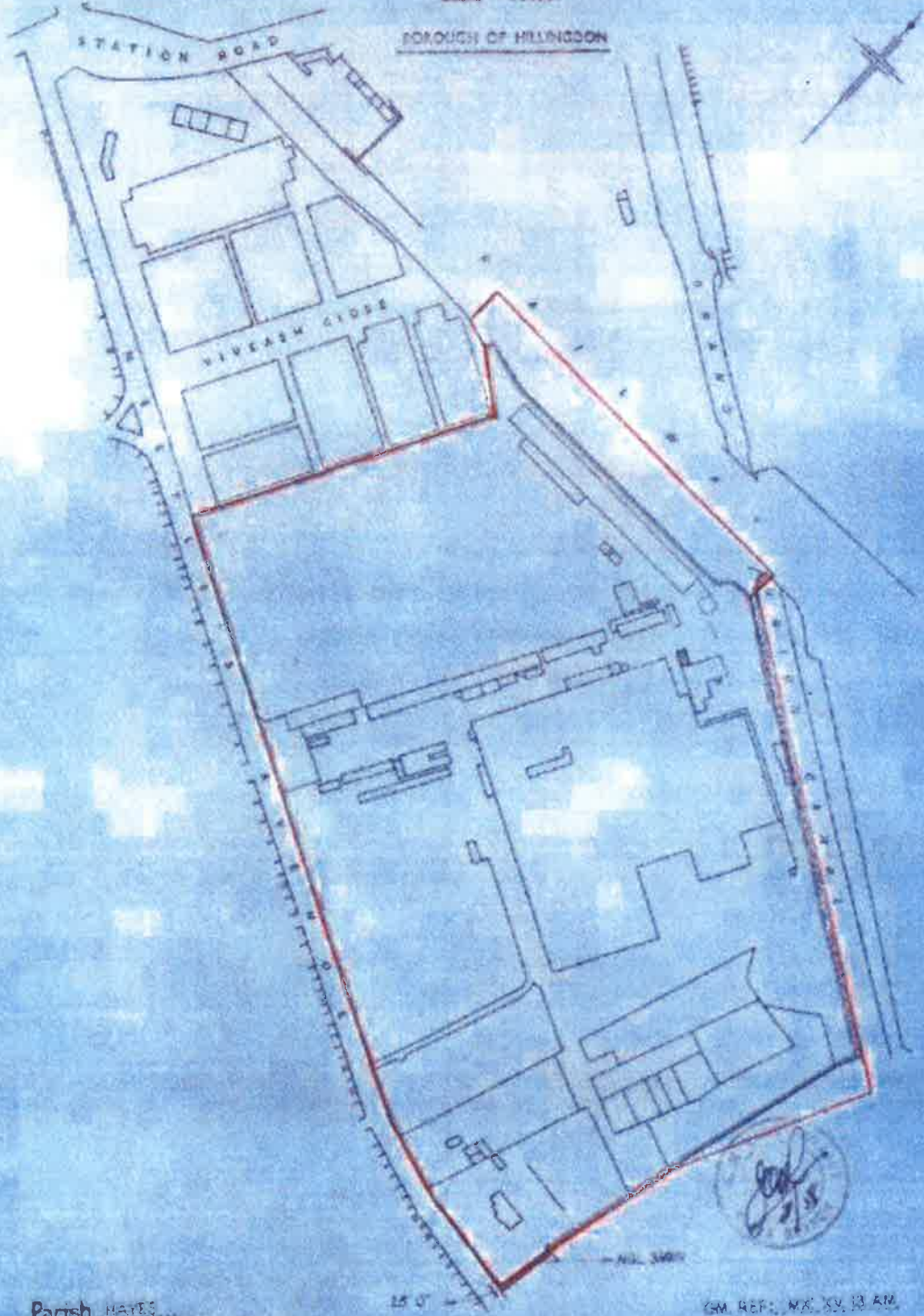


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**PLAN 1**





# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |                          |              |  |
|----------------------------|--------------------------|--------------|--|
| Title                      |                          |              |  |
| First name                 | C/O AGENT                |              |  |
| Last Name                  |                          |              |  |
| Organisation (if relevant) | IMPERIAL COLLEGE LONDON. |              |  |
| Unit                       |                          | House number |  |
| House name                 |                          |              |  |
| Address 1                  |                          |              |  |
| Address 2                  |                          |              |  |
| Town                       |                          |              |  |
| County                     |                          |              |  |
| Postcode                   |                          |              |  |
| Telephone                  |                          |              |  |
| Email                      |                          |              |  |

| 2. Agent's Name and Address (if applicable) |                 |
|---|-----------------|
| Title                                       | MISS            |
| First name                                  | EMMA-LISA       |
| Last name                                   | SHIELLS         |
| Company                                     | BARTON WILLMORE |
| Unit  |                 |
| House name                                  |                 |
| Address 1                                   |                 |
| Address 2                                   |                 |
| Town  |                 |
| County                                      |                 |
| Postcode                                    |                 |
| Telephone                                   |                 |
| Email                                       |                 |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   |
|-------------------------------------|-----------------------------------|
| <input type="checkbox"/>            | Development Management Policies   |
| <input type="checkbox"/>            | Site Allocations and Designations |
| <input checked="" type="checkbox"/> | Policies Map (Atlas of Changes)   |

| Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|--|---|
| <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                               |
|-------------------------------|-------------------------------|
| Policy number;                | See attached Representations. |
| Paragraph number;             | See attached Representations. |
| Table or figure number; or    | See attached Representations. |
| Map number (Atlas of Changes) | See attached Representations. |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |
|--------------------------|-------------------------------------|
| <input type="checkbox"/> | It has not been positively prepared |
| <input type="checkbox"/> | It is not justified                 |

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not consistent with national policy |



**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

See attached Representations.

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

See attached Representations.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

See attached Representations.

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                          |  |
|--------------------------|--|
| <input type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

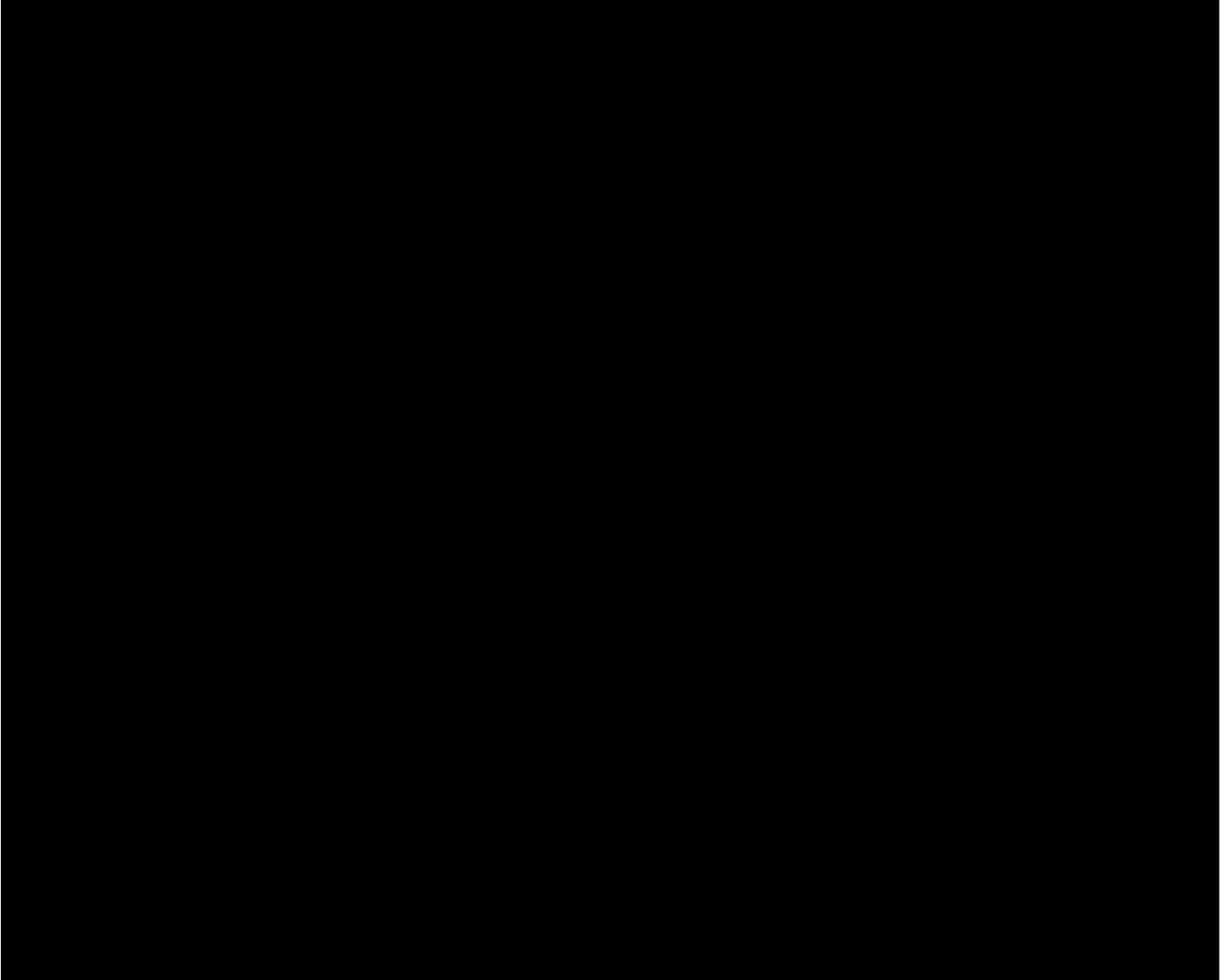
- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## **Monitoring Questions**

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.



**LOCAL PLAN: PART 2 REVISED PROPOSED SUBMISSION VERSION, OCTOBER 2015**  
**REPRESENTATION BY IMPERIAL COLLEGE LONDON**

**Introduction**

1. We act on behalf of Imperial College London (“ICL”) and have been instructed to submit the following representation to the Hillingdon Local Plan Part 2 (October 2015).
2. ICL is the landowner of Imperial College Sports Ground located at land at Sipson Lane, which is currently occupied by Queens Park Rangers Football Club (QPR). As such, ICL is well placed to comment on the Local Plan: Part 2 and specifically the emerging Policies Map designations.
3. The Site extends to approximately 22.37ha and is illustrated on the attached Site Location Plan. The Site comprises mainly sports pitches, however, there is hardstanding on the Site which comprises car parking for the sports grounds and also a two storey club house building and also storage facilities. The Site is surrounded by a mix of uses, including a primary school, residential settlements to the east and west, Little Harlington Playing Fields and gravel works to the west and north west.

**Representation**

***Composite Policies Map (South Sheet)***

4. The Site falls within the Green Belt on the emerging Policies Map, this is a historic allocation that has been carried forward from the adopted Unitary Development Plan Policies Map.
5. ICL objects to the designation of the Site and requests that it is deleted from the Green Belt. Removal of the Site from the Green Belt is considered to be acceptable as it is bounded by the settlements of Sipson and Harmondsworth (to the west) and Harlington (to the east) and the M4 to the north, as such the area around the Site comprises built development and the removal of the Green Belt designation is considered to be entirely acceptable as the Site does not serve the purpose of the Green Belt in terms of the NPPF (Paragraph 80), in that it does not:
  - Check the unrestricted sprawl of large built-up areas;
  - Prevent neighbouring towns merging into one another;
  - Assist in safeguarding the countryside from encroachment;
  - Preserve the setting and special character of historic towns; nor
  - Assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
6. The removal of the designation will not result in the sprawl of a large built up area, given that the Site only comprises approximately 22.37ha and there is a much wider Green Belt designation which would remain in situ. Therefore, there would remain sufficient Green Belt land in between the two settlements which would prevent the coalescence of Sipson and Harmondsworth and Harlington.



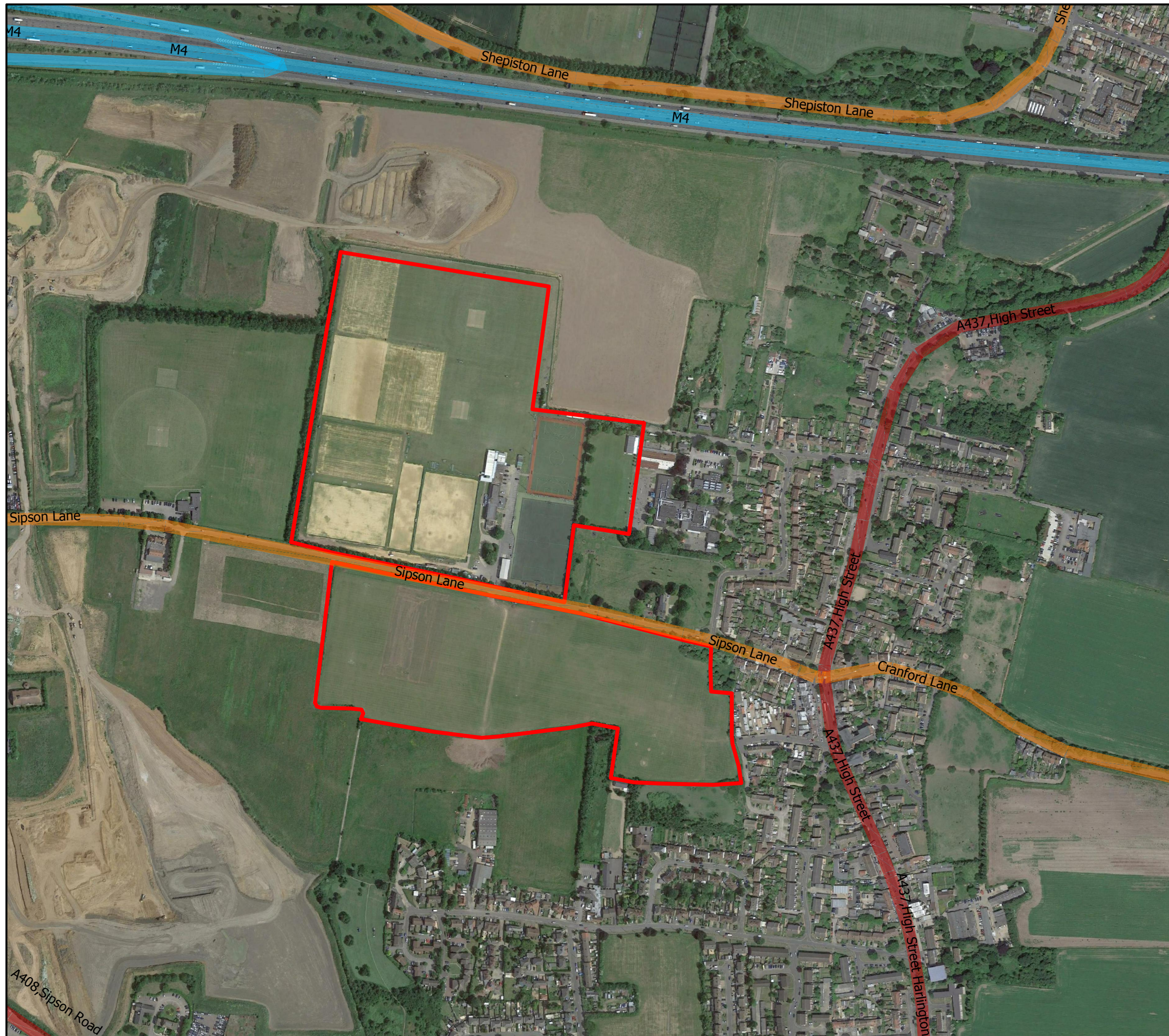
7. Given the proximity of the Site to Heathrow, the settlements of Harlington and Sipson and Harmondsworth and the built up nature of the wider area, the Site is not considered to be within a wider area of countryside that the removal of this Site from the Green Belt will encroach upon.
8. Harlington to the east of the Site is within an emerging Conservation Area designation, however, this is located beyond the primary school, focussed around the area of High Street and as such this purpose does not apply to this part of the Green Belt, as it itself is not within a designated Conservation Area. There is therefore no reason to retain this Site within the Green Belt for historic character reasons.
9. The land should be considered as urban land due to its proximity to the adjacent settlements, with particular reference to Harlington situated immediately to the east of the Site. The position of the Site adjacent to the existing urban settlement and the presence of hard standing and buildings means it has greater urban appearance and function.
10. In addition to the above, following a review of Hillingdon Landscape Character Assessment (May 2012), the Site falls within Character Area K2 – Harlington Open Gravel Terrace. K2 is not specifically recognised for its landscape value. Within the key characteristics of the Character Area it is stated that 'modern edge settlement surrounds the character area, although there is limited settlement within the character area itself. Heathrow Airport and associated infrastructure feature predominantly along the southern boundary'. This supports our comments in Paragraph 7.
11. With consideration of the above, it is considered reasonable that the Site is removed from the Green Belt designation and the boundary redefined to exclude it as it does not serve any purpose of the Green Belt as demonstrated above. This will ensure consistency with the London Plan and the National Planning Policy Framework in terms of the reasons for designating land within the Green Belt.

### **Next Steps**

12. We trust the above will assist in the formulation of the Local Plan: Part 2 and request that the Site is removed from the Green Belt within the Policies Map. In the meantime, we would be happy to discuss these representations in more detail with your Officers.
13. Please confirm receipt of these representations and keep us informed of the progress of the Local Plan Part 2. If you have any queries or require any further information please do not hesitate to contact Emma-Lisa Shiells or Mark Harris at this office.

**BARTON WILLMORE LLP, 8<sup>th</sup> December 2015**

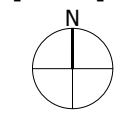




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 Revision \_\_\_\_\_ Date \_\_\_\_\_ Drn \_\_\_\_\_ Ckd \_\_\_\_\_

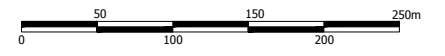
**LEGEND**

 Site Boundary



Project  
**Land at Sipson Lane,  
 Harlington**  
 Drawing Title  
**Site Location Plan**

|            |             |          |          |
|------------|-------------|----------|----------|
| Date       | Scale       | Drawn by | Check by |
| 08.12.2015 | 1:5,000 @A3 | ML       | E-LS     |
| Project No | Drawing No  | Revision |          |
| 25677      | R001        | -        |          |



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# HILLINGDON

LONDON

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| 1. Name and Address        |                |              |  |
|----------------------------|----------------|--------------|--|
| Title                      |                |              |  |
| First name                 |                |              |  |
| Last Name                  |                |              |  |
| Organisation (if relevant) | Barratt London |              |  |
| Unit                       |                | House number |  |
| House name                 |                |              |  |
| Address 1                  |                |              |  |
| Address 2                  |                |              |  |
| Town                       |                |              |  |
| County                     |                |              |  |
| Postcode                   |                |              |  |
| Telephone                  |                |              |  |
| Email                      |                |              |  |

| 2. Agent's Name and Address (if applicable) |                         |              |  |
|---|-------------------------|--------------|--|
| Title                                       |                         |              |  |
| First name                                  |                         |              |  |
| Last name                                   |                         |              |  |
| Company                                     | Winckworth Sherwood LLP |              |  |
| Unit  |                         | House number |  |
| House name                                  |                         |              |  |
| Address 1                                   |                         |              |  |
| Address 2                                   |                         |              |  |
| Town  |                         |              |  |
| County                                      |                         |              |  |
| Postcode                                    |                         |              |  |
| Telephone                                   |                         |              |  |
| Email                                       |                         |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1.** I am commenting on proposed changes to: *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2.** Please indicate the Proposed Change on which you wish to comment:

|                               |     |
|-------------------------------|-----|
| Policy number;                | SA5 |
| Paragraph number;             |     |
| Table or figure number; or    |     |
| Map number (Atlas of Changes) |     |

**Q3.** Do you consider that as a result of the proposed changes, the Local Plan Part 2 is *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**Q4.** If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/>            | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

Please see the attached letter.

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

Please see the attached letter.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

N/A

Please continue on a separate sheet if necessary



## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
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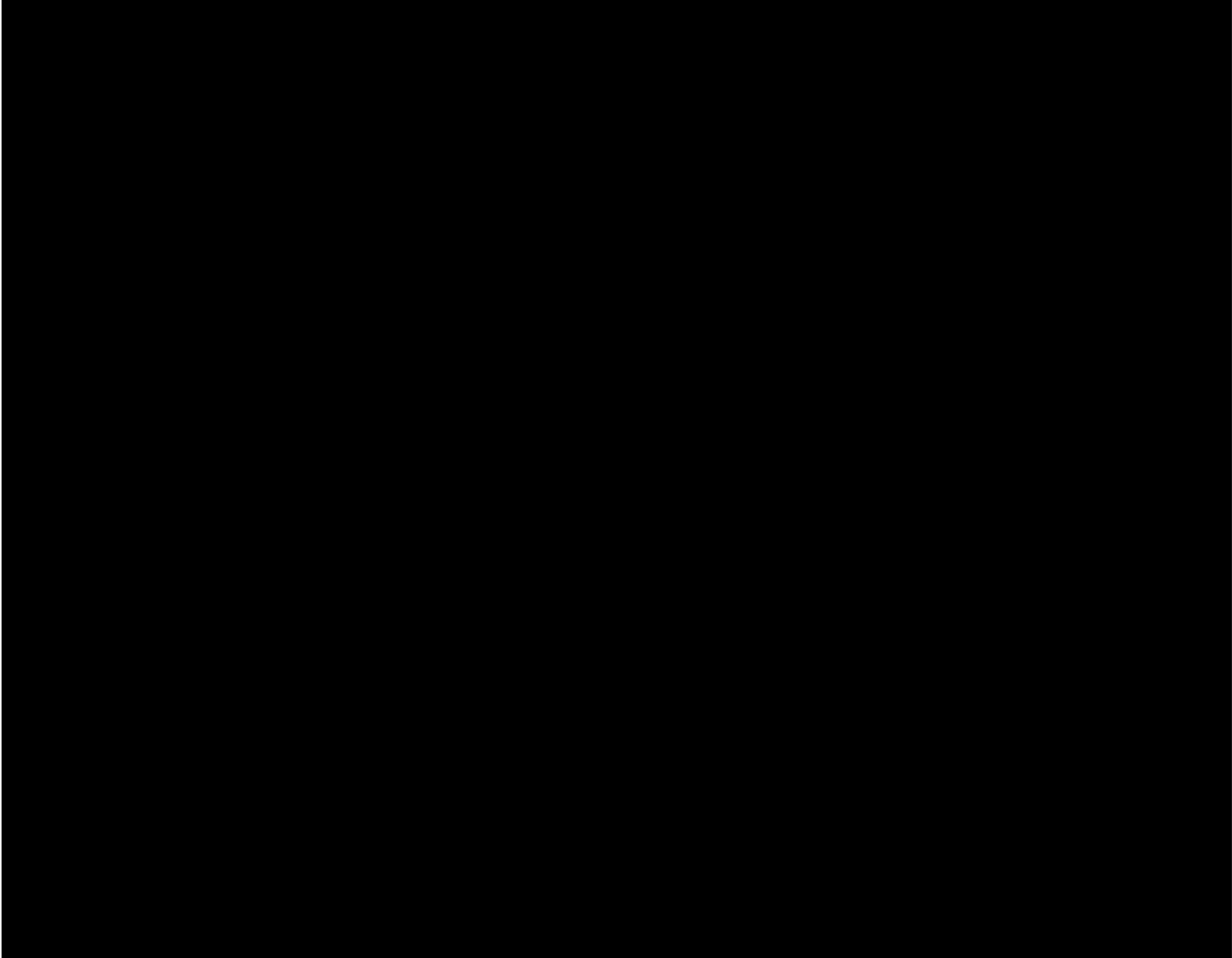
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**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## Monitoring Questions

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Planning Policy  
London Borough of Hillingdon  
Civic Centre  
Uxbridge High Street  
London  
UB8 1UW

Solicitors and  
Parliamentary Agents

Minerva House  
5 Montague Close  
London  
SE1 9BB  
DX: 156810 London Bridge 6

Switchboard 020 7593 5000  
Direct Line 020 7593 5073  
www.wslaw.co.uk

By post and email: [localplan@hillingdon.gov.uk](mailto:localplan@hillingdon.gov.uk)

Our Ref: LG/22646/1214

8 December 2015

Dear Sirs

**LB Hillingdon Local Plan Part 2 – Revised Proposed Submission Version  
Site Allocations and Designations  
Comments on Behalf of Barratt London**

We act for Barratt London (**BL**) trading as BDW Trading Limited in connection with the former Nestle factory site, Hayes within the London Borough of Hillingdon (**the Site**).

BL has been selected as the residential development partner to deliver much needed new homes on the Site and is actively working with the owners, SEGRO (the purchaser of the Site) to formulate and deliver a comprehensive site wide masterplan for the provision of, amongst other things:-

- new market and affordable homes;
- employment opportunities;
- enhanced open space.

This letter sets out BL's comments and concerns regarding the emerging policy for the Site as contained within the draft LB Hillingdon Local Plan Part 2 Site Allocations and Designations consultation.

This letter should be read in conjunction with separate joint representations submitted by Barton Willmore Planning Partnership (**BWPP**) on behalf of BL and SEGRO made in respect of the Site Allocations and Designations and Development Management Policies consultation.

The purpose of this letter, however, is to advise the London Borough of Hillingdon (**the Council**) of BL's very significant and enviable track record of delivery of much needed new homes within the Capital and its intentions in relation to this Site in the context of emerging policy.

As the BWPP letter makes clear it is intended that a planning application will be submitted for the redevelopment of the Site sometime in 2016. Extensive pre-application discussions have

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already begun with the Council on the redevelopment opportunities of this strategic site to ensure that the Site delivers the optimum output in terms of housing whilst ensuring good quality design. This is in accordance with both National Government (paragraph 47 of the NPPF) and strategic London policies (paragraph 3.4 of the London Plan).

Whilst there are a number of issues which need to be worked through and understood in relation to the Site (relating to its history, constraints, heritage, and opportunities) it is considered that the policy for the Site should provide sufficient flexibility to ensure:-

- a strong basis for determining planning applications and securing key objectives for the Site that the Council desires and can justify;
- clarity for applicants and third parties to understand what is required and how applications will be judged;
- all parties have sufficient flexibility to enable evolution of design to occur without policy stifling what might otherwise be considered good outcomes; and
- the optimisation of housing output for the Site whilst ensuring good design

The comments below are therefore made in the context of the emerging masterplan proposals to redevelop the Site which are based on current and emerging national, regional and local planning policy.

## **1. BL's Track record of delivery**

- 1.1 Part of the Barratt Developments PLC group of companies, BL established as a separate brand in January 2014. The new brand reflects BL's dedication to the London market and demonstrates that it is a London specialist, focused on making London an even better place to live.
- 1.2 BL designs, builds and sells large, complex residential-led developments tailored to the needs of its customers and stakeholders, as well as local boroughs and communities. Its vision is to make London an even better place to live by providing exceptional build quality, thoughtful design, and works to inspire strong local communities and unbeatable customer service.
- 1.3 The BL portfolio seeks to provide homes for all Londoners, from modern state-of-the-art apartments and penthouses in Westminster to riverside communities in Fulham, and complex, mixed-use regeneration schemes such as that proposed here. Working with respected planners and designers, BL has accrued invaluable experience in realising high-quality homes within an architecturally challenging but exciting city.
- 1.4 Barratt Developments PLC sold 14,000 homes and BL sold 1,655 homes in London in the year to June 2014, making it the biggest housebuilder by volume in Britain. BL has built over 30,000 homes for Londoners in the past 30 years and it has the capacity to, and delivers over 2,000 completed homes a year.
- 1.5 On this basis the Council can be assured of BL's track record of delivery of new homes and its commitment to building and providing new private and affordable homes to those people wishing to live in the Hillingdon area as soon as reasonably practicable.
- 1.6 We note that from previous consultation (see the Regulation 19 responses prepared by the Council) that there was a reference to Part A of the Aite allocated in policy SA 5 that it would not come forward for delivery within the next 5 years. We can confirm that as the selected residential developer and on the basis that BL's development partner has

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been in consultation with the Council for some time on the development of a masterplan for the Site that BL is committed to delivering a planning application in 2016.

**2. Site Allocation Policy SA5 – Land to the South of the Railway, Including Nestlé Site**

- 2.1 BL supports the identification of land at Nestles Avenue for development on the Site in the Allocations and Designations Local Plan Part 2 (Revised Proposed Submission Version, October 2015) (Policy SA 5, "Site A") for mixed use residential and employment purposes.
- 2.2 The Site is a key strategic site, which has been identified to be delivered to assist with the provision of new homes in the Borough. Site A can deliver the Council's aspirations in terms of mixed-use employment and residential uses and is in a more sustainable location compared to other sites given its close proximity to Hayes town centre and existing transport infrastructure.
- 2.3 Whilst this is supported, BL is concerned about the way in which policy and supporting text is proposed to be worded in particular the use of a maximum number of residential units on the Site.
- 2.4 London is a dynamic City but in order to continue to grow and attract investment it must provide the necessary housing for that growth in the economy. The Council has identified the Site as a strategic site and BL consider that in order to deliver its housing numbers going forward it should seek to optimise the housing output on strategic sites and should not look to restrict housing numbers on such sites. To do so not only constrains the Council going forward in a changing environment in terms of density, design and transport but it is also a lost opportunity to deliver much needed housing including affordable housing in the Borough
- 2.5 This approach is line with the recent consultation by the Government on the NPPF published this month. This consultation highlights the need for optimising housing numbers by allowing greater density on sites close to transport hubs. This is exactly the type of site that needs to deliver optimum housing numbers. The Council still controls the numbers on the Site by way of good design. If good design can deliver those policy aspirations then this should be tested in the masterplan and the planning applications for the Site and not by imposing an arbitrary maximum number of residential units on this strategic site. BL contend that there is no land planning justification for this restriction and it could stymie the most appropriate design solution.

Extent of Site A

- 2.6 We note points made by BWPP in its representations made regarding site boundaries and we agree that the plan supporting policy SA5 should be accurate.

Comprehensiveness

- 2.7 Whilst the desire to see sites A, B and C brought forward together comprehensively is appreciated, the reality is that the sites are owned by different organisations and individuals. BL is of the view that there is no overwhelming reason why an acceptable redevelopment cannot be achieved for the sites independently and on different timescales as this often happens with larger sites. Policy and development control decisions require back to back coordination, but this can be achieved. Approached carefully, the Council can ensure that the sites can be brought back into active and beneficial use as soon as possible. The policy should reflect practicalities whilst at the same time safeguarding key outcomes it would like to see that might cross over more than one site or landownership.

- 
- 2.8 Whilst comprehensive redevelopment maybe be preferable for all of the allocated sites, it should not be a requirement of the land use policy as this could potentially delay any development, particularly as Site A will come forward in 2016, which is far sooner than the timescales proposed in the accompanying Regulation 19 Statement, which states that it does not anticipate the site coming forward within the next five years.
- 2.9 The key for BL is that the Council's aspiration to bring forward a comprehensive masterplan for all of SA5 should not stymie or prevent the delivery of Site A. We note that the Council accepts that whilst this is a policy aspiration the disparate planning ownerships in particular in relation to plots B and C will cause problems in terms of one overall development of the Site.
- 2.10 The policy should therefore not provide that site A, B and C should be delivered together. The policy should seek to deliver the land uses on the those sites and ensure that the development of each site does not prevent the other sites coming forward in terms of design, legibility and connectivity. That said the supporting text can reference the Council's desire to see all three sites come forward within the plan period

#### Residential Capacity

- 2.11 The Policy, as currently worded, states that up to 500 new residential units should be provided on the Site. The present wording of the policy would mean that where a higher number is proposed it would be contrary to policy. We reiterate our points at paragraph 2.4 and 2.5 above in relation to a restriction on housing numbers. As you will be aware, the ultimate capacity for the Site will be dependent on many factors, including the approach taken to the amount of employment land to be retained and the approach to retention of existing buildings and structures on the Site. Given the proximity of existing transport infrastructure, the opening of Crossrail (which will increase the PTAL rating of the Site), the revised additional dwellings target the Further Alterations to the London Plan identifies for LB Hillingdon and the opportunity to maximise density through good design, we are of the view that the current identified residential capacity on Site should be increased.
- 2.12 The evolving masterplan for the Site which the Council has been consulting on demonstrates that considerably more than 500 residential units can be delivered in an acceptable manner (the current masterplan being discussed with Council demonstrates that with the right design the Site could deliver between 1000- 1200 residential units on the Site). BL understand from pre application discussions with the Council that the Council has not at any point rejected this approach. BL consider it would be beneficial to the objective of seeing the Site redeveloped for maximum community benefit to consider re-wording the policy to provide more flexibility to the Council going forward. There is no land use or planning justification for this maximum number. BL consider that the maximum number of units on the Site should be led by good design. If BL can deliver a high quality design in line with the proposed masterplan then this approach should not be restricted by the policy. Indeed the policy should seek to support this approach.

#### Affordable Housing Tenure

- 2.13 We support the representations made by BWPP for the Site. In particular, the need for the Council to allow for flexibility in delivering affordable housing products and the changing nature of housing tenures and affordable housing in London. We refer the Council to the recent consultation on the definition of Affordable Housing in the NPPF (7 December 2015). This consultation is looking to include products such as starter homes within that definition again to allow Councils flexibility. Whilst BL acknowledge that the Council will consider its housing needs in the Borough in this context BL would ask that sufficient flexibility is included in any draft so that developments are not stymied in any



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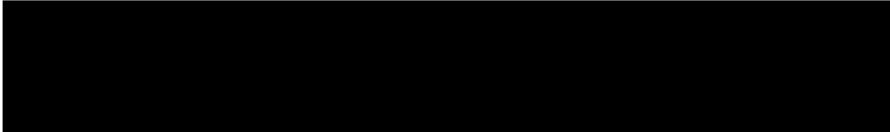
way because of lack of flexibility. The housing market, including affordable housing, is changing and the key is to ensure flexibility to allow development to come forward

**3. Conclusion**

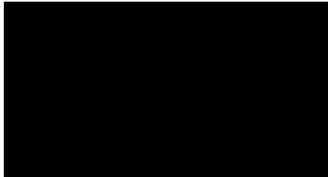
We wish to reserve BL's right to attend the Examination in Public on the Local Plan Part 2 Site Allocations policy for the Site. We trust the above comments are helpful and will be taken into account.

We would be happy to discuss further, should this be helpful.

Yours faithfully

A large black rectangular redaction box covering the signature area.

**Winckworth Sherwood LLP**

A black rectangular redaction box covering contact information.



# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

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| 1. Name and Address        |       |
|----------------------------|-------|
| Title                      | Mr    |
| First name                 | Robin |
| Last Name                  | Brown |
| Organisation (if relevant) |       |
| Unit                       |       |
| House name                 |       |
| Address 1                  |       |
| Address 2                  |       |
| Town                       |       |
| County                     |       |
| Postcode                   |       |
| Telephone                  |       |
| Email                      |       |

| 2. Agent's Name and Address (if applicable) |              |  |
|---|--------------|--|
| Title                                       |              |  |
| First name                                  |              |  |
| Last name                                   |              |  |
| Company                                     |              |  |
| Unit  | House number |  |
| House name                                  |              |  |
| Address 1                                   |              |  |
| Address 2                                   |              |  |
| Town  |              |  |
| County                                      |              |  |
| Postcode                                    |              |  |
| Telephone                                   |              |  |
| Email                                       |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2 |                                   |
|-------------------|-----------------------------------|
| √<br>ticked       | Development Management Policies   |
| √<br>ticked       | Site Allocations and Designations |
| √<br>ticked       | Policies Map (Atlas of Changes)   |

| Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|--|---|
| <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                                      |
|-------------------------------|--------------------------------------|
| Policy number;                | Identified throughout representation |
| Paragraph number;             | “ “ “                                |
| Table or figure number; or    | “ “ “                                |
| Map number (Atlas of Changes) | “ “ “                                |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No           |
|---|--------------------------|--------------|
| Sound?  | <input type="checkbox"/> | √<br>Tick ed |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | √<br>Tick ed |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|             |                                     |
|-------------|-------------------------------------|
| √<br>ticked | It has not been positively prepared |
| √<br>ticked | It is not justified                 |

|             |   |
|-------------|---|
| √<br>ticked | It is not effective                       |
| √<br>ticked | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

**Development Management 2 The Economy para2.10:** proposed deletion of the first principle to retain employment uses on non-designated sites... would be contrary to the fulfilment of local Plan Part 1's Strategic Objective SO15 (to protect land for employment to meet the needs of different sectors of the economy). This inconsistency would reduce the effectiveness of the Plan and would not support existing business sectors (NPPF para 21). Amendment required: reinstate original para 2.10.

**Development Management 3 Town Centres Policy DMTC 4B:** proposed deletion of resisting various uses in proximity to schools or sensitive community uses would not accord with NPPF's Core Principle promoting healthy communities. Text supporting London Plan Policy 4.8 notes that over concentrations of betting shops and hot food take aways can give rise to particular concerns. Amendment required: reinstate.

**Development Management 5 Historic and the Built Environment: Policy DMHB 4 Conservation Areas:** this proposed policy does not apply para 5.15's requirement for Heritage Statements to support planning applications in Conservation Areas and, therefore, this policy is not effective in this respect and does not fulfil NPPF para 128. Amendment required: add to C requirement for Heritage Statement.

**Policy DMBH 10 High Buildings and Structures:** proposed deletion of original clause ix) (not to adversely impact on biodiversity...) would not adequately ensure that the planning system contributes to and enhances the natural and local environment (NPPF para 109) and would be contrary to the Council's biodiversity statutory duty S40 of the NE&RC Act 2006. Watercourses and water bodies are not referred to in Policy DMHB 11 Design of New Development. Amendment required: reinstate.

**Development Management: Environmental Protection and Enhancement: para 6:** new wording omits reference to (living) walls as well as living roofs so as to follow on from para 6.5 and to serve as a preamble to Policy DME 1 Living Walls and Roofs and on-site Vegetation. To ensure consistency, clarity and effectiveness. Amendment required: add phrase "and walls" to para 6.6.

**Development Management: Environmental Protection and Enhancement: Policy DM 1 Living Walls and Roofs and on-site Vegetation:** proposed deletion of Sustainable design Standards would not fulfil Local Plan Part 1 Policy BE1 Built Environment clause 10 and the promise of a suite of sustainable design goals. This inconsistency would reduce the effectiveness of the Plan and would not support the move to a low carbon future (NPPF 95) and sustainable development generally. It is accepted that identification of specific standards or assessment codes is too prescriptive. Amendment required: reinstate Sustainable Design Standards to policy title and reinstate

generalised requirement for sustainable design and construction.

**Development Management: Environmental Protection and Enhancement: Policy DMEI 5: Development in Green Chains: new B** not clear as criteria in opening sentence of A relate to development in Green Chains and not to development in areas deficient in Green Chains. Therefore, this is not effective. However, what is likely to be intended from para 6.23 is supported by this representation.  
Amendment required: reword B.

**Development Management: Environmental Protection and Enhancement: Biodiversity Protection and Enhancement: para 6.27:** proposed change to 'aspire to include enhancement measures' would not comply with NPPF para 109 and the Council's statutory duty on biodiversity (see above).  
Amendment required: delete proposed these wording changes to para 6.27.

**Development Management: Environmental Protection and Enhancement: Policy DMEI 10 Water Management, Efficiency and Quality:** the proposed deletion of original Policy DME 12 Water Quality has not been remedied by Policy DMEI 10 addressing Water Quality. Local Plan Part 1 through Policy EM8 Land Water Air & Noise seeks to safeguard and improve water quality and its para 8.128 clearly sets out planning requirements to control development which ought to be expressed in policy in order to be effective and comply with NPPF para 109.  
Amendment required: convert Local Plan Part 1 para 8.128 into policy.

**Development Management: Environmental Protection and Enhancement: Policy MIN 4: Re-use and Recycling of Aggregates: B:** "Planning permission for aggregate recycling on minerals extraction sites and existing landfill sites will be granted" predetermines the planning process and is inconsistent with para 6.67 which explains that flat topography and lack of natural screening makes workings highly intrusive and severely intrusive. This also applies to works and structures. As the sites are in the Green belt this presumption in favour of permission would be contrary to national policy as the very special circumstances have not been set out.  
Amendment required; delete first sentence of B.

**Development Management: Community Infrastructure: Education and Community Uses: paras 7.12 & 7.13:** these set out requirements (needs) part only of which have been objectively assessed. This does not meet the objectively assessed requirements of the positive preparation of a sound plan as required by the tests of soundness (NPPF para 182).  
Amendment required : objectively assess requirements (needs) and set out how they would be met in order to achieve sustainable development.

**Development Management: Community Infrastructure: Items to be funded by CIL/S106: para 7.42:** proposed deletion diminishes clarity and intent from the Plan reducing its effectiveness and does not address the 'meaningful proportion of CIL' that national regulations require for the local community.  
Amendment required: reinstate appropriately reworded para 7.42.

**Development Management: 8 Transport and Aviation: Policy DMAV 1 Safe Operation of Airports:** Proposed deletion of last clause that developments should not deleteriously impact on safe movement of aircraft would run counter to the proper planning of the borough.  
Amendment required: reinstate.

**Site Allocations and Designations: Green Belt Deletions: Longford Green and Lake Farm School, Hayes:** These sites still perform the Green Belt functions and

should be retained to comply with national policy.

**Site Allocations and Designations: New Homes: Policy SA 5: Nestles:** quantum of development set out in this policy would preempt proper planning determination of this important site which lies within a Conservation Area.

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>No, I do not want to participate in the oral examination</b> |
| <input checked="" type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

I would like to take part in the debate and respond to the representations and proposed changes of other participants;  
the opportunity to explain clearly the changes I am seeking and provide up to date information;  
to respond to new evidence produced by the Council and other participants; and  
to respond to relevant changes in national and regional policy.

A large, empty rectangular box with a thin black border, occupying the upper half of the page. It is intended for providing comments on the technical reports mentioned in the question below.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

A large, empty rectangular box with a thin black border, occupying the lower half of the page. It is intended for providing comments on the technical reports mentioned in the question above.



Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|  |  |
|--|--|
| <input type="checkbox"/><br>ticke<br>d | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input type="checkbox"/><br>ticke<br>d | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input type="checkbox"/><br>ticke<br>d | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

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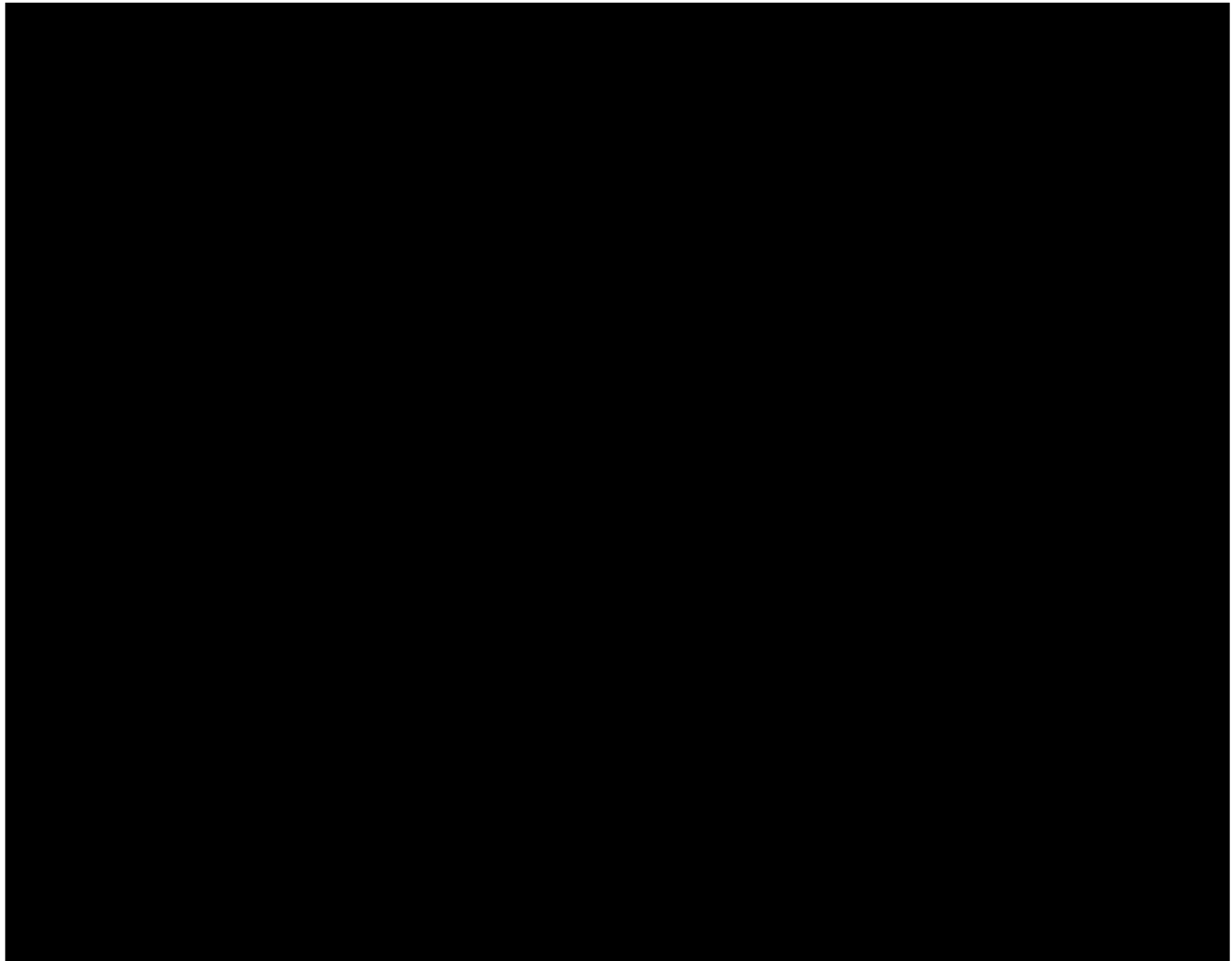
- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

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## Monitoring Questions

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Our ref: N/A

8<sup>th</sup> December 2015

Dear Sir or Madam,

**Hillingdon Local Plan Part 2 – Development Management Policies  
Revised Submission Consultation – October 2015**

Thank you for the opportunity to comment on the above document. The following comments are submitted by NHS Property Services (NHSPS).

**Background**

NHSPS manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare and working environments. NHS Property Services has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS.

**Policy DMCI 1: Retention of Existing Community Facilities**

Faced with financial pressures, the NHS requires flexibility in its estate. In particular, when property becomes surplus to NHS commissioners requirements, it is vital that NHS PS is able to dispose of that property for alternative uses at the earliest opportunity. The cost of holding vacant and surplus property can be significant and diverts resources away from front line services.

Much surplus NHS property is often outdated and not readily adapted, or expensive to adapt for alternative “community” uses. Commissioners do not declare property as surplus unless they are satisfied that it is no longer required for frontline services, often because services have been relocated to more suitable accommodation, or the model for delivering services has changed (for example where care is to be provided in people’s homes where there is no need to tie up costs in property). NHS PS therefore objects to policies that restrict the potential for the alternative use of such surplus property, particularly for much needed housing.

Please see the table below which summarises our comments to the proposed amendments. These comments have been prepared to positively respond to the London Plan’s (FALP 2015) approach to surplus health facilities:

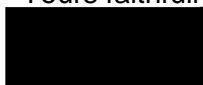
*3.87A – “Loss of social infrastructure in areas of defined need may be acceptable if it can be demonstrated that the disposal of assets is part of an agreed programme of social infrastructure re-provision (in health and community safety, for example) to ensure continued delivery of social infrastructure and related services.” (FALP; 2015; p138-139)*

3.94A- *“In April 2013, the Primary Care Trust and Strategic Health Authority estate transferred to NHS Property Services, Community Health Partnerships and NHS community health and hospital trusts. All organisations are looking to make more effective use of the health estate and support strategies to reconfigure healthcare services and improve the quality of care, and ensure that the estate is managed sustainably and contributes to carbon reduction targets. **This will result in surplus sites being released for other purposes. In particular, NHS Property Services will be implementing a disposals strategy which will provide opportunities for new homes on surplus sites.**” (FALP; 2015; p141)*

| Text Reference       | Proposed Text Amendments   | NHSPS Comments   |
|----------------------|--|--|
| <b>Paragraph 7.5</b> | <i>“Applicants <del>may</del> will need to demonstrate that the existing, specific social infrastructure use is no longer required on-site.”</i>   | <p>The proposed amendment should be reversed, and “may” retained, where this provides flexibility in the application of the policy. There may be instances, for example where all health services have relocated to a new facility, where it may not be necessary to demonstrate this in detail. Flexibility should be retained to enable an assessment on a site by site basis.</p> <p>An alternative approach would be to reflect the text in the London Plan and add the following text at the end of this sentence:<br/> <i>... unless it can be demonstrated that the proposal is part of an agreed programme of social infrastructure or service provision</i></p> |
| <b>Paragraph 7.5</b> | <i>“Where this is the case, marketing evidence <del>may</del> should be submitted to establish<del>ing</del> lack of demand, by showing that premises have been offered at a reasonable charge to appropriate user groups”</i> | NHSPS does not support the proposed replacement of “may” with “should” in this sentence. It is not always appropriate to provide marketing evidence, for example where alternative services have been provided on an alternative site. A requirement for an extended period of marketing in these cases delays the disposal of surplus property for other uses, and results in ongoing holding costs (of rates, security etc) of vacant property to the NHS. This requirement should be flexibly applied, and not conflict with paragraph 3.87A of the London Plan (FALP 2015).  |

NHSPS thanks the Council for the opportunity to participate in this round of consultation. Please do not hesitate to contact me if you wish to discuss any of these matters further.

Yours faithfully,



Mark Adams  
(Planning Assistant – NHS Property Services Ltd)



# HILLINGDON

LONDON

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### PART A - Your details

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| 1. Name and Address        |                           |
|----------------------------|---------------------------|
| Title                      | Mr                        |
| First name                 | Mark                      |
| Last Name                  | Adams                     |
| Organisation (if relevant) | NHS Property Services Ltd |
| Unit                       |                           |
| House name                 |                           |
| Address 1                  |                           |
| Address 2                  |                           |
| Town                       |                           |
| County                     |                           |
| Postcode                   |                           |
| Telephone                  |                           |
| Email                      |                           |

| 2. Agent's Name and Address (if applicable) |              |  |
|---|--------------|--|
| Title                                       |              |  |
| First name                                  |              |  |
| Last name                                   |              |  |
| Company                                     |              |  |
| Unit  | House number |  |
| House name                                  |              |  |
| Address 1                                   |              |  |
| Address 2                                   |              |  |
| Town  |              |  |
| County                                      |              |  |
| Postcode                                    |              |  |
| Telephone                                   |              |  |
| Email                                       |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------------------------|-----------------------------------|--|---|
| <input checked="" type="checkbox"/> | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                       |
|-------------------------------|-----------------------|
| Policy number;                | DMCI 1                |
| Paragraph number;             | DMCI 1, Paragraph 7.5 |
| Table or figure number; or    |                       |
| Map number (Atlas of Changes) |                       |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                                     |                                     |                                     |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/>            | It has not been positively prepared | <input type="checkbox"/>            | It is not effective                       |
| <input checked="" type="checkbox"/> | It is not justified                 | <input checked="" type="checkbox"/> | It is not consistent with national policy |



**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

***Please see separate letter attachment***

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                                     |   |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | <b>No, I do not want to participate in the oral examination</b> |
| <input type="checkbox"/>            | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

N/A

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

N/A

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input checked="" type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input checked="" type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

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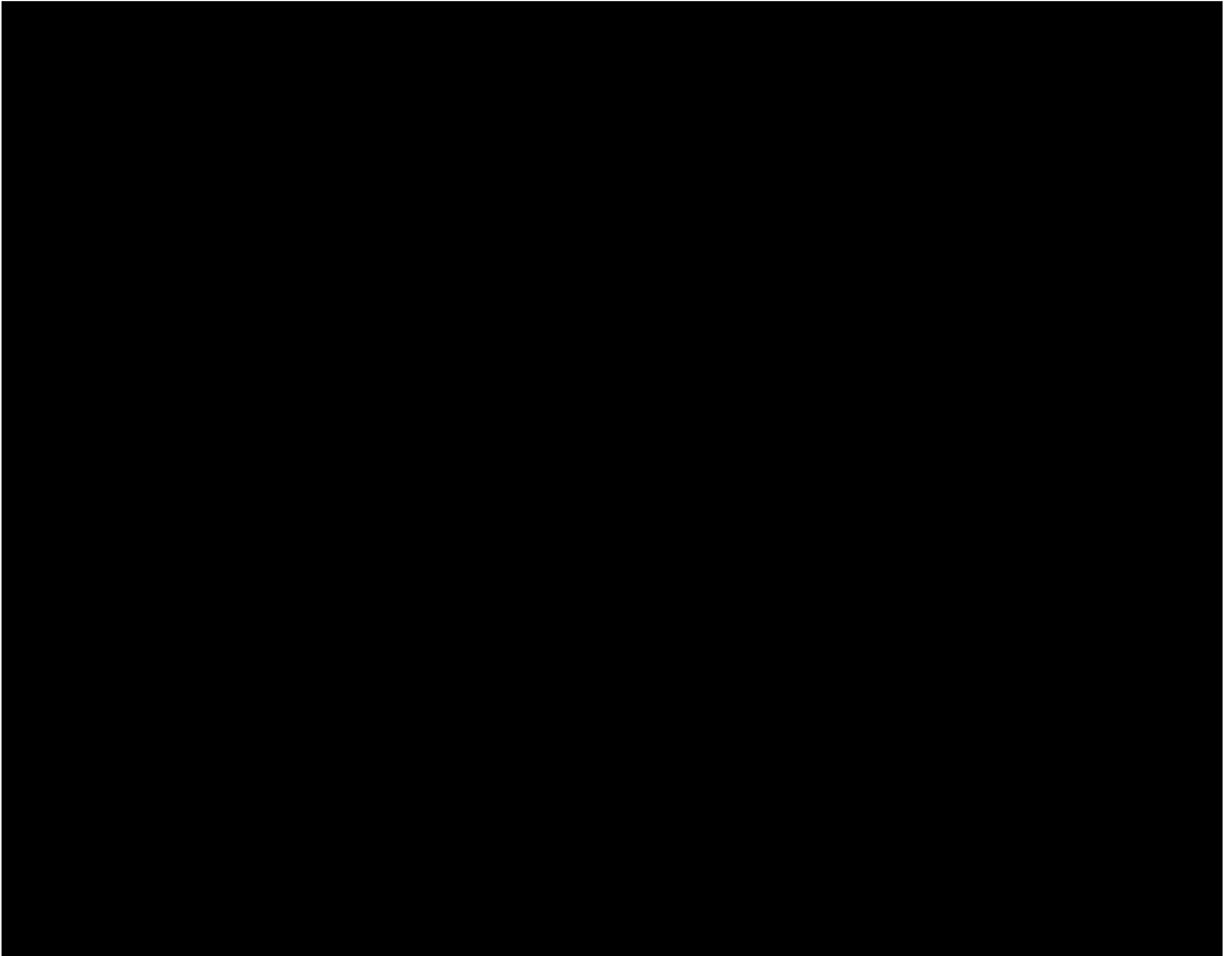
- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
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# HILLINGDON

LONDON

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| 1. Name and Address        |   |
|----------------------------|---|
| Title                      | Mr  |
| First name                 | Robin   |
| Last Name                  | Brown   |
| Organisation (if relevant) | Conservation Area Advisory Panel for south of Borough |
| Unit                       |   |
| House name                 |   |
| Address 1                  |   |
| Address 2                  |   |
| Town                       |   |
| County                     |   |
| Postcode                   |   |
| Telephone                  |   |
| Email                      |   |

| 2. Agent's Name and Address (if applicable) |              |  |
|---|--------------|--|
| Title                                       |              |  |
| First name                                  |              |  |
| Last name                                   |              |  |
| Company                                     |              |  |
| Unit  | House number |  |
| House name                                  |              |  |
| Address 1                                   |              |  |
| Address 2                                   |              |  |
| Town  |              |  |
| County                                      |              |  |
| Postcode                                    |              |  |
| Telephone                                   |              |  |
| Email                                       |              |  |



## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2 |                                   | Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|-------------------|-----------------------------------|--|---|
| ticked            | Development Management Policies   | <input type="checkbox"/>                             | Addendum to Sustainability Appraisal            |
| ticked            | Site Allocations and Designations | <input type="checkbox"/>                             | Consultation Statement                          |
| ticked            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                             | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                                      |
|-------------------------------|--------------------------------------|
| Policy number;                | Identified throughout representation |
| Paragraph number;             | “ “ “                                |
| Table or figure number; or    | “ “ “                                |
| Map number (Atlas of Changes) | “ “ “                                |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                      | No                       |
|---|--------------------------|--------------------------|
| Sound?  | <input type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
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**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to co-operate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

***The Conservation Area Advisory Panel for the south of the borough (Hayes, Harlington, Cranford, Harmondsworth, West Drayton and Longford has just met having considered the revised proposed submission. The group asked that a representation be made expressing general support for the Local Plan Part 2 in respect of policies and proposals that would concern or affect the heritage assets and their settings in these various areas.***

***There were points of objection to certain specific proposals and these are explained below.***

***The Development Management's Historic and Built Environment Chapter comprehensively addresses those aspects of designation, protection and enhancement appropriate for the townscape of this part of the borough. The detailed guidance on shopfronts and for householder development is welcomed, particularly since it is now proposed to be found within the Local Plan rather than relegated elsewhere.***

***The Panel requests that Policy DMHB 4 Conservation Areas requires Heritage Statements to accompany planning applications, and that there be 'signposting' at various places throughout the relevant part of the Chapter. Just as there is a 'signpost' or link for more information on Locally Listed Buildings (para 5.13) so too should there be for Conservation Areas –to the Appraisals/Management Plans, for example, to ASLCs, Listed Buildings etc. Such an approach here and elsewhere would improve the functionality and usefulness of the Plan.***

***The Site Allocations and Designations document brings forward a number of nature conservation designation upgrades and new or extended areas. These are supported, particularly for Cranford, Harmondsworth, West Drayton and Longford.***

***Policy SA 24 Benlow Works, Silverdale Road, Hayes: proposals to repurpose and provide for a secure future for this at risk listed building are welcomed.***

***Points of objection: these have largely been covered elsewhere in the personal submission by Robin Brown, but for the record are endorsed, namely:***

- Green Belt deletions for Longford Green and Lake Farm School, Hayes- on grounds that they still function to prevent urban sprawl and their release would serve as an unacceptable precedent;***
- Policy SA 5 Land to the South of the Railway, including Nestles: to identify a considerable amount of development here would be premature and prejudicial to the Conservation Area that the site includes. There is no evidence that the Conservation area designation has informed the proposed scale and content of development proposed.***

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | <b>No, I do not want to participate in the oral examination</b> |
| <input type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

|  |
|--|
| Please continue on a separate sheet if necessary |
|--|

### **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                          |  |
|--------------------------|--|
| <input type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b> |
|--------------------------|--|

|                          |  |
|--------------------------|--|
| <input type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

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- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

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**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## Monitoring Questions

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### 1) What is your gender?

Male  Female

### 2) To which age group do you belong?

under 15  25 – 44  65 – 85  
 15 - 24  45 - 64  85+


### 3) Do you consider yourself to be a disabled person?

No  Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |



PD9974/JC/GA  


04 December 2015

Planning Policy Team  
London Borough of Hillingdon  
3N/02 Civic Centre  
High Street  
Uxbridge  
Middlesex  
UB8 1UW

Dear Sirs

**STOCKLEY FARM, STOCKLEY ROAD  
LOCAL PLAN PART II - REPRESENTATIONS**

Thank you for consulting our client, Townend Developments, with respect to the Local Plan Part II.

We would like to make observations on 1) The Site Allocations and Designations and 2) the Policies map, in relation to our client's site. However, before we do so we provide a short description of our client's holding below as this is highly material to the consideration of the sites designation and allocation in the Local Plan.

A 1:1250 site location plan is enclosed for your information, with our client's holding outlined in red.

The site is presently laid to hard standing surrounded by soil bunds to the perimeter, of some 3 – 3.5 m in height. A certificate of lawfulness has been submitted for the physical works to the site including the bunds, hardstanding and fences, given that they have been existed for well in excess of four years.

Furthermore, the site is occupied. It is utilised for purposes within Class B8 of the town and country planning (use classes) order for purposes of storage, including vehicles plant and machinery. It has been so for in excess of ten years and a certificate of lawfulness ([11888/APP/2015/2930](#)) has been obtained for part of the site with a further application awaiting determination. We are in the process of preparing further certificates of lawfulness applications for the remainder of the site.

We have enclosed a series of photographs taken in July of this year which show the site in its present condition and use. We have also enclosed an aerial photograph for your information which shows the extent of use.

There are presently 14 occupiers on site utilising it for purposes of open storage of vehicles and plant largely associated with the construction and haulage sectors.

Taking account of this lawful use and condition, we make the following observations on the local plan.

## **Site Allocations and Designations – Revised Proposed Submission Version Oct 2015**

### **Rebalancing Employment Land**

P122 - Paragraph 4.27 - The Stockley Farm Site is operating as a Locally Significant Industrial Site, taking account of its existing use and the number of occupiers.

It is also well suited to industrial use given, its proximity to Heathrow, its separation from existing residential properties and its good access to the Primary Road Network.

We therefore suggest it is included as a Locally Significant Industrial Site as is the most appropriate strategy for the site and reflects the requirement for it to remain in operation.

### **Green Belt**

P.155 Green Belt Deletions Map.

The NPPF at paragraph 80 sets out five tests for which the designation of Green Belt sites must be assessed against in terms of their function. These are:

- 1) To check the unrestricted sprawl of large built-up areas;
- 2) To prevent neighbouring towns merging into one another;
- 3) To assist in safeguarding the countryside from encroachment;
- 4) To preserve the setting and special character of historic towns;
- 5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

We have assessed the Stockley Farm site against the five criteria in the NPPF. In our view the site no longer functions as Green Belt.

The site is Previously Developed Land and in use for industrial purposes. The site is not required to prevent the unrestricted sprawl of built up areas. It is bordered on all sides by housing to the north, east and industrial land to the west. It clearly forms and functions as part of the built up area when approaching from the north.

As noted above the site performs strong employment function, with 14 small businesses on site. There is a direct conflict between the employment objectives of the plan and the designation of this site as Green Belt. The designation would fetter the ability of the site to maximise its function as an employment site and its potential for job creation.

The designation of the site as Green Belt is not the most appropriate strategy for this site and its designation is not justified. Its designation is therefore unsound.

We recommend that site is deleted from the proposals map as Green Belt. We propose that the map should be adjusted exclude the area outlined in red on enclosed site location plan.

## **Site of Nature Conservation Importance**

P182 – SINC deletions

As noted above and from the enclosed pictures a significant proportion of the site is laid to hard standing with earth bunds to the perimeter. The site has little or no ecological value and its designation as a SINC does not reflect the activities taking place on the site related to its storage use. It is laid to hard standing and in industrial use.

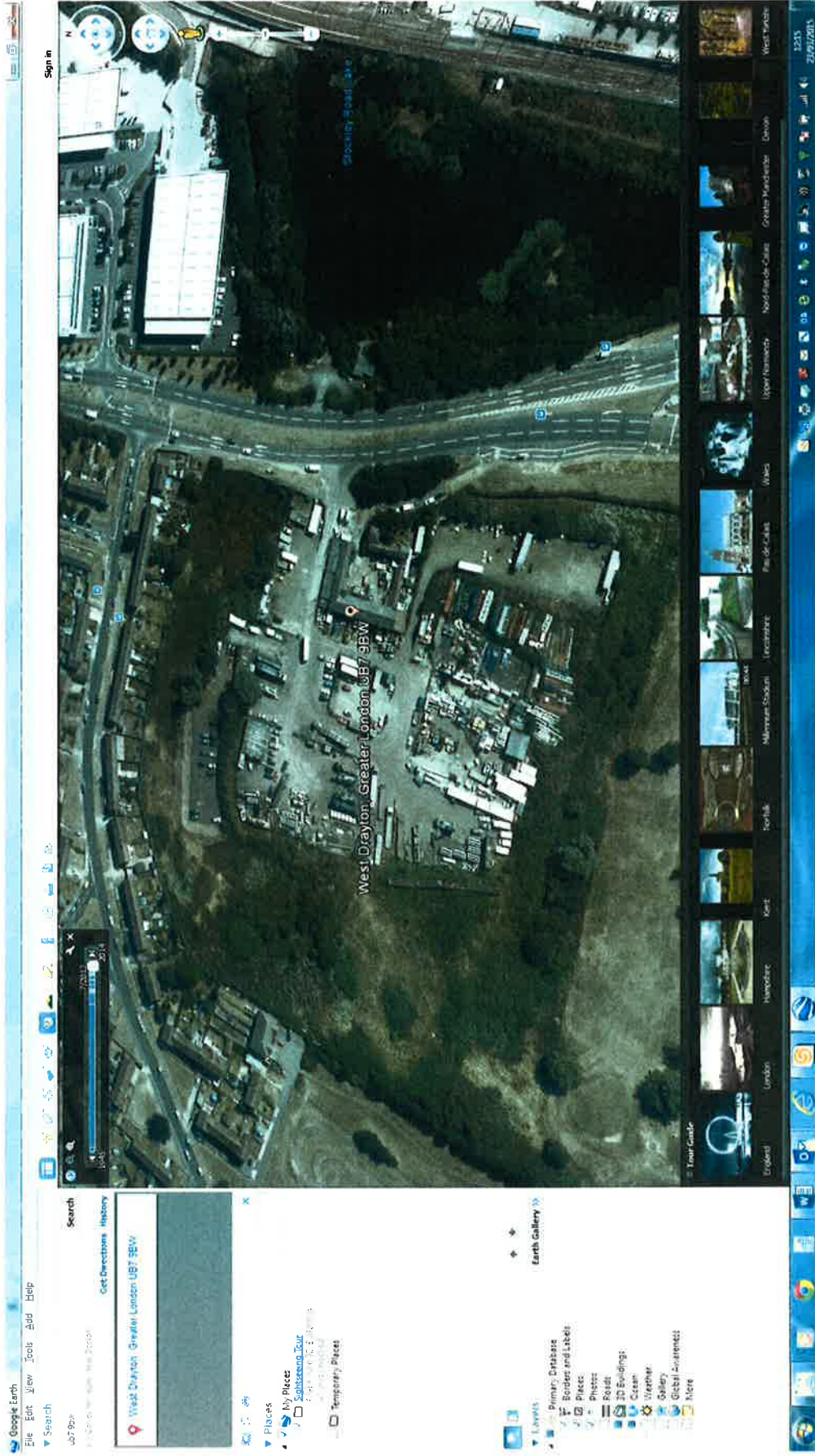
Furthermore, there is a direct conflict between the employment objectives of the plan and the designation of this site as SINC. The designation would fetter the ability of the site to maximise its function as an employment site and its potential for job creation.

It should be removed from the site allocations or at the very least substantially reduced in its extent. The designation of the site a SINC is not the most appropriate strategy for this site and its designation is not justified. Its designation is therefore unsound.

We trust that having regard to the information submitted you will incorporate the amendments suggested. If you do need any further information in relation to the site or to inform your decisions regarding the site's designations please do not hesitate to contact Graham Allison [REDACTED]  
[REDACTED]

Yours faithfully,

[REDACTED]  
**Montagu Evans LLP**



**Aerial Photograph of UB7 9BW, July 2013**

source – Google Earth

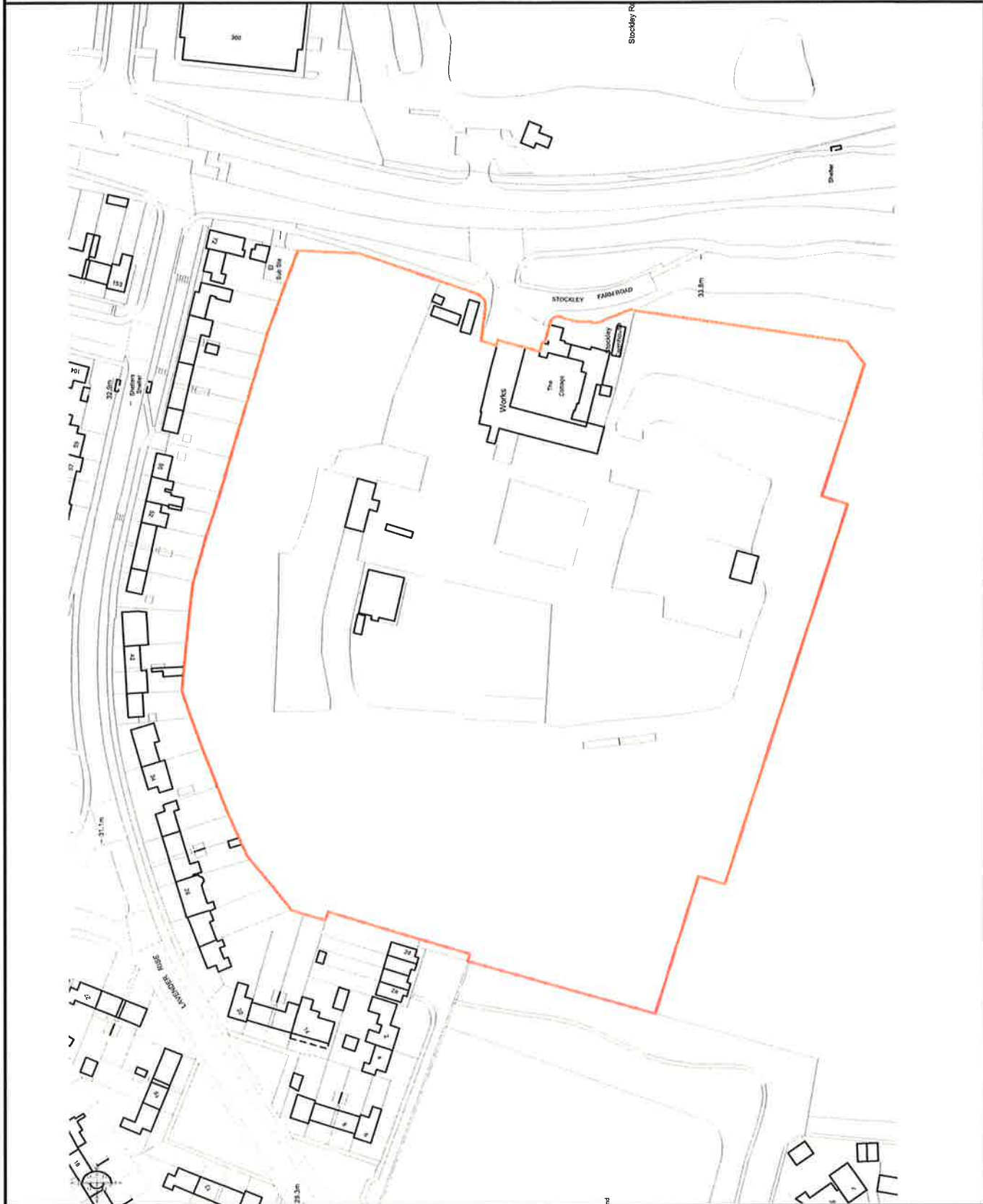


**Site Location Plan :**

Scale 1:1250  
Date September 2015  
North



**MONTAGU  
EVANS**  
CHARTERED SURVEYORS  
5 Belton Street, London W1J 8BA  
Tel : 020-7493 4002  
Fax : 020-7312 7548  
www.montagu-evans.co.uk







































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www.tjacksongroup.co.uk







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# HILLINGDON

LONDON

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### PART A - Your details

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| 1. Name and Address        |         |
|----------------------------|---------|
| Title                      | MRS     |
| First name                 | FRANCES |
| Last Name                  | BURTON  |
| Organisation (if relevant) |         |
| Unit                       |         |
| House name                 |         |
| Address 1                  |         |
| Address 2                  |         |
| Town                       |         |
| County                     |         |
| Postcode                   |         |
| Telephone                  |         |
| Email                      |         |

| 2. Agent's Name and Address (if applicable) |              |  |
|---|--------------|--|
| Title                                       |              |  |
| First name                                  |              |  |
| Last name                                   |              |  |
| Company                                     |              |  |
| Unit  | House number |  |
| House name                                  |              |  |
| Address 1                                   |              |  |
| Address 2                                   |              |  |
| Town  |              |  |
| County                                      |              |  |
| Postcode                                    |              |  |
| Telephone                                   |              |  |
| Email                                       |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                      |
|-------------------------------|----------------------|
| Policy number;                | SA 37 PAGES 107) 108 |
| Paragraph number;             |                      |
| Table or figure number; or    |                      |
| Map number (Atlas of Changes) |                      |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*



**Monitoring Questions**

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1) What is your gender?

- Male                       Female

2) To which age group do you belong?

- under 15                       25 - 44                       65 - 85
- 15 - 24                       45 - 64                       85+

3) Do you consider yourself to be a disabled person?

- No                       Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
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# HILLINGDON

LONDON

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| 1. Name and Address        |           |
|----------------------------|-----------|
| Title                      | MRS       |
| First name                 | CATHERINE |
| Last Name                  | LEVELL    |
| Organisation (if relevant) |           |
| Unit                       |           |
| House name                 |           |
| Address 1                  |           |
| Address 2                  |           |
| Town                       |           |
| County                     |           |
| Postcode                   |           |
| Telephone                  |           |
| Email                      |           |

| 2. Agent's Name and Address (if applicable) |              |  |
|---|--------------|--|
| Title                                       |              |  |
| First name                                  |              |  |
| Last name                                   |              |  |
| Company                                     |              |  |
| Unit  | House number |  |
| House name                                  |              |  |
| Address 1                                   |              |  |
| Address 2                                   |              |  |
| Town  |              |  |
| County                                      |              |  |
| Postcode                                    |              |  |
| Telephone                                   |              |  |
| Email                                       |              |  |



## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                     |
|-------------------------------|---------------------|
| Policy number;                | SA 37 Pages 107/108 |
| Paragraph number;             |                     |
| Table or figure number; or    |                     |
| Map number (Atlas of Changes) |                     |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

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*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*



[Empty rectangular box for comments]

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

[Large empty rectangular box for comments]

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                          |  |
|--------------------------|--|
| <input type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
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Male  Female

### 2) To which age group do you belong?

under 15  25 - 44  65 - 85  
 15 - 24  45 - 64  85+

### 3) Do you consider yourself to be a disabled person?

No  Yes

### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
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# HILLINGDON

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| 1. Name and Address        |              |  |  |
|----------------------------|--------------|--|--|
| Title                      | MR BISHOP    |  |  |
| First name                 | JOSEPH       |  |  |
| Last Name                  | BISHOP       |  |  |
| Organisation (if relevant) |              |  |  |
| Unit                       | House number |  |  |
| House name                 | [REDACTED]   |  |  |
| Address 1                  |              |  |  |
| Address 2                  |              |  |  |
| Town                       |              |  |  |
| County                     |              |  |  |
| Postcode                   |              |  |  |
| Telephone                  |              |  |  |
| Email                      |              |  |  |

| 2. Agent's Name and Address (if applicable) |              |  |  |
|---|--------------|--|--|
| Title                                       |              |  |  |
| First name                                  |              |  |  |
| Last name                                   |              |  |  |
| Company                                     |              |  |  |
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| Address 1                                   |              |  |  |
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| County                                      |              |  |  |
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| Telephone                                   |              |  |  |
| Email                                       |              |  |  |

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| Local Plan Part 2                   |                                   |
|-------------------------------------|-----------------------------------|
| <input type="checkbox"/>            | Development Management Policies   |
| <input checked="" type="checkbox"/> | Site Allocations and Designations |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|--|---|
| <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
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|-------------------------------|-----------------------|
| Policy number;                | SA 37 PAGES 107   108 |
| Paragraph number;             |                       |
| Table or figure number; or    |                       |
| Map number (Atlas of Changes) |                       |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

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under 15                       25 - 44                       65 - 85  
 15 - 24                       45 - 64                       85+

### 3) Do you consider yourself to be a disabled person?

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### 4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
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| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |





# HILLINGDON

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| 1. Name and Address        |          |              |  |
|----------------------------|----------|--------------|--|
| Title                      | MR       |              |  |
| First name                 | MOHAMMED |              |  |
| Last Name                  | SCAM     |              |  |
| Organisation (if relevant) |          |              |  |
| Unit                       |          | House number |  |
| House name                 |          |              |  |
| Address 1                  |          |              |  |
| Address 2                  |          |              |  |
| Town                       |          |              |  |
| County                     |          |              |  |
| Postcode                   |          |              |  |
| Telephone                  |          |              |  |
| Email                      |          |              |  |

| 2. Agent's Name and Address (if applicable) |  |              |  |
|---|--|--------------|--|
| Title                                       |  |              |  |
| First name                                  |  |              |  |
| Last name                                   |  |              |  |
| Company                                     |  |              |  |
| Unit  |  | House number |  |
| House name                                  |  |              |  |
| Address 1                                   |  |              |  |
| Address 2                                   |  |              |  |
| Town  |  |              |  |
| County                                      |  |              |  |
| Postcode                                    |  |              |  |
| Telephone                                   |  |              |  |
| Email                                       |  |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. I am commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2                   |                                   |
|-------------------------------------|-----------------------------------|
| <input type="checkbox"/>            | Development Management Policies   |
| <input checked="" type="checkbox"/> | Site Allocations and Designations |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|--|---|
| <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|                               |                     |
|-------------------------------|---------------------|
| Policy number;                | SA 37 PAGES 107/108 |
| Paragraph number;             |                     |
| Table or figure number; or    |                     |
| Map number (Atlas of Changes) |                     |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is** *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below** *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*



## Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

### 1) What is your gender?

Male  Female

### 2) To which age group do you belong?

under 15  25 - 44  65 - 85  
 15 - 24  45 - 64  85+

### 3) Do you consider yourself to be a disabled person?

No  Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

|  |   |
|--|---|
| a) <input type="checkbox"/> White                  | d) <input type="checkbox"/> European background |
| b) <input type="checkbox"/> Asian or Asian British | e) <input type="checkbox"/> Mixed Group         |
| c) <input type="checkbox"/> Black or Black British | f) <input type="checkbox"/> Other ethnic group  |



# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |         | 2. Agent's Name and Address (if applicable) |              |
|----------------------------|---------|---|--------------|
| Title                      | MR      | Title                                       |              |
| First name                 | MARK    | First name                                  |              |
| Last Name                  | DECKENT | name  |              |
| Organisation (if relevant) |         | Company                                     |              |
| Unit                       |         | Unit  | House number |
| House name                 |         | House name                                  |              |
| Address 1                  |         | Address 1                                   |              |
| Address 2                  |         | Address 2                                   |              |
| Town                       |         | Town  |              |
| County                     |         | County                                      |              |
| Postcode                   |         | Postcode                                    |              |
| Telephone                  |         | Telephone                                   |              |
| Email                      |         | Email                                       |              |



## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on proposed changes to: *(please tick relevant box)*

| Local Plan Part 2                   |                                   |
|-------------------------------------|-----------------------------------|
| <input type="checkbox"/>            | Development Management Policies   |
| <input checked="" type="checkbox"/> | Site Allocations and Designations |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|--|---|
| <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

Q2. Please indicate the Proposed Change on which you wish to comment:

|                               |              |
|-------------------------------|--------------|
| Policy number;                | 8A37         |
| Paragraph number;             | Page 107-108 |
| Table or figure number; or    |              |
| Map number (Atlas of Changes) |              |

Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

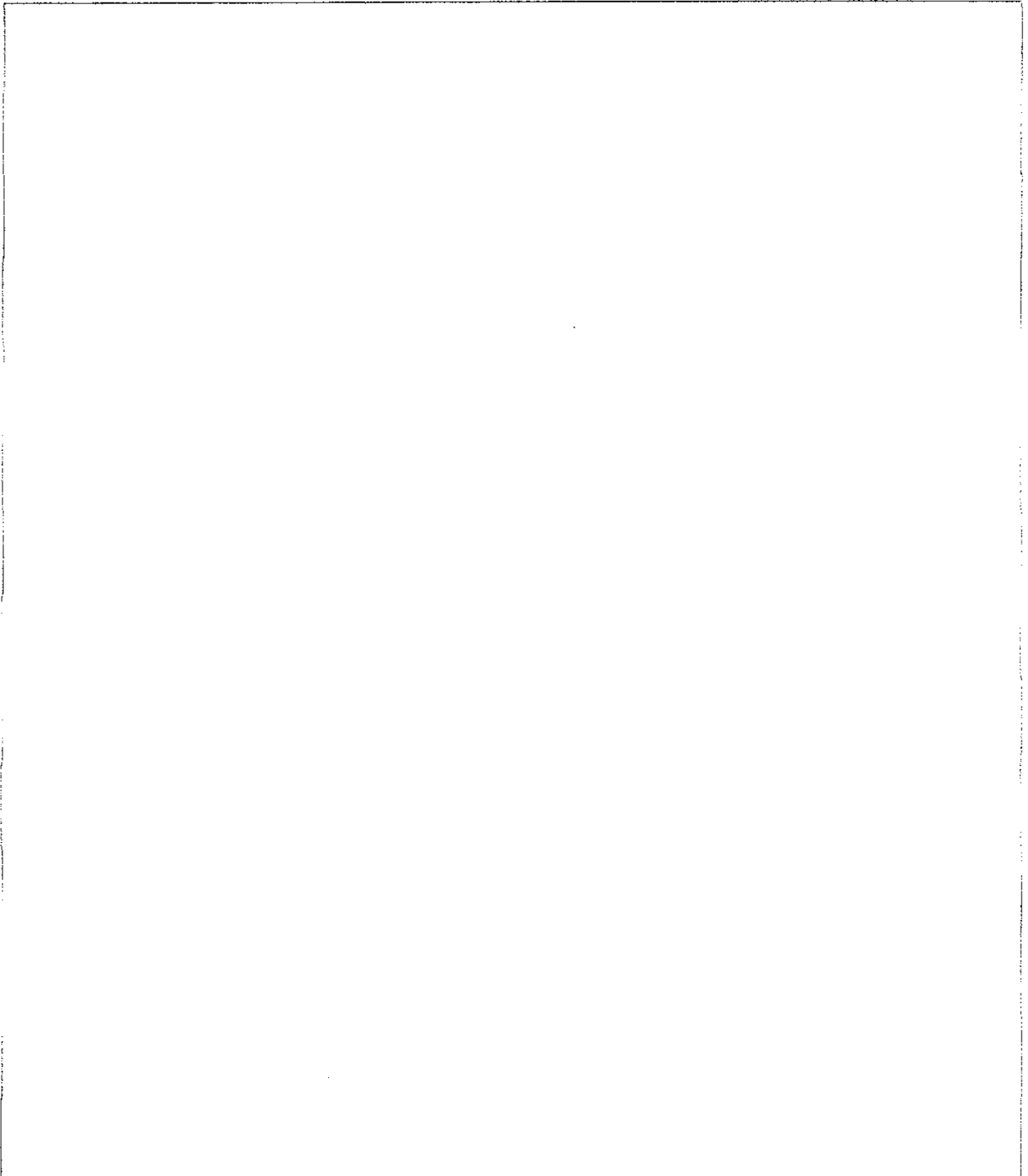
Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below *(Tick relevant box/es)*

|                          |                                     |                          |  |
|--------------------------|-------------------------------------|--------------------------|--|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                        |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy. |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*



Please continue on a separate sheet if necessary

**Q6.** If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?  
*(Please tick appropriate box)*

No, I do not want to participate in the oral examination

Yes, I would like to participate in the oral examination

**Q7.** If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## PART C - Progress of the Local Plan Part 2

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | When the Local Plan Part 2 Plan has been submitted for independent examination.   |
| <input type="checkbox"/> | The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2. |
| <input type="checkbox"/> | The adoption of the Local Plan Part 2.  |

## Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** [localplan@hillingdon.gov.uk](mailto:localplan@hillingdon.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

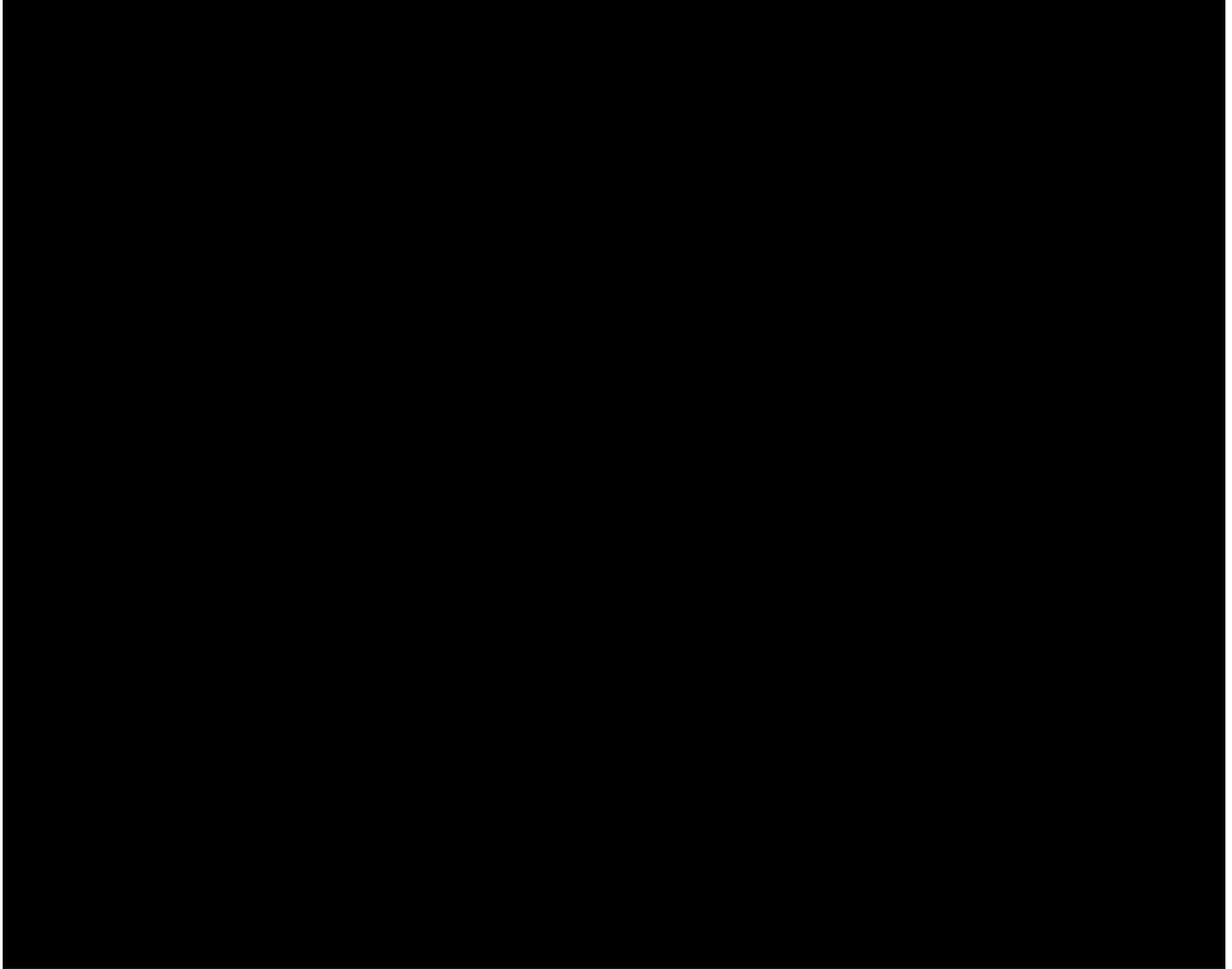
**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillingdon.gov.uk](mailto:localplan@hillingdon.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**



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# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

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### PART A - Your details

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| 1. Name and Address        |          |
|----------------------------|----------|
| Title                      | MRS      |
| First name                 | MELANIE  |
| Last Name                  | AUCKLAND |
| Organisation (if relevant) |          |
| Unit                       |          |
| House name                 |          |
| Address 1                  |          |
| Address 2                  |          |
| Town                       |          |
| County                     |          |
| Postcode                   |          |
| Telephone                  |          |
| Email                      |          |

| 2. Agent's Name and Address (if applicable) |  |              |  |
|---|--|--------------|--|
| Title                                       |  |              |  |
| First name                                  |  |              |  |
| Last name                                   |  |              |  |
| Company                                     |  |              |  |
| Unit  |  | House number |  |
| House name                                  |  |              |  |
| Address 1                                   |  |              |  |
| Address 2                                   |  |              |  |
| Town  |  |              |  |
| County                                      |  |              |  |
| Postcode                                    |  |              |  |
| Telephone                                   |  |              |  |
| Email                                       |  |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1.** I am commenting on proposed changes to: *(please tick relevant box)*

| Local Plan Part 2                   |                                   |
|-------------------------------------|-----------------------------------|
| <input type="checkbox"/>            | Development Management Policies   |
| <input checked="" type="checkbox"/> | Site Allocations and Designations |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|--|---|
| <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

**Q2.** Please indicate the Proposed Change on which you wish to comment:

|                               |                |
|-------------------------------|----------------|
| Policy number;                | SA 37          |
| Paragraph number;             | Page 107 & 108 |
| Table or figure number; or    |                |
| Map number (Atlas of Changes) |                |

**Q3.** Do you consider that as a result of the proposed changes, the Local Plan Part 2 is *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Q4.** If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below *(Tick relevant box/es)*

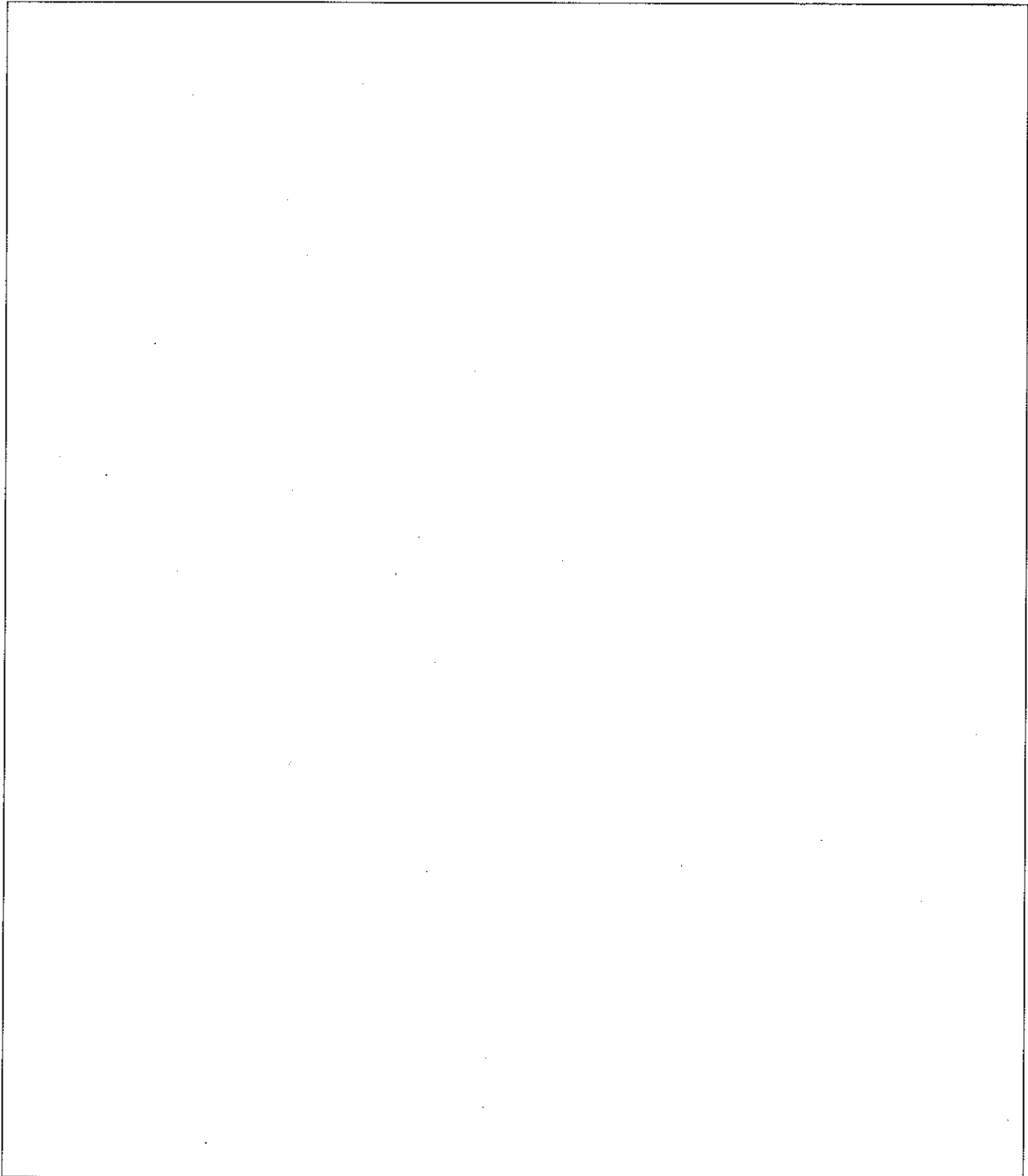
|                          |                                     |
|--------------------------|-------------------------------------|
| <input type="checkbox"/> | It has not been positively prepared |
| <input type="checkbox"/> | It is not justified                 |

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*



Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

**No, I do not want to participate in the oral examination**

**Yes, I would like to participate in the oral examination**

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

---

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary



## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                          |  |
|--------------------------|--|
| <input type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

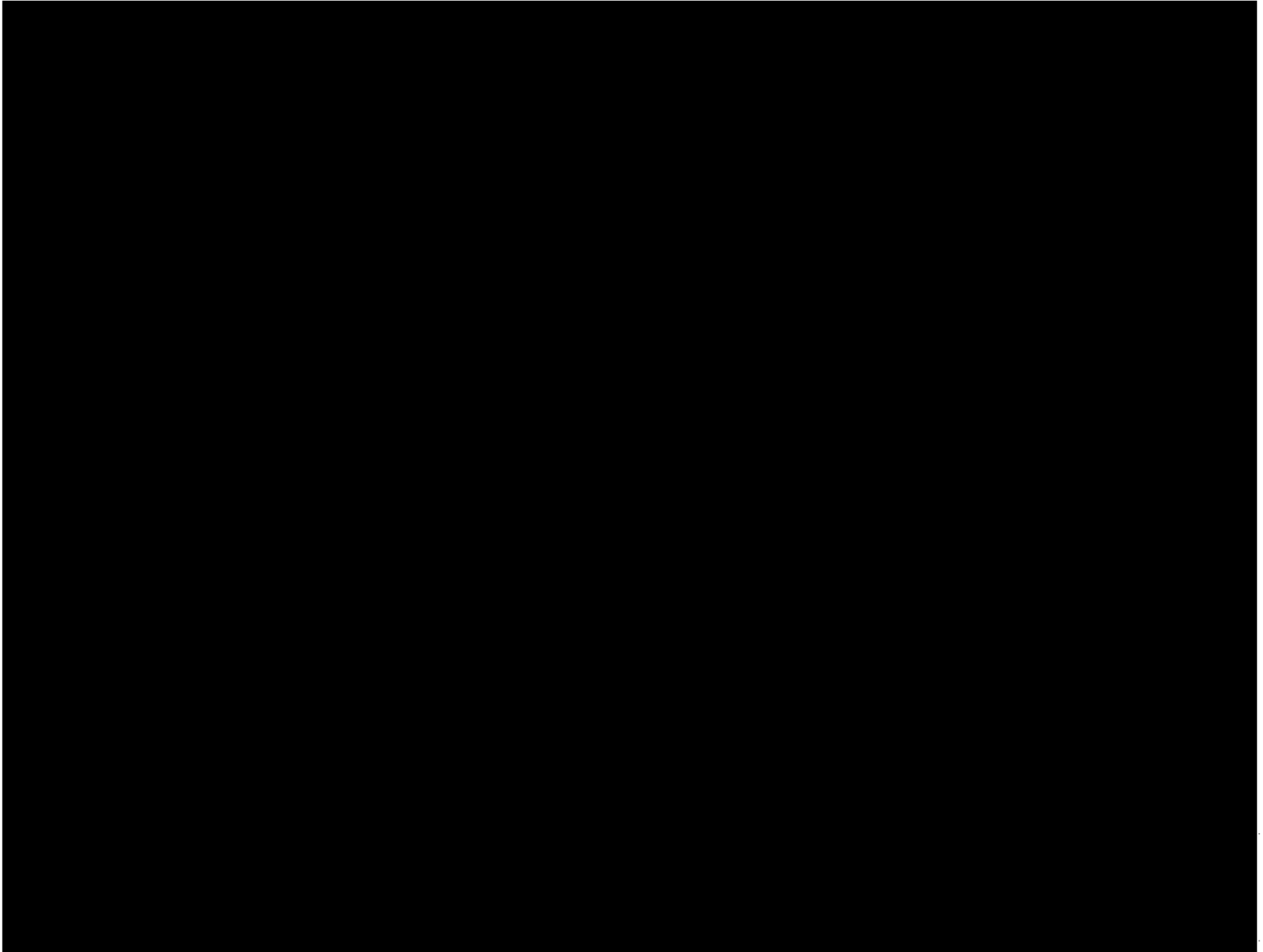
- **Email to:** [localplan@hillingdon.gov.uk](mailto:localplan@hillingdon.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillingdon.gov.uk](mailto:localplan@hillingdon.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

## **Monitoring Questions**

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# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

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### PART A - Your details

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| 1. Name and Address        |       | 2. Agent's Name and Address (if applicable) |              |
|----------------------------|-------|---|--------------|
| Title                      | MR    | Title                                       |              |
| First name                 | BALAL | First name                                  |              |
| Last Name                  | AKRAM | Last name                                   |              |
| Organisation (if relevant) |       | Company                                     |              |
| Unit                       |       | Unit  | House number |
| House name                 |       | House name                                  |              |
| Address 1                  |       | Address 1                                   |              |
| Address 2                  |       | Address 2                                   |              |
| Town                       |       | Town  |              |
| County                     |       | County                                      |              |
| Postcode                   |       | Postcode                                    |              |
| Telephone                  |       | Telephone                                   |              |
| Email                      |       | Email                                       |              |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on proposed changes to: (please tick relevant box)

| Local Plan Part 2                   |                                   |
|-------------------------------------|-----------------------------------|
| <input type="checkbox"/>            | Development Management Policies   |
| <input checked="" type="checkbox"/> | Site Allocations and Designations |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| Technical Reports (answer Q1 & Q9 only) |   |
|---|---|
| <input type="checkbox"/>                | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                | Consultation Statement                          |
| <input type="checkbox"/>                | Addendum to the Strategic Flood Risk Assessment |

Q2. Please indicate the Proposed Change on which you wish to comment:

|                               |                |
|-------------------------------|----------------|
| Policy number;                | SA37           |
| Paragraph number;             | Page 107 - 108 |
| Table or figure number; or    |                |
| Map number (Atlas of Changes) |                |

Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is (please tick)

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

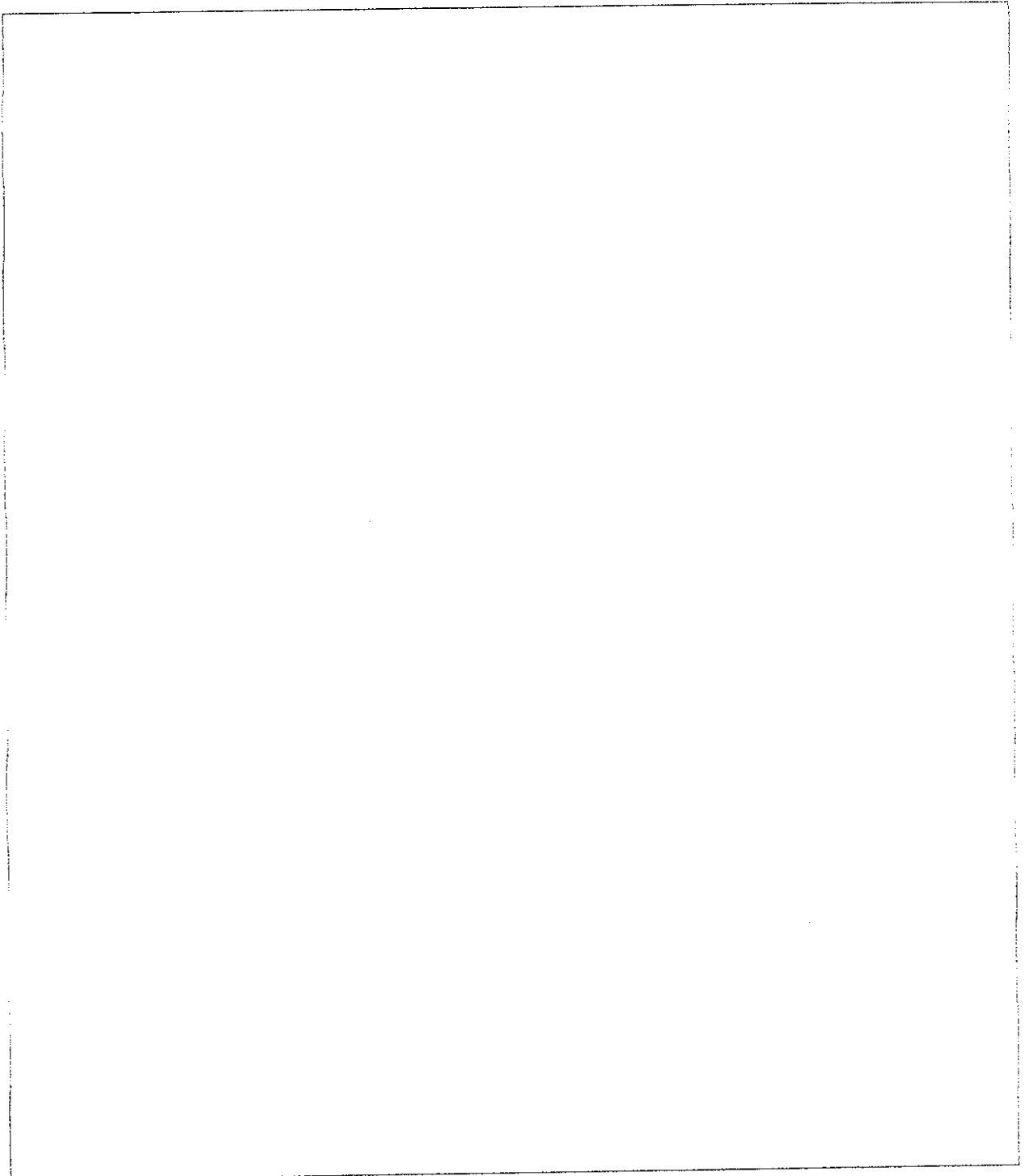
Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below (Tick relevant box/es)

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*





Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

**No, I do not want to participate in the oral examination**

**Yes, I would like to participate in the oral examination**

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                          |  |
|--------------------------|--|
| <input type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

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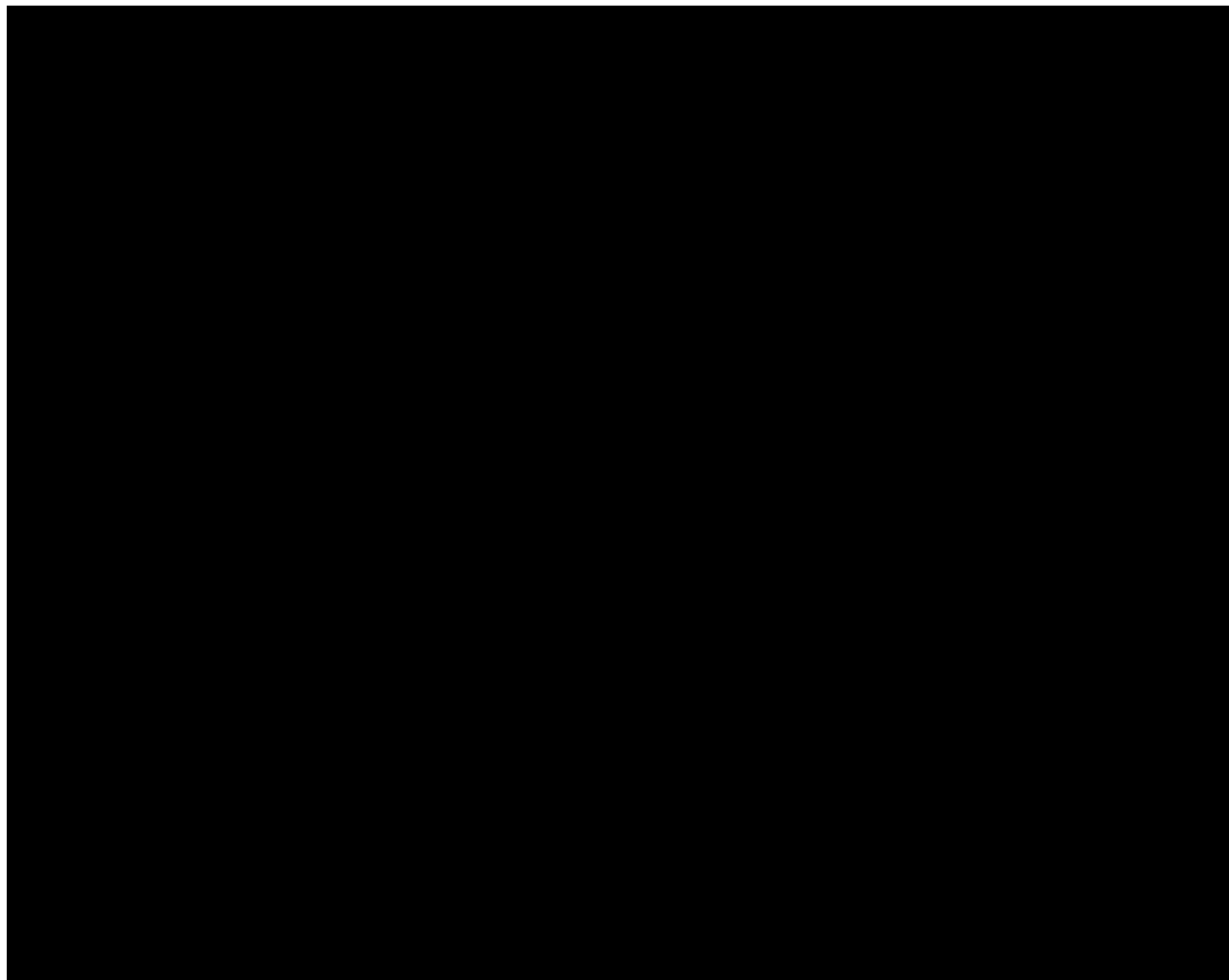
- **Email to:** [localplan@hillingdon.gov.uk](mailto:localplan@hillingdon.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillingdon.gov.uk](mailto:localplan@hillingdon.gov.uk)

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# HILLINGDON

LONDON

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| 1. Name and Address        |          |
|----------------------------|----------|
| Title                      | MR       |
| First name                 | Mark     |
| Last Name                  | Auckland |
| Organisation (if relevant) |          |
| Unit                       |          |
| House name                 |          |
| Address 1                  |          |
| Address 2                  |          |
| Town                       |          |
| County                     |          |
| Postcode                   |          |
| Telephone                  |          |
| Email                      |          |

| 2. Agent's Name and Address (if applicable) |              |  |
|---|--------------|--|
| Title                                       |              |  |
| First name                                  |              |  |
| Last name                                   |              |  |
| Company                                     |              |  |
| Unit  | House number |  |
| House name                                  |              |  |
| Address 1                                   |              |  |
| Address 2                                   |              |  |
| Town  |              |  |
| County                                      |              |  |
| Postcode                                    |              |  |
| Telephone                                   |              |  |
| Email                                       |              |  |



## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on proposed changes to: *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

Q2. Please indicate the Proposed Change on which you wish to comment:

|                               |               |
|-------------------------------|---------------|
| Policy number;                | SA37          |
| Paragraph number;             | Page 107, 108 |
| Table or figure number; or    |               |
| Map number (Atlas of Changes) |               |

Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

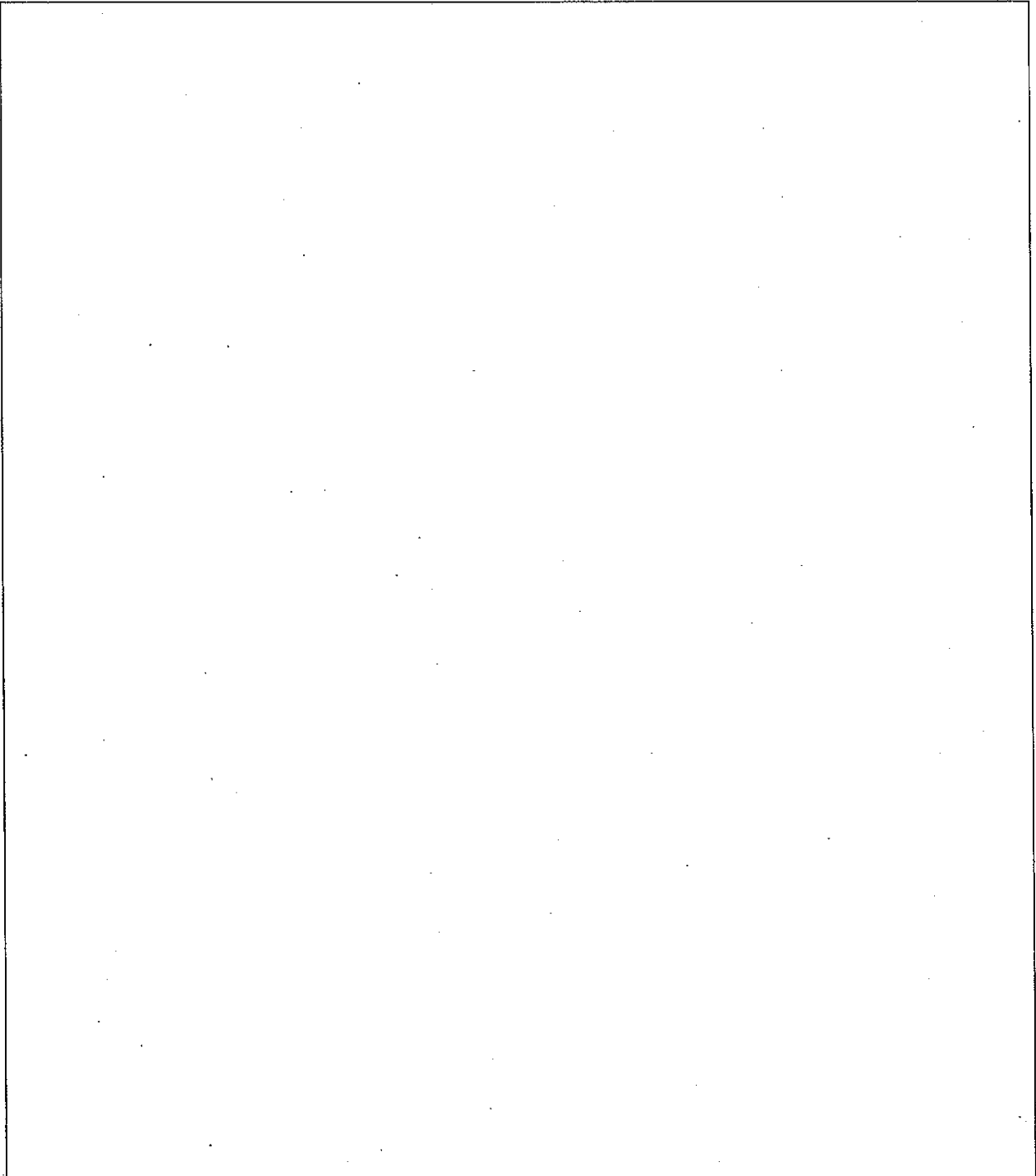
Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*



Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

**No, I do not want to participate in the oral examination**

**Yes, I would like to participate in the oral examination**

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                          |  |
|--------------------------|--|
| <input type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

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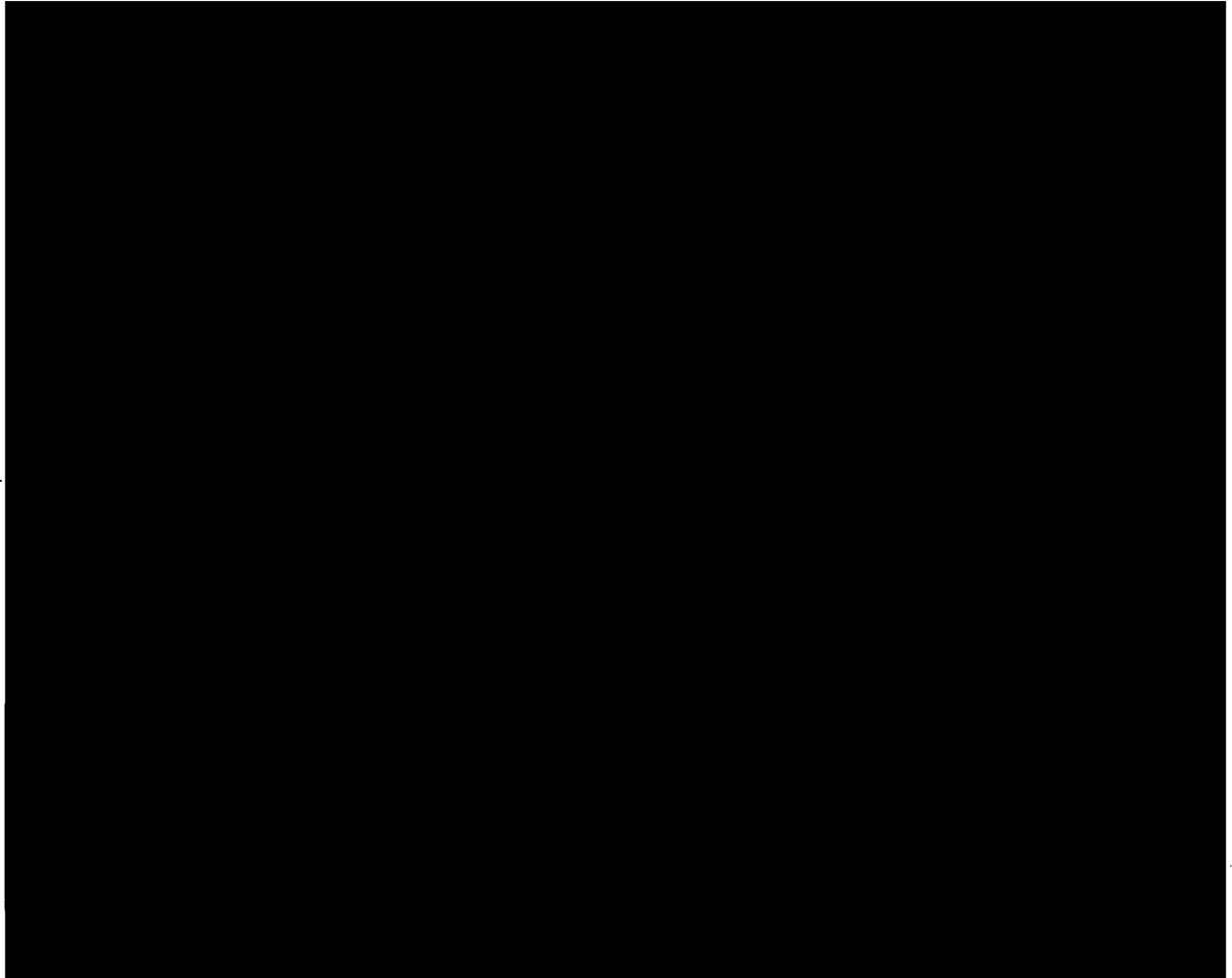
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## Monitoring Questions

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# HILLINGDON

LONDON

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### PART A - Your details

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| 1. Name and Address        | 2. Agent's Name and Address (if applicable) |              |
|----------------------------|---|--------------|
| Title <b>MRS</b>           | Title                                       |              |
| First name <b>MARGARET</b> | First name                                  |              |
| Last Name <b>ATKINSON</b>  | Last name                                   |              |
| Organisation (if relevant) | Company                                     |              |
|                            | Unit  | House number |
|                            | House name                                  |              |
|                            | Address 1                                   |              |
|                            | Address 2                                   |              |
|                            | Town  |              |
|                            | County                                      |              |
|                            | Postcode                                    |              |
|                            | Telephone                                   |              |
|                            | Email                                       |              |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on proposed changes to: (please tick relevant box)

| Local Plan Part 2                   |                                   | Technical Reports (answer Q1 & Q9 only) |   |
|-------------------------------------|-----------------------------------|---|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                | Addendum to the Strategic Flood Risk Assessment |

Q2. Please indicate the Proposed Change on which you wish to comment:

|                               |                |
|-------------------------------|----------------|
| Policy number;                | SA 37.         |
| Paragraph number;             | Page 107 - 108 |
| Table or figure number; or    |                |
| Map number (Atlas of Changes) |                |

Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is (please tick)

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below (Tick relevant box/es)

|                          |                                     |                          |  |
|--------------------------|-------------------------------------|--------------------------|--|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                        |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy. |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

A large, empty rectangular box with a thin black border, intended for the respondent to provide their representation or amendments as requested in the questions above.

Please continue on a separate sheet if necessary

**Q6.** If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?  
*(Please tick appropriate box)*

No, I do not want to participate in the oral examination

Yes, I would like to participate in the oral examination

**Q7.** If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary



## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                          |  |
|--------------------------|--|
| <input type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
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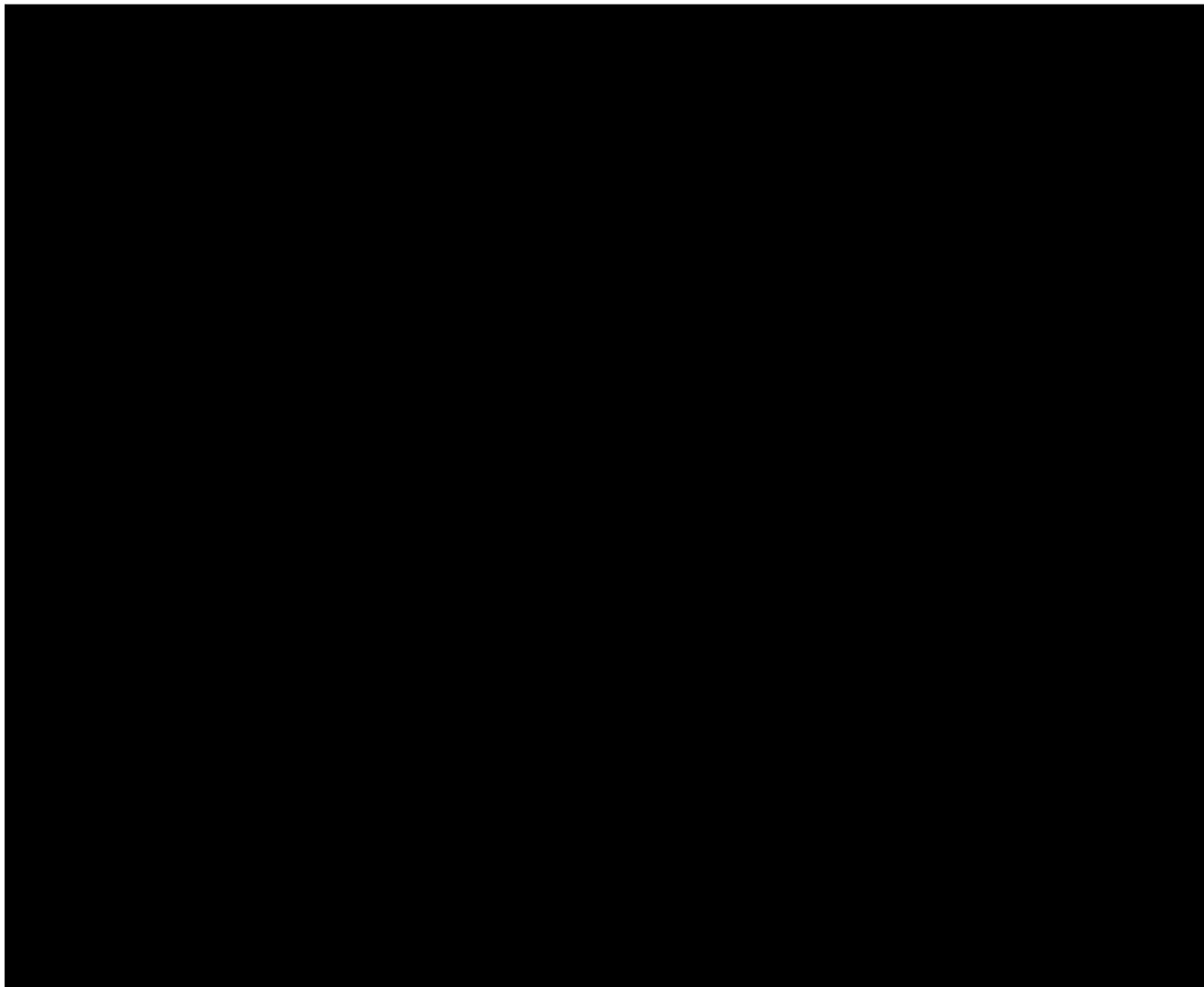
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# HILLINGDON

LONDON

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| 1. Name and Address        | 2. Agent's Name and Address (if applicable) |              |
|----------------------------|---|--------------|
| Title <b>MRS</b>           | Title                                       |              |
| First name <b>MARGARET</b> | First name                                  |              |
| Last Name <b>ATKINSON</b>  | Last name                                   |              |
| Organisation (if relevant) | Company                                     |              |
|                            | Unit  | House number |
|                            | House name                                  |              |
|                            | Address 1                                   |              |
|                            | Address 2                                   |              |
|                            | Town  |              |
|                            | County                                      |              |
|                            | Postcode                                    |              |
|                            | Telephone                                   |              |
|                            | Email                                       |              |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on proposed changes to: (please tick relevant box)

| Local Plan Part 2                   |                                   | Technical Reports (answer Q1 & Q9 only) |   |
|-------------------------------------|-----------------------------------|---|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                | Addendum to the Strategic Flood Risk Assessment |

Q2. Please indicate the Proposed Change on which you wish to comment:

|                               |               |
|-------------------------------|---------------|
| Policy number;                |               |
| Paragraph number;             | 7.16 PAGE 245 |
| Table or figure number; or    |               |
| Map number (Atlas of Changes) |               |

Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is (please tick)

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below (Tick relevant box/es)

|                          |                                     |                                     |   |
|--------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input checked="" type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/>            | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

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COUNCIL NEEDS TO IDENTIFY SITE

FOR NEW HEALTH HUB IN

KILWSLEY | WEST DRAYTON.

AREA HAS BOOMING POPULATION

WITH NO ADEQUATE HEALTH

CARE

COUNCIL HAS DUTY TO KEEP

CITIZENS HEALTHY

SWIMMING POOL SITE SHOULD

BE KEPT FOR COMMUNITY USE



Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

**No, I do not want to participate in the oral examination**

**Yes, I would like to participate in the oral examination**

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | When the Local Plan Part 2 Plan has been submitted for independent examination.   |
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| <input type="checkbox"/> | The adoption of the Local Plan Part 2.  |

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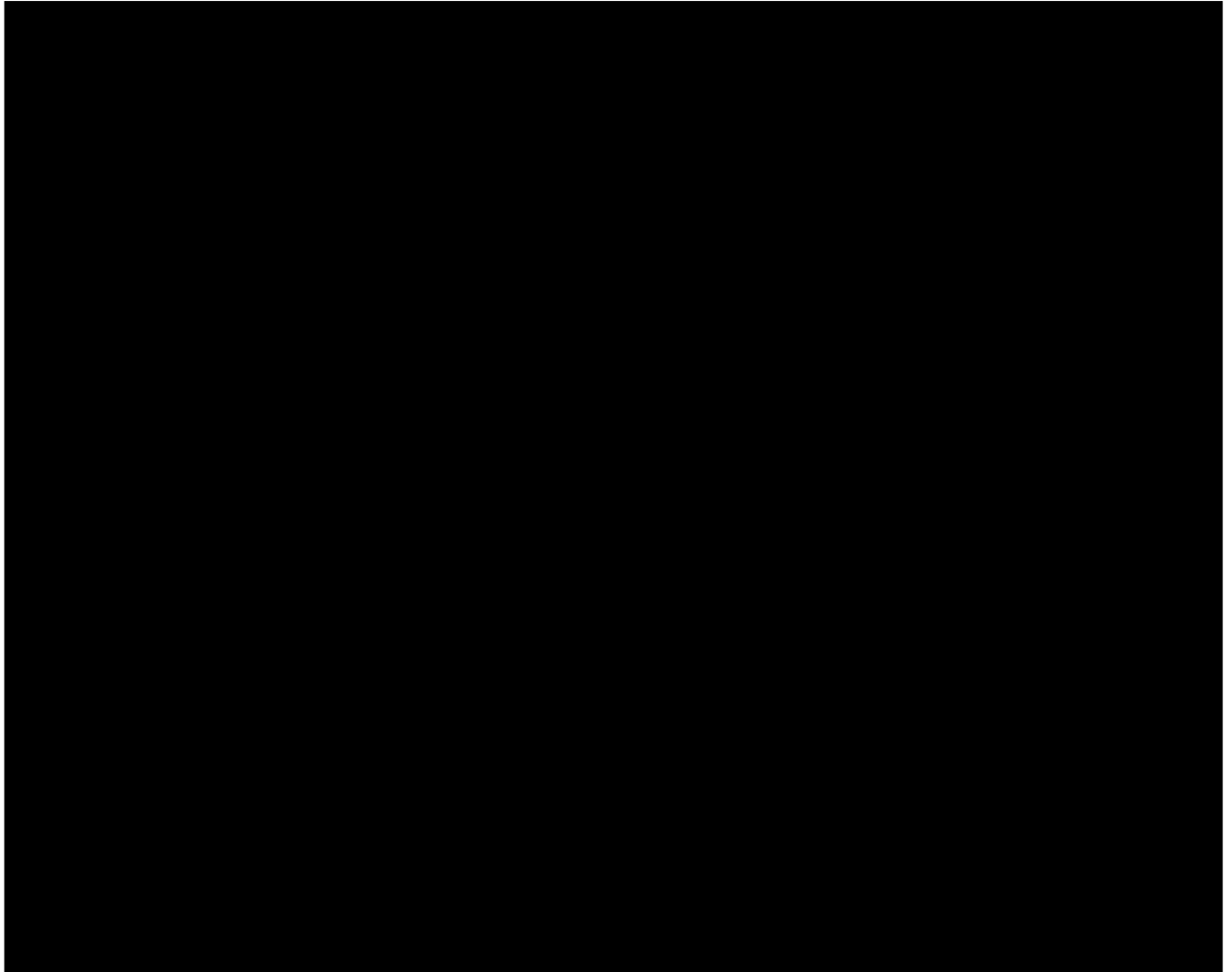
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| 1. Name and Address        |          | 2. Agent's Name and Address (if applicable) |              |
|----------------------------|----------|---|--------------|
| Title                      | MRS      | Title                                       |              |
| First name                 | SARAH    | First name                                  |              |
| Last Name                  | ATKINSON | Last name                                   |              |
| Organisation (if relevant) |          | Company                                     |              |
| Unit                       |          | Unit  | House number |
| House name                 |          | House name                                  |              |
| Address 1                  |          | Address 1                                   |              |
| Address 2                  |          | Address 2                                   |              |
| Town                       |          | Town  |              |
| County                     |          | County                                      |              |
| Postcode                   |          | Postcode                                    |              |
| Telephone                  |          | Telephone                                   |              |
| Email                      |          | Email                                       |              |



## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on proposed changes to: (please tick relevant box)

| Local Plan Part 2                   |                                   | Technical Reports (answer Q1 & Q9 only) |   |
|-------------------------------------|-----------------------------------|---|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                | Addendum to the Strategic Flood Risk Assessment |

Q2. Please indicate the Proposed Change on which you wish to comment:

|                               |                |
|-------------------------------|----------------|
| Policy number;                | SA37           |
| Paragraph number;             | Page 107 & 108 |
| Table or figure number; or    |                |
| Map number (Atlas of Changes) |                |

Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is (please tick)

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below (Tick relevant box/es)

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
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**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

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Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                          |  |
|--------------------------|--|
| <input type="checkbox"/> | No, I do not want to participate in the oral examination |
| <input type="checkbox"/> | Yes, I would like to participate in the oral examination |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

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**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                          |  |
|--------------------------|--|
| <input type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
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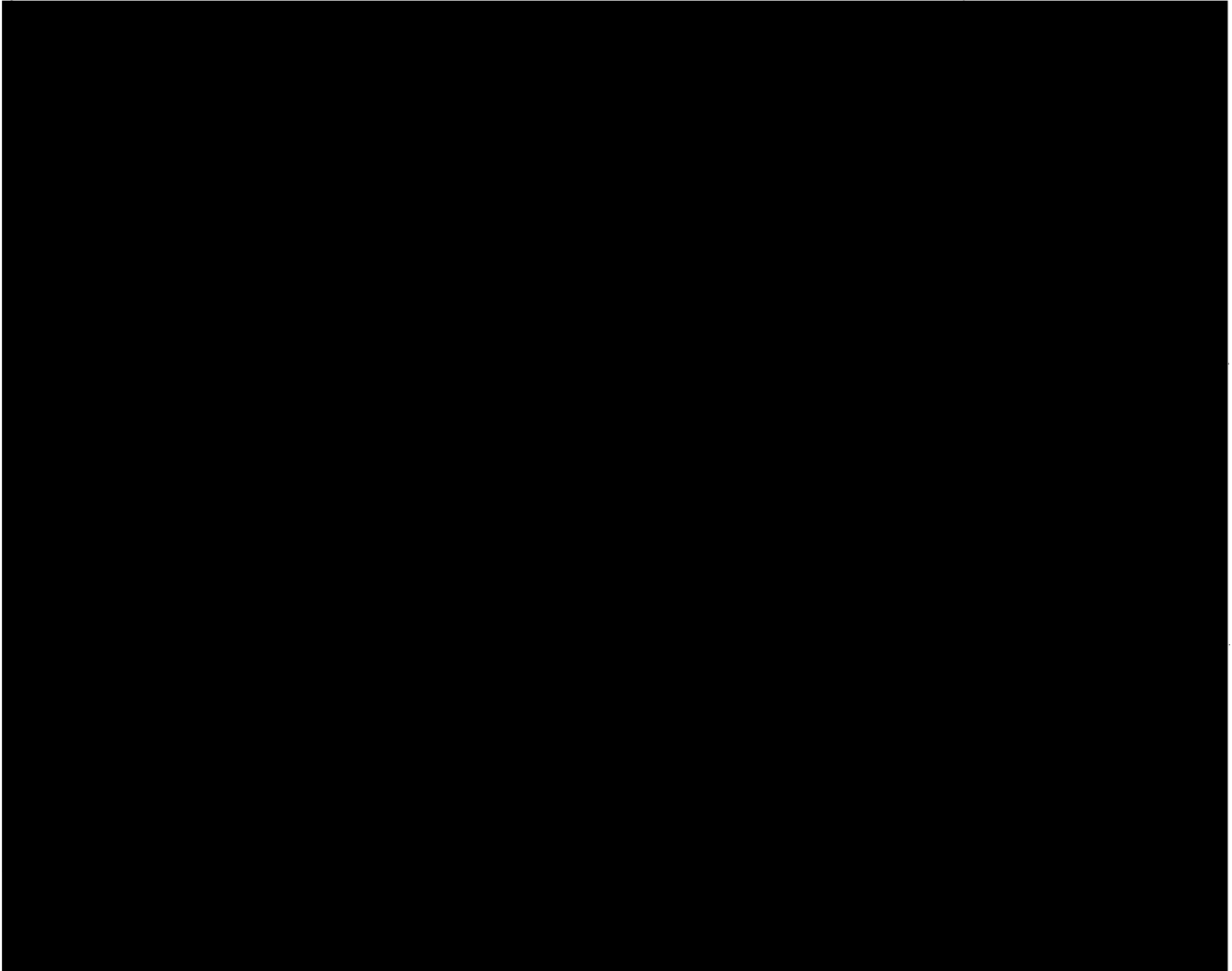
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| 1. Name and Address        |          |              |  | 2. Agent's Name and Address (if applicable) |  |              |  |
|----------------------------|----------|--------------|--|---|--|--------------|--|
| Title                      | MR       |              |  | Title                                       |  |              |  |
| First name                 | DARYLL   |              |  | First name                                  |  |              |  |
| Last Name                  | ATKINSON |              |  | Last name                                   |  |              |  |
| Organisation (if relevant) |          |              |  | Company                                     |  |              |  |
| Unit                       |          | House number |  | Unit  |  | House number |  |
| House name                 |          |              |  | House name                                  |  |              |  |
| Address 1                  |          |              |  | Address 1                                   |  |              |  |
| Address 2                  |          |              |  | Address 2                                   |  |              |  |
| Town                       |          |              |  | Town  |  |              |  |
| County                     |          |              |  | County                                      |  |              |  |
| Postcode                   |          |              |  | Postcode                                    |  |              |  |
| Telephone                  |          |              |  | Telephone                                   |  |              |  |
| Email                      |          |              |  | Email                                       |  |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on proposed changes to: *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

Q2. Please indicate the Proposed Change on which you wish to comment:

|                               |                |
|-------------------------------|----------------|
| Policy number:                | SA37           |
| Paragraph number:             | PARA 107 & 108 |
| Table or figure number, or    |                |
| Map number (Atlas of Changes) |                |

Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

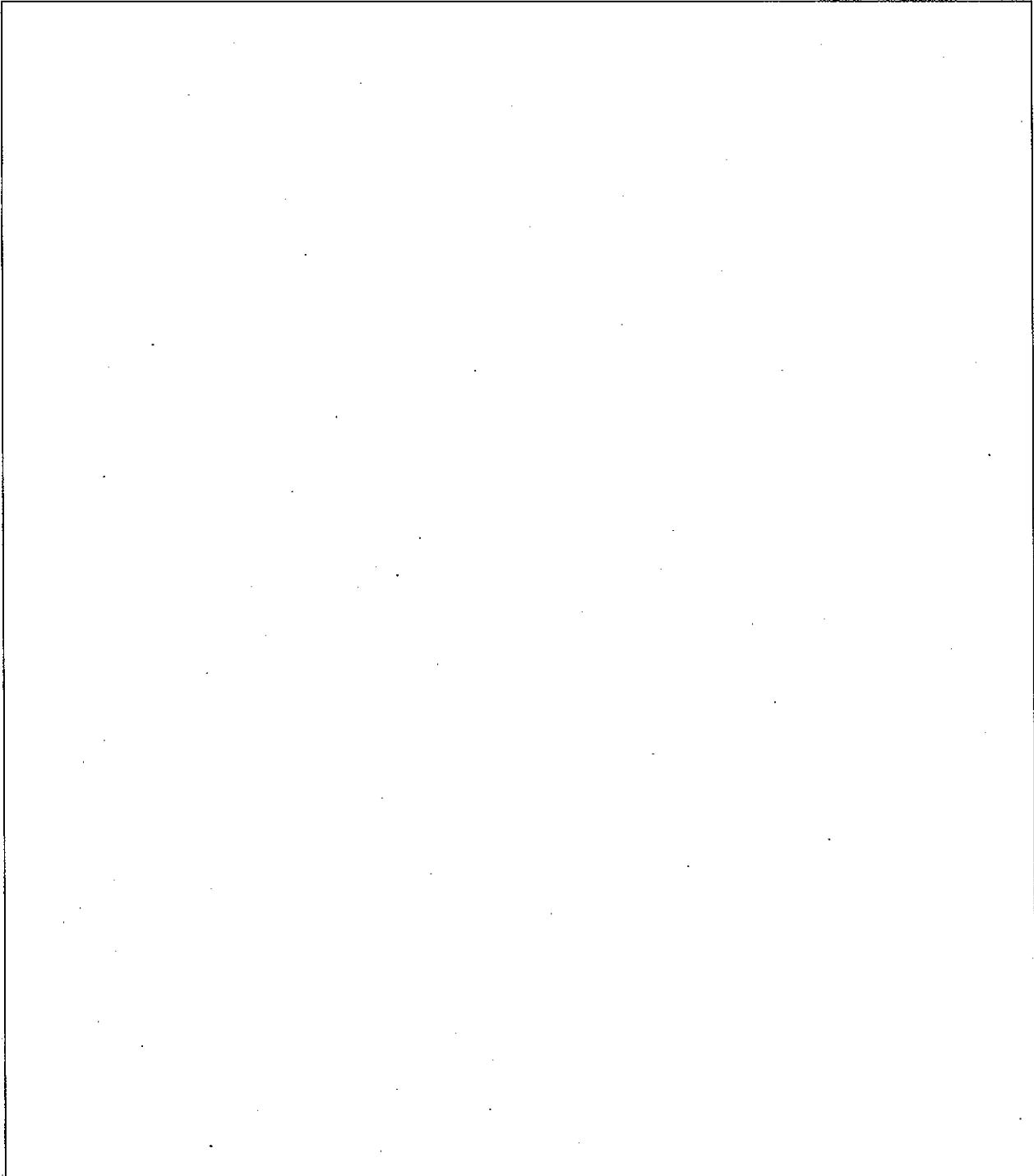
Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

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Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | <b>No, I do not want to participate in the oral examination</b> |
| <input type="checkbox"/> | <b>Yes, I would like to participate in the oral examination</b> |

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary



## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                          |  |
|--------------------------|--|
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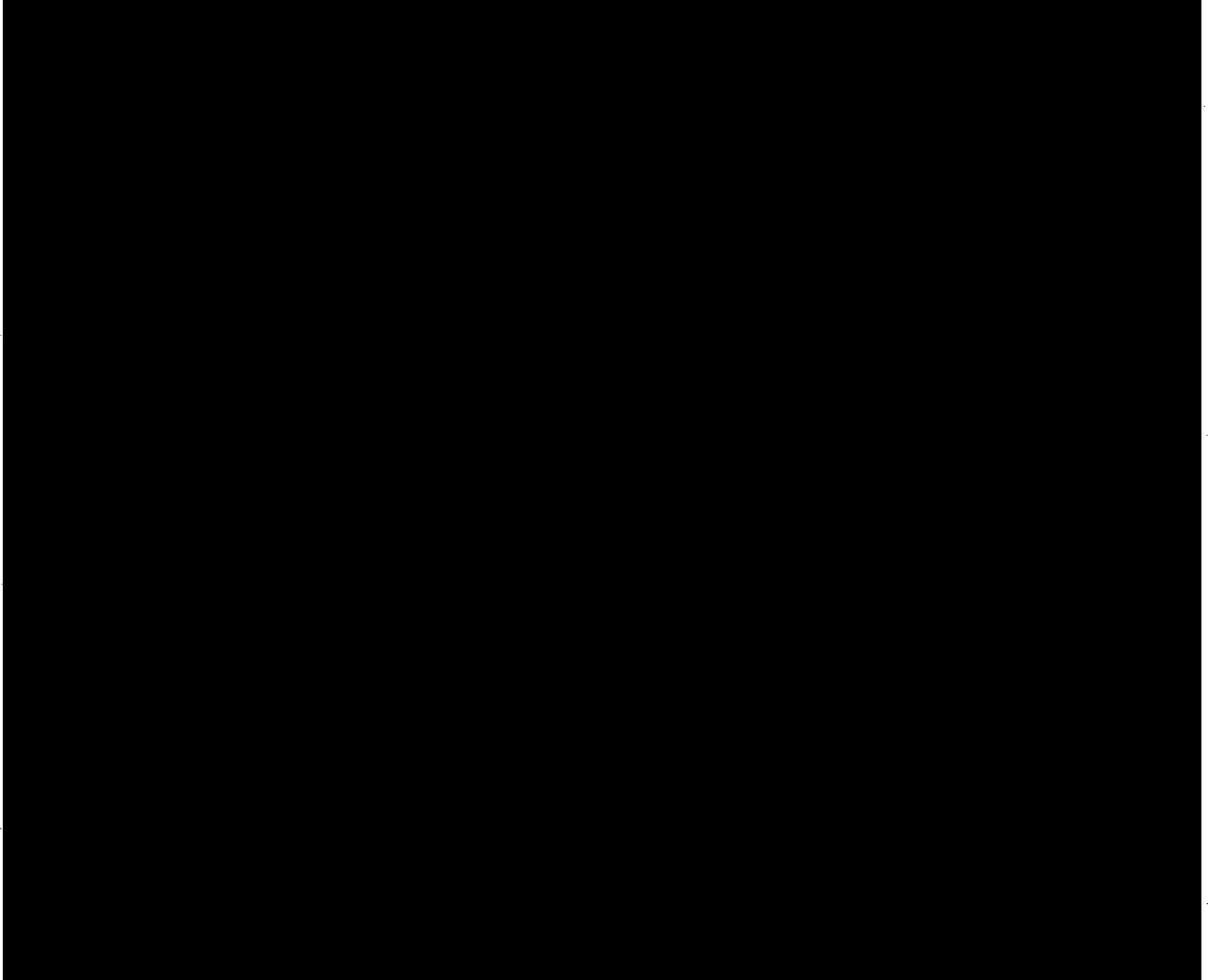
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#### 1. Name and Address

Title Mr

First name WILLIAM

Last

Name Cummings

Organisation  
(if relevant)

#### 2. Agent's Name and Address (if applicable)

Title

First name

Last  
name

Company

Unit

House  
number

House  
name

Address 1

Address 2

Town

County

Postcode

Telephone

Email

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on proposed changes to: (please tick relevant box)

| Local Plan Part 2                   |                                   | Technical Reports (answer Q1 & Q9 only) |   |
|-------------------------------------|-----------------------------------|---|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                | Addendum to Sustainability Appraisal            |
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Q2. Please indicate the Proposed Change on which you wish to comment:

|                               |                |
|-------------------------------|----------------|
| Policy number;                | SA 37          |
| Paragraph number;             | Page 107 & 108 |
| Table or figure number; or    |                |
| Map number (Atlas of Changes) |                |

Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is (please tick)

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below (Tick relevant box/es)

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

A large, empty rectangular box with a thin black border, intended for the respondent to provide their representation or suggested revised wording as requested in the text above.



Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

**No, I do not want to participate in the oral examination**

**Yes, I would like to participate in the oral examination**

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                          |  |
|--------------------------|--|
| <input type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

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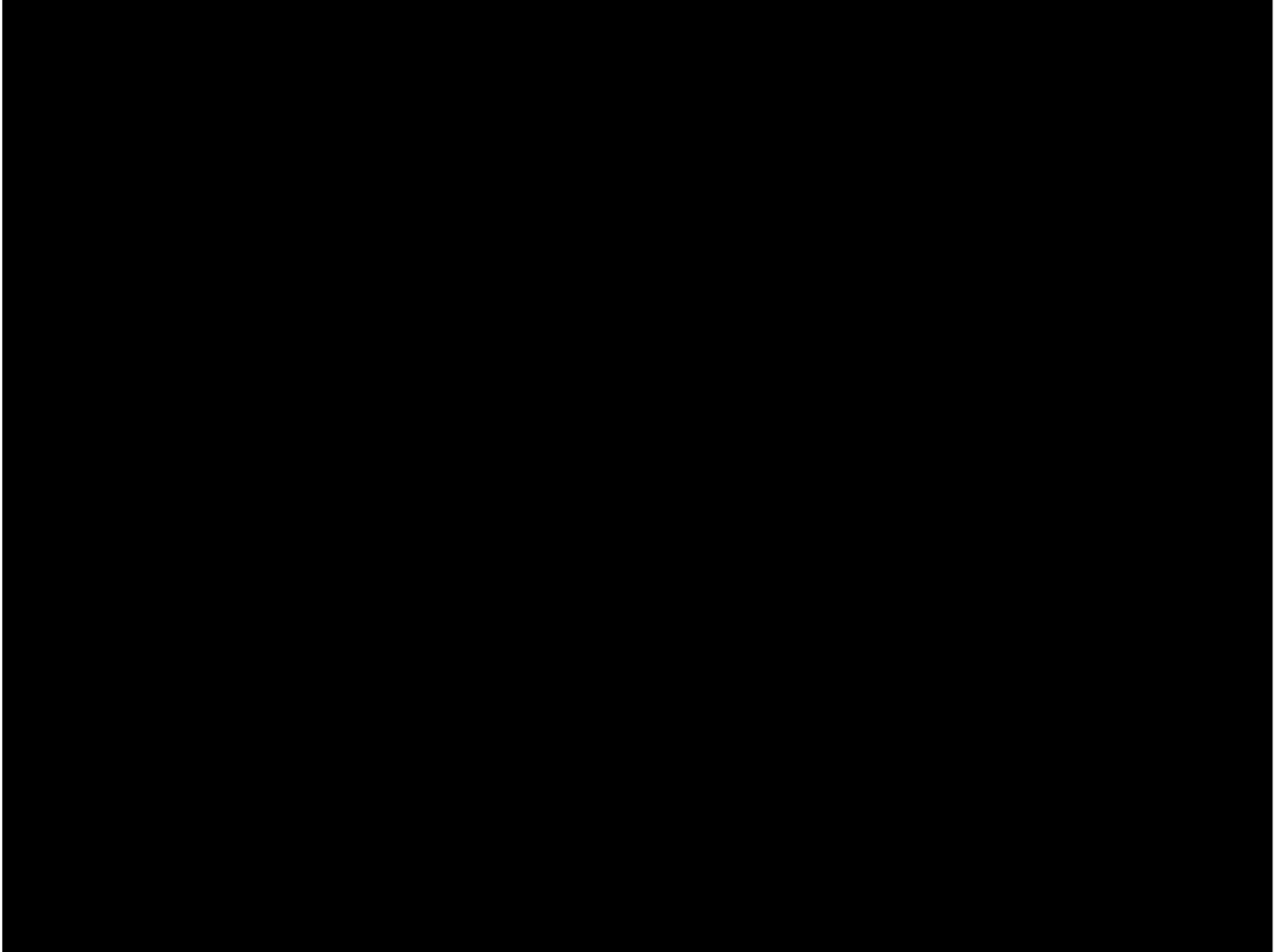
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## Monitoring Questions

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# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

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### PART A - Your details

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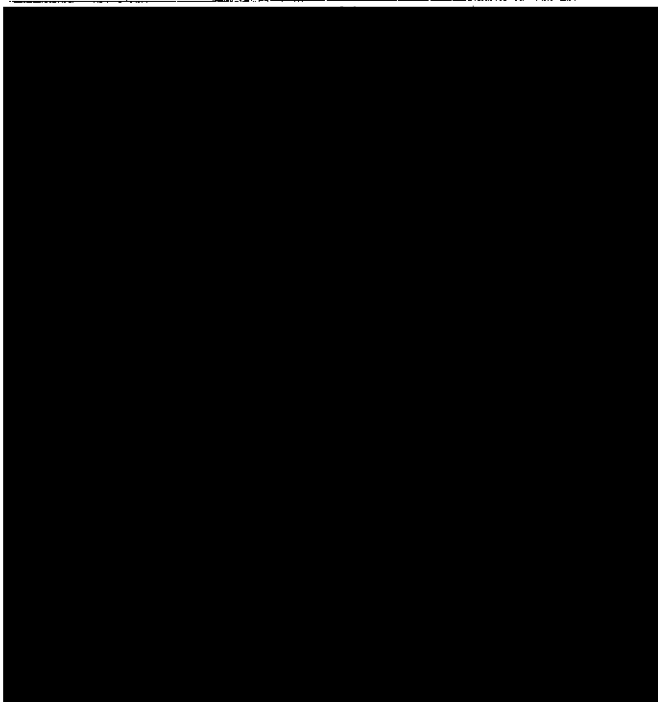
#### 1. Name and Address

Title *MR*

First name *ALAN*

Last Name *ATKINSON*

Organisation  
(if relevant)



#### 2. Agent's Name and Address (if applicable)

Title

First name

Last name

Company

Unit House number

House name

Address 1

Address 2

Town

County

Postcode

Telephone

Email



## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on proposed changes to: (please tick relevant box)

| Local Plan Part 2   | Technical Reports (answer Q1 & Q9 only)                                  |
|---|--|
| <input type="checkbox"/> Development Management Policies              | <input type="checkbox"/> Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> Site Allocations and Designations | <input type="checkbox"/> Consultation Statement                          |
| <input type="checkbox"/> Policies Map (Atlas of Changes)              | <input type="checkbox"/> Addendum to the Strategic Flood Risk Assessment |

Q2. Please indicate the Proposed Change on which you wish to comment:

|                               |                |
|-------------------------------|----------------|
| Policy number;                |                |
| Paragraph number;             | 7.16 PAGE 245. |
| Table or figure number; or    |                |
| Map number (Atlas of Changes) |                |

Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is (please tick)

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Sound?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below (Tick relevant box/es)

|  |  |
|--|--|
| <input type="checkbox"/> It has not been positively prepared | <input checked="" type="checkbox"/> It is not effective            |
| <input type="checkbox"/> It is not justified                 | <input type="checkbox"/> It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

The Council needs to identify a site for the Health Hub in West Drayton. Especially now that the Swimming Pool site in Yiewsley is not being developed as a health centre.

The Council needs to PROTECT this site for community use - either for sports or another swimming pool.

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

**No, I do not want to participate in the oral examination**

**Yes, I would like to participate in the oral examination**

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                          |  |
|--------------------------|--|
| <input type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

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- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

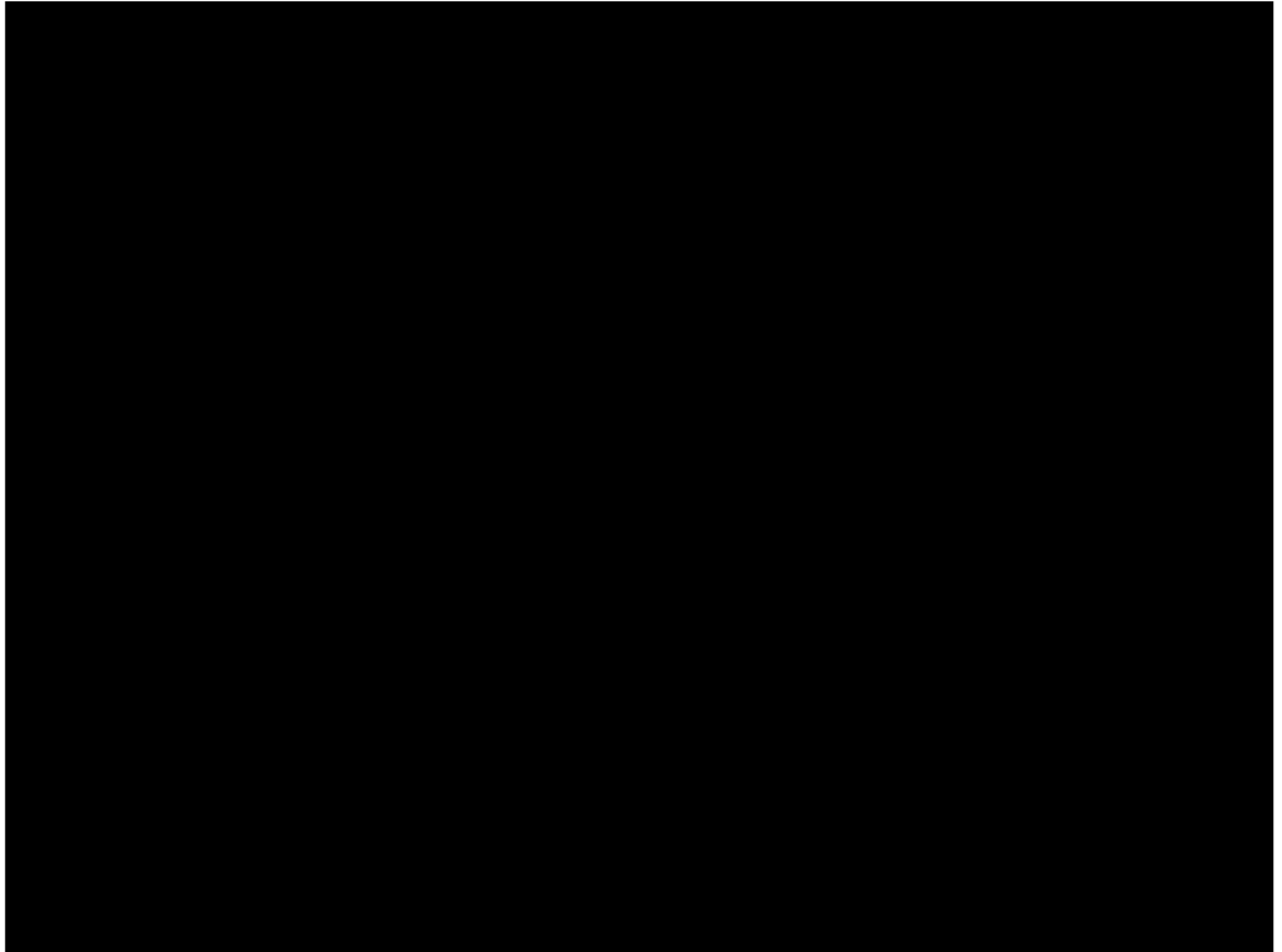
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# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

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### PART A - Your details

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |          | 2. Agent's Name and Address (if applicable) |              |  |
|----------------------------|----------|---|--------------|--|
| Title                      | MISS     | Title                                       |              |  |
| First name                 | Emily    | First name                                  |              |  |
| Last Name                  | Auckland | Last name                                   |              |  |
| Organisation (if relevant) |          | Company                                     |              |  |
| Unit                       |          | Unit  | House number |  |
| House name                 |          | House name                                  |              |  |
| Address 1                  |          | Address 1                                   |              |  |
| Address 2                  |          | Address 2                                   |              |  |
| Town                       |          | Town  |              |  |
| County                     |          | County                                      |              |  |
| Postcode                   |          | Postcode                                    |              |  |
| Telephone                  |          | Telephone                                   |              |  |
| Email                      |          | Email                                       |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on proposed changes to: (please tick relevant box)

| Local Plan Part 2                   |                                   | Technical Reports (answer Q1 & Q9 only) |   |
|-------------------------------------|-----------------------------------|---|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                | Addendum to the Strategic Flood Risk Assessment |

Q2. Please indicate the Proposed Change on which you wish to comment:

|                               |                  |
|-------------------------------|------------------|
| Policy number;                | SA37             |
| Paragraph number;             | Page 107 and 108 |
| Table or figure number; or    |                  |
| Map number (Atlas of Changes) |                  |

Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is (please tick)

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

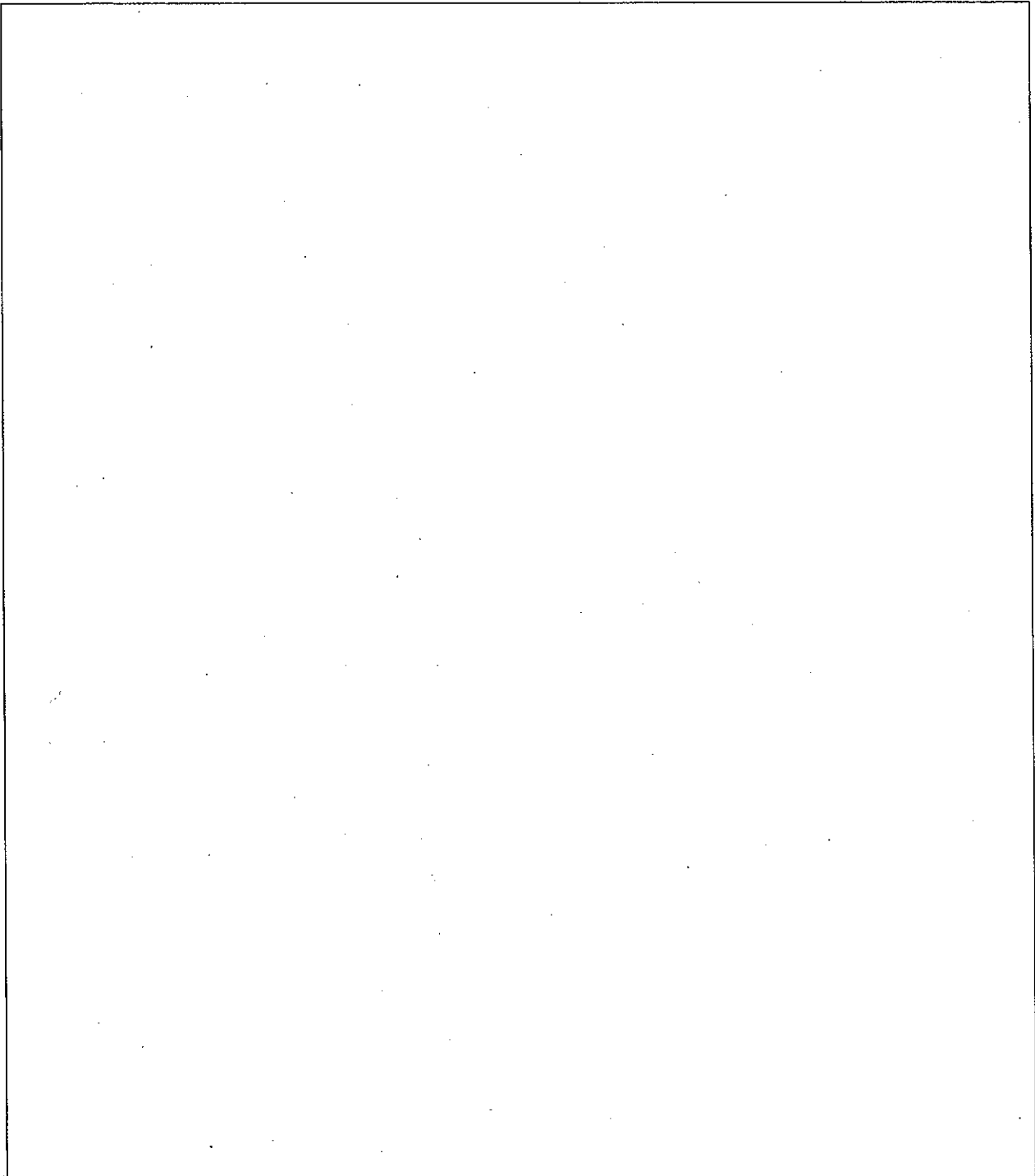
Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below (Tick relevant box/es)

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*





**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary



## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:**

|                          |  |
|--------------------------|--|
| <input type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input type="checkbox"/> | <b>The adoption of the Local Plan Part 2.</b>  |

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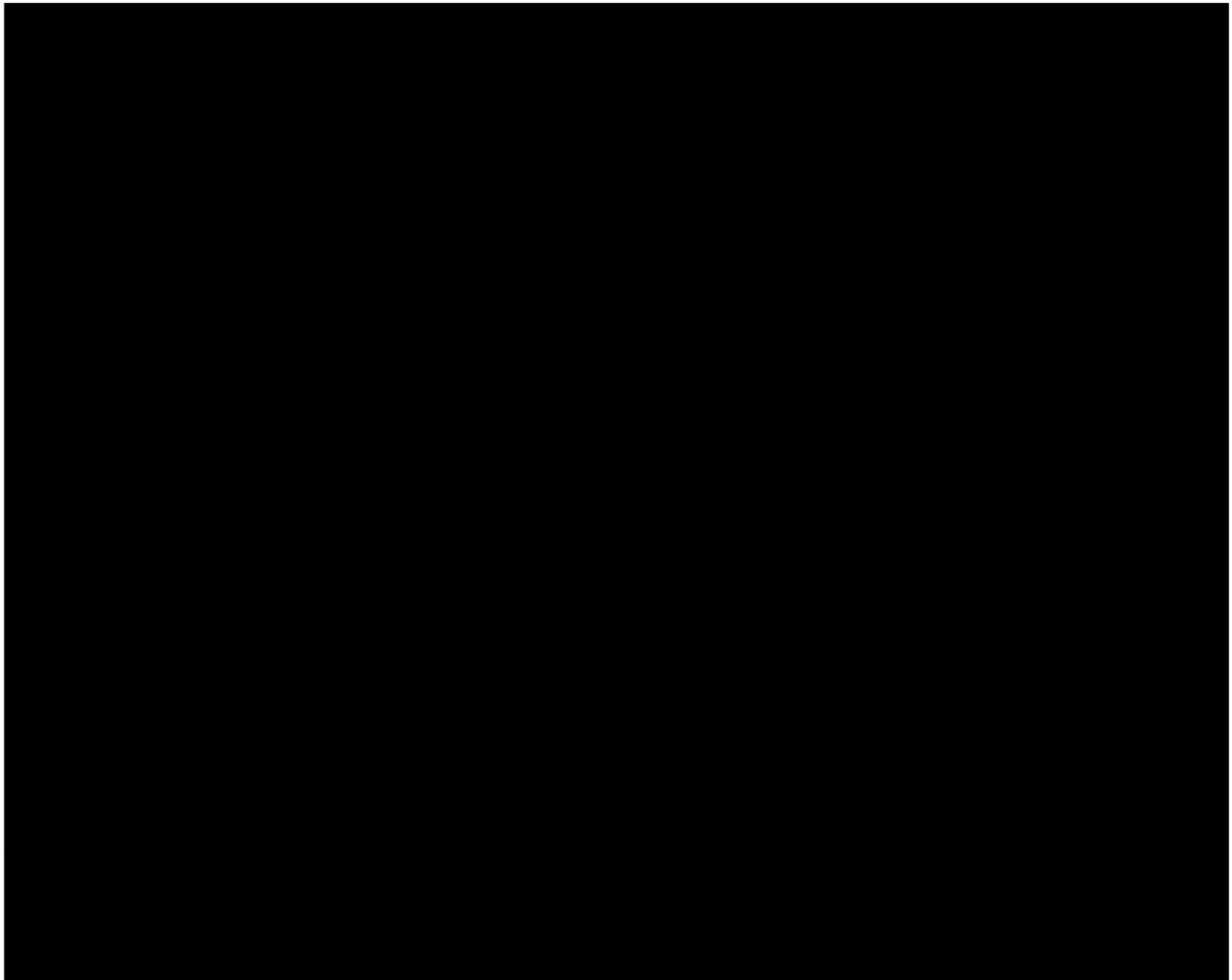
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# HILLINGDON

LONDON

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### PART A - Your details

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| 1. Name and Address        |        | 2. Agent's Name and Address (if applicable) |              |  |
|----------------------------|--------|---|--------------|--|
| Title                      | MR     | Title                                       |              |  |
| First name                 | PETER  | First name                                  |              |  |
| Last Name                  | DECENT | Last name                                   |              |  |
| Organisation (if relevant) |        | Company                                     |              |  |
| Unit                       |        | Unit  | House number |  |
| House name                 |        | House name                                  |              |  |
| Address 1                  |        | Address 1                                   |              |  |
| Address 2                  |        | Address 2                                   |              |  |
| Town                       |        | Town  |              |  |
| County                     |        | County                                      |              |  |
| Postcode                   |        | Postcode                                    |              |  |
| Telephone                  |        | Telephone                                   |              |  |
| Email                      |        | Email                                       |              |  |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on proposed changes to: (please tick relevant box)

| Local Plan Part 2                   |                                   | Technical Reports (answer Q1 & Q9 only) |   |
|-------------------------------------|-----------------------------------|---|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                | Addendum to the Strategic Flood Risk Assessment |

Q2. Please indicate the Proposed Change on which you wish to comment:

|                               |                |
|-------------------------------|----------------|
| Policy number;                | SA 37          |
| Paragraph number;             | PAGE 107 & 108 |
| Table or figure number; or    |                |
| Map number (Atlas of Changes) |                |

Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is (please tick)

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below (Tick relevant box/es)

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

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*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*





**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | When the Local Plan Part 2 Plan has been submitted for independent examination.   |
| <input type="checkbox"/> | The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2. |
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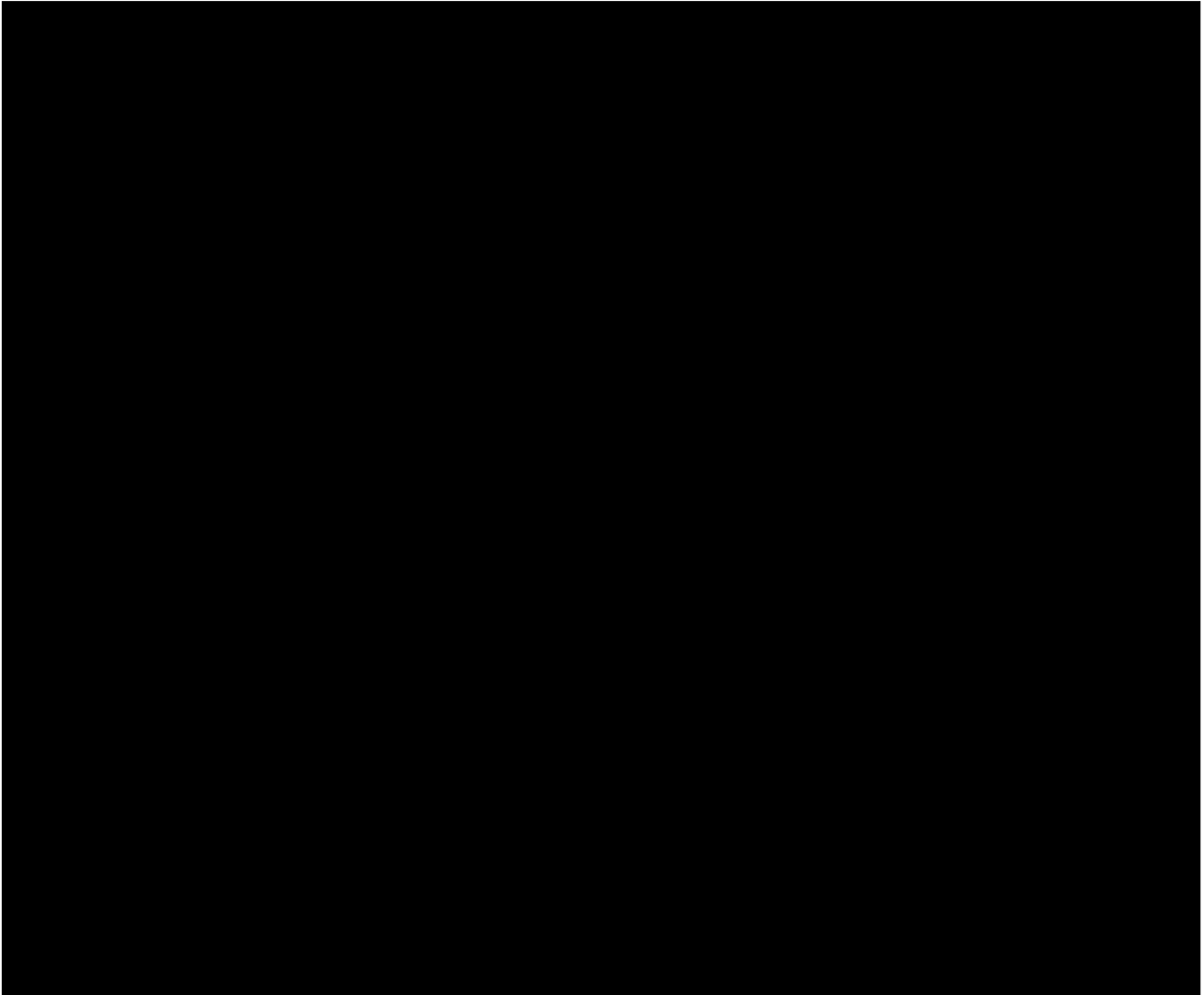
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| 1. Name and Address        |                        | 2. Agent's Name and Address (if applicable) |              |
|----------------------------|------------------------|---|--------------|
| Title                      | MRS                    | Title                                       |              |
| First name                 | <del>MRS</del> FRANCES | First name                                  |              |
| Last Name                  | DECENT                 | Last name                                   |              |
| Organisation (if relevant) |                        | Company                                     |              |
| Unit                       |                        | Unit  | House number |
| House name                 |                        | House name                                  |              |
| Address 1                  |                        | Address 1                                   |              |
| Address 2                  |                        | Address 2                                   |              |
| Town                       |                        | Town  |              |
| County                     |                        | County                                      |              |
| Postcode                   |                        | Postcode                                    |              |
| Telephone                  |                        | Telephone                                   |              |
| Email                      |                        | Email                                       |              |



## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on proposed changes to: *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

Q2. Please indicate the Proposed Change on which you wish to comment:

|                               |              |
|-------------------------------|--------------|
| Policy number;                | SA37.        |
| Paragraph number;             | Page 107 108 |
| Table or figure number; or    |              |
| Map number (Atlas of Changes) |              |

Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

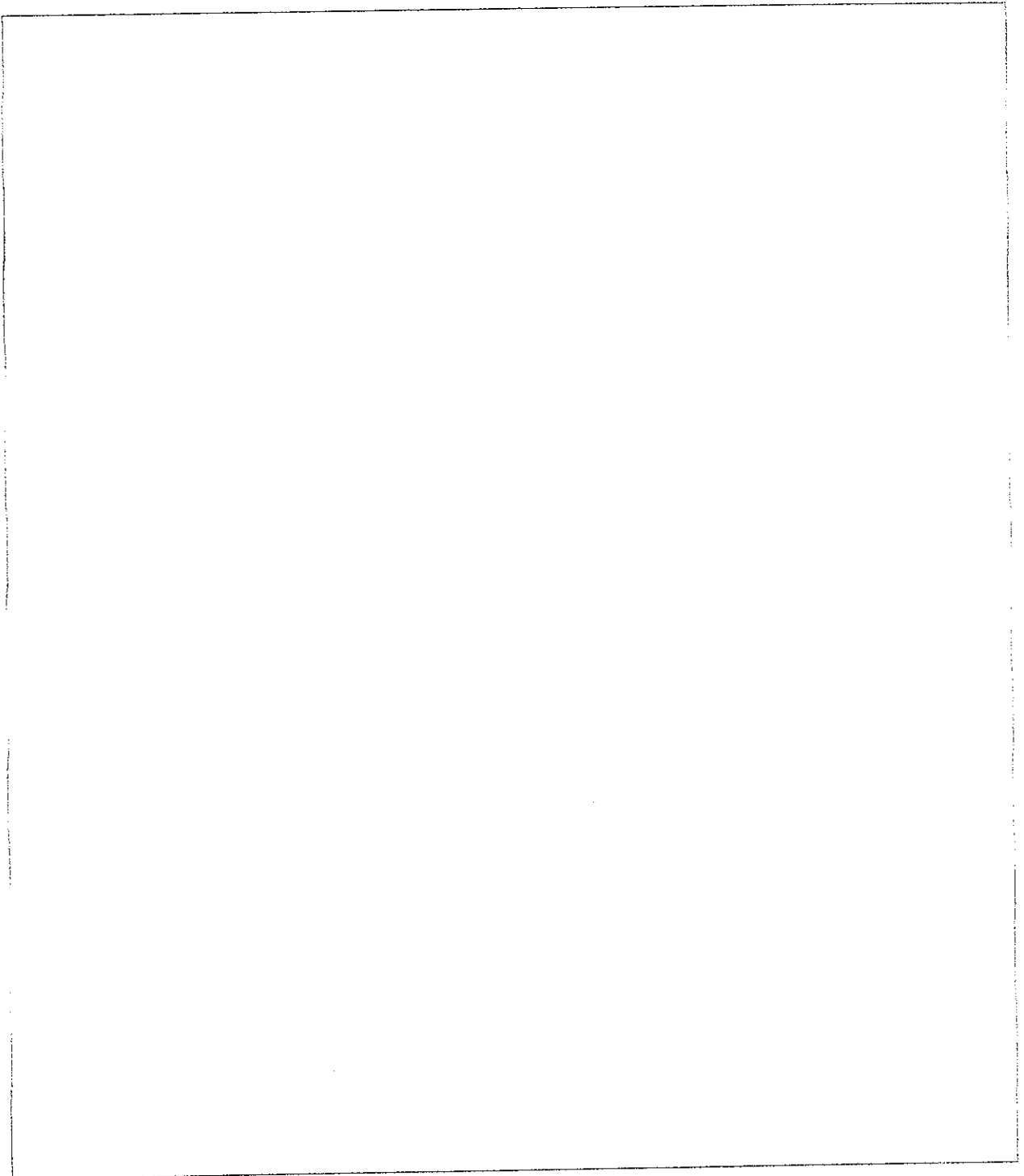
Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below *(Tick relevant box/es)*

|                          |                                     |                          |  |
|--------------------------|-------------------------------------|--------------------------|--|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                        |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy. |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

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Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

**No, I do not want to participate in the oral examination**

**Yes, I would like to participate in the oral examination**

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

|  |
|--|
|  |
|--|

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

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If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                          |  |
|--------------------------|--|
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| <input type="checkbox"/> | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
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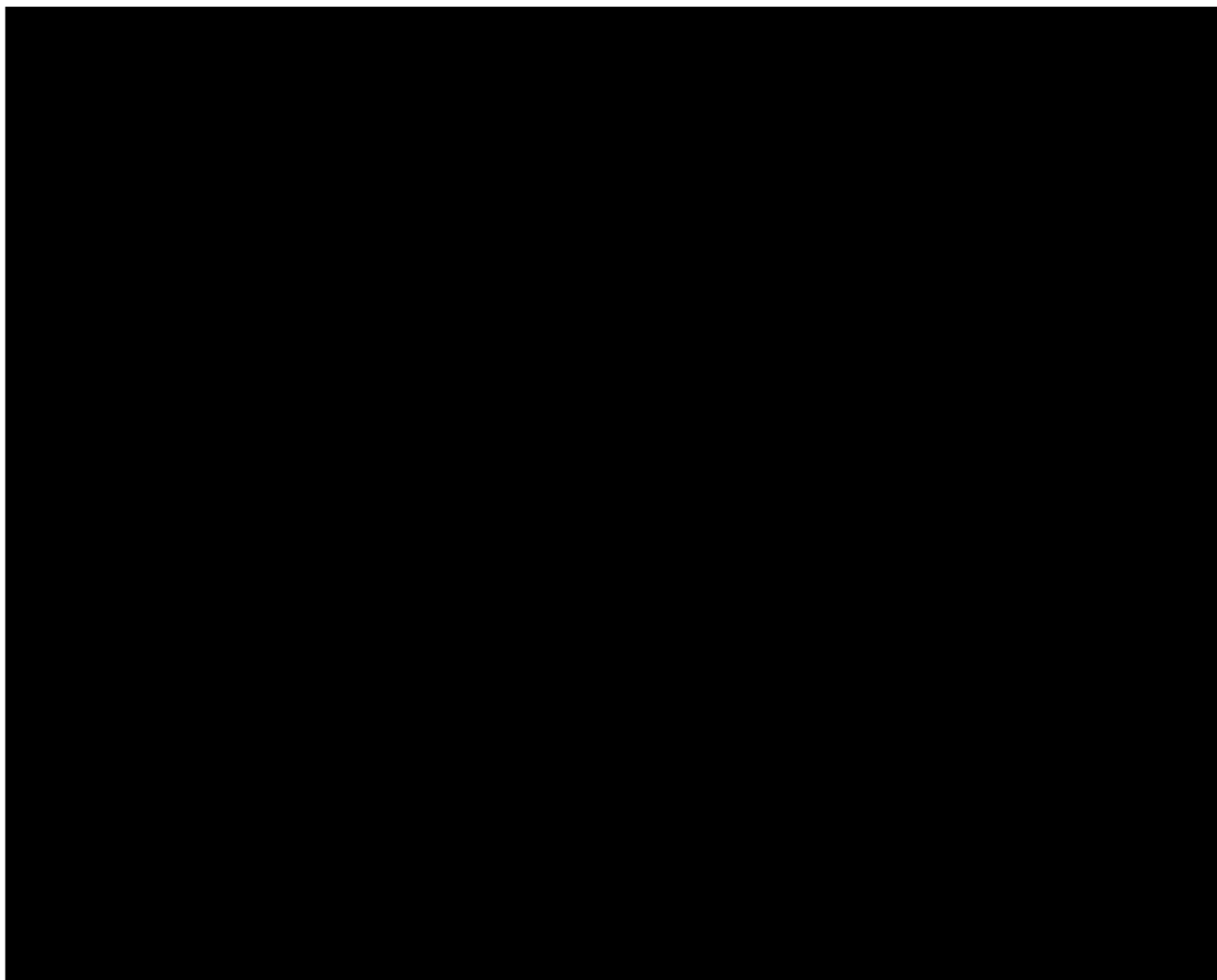
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| 1. Name and Address        |         | 2. Agent's Name and Address (if applicable) |              |
|----------------------------|---------|---|--------------|
| Title                      | MR      | Title                                       |              |
| First name                 | MATTHEW | First name                                  |              |
| Last Name                  | CRANIE  | Last name                                   |              |
| Organisation (if relevant) |         | Company                                     |              |
| Unit                       |         | Unit  | House number |
| House name                 |         | House name                                  |              |
| Address 1                  |         | Address 1                                   |              |
| Address 2                  |         | Address 2                                   |              |
| Town                       |         | Town  |              |
| County                     |         | County                                      |              |
| Postcode                   |         | Postcode                                    |              |
| Telephone                  |         | Telephone                                   |              |
| Email                      |         | Email                                       |              |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on proposed changes to: *(please tick relevant box)*

| Local Plan Part 2                   |                                   |
|-------------------------------------|-----------------------------------|
| <input type="checkbox"/>            | Development Management Policies   |
| <input checked="" type="checkbox"/> | Site Allocations and Designations |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| Technical Reports (answer Q1 & Q9 only) |   |
|---|---|
| <input type="checkbox"/>                | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                | Consultation Statement                          |
| <input type="checkbox"/>                | Addendum to the Strategic Flood Risk Assessment |

Q2. Please indicate the Proposed Change on which you wish to comment:

|                               |                |
|-------------------------------|----------------|
| Policy number;                | S A37          |
| Paragraph number;             | PAGE 107 & 108 |
| Table or figure number; or    |                |
| Map number (Atlas of Changes) |                |

Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below *(Tick relevant box/es)*

|                          |                                     |
|--------------------------|-------------------------------------|
| <input type="checkbox"/> | It has not been positively prepared |
| <input type="checkbox"/> | It is not justified                 |

|                          |  |
|--------------------------|--|
| <input type="checkbox"/> | It is not effective                        |
| <input type="checkbox"/> | It is not consistent with national policy. |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

A large, empty rectangular box with a thin black border, intended for the respondent to provide their representation or suggested revised wording as requested in the text above.



**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary



## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input type="checkbox"/>            | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input type="checkbox"/>            | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

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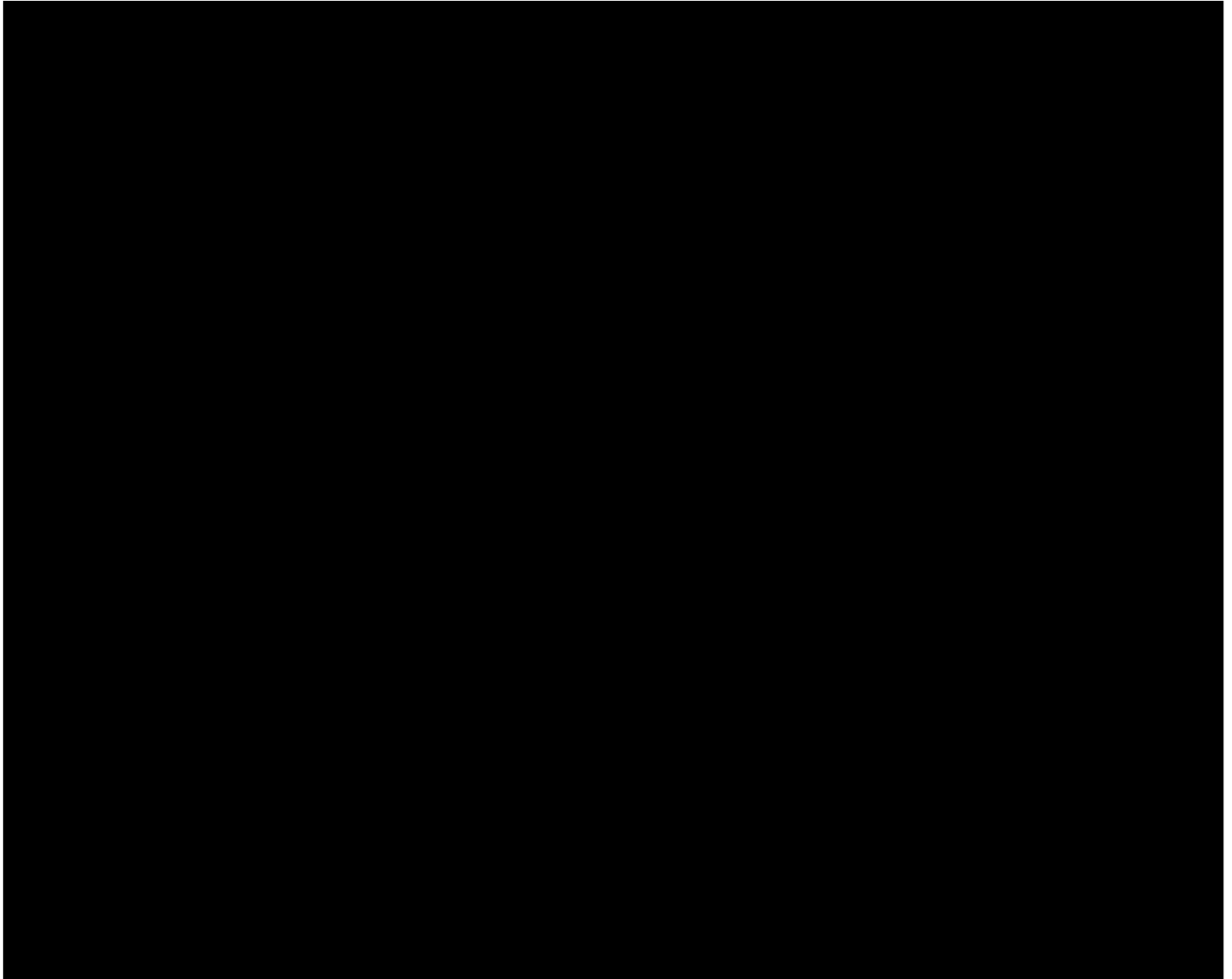
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# HILLINGDON

LONDON

## Further Changes to the Local Plan Part 2 Regulation 19 Revised Proposed Submission Version Representation Form

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### PART A - Your details

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| 1. Name and Address        |          | 2. Agent's Name and Address (if applicable) |              |
|----------------------------|----------|---|--------------|
| Title                      | MR       | Title                                       |              |
| First name                 | THOMAS   | First name                                  |              |
| Last Name                  | CATHCART | Last name                                   |              |
| Organisation (if relevant) |          | Company                                     |              |
| Unit                       |          | Unit  | House number |
| House name                 |          | House name                                  |              |
| Address 1                  |          | Address 1                                   |              |
| Address 2                  |          | Address 2                                   |              |
| Town                       |          | Town  |              |
| County                     |          | County                                      |              |
| Postcode                   |          | Postcode                                    |              |
| Telephone                  |          | Telephone                                   |              |
| Email                      |          | Email                                       |              |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on proposed changes to: *(please tick relevant box)*

| Local Plan Part 2                   |                                   |
|-------------------------------------|-----------------------------------|
| <input type="checkbox"/>            | Development Management Policies   |
| <input checked="" type="checkbox"/> | Site Allocations and Designations |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|--|---|
| <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

Q2. Please indicate the Proposed Change on which you wish to comment:

|                               |                |
|-------------------------------|----------------|
| Policy number;                | JA 37          |
| Paragraph number;             | PAGE 107 & 108 |
| Table or figure number; or    |                |
| Map number (Atlas of Changes) |                |

Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

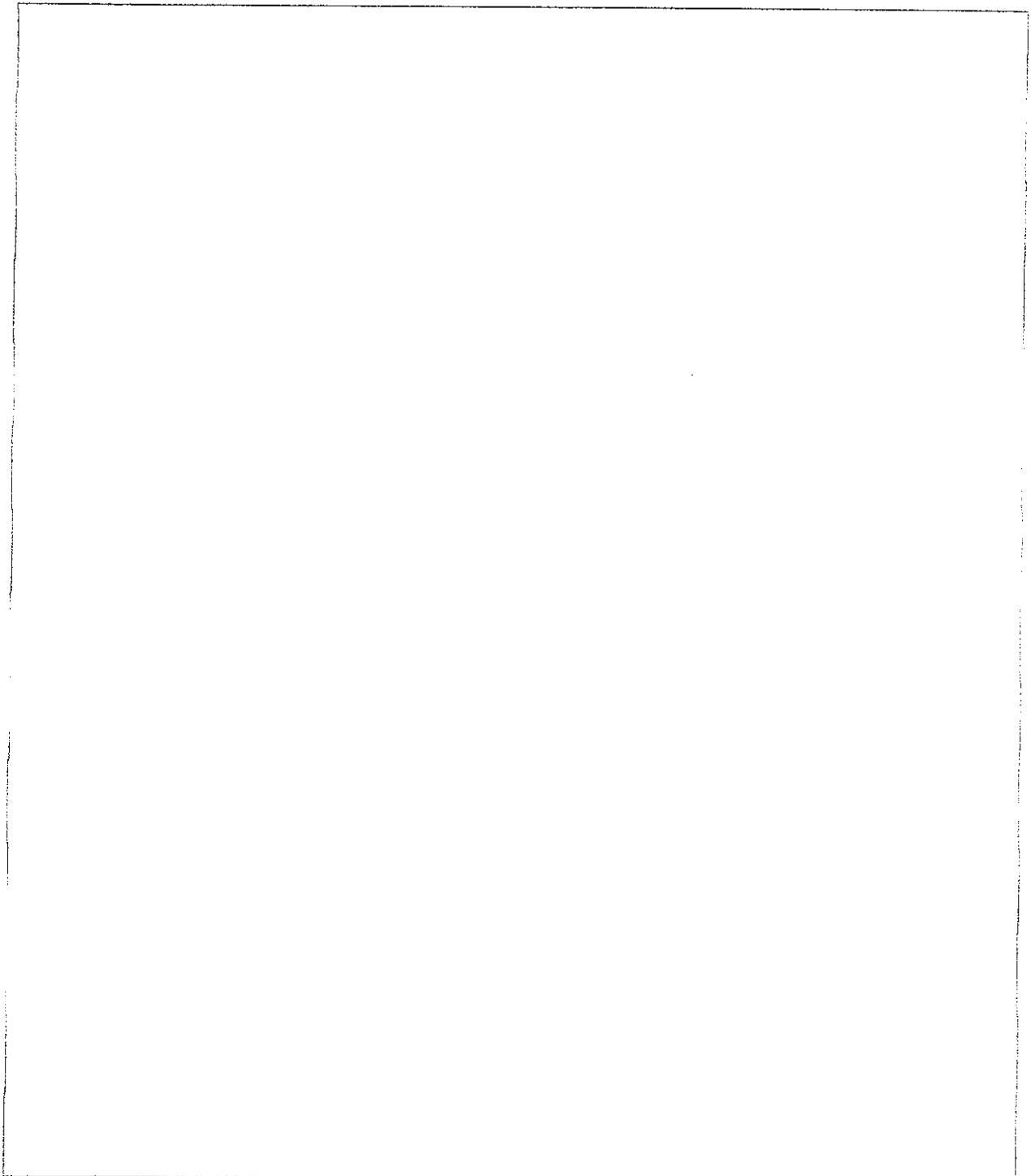
Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*





Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

**No, I do not want to participate in the oral examination**

**Yes, I would like to participate in the oral examination**

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## PART C - Progress of the Local Plan Part 2

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                                     |   |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | When the Local Plan Part 2 Plan has been submitted for independent examination.   |
| <input type="checkbox"/>            | The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2. |
| <input type="checkbox"/>            | The adoption of the Local Plan Part 2.  |

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# HILLINGDON

LONDON

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| 1. Name and Address        |          | 2. Agent's Name and Address (if applicable) |              |  |
|----------------------------|----------|---|--------------|--|
| Title                      | MR       | Title                                       |              |  |
| First name                 | ALAN     | First name                                  |              |  |
| Last Name                  | ATKINSON | Last name                                   |              |  |
| Organisation (if relevant) |          | Company                                     |              |  |
| Unit                       |          | Unit  | House number |  |
| House name                 |          | House name                                  |              |  |
| Address 1                  |          | Address 1                                   |              |  |
| Address 2                  |          | Address 2                                   |              |  |
| Town                       |          | Town  |              |  |
| County                     |          | County                                      |              |  |
| Postcode                   |          | Postcode                                    |              |  |
| Telephone                  |          | Telephone                                   |              |  |
| Email                      |          | Email                                       |              |  |



## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on proposed changes to: (please tick relevant box)

| Local Plan Part 2                   |                                   |
|-------------------------------------|-----------------------------------|
| <input type="checkbox"/>            | Development Management Policies   |
| <input checked="" type="checkbox"/> | Site Allocations and Designations |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   |

| Technical Reports (answer Q1 & Q9 only) |   |
|---|---|
| <input type="checkbox"/>                | Addendum to Sustainability Appraisal            |
| <input type="checkbox"/>                | Consultation Statement                          |
| <input type="checkbox"/>                | Addendum to the Strategic Flood Risk Assessment |

Q2. Please indicate the Proposed Change on which you wish to comment:

|                               |                |
|-------------------------------|----------------|
| Policy number;                | S A 37         |
| Paragraph number;             | PAGE 107 & 108 |
| Table or figure number; or    |                |
| Map number (Atlas of Changes) |                |

Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is (please tick)

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

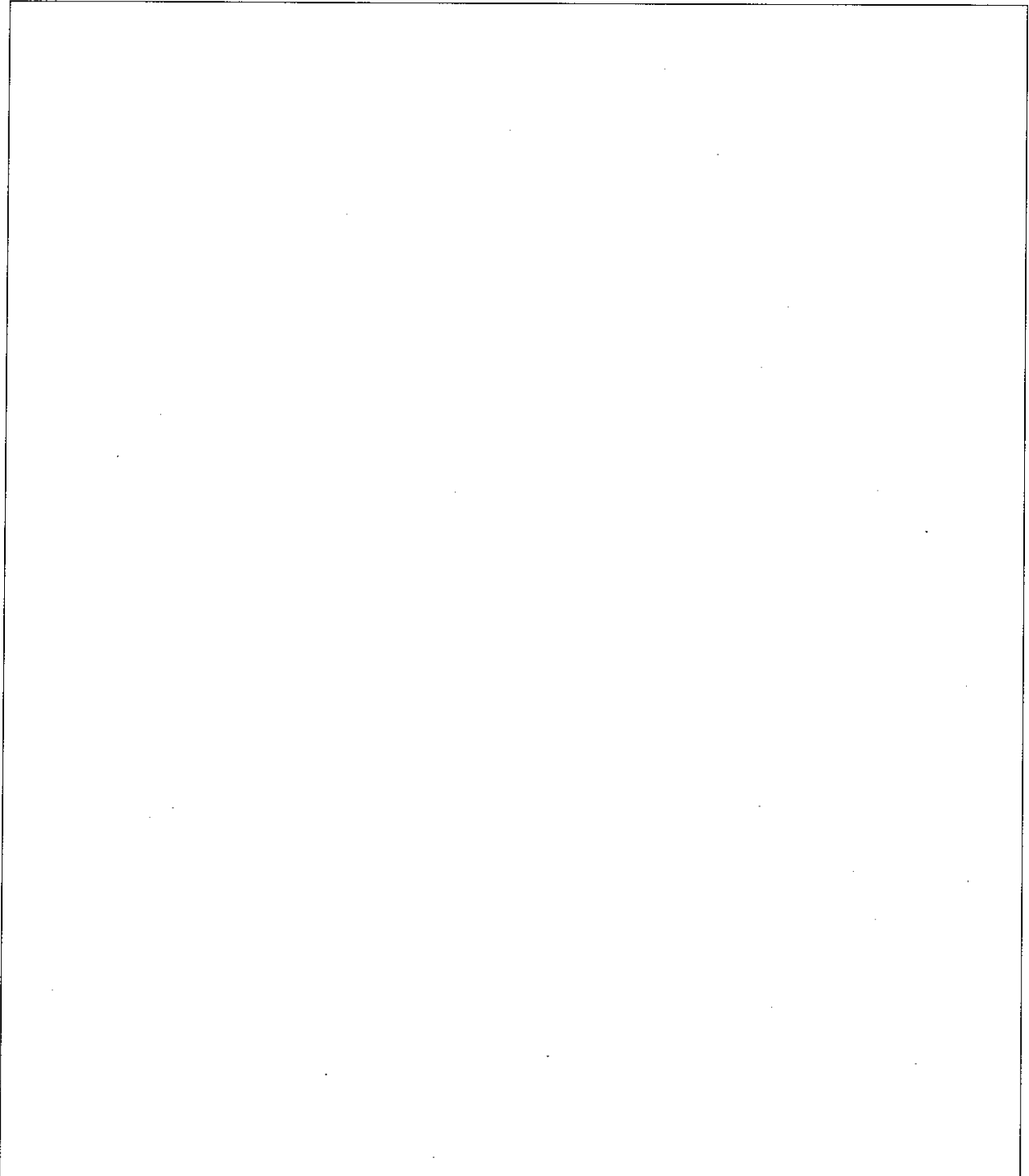
Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below (Tick relevant box/es)

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

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Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

**No, I do not want to participate in the oral examination**

**Yes, I would like to participate in the oral examination**

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input type="checkbox"/>            | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
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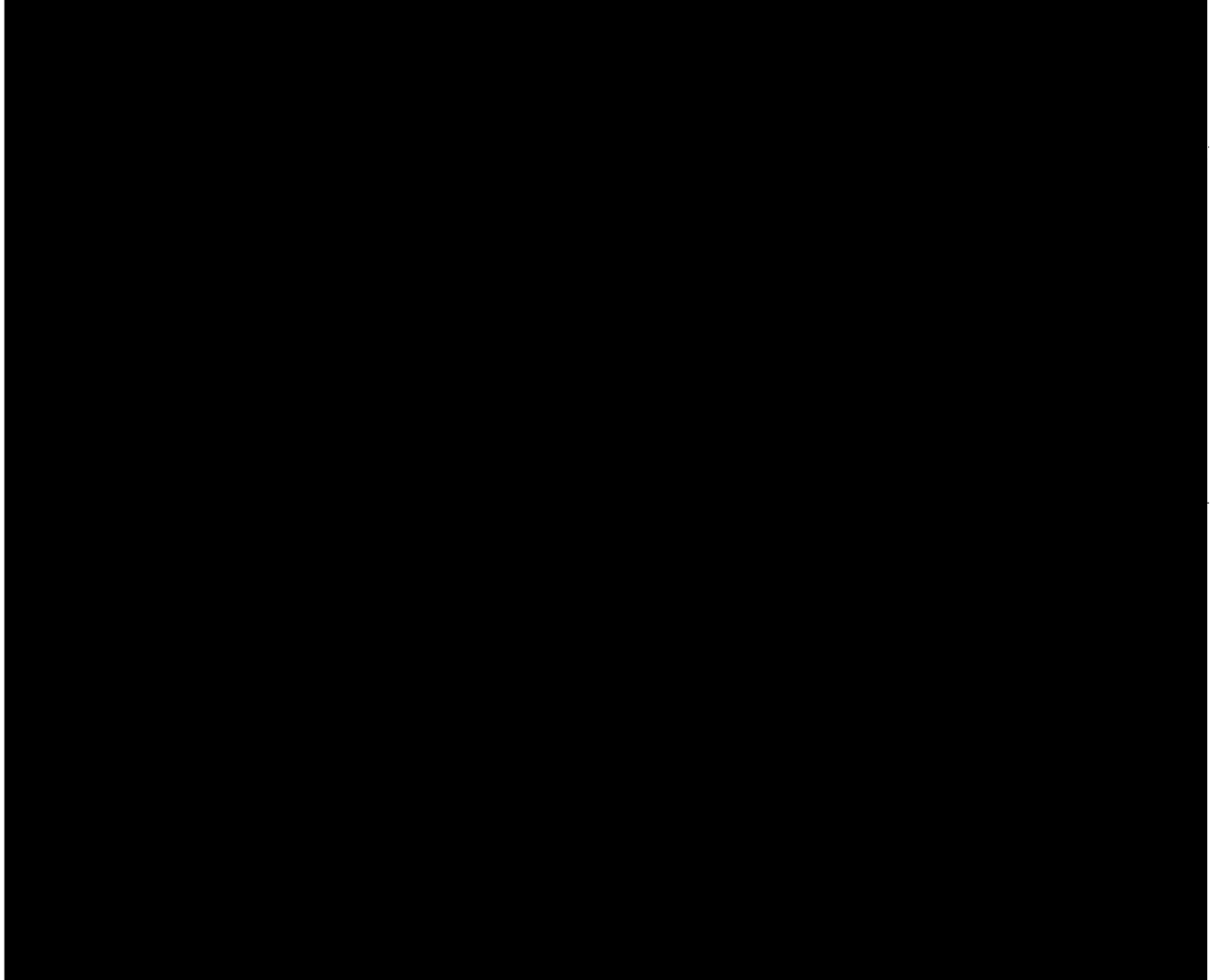
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LONDON

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### PART A - Your details

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| 1. Name and Address        |          | 2. Agent's Name and Address (if applicable) |              |
|----------------------------|----------|---|--------------|
| Title                      | MR       | Title                                       |              |
| First name                 | Jack     | First name                                  |              |
| Last Name                  | Cathcart | Last name                                   |              |
| Organisation (if relevant) |          | Company                                     |              |
| Unit                       |          | Unit  | House number |
| House name                 |          | House name                                  |              |
| Address 1                  |          | Address 1                                   |              |
| Address 2                  |          | Address 2                                   |              |
| Town                       |          | Town  |              |
| County                     |          | County                                      |              |
| Postcode                   |          | Postcode                                    |              |
| Telephone                  |          | Telephone                                   |              |
| Email                      |          | Email                                       |              |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on proposed changes to: *(please tick relevant box)*

| Local Plan Part 2                   |                                   | Technical Reports <i>(answer Q1 &amp; Q9 only)</i> |   |
|-------------------------------------|-----------------------------------|--|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                           | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                           | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                           | Addendum to the Strategic Flood Risk Assessment |

Q2. Please indicate the Proposed Change on which you wish to comment:

|   |                 |
|---|-----------------|
| Policy number;  | SA 37           |
| Paragraph number;   | Page 107 + 108. |
| Table or figure number; or<br>Map number (Atlas of Changes) |                 |

Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is *(please tick)*

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below *(Tick relevant box/es)*

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

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*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*





**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## PART C - Progress of the Local Plan Part 2

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                                     |   |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | When the Local Plan Part 2 Plan has been submitted for independent examination.   |
| <input type="checkbox"/>            | The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2. |
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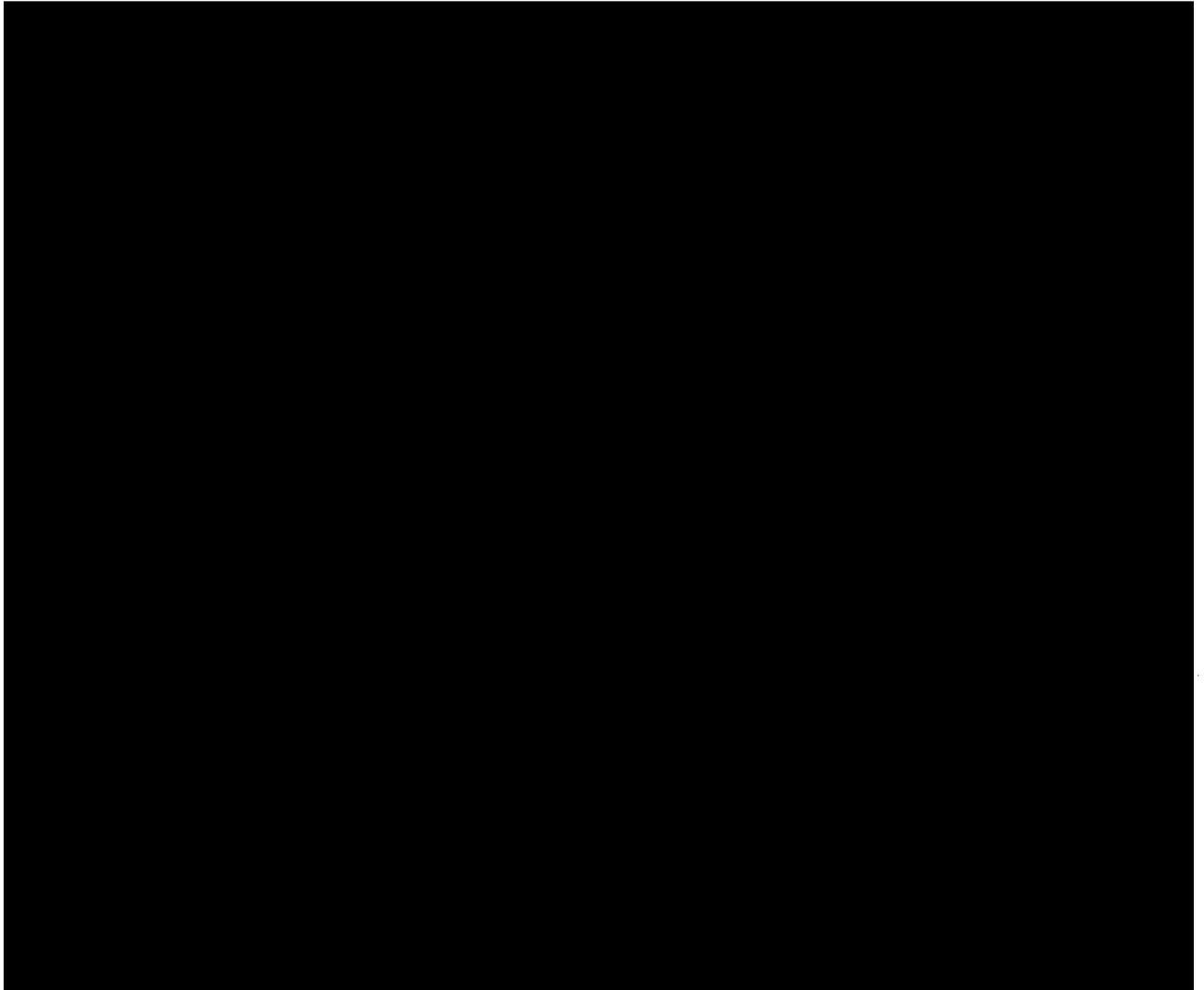
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| 1. Name and Address        |        | 2. Agent's Name and Address (if applicable) |              |
|----------------------------|--------|---|--------------|
| Title                      | MRS    | Title                                       |              |
| First name                 | Sarah  | First name                                  |              |
| Last Name                  | Cranie | Last name                                   |              |
| Organisation (if relevant) |        | Company                                     |              |
| Unit                       |        | Unit  | House number |
| House name                 |        | House name                                  |              |
| Address                    |        | Address 1                                   |              |
| Address                    |        | Address 2                                   |              |
| Town                       |        | Town  |              |
| County                     |        | County                                      |              |
| Postcode                   |        | Postcode                                    |              |
| Telephone                  |        | Telephone                                   |              |
| Email                      |        | Email                                       |              |

## PART B - Your responses

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on proposed changes to: (please tick relevant box)

| Local Plan Part 2                   |                                   | Technical Reports (answer Q1 & Q9 only) |   |
|-------------------------------------|-----------------------------------|---|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                | Addendum to the Strategic Flood Risk Assessment |

Q2. Please indicate the Proposed Change on which you wish to comment:

|                               |                  |
|-------------------------------|------------------|
| Policy number;                | JA 37            |
| Paragraph number;             | Page 107 and 108 |
| Table or figure number; or    |                  |
| Map number (Atlas of Changes) |                  |

Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is (please tick)

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

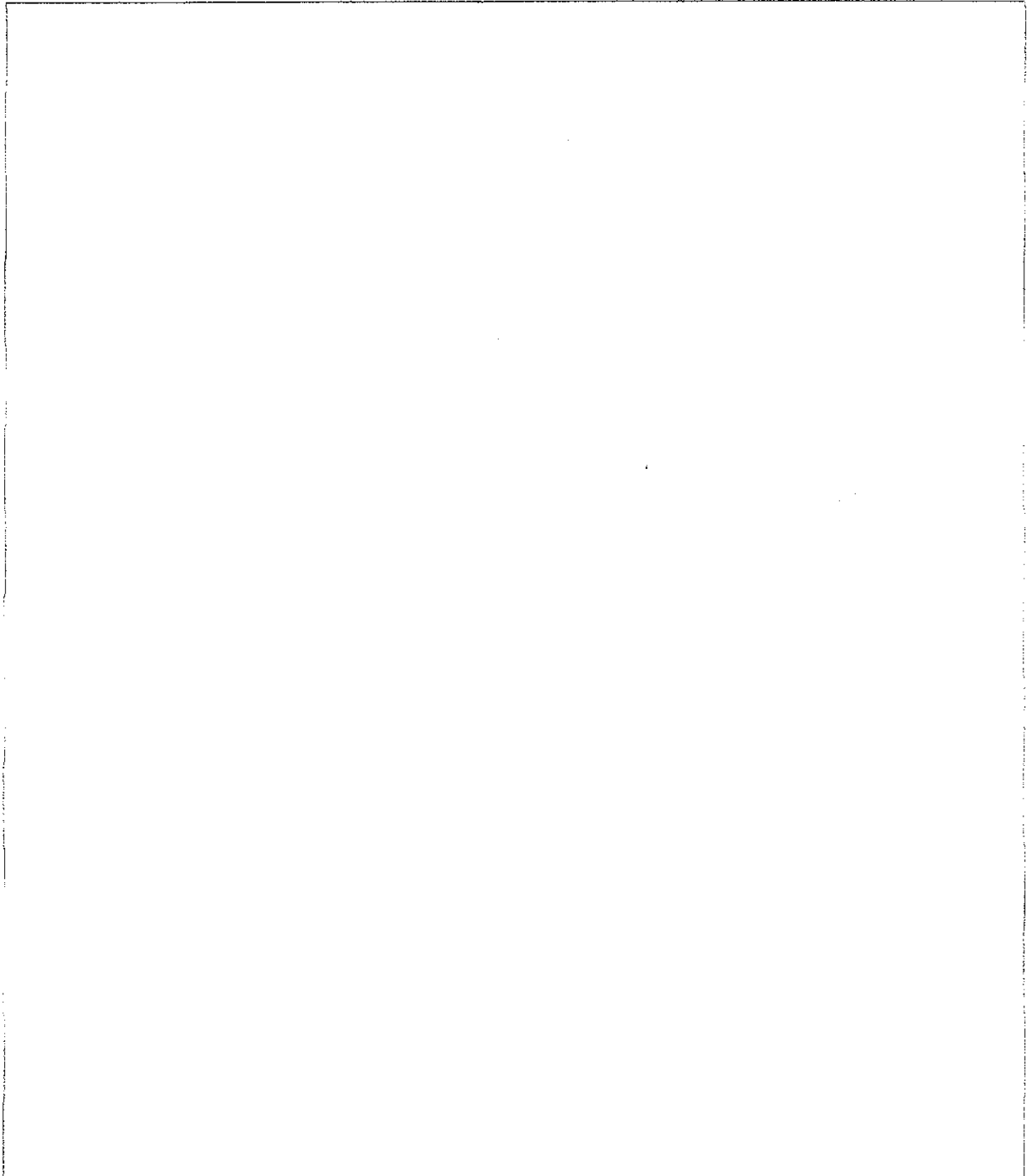
Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below (Tick relevant box/es)

|                          |                                     |                          |   |
|--------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                       |
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**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

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A large, empty rectangular box with a thin black border, intended for the respondent to provide their representation or suggested revised wording as requested in the text above.



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Please continue on a separate sheet if necessary



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If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                                     |   |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | When the Local Plan Part 2 Plan has been submitted for independent examination.   |
| <input type="checkbox"/>            | The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2. |
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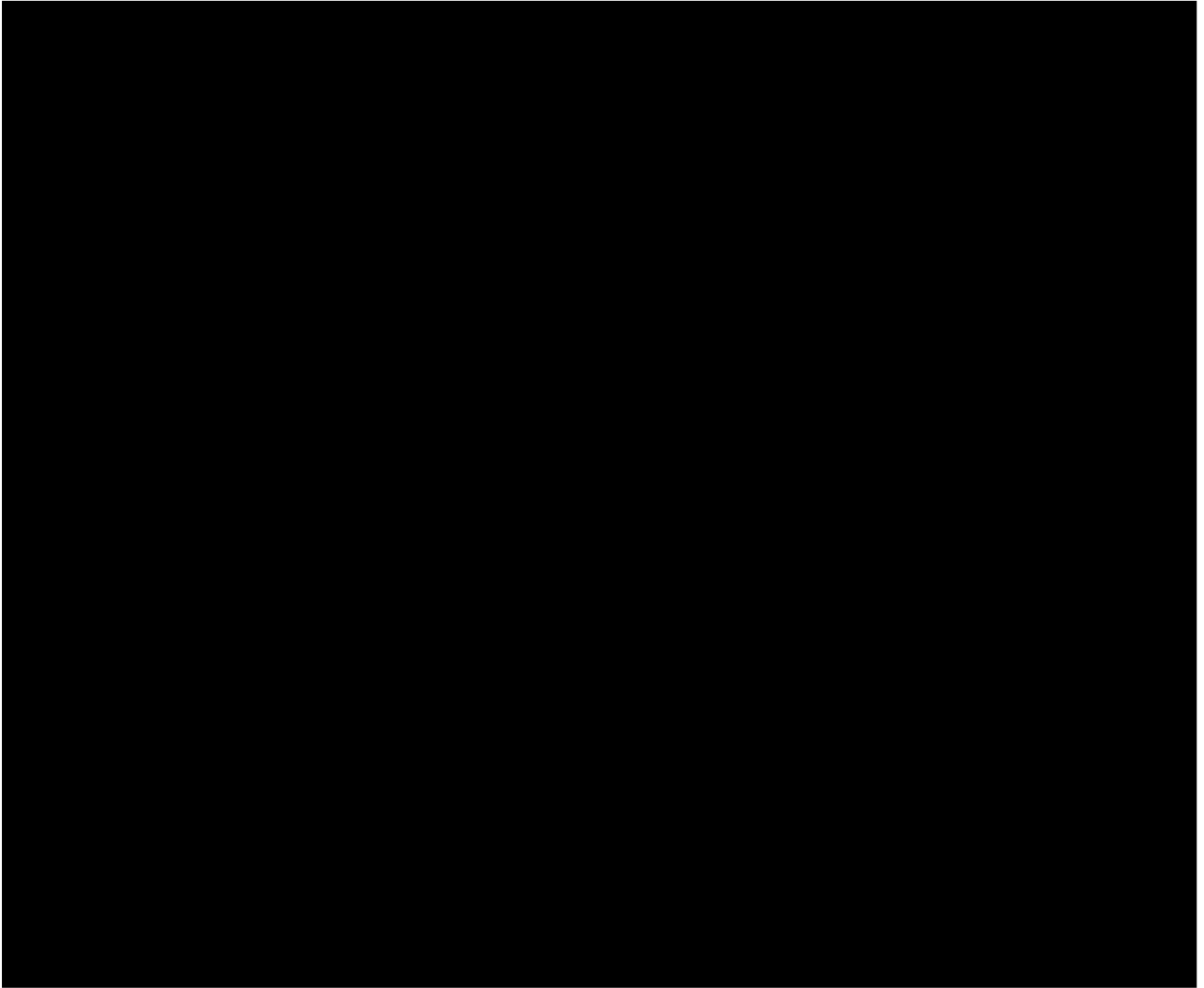
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| 1. Name and Address        |          | 2. Agent's Name and Address (if applicable) |              |
|----------------------------|----------|---|--------------|
| Title                      | MR       | Title                                       |              |
| First name                 | Harry    | First name                                  |              |
| Last Name                  | Cathcart | Last name                                   |              |
| Organisation (if relevant) |          | Company                                     |              |
| Unit                       |          | Unit  | House number |
| House name                 |          | House name                                  |              |
| Address 1                  |          | Address 1                                   |              |
| Address 2                  |          | Address 2                                   |              |
| Town                       |          | Town  |              |
| County                     |          | County                                      |              |
| Postcode                   |          | Postcode                                    |              |
| Telephone                  |          | Telephone                                   |              |
| Email                      |          | Email                                       |              |

## PART B - Your responses

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Q1. I am commenting on proposed changes to: (please tick relevant box)

| Local Plan Part 2                   |                                   | Technical Reports (answer Q1 & Q9 only) |   |
|-------------------------------------|-----------------------------------|---|---|
| <input type="checkbox"/>            | Development Management Policies   | <input type="checkbox"/>                | Addendum to Sustainability Appraisal            |
| <input checked="" type="checkbox"/> | Site Allocations and Designations | <input type="checkbox"/>                | Consultation Statement                          |
| <input type="checkbox"/>            | Policies Map (Atlas of Changes)   | <input type="checkbox"/>                | Addendum to the Strategic Flood Risk Assessment |

Q2. Please indicate the Proposed Change on which you wish to comment:

|                               |                  |
|-------------------------------|------------------|
| Policy number;                | Sa 37            |
| Paragraph number;             | Page 107 and 108 |
| Table or figure number; or    |                  |
| Map number (Atlas of Changes) |                  |

Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is (please tick)

|   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| Sound?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

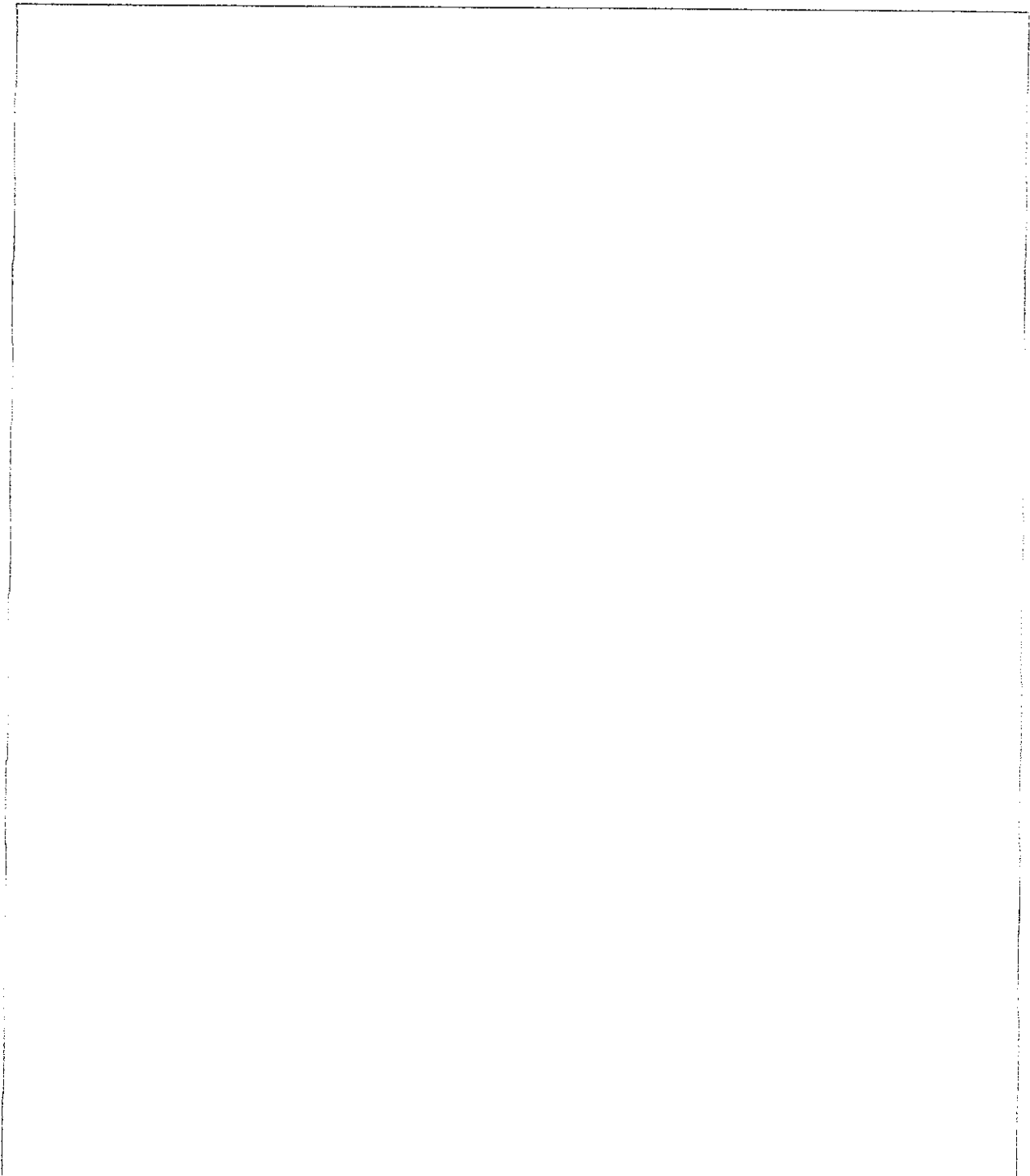
Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below (Tick relevant box/es)

|                          |                                     |                          |  |
|--------------------------|-------------------------------------|--------------------------|--|
| <input type="checkbox"/> | It has not been positively prepared | <input type="checkbox"/> | It is not effective                        |
| <input type="checkbox"/> | It is not justified                 | <input type="checkbox"/> | It is not consistent with national policy. |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

A large, empty rectangular box with a thin black border, intended for the respondent to provide their representation or amendments as requested in the questions above.

Please continue on a separate sheet if necessary

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
*(Please tick appropriate box)*

**No, I do not want to participate in the oral examination**

**Yes, I would like to participate in the oral examination**

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

|  |
|--|
|  |
|--|



**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

If you would like to be updated on the progress of the Local Plan Part 2, please indicate (*tick*) which stage(s) you would like to be informed of:

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>When the Local Plan Part 2 Plan has been submitted for independent examination.</b>   |
| <input type="checkbox"/>            | <b>The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.</b> |
| <input type="checkbox"/>            | <b>The adoption of the Local Plan Part 2.</b>  |

## Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

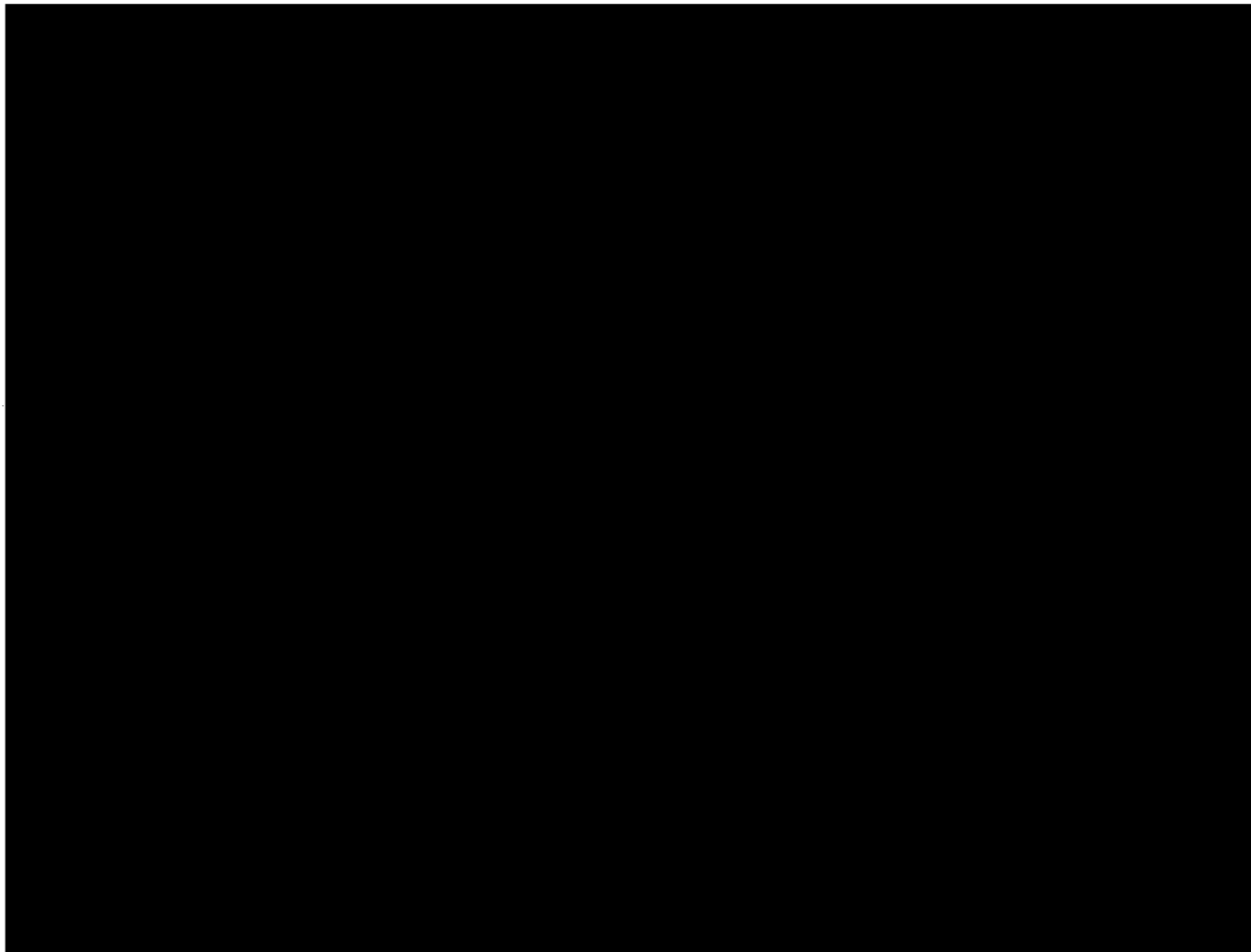
- **Email to:** [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk), or
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

**For more details:** Please telephone the Planning Policy Team on 01895 250 230 or send an email to: [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)

**All forms must be received by the Council by 5pm on Tuesday 8<sup>th</sup> December 2015.**

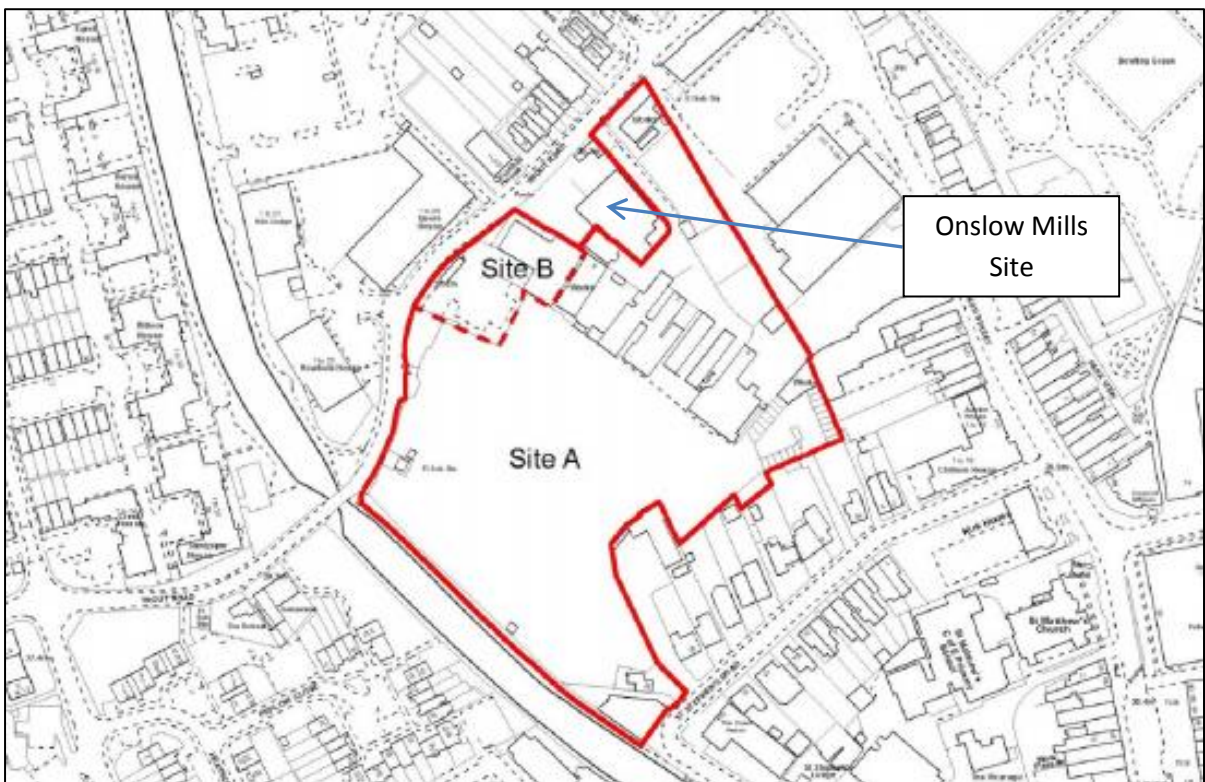
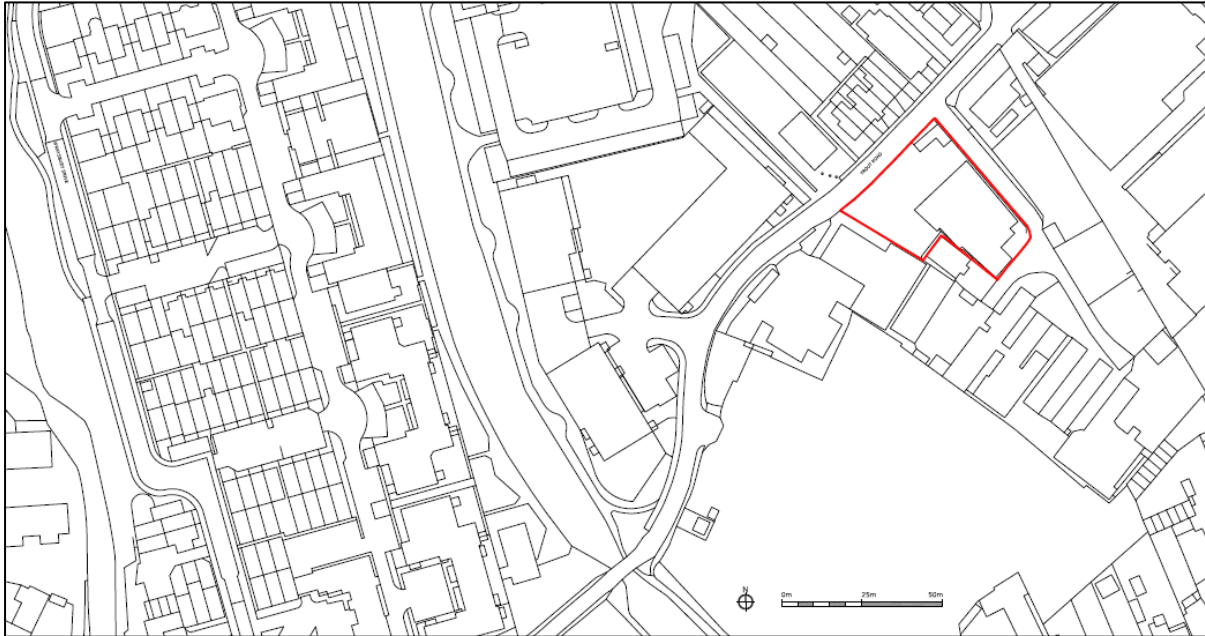
## Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.



## Onslow Mills – Site Allocation Reps

The site was previously a part of site allocation SA39, but has since been removed from the allocation in the recent Site Allocations and Designations, Revised Proposed Submission Version (October 2015) without the notification of the site owner.

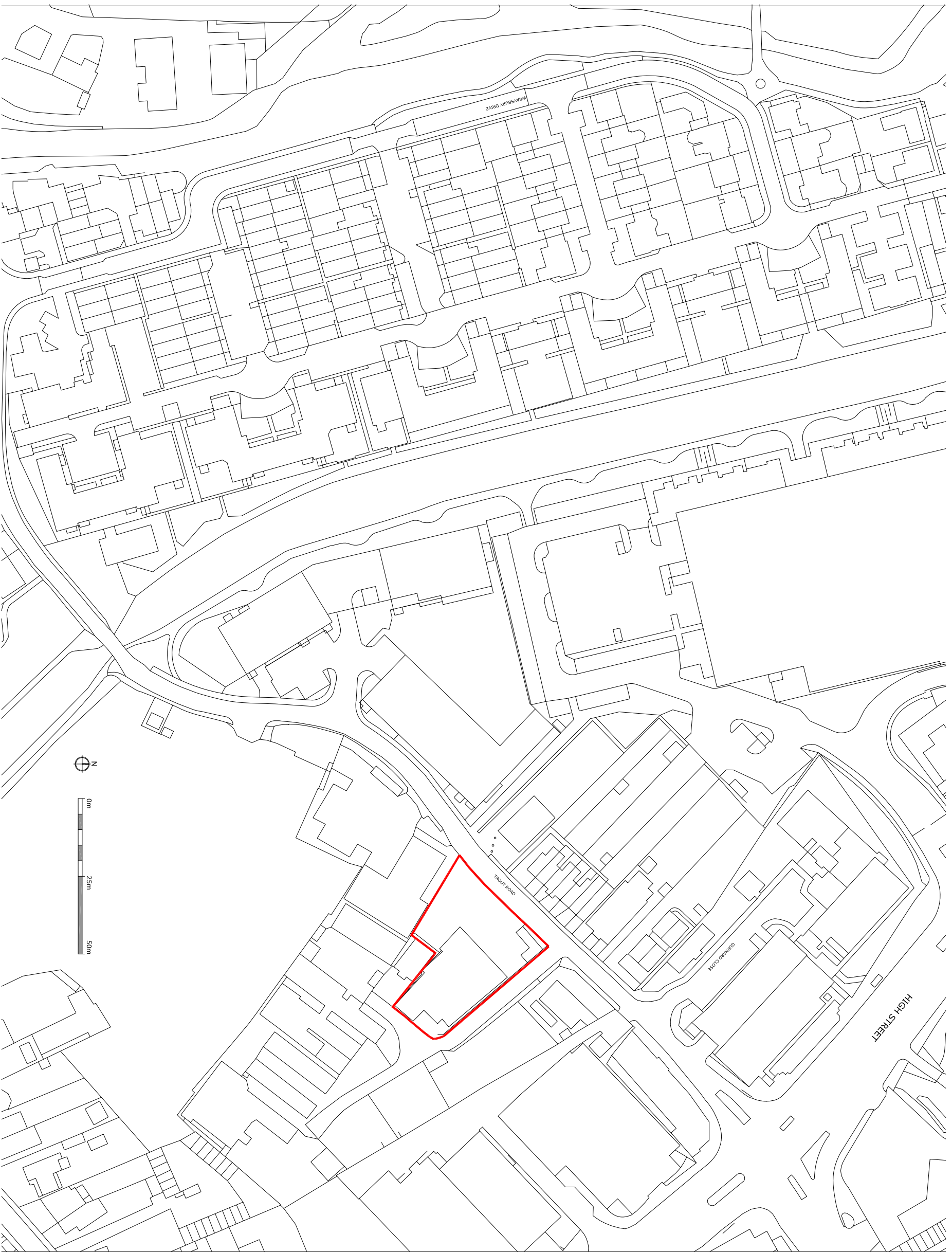


The boundary of the allocation was amended as Site A and Site B (Above) gained planning permission (Ref: 38058/APP/2013/1756 & 3678/APP/2013/3637 respectively) and no scheme came forward for the Onslow Mills site. An application for a car wash / garage / tyre centre has now been refused.

We would like for the site to be reconsidered as a part of this site allocation as it was removed without our client's knowledge and in light of the owner's pre-application discussions with Senior planning officers for redevelopment of the site held on January 28<sup>th</sup> 2016.

The proposal is for residential development of the site which would bring forward the final piece of the SA39 allocation as was originally designated, helping to achieve the original comprehensive regeneration masterplan for the site alongside the Caxton House and Rainbow Industrial Estate proposals that have gained planning approvals (Sites A & B). The proposed redevelopment of the site will be more in keeping with its surroundings once the adjacent proposed developments have been built out. The new proposal represents the best use of this previously developed site following the sustainable development principles of the NPPF and contributing towards meeting the housing need of the borough.

On this basis we think that this site should be re-included in site allocation SA39.



**REV DATE DESCRIPTION DRAWN**

|    |       |                        |    |
|----|-------|------------------------|----|
| 00 | 06/16 | Issued for Information | BW |
|----|-------|------------------------|----|

**CLIENT**

WVC Group  
Project  
Onslow Mills  
Trout Road

**DRAWING TITLE**

Site Location Plan  
PROJECT No 207  
DWG TYPE PL  
DWG No 010  
DATE 12/02/16  
DRAWN DB  
CHECKED BW  
REV 00  
STATUS For Information  
SCALE 1:1250 @ A3

**willcoxandmeilwes**

Do not scale drawings. Use only the dimensions given. The Contractor to check site dimensions and report any variations or omissions to Willcox and Meilwes. The drawing is Copyright of Willcox and Meilwes and must not be reproduced or used without express permission.







Brianne Stolper &lt;bstolper@hillington.gov.uk&gt;

---

**Fwd: Onslow Mills - Site Reps**

1 message

---

**Efua Dadze-Arthur** <edadze-arthur@hillington.gov.uk>

17 February 2016 at 09:55

To: Brianne Stolper &lt;bstolper@hillington.gov.uk&gt;

**Efua Dadze-Arthur** (BA, MA, MSc, MRTPI)

Principal Planning Officer  
Planning Policy Team  
Residents Services Directorate  
London Borough of Hillingdon  
3N/02, Civic Centre, High Street, Uxbridge UB8 1UW

Tel: 01895 250230 ext 8352

[www.hillingdon.gov.uk](http://www.hillingdon.gov.uk)

----- Forwarded message -----

From: **Zachary Croft** [REDACTED]

Date: 16 February 2016 at 12:04

Subject: RE: Onslow Mills - Site Reps

To: James Gleave &lt;jgleave@hillington.gov.uk&gt;, Efua Dadze-Arthur &lt;edadze-arthur@hillington.gov.uk&gt;

Cc: "mmalhotra@hillington.gov.uk" &lt;mmalhotra@hillington.gov.uk&gt;

Dear All,

I would like to put forward the above site to be considered for site allocation in the Local Plan. Please find a location plan and written representation attached. This site was originally a part of allocation SA39, but was then removed. In line with the latest proposal for the site, it should be considered for re-allocation. I look forward to hearing from you.

Kind regards,

**Zach Croft MTCP (Hons)  
Planner**



**Preston Bennett in association with Hamptons International**

Planning, Land and Development



**From:** Mandip Malhotra [mailto:[mmalhotra@hillingdon.gov.uk](mailto:mmalhotra@hillingdon.gov.uk)]

**Sent:** 16 February 2016 11:01

**To:** Zachary Croft

**Cc:** James Gleave; Efua Dadze-Arthur

**Subject:** Re: Onslow Mills - Site Reps

Hi Zachary

I have copied in the two officers that any local plan representations need to be issued to.

Many thanks

Mandip



Good Morning Mandip,

20 July 2017

James Gleave  
Planning Policy Team  
3N/02  
Residents Services, Civic Centre  
High Street  
Uxbridge  
UB8 1UW



[gva.co.uk](http://gva.co.uk)

Dear James

### **Site Allocations and Designations - Revised Proposed Submission Version**

We write on behalf of our client, Redrow Homes following our recent pre-application meeting to discuss the Comag Site, West Drayton.

This letter relates to the Comag Site, Tavistock Road, West Drayton, as defined by the enclosed site plan. Redrow Homes are currently in confidential discussions regarding the purchase of this site and are in the process of preparing a planning application for circa 118 homes.

We note that the adjacent former Padcroft Works site (ref. 'SA 38 – Padcroft Works, Tavistock Road') is proposed to be allocated for housing as part of the emerging Part 2 Policies, in order to reflect the approval (and implementation) of the residential planning permission on this site.

At the time this proposed allocation was originally drafted, the Comag Site was not available to come forward for development. However, given the emerging changes in land ownership and proposed emerging planning application, it would be appropriate to amend the adjacent proposed Site Allocation in order to positively plan for the comprehensive redevelopment of these two sites.

As an interested stakeholder and landowner in the London Borough of Hillingdon, Redrow Homes is keen to work closely with the LPA to ensure the delivery of new homes in the borough. The Site Allocations DPD provides the opportunity to recognise the potential the site can play in delivering new homes through amending the proposed Site Allocation 'SA 38 – Padcroft Works, Tavistock Road' to take account of the Comag Site coming forward.

Proposed Policy SA 38 confirms the site suitable for residential redevelopment subject to a nine criteria. In our view, this would also apply to the Comag Site. Redrow Homes supports the proposed wording of these criteria, subject to the following suggested minor amendments (deletions shown in strikethrough and additions shown in red).

GVA is the trading name of GVA Grimley Limited registered in England and Wales number 6382509. Registered office, 3 Brindleyplace, Birmingham B1 2JB. Regulated by RICS.

Birmingham Bristol Cardiff Dublin  
Edinburgh Glasgow Leeds Liverpool  
London Manchester Newcastle



|  |  |
|--|--|
| <b>Site Name</b>                                     | <b>Padcroft Works <a href="#">and Comag Site</a></b>   |
| <b>Ward</b>  | Yiewsley   |
| <b>Location</b>                                      | Tavistock Road   |
| <b>Area (ha/sqm)</b>                                 | 1.6 ha   |
| <b>PTAL Rating</b>                                   | 4,2 and 3  |
| <b>Proposed Development</b>                          | Residential  |
| <b>Current UDP Designations</b>                      | Yiewsley Town Centre, Secondary Shopping Area; Archaeological Priority Zone  |
| <b>Proposed New Designations</b>                     | None   |
| <b>Existing Use</b>                                  | Industrial   |
| <b>Relevant Planning History (Most recent)</b>       | <p>Demolition of all existing buildings on the site enclosed by Bentinck Road and Tavistock Road (as shown outlined in red on the submitted application site plan) including Globe House, Globe Court, Padcroft Works, the former Dairy Crest Dairy and Tigi Warehouse and comprehensive redevelopment to provide three building rising from three to eight storeys comprising 308 residential units, 175 sqm of Class B1 floorspace, public and private amenity space, hard and soft landscaping and lower ground floor parking space for 293 vehicles (ref 45200/APP/2014/3638). Approved subject to S106.</p> <p><a href="#">Variation of condition 2 (Accordance with approved plans) of planning permission ref: 45200/APP/2016/3886 dated 25-01-2017: Variation of conditions 2 (Accordance with approved plans), 15 (Pedestrian Link) and 23 (Car Parking Stackers) of planning permission ref: 45200/APP/2014/3638 dated 10-12-2015: Demolition of all existing buildings on the site enclosed by Bentinck Road and Tavistock Road (as shown outlined in red on the submitted application site plan) including Globe House, Globe Court, Padcroft Works, the former Dairy Crest dairy and TiGi Warehouse and comprehensive redevelopment to provide three buildings rising from three to eight storeys comprising 308 residential units, 175 sqm of Class B1 floorspace, public and private amenity space, hard and soft landscaping and lower ground floor parking space for 293 vehicles, to allow the addition of 7 residential units within the approved floorspace.</a></p> |
| <b>Proposed Number of Units</b>                      | <del>308</del> <a href="#">440</a>   |
| <b>Existing Units</b>                                | 0  |
| <b>Net Completions</b>                               | <del>308</del> <a href="#">440</a>   |
| <b>Infrastructure Considerations and Constraints</b> | Drainage strategy is in place  |
| <b>Flood Risk</b>                                    | Flood Zone 1, surface water flooding   |
| <b>Contamination</b>                                 | Any potential contamination will be addressed through the implementation and discharge of a suitable planning condition.   |

|                           |  |
|---------------------------|--|
| <b>Indicative Phasing</b> | 2016 - 2021  |
| <b>Other Information</b>  | Crossrail and HS2 200 metre buffer. Site identified in the Hillingdon Housing Trajectory |

Redrow Homes is committed to working closely with the LPA and local community to deliver new homes in the borough. The emerging planning application will provide an opportunity to deliver positive growth and sustainable development underpinned by an allocation progressed through a plan-led process.

We trust this letter will be taken into account in the preparation of the Site Allocations DPD prior to submission for examination and we would be happy to meet with you should you wish to discuss our representations in further detail.

Yours sincerely

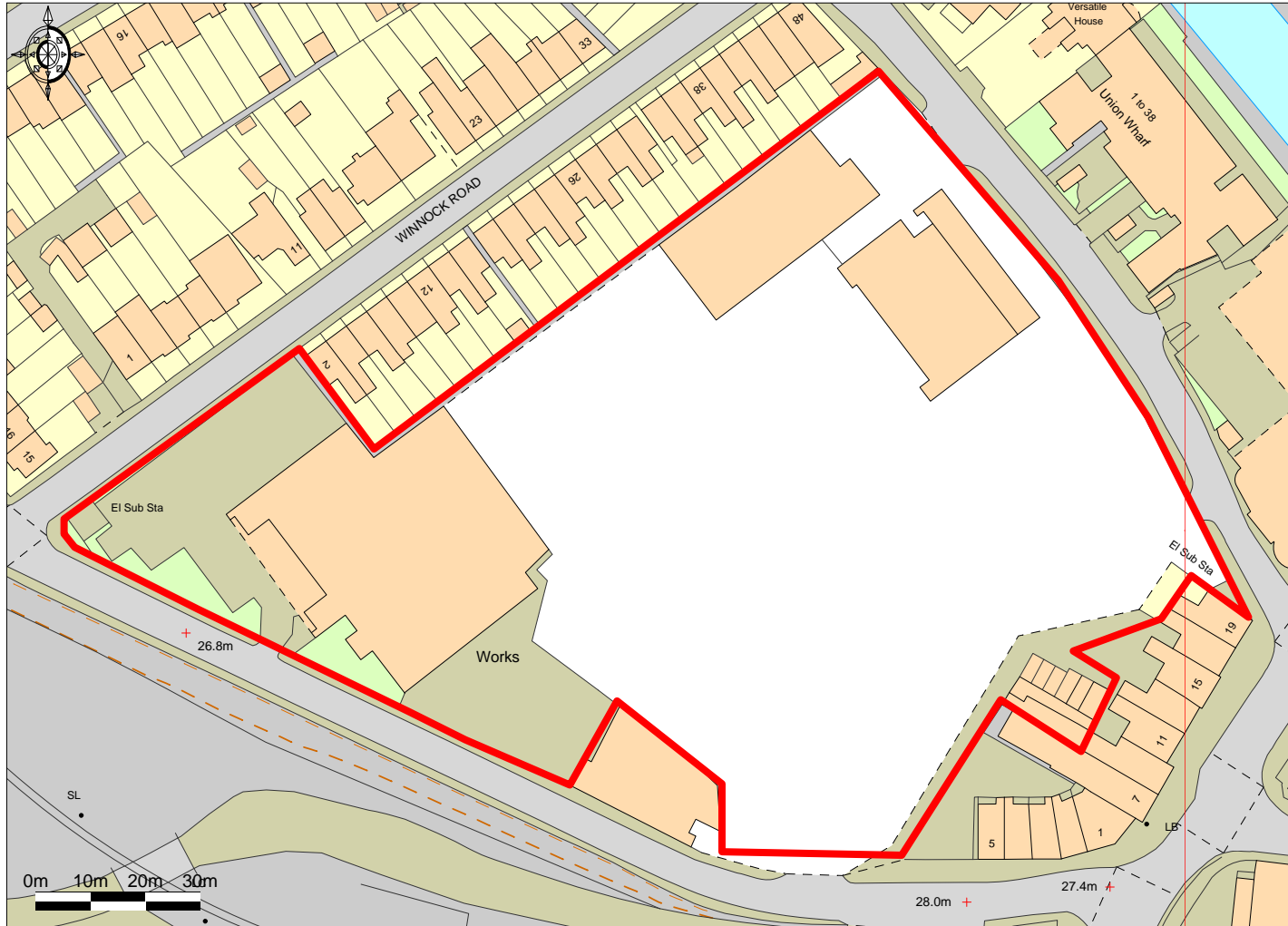


**Tim Sturgess**  
**Associate**



**For and on behalf of GVA Grimley Limited**

Enc: Site Location Plan



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Dear Sir,

**Re: Land to the West of Long Lane Hillingdon.  
297-299 Long Lane Hillingdon (page 91-82) Hillingdon's Local Plan: Part 2 - Site Allocations and Designations. Oct 2015**

It has come to the attention of our clients, R.D. KEELER PROPERTIES LIMITED, that a parcel of land in their ownership is being proposed within the proposed new Local Plan as part of a larger site for residential development.

Having read the proposal, it appears their substantial plot (0.3acres) is being considered as a green buffer zone between Tudor Way and the old Dairy Crest Depot.

They strongly object to this proposed re zoning of their land and find it quite disturbing that they have only just discovered its inclusion within the proposed new Local Plan. They have never been written to or approached by Hillingdon Planning Policy Department since or before the first consultation document was published in 2015. A simple search at Land Registry would have provided the contact details of the property company that has ownership of the land since 2000.

Please find attached the Land Registry Title Deeds. **(MX 147599)**

We have also attached the Land Registry Title Deeds **(NGL 301816)** for an adjoining piece of land that affords our clients access to the whole site.

Our clients would like to take this opportunity to put forward both sites in their ownership for consideration as developable residential land.

Considering the need for housing within Greater London, it is our clients intention to submit a planning application for residential units on the site.

We have attached a title plan which red lines the proposed site.

Could a member of the Planning Policy Team, please acknowledge receipt of this email and attachments and if you have any questions please contact me directly.

Kind Regards

\*\*\*

### 3 Attachments





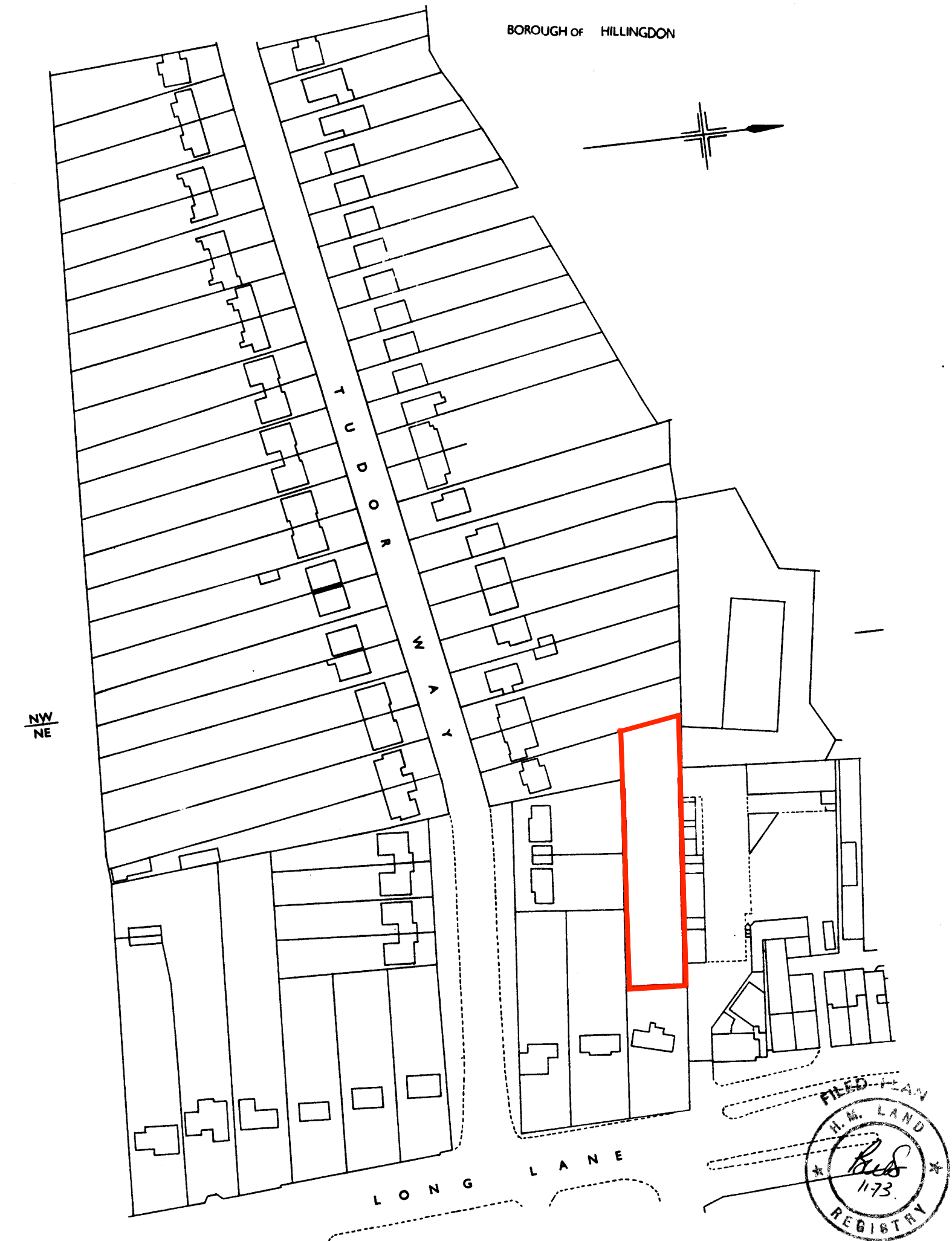
# H. M. LAND REGISTRY GENERAL MAP

GREATER LONDON SHEET TQ 0784  
NATIONAL GRID

SECTION E

Scale 1/1250

BOROUGH OF HILLINGDON



Old Reference XIV 4 P

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## TITLE No. MX 147599

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Title Number : MX147599

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The following extract contains information taken from the register of the above title number. A full copy of the register accompanies this document and you should read that in order to be sure that these brief details are complete.

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This extract shows information current on 22 MAR 2018 at 11:35:06 and so does not take account of any application made after that time even if pending in HM Land Registry when this extract was issued.

REGISTER EXTRACT

|                     |   |
|---------------------|---|
| Title Number        | : MX147599                                      |
| Address of Property | : land lying to the west of Long Lane           |
| Price Stated        | : Not Available                                 |
| Registered Owner(s) | : R. D. KEELER PROPERTIES LIMITED of [REDACTED] |
| Lender(s)           | : None  |

## Title number MX147599

This is a copy of the register of the title number set out immediately below, showing the entries in the register on 22 MAR 2018 at 11:35:06. This copy does not take account of any application made after that time even if still pending in HM Land Registry when this copy was issued.

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### A: Property Register

This register describes the land and estate comprised in the title.

HILLINGDON

- 1 (13.06.1944) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being land lying to the west of Long Lane.
- 2 (15.02.2000) A Transfer of the land in this title dated 7 February 2000 made between (1) William George Frank Keeler and (2) R.D. Keeler Properties Limited contains the following provision:-

There shall not be implied in this Transfer whether by statute or common law the grant or reservation of any easement right of way quasi-easement or other rights or licence over land retained by the Transferor known as 22 Tudor Way Hillingdon and the benefit of all or any such shall not pass to the Transferee or its successors in title.

### B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

#### Title absolute

- 1 (15.02.2000) PROPRIETOR: R. D. KEELER PROPERTIES LIMITED of 1190 Uxbridge Road, Hayes, Middx UB4 8JE.
- 2 (11.05.2000) A Transfer of the land in this title dated 7 February 2000 made between (1) William George Frank Keeler (Transferor) and (2) R. D. Keeler Properties Limited (Transferee) contains Transferee's personal covenant(s) details of which are set out in the schedule of personal covenants hereto.

#### Schedule of personal covenants

- 1 The following are details of the covenants contained in the Transfer dated 7 February 2000 referred to in the Proprietorship Register:-

"The Transferee hereby covenants with the Transferor not to dispose of the Property otherwise than for open market value and upon completion of any such sale forthwith to pay to the Transferor or if he shall no longer be living to his estate provided that Eileen Mary Keeler his wife is living at the date of such disposal one half of the proceeds of sale after deducting all expenses of the Transferor in connection with the Property and without prejudice to the generality of the foregoing:-

(a) The sum of £22,000

(b) All rates taxes duties impositions assessments and outgoings payable from time to time in respect of the Property

(c) All costs incurred in connection with the upkeep and maintenance of the Property from time to time

## Schedule of personal covenants continued

(d) All sums reasonably expended in improving or enhancing the value of the Property

(e) All loan interest payable by the Transferor in connection with any of the foregoing or otherwise properly incurred in connection with the Property.

(f) All proper conveyancing costs and disbursements and agents commission in connection with the sale of the Property.

This covenants shall cease after the death of the Transferor and Eileen Mary Keeler."

## C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 A Conveyance dated 31 December 1923 made between (1) The Halden Estates Company Limited (Vendors) (2) Percy Willis Russell (Mortgagee) (3) Percy Willis Russell and William Rowland Fisher (Second Mortgagee) and (4) Maurice Alexander Robinson (Purchaser) contains covenants details of which are set out in the schedule of restrictive covenants hereto.
- 2 The land is subject to the following rights reserved by a Transfer of the land in this title dated 8 June 1944 made between (1) United Dairies Limited and (2) Robert Andrew Patrick Paul:-

"EXCEPT AND RESERVED to the said United Dairies Limited or any associated Company owning or occupying any adjoining or neighbouring premises (a) the right to carry on upon any such premises any trade or business in which they are for the time being engaged without being responsible for any damage or annoyance which may be thereby occasioned to the said Robert Andrew Patrick Paul or the occupiers of the property hereby transferred (b) the right to build upon such premises in such manner as they shall think fit notwithstanding that the access of light and air to the said property may be thereby affected (c) the free passage and running of water and soil through any pipes or drains upon the property hereby transferred (d) the access and use of light and air to and for any building at present existing on such adjoining or neighbouring premises."

## Schedule of restrictive covenants

- 1 The following are details of the covenants contained in the Conveyance dated 31 December 1923 referred to in the Charges Register:-

"The Purchaser for himself and his heirs or assigns to the intent and so that the covenant shall be binding on the said lands and premises hereby assured into whosoever hands the same may come but not so as to be personally liable in damages for any breach thereof after he the purchaser shall have parted with the premises covenants with the Vendors their successors and assigns that he will observe and perform the stipulations and regulations in relation to the said land and premises hereby assured which are contained in the Schedule hereto.

THE SCHEDULE hereinbefore referred to

1. The Building Line in respect of any house or houses erected shall be 50 feet from the frontage of the plot.

2. Plans (including layout) for any dwellinghouses or any other building or erections to be erected must be approved by the Vendors Architects.

3. The Purchaser must erect and maintain good and sufficient fences on the sides of the property marked "T" on the said plan such fences to be erected within three months from the date of possession being given to the purchaser.

Title number MX147599

## Schedule of restrictive covenants continued

4. No house other than a private dwellinghouse shall be erected on the property but no objection shall be taken to poultry being kept or market or other gardening being carried on so long as the same are kept or carried on in such a manner as not to be a nuisance to adjoining owners."

NOTE:-The south and west sides of the land are marked T on the Conveyance plan.

End of register

# H. M. LAND REGISTRY GENERAL MAP

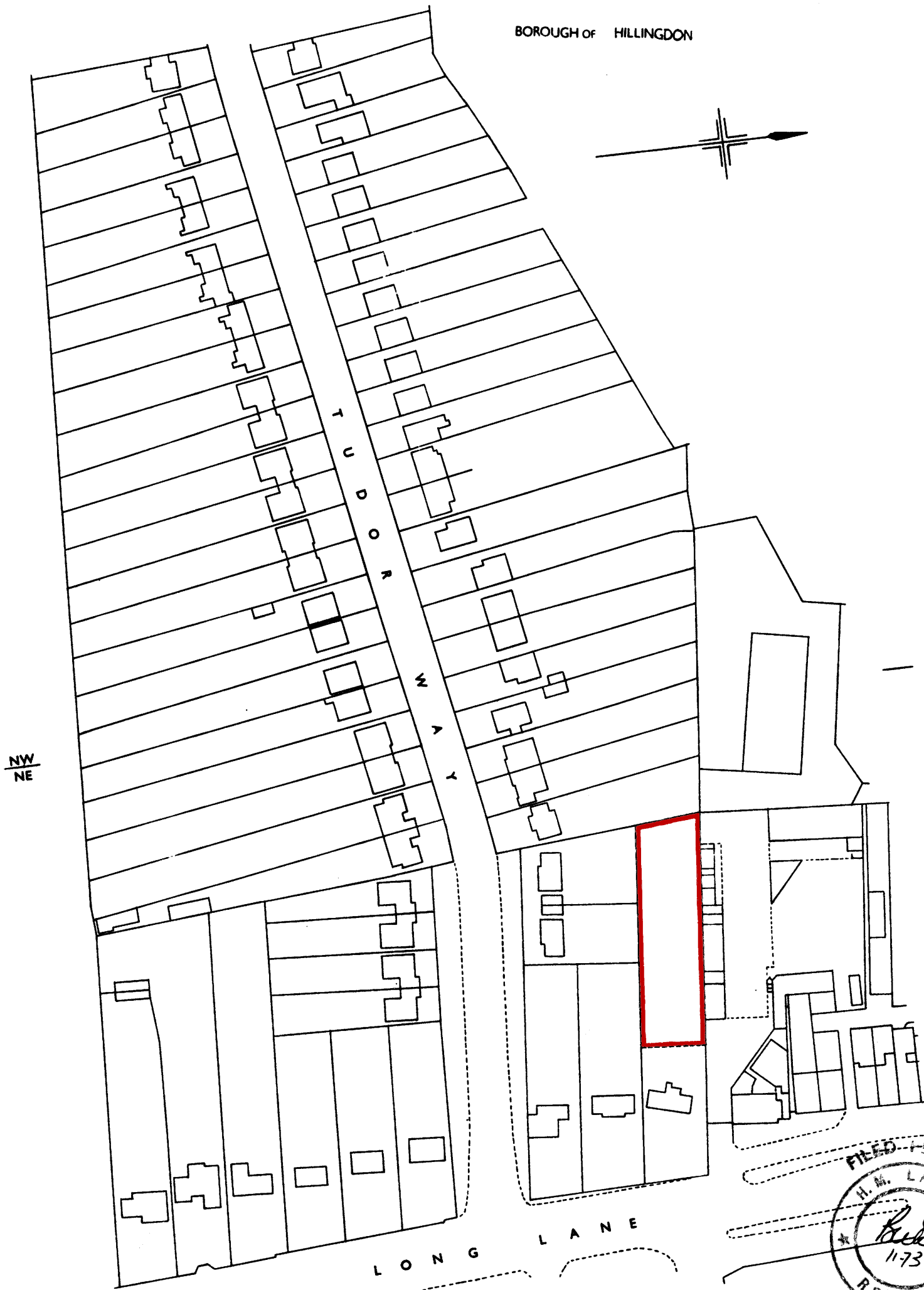
GREATER LONDON SHEET  
NATIONAL GRID

TQ 0784

SECTION E

Scale 1/1250

BOROUGH OF HILLINGDON



NW  
NE

Old Reference XIV 4 P



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Title Number : NGL301816

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This extract shows information current on 22 MAR 2018 at 11:36:44 and so does not take account of any application made after that time even if pending in HM Land Registry when this extract was issued.

REGISTER EXTRACT

|                     |  |
|---------------------|--|
| Title Number        | : NGL301816  |
| Address of Property | : land lying to the North of Tudor Way, Hillingdon |
| Price Stated        | : Not Available                                    |
| Registered Owner(s) | : R.D. KEELER PROPERTIES LIMITED [REDACTED]        |
| Lender(s)           | : None   |



## Title number NGL301816

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### A: Property Register

This register describes the land and estate comprised in the title.

HILLINGDON

- 1 (07.11.1930) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being land lying to the North of Tudor Way, Hillingdon.

### B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

#### Title absolute

- 1 (14.02.2000) PROPRIETOR: R.D. KEELER PROPERTIES LIMITED of 1190 Uxbridge Road, Hayes, Middx UB4 8JE.
- 2 (11.05.2000) A Transfer of the land in this title dated 7 February 2000 made between (1) William George Frank Keeler (Transferor) and (2) R. D. Keeler Properties Limited (Transferee) contains Transferee's personal covenant(s) details of which are set out in the schedule of personal covenants hereto.

#### Schedule of personal covenants

- 1 The following are details of the covenants contained in the Transfer dated 7 February 2000 referred to in the Proprietorship Register:-

"The Transferee hereby covenants with the Transferor not to dispose of the Property otherwise than for open market value and upon completion of any such sale forthwith to pay to the Transferor or if he shall no longer be living to his estate provided that Eileen Mary Keeler his wife is living at the date of such disposal one half of the proceeds of sale after deducting all expenses of the Transferor in connection with the Property and without prejudice to the generality of the foregoing:-

(a) The sum of £22,000

(b) All rates taxes duties impositions assessments and outgoings payable from time to time in respect of the Property

(c) All costs incurred in connection with the upkeep and maintenance of the Property from time to time

(d) All sums reasonably expended in improving or enhancing the value of the Property

(e) All loan interest payable by the Transferor in connection with any of the foregoing or otherwise properly incurred in connection with the Property.

(f) All proper conveyancing costs and disbursements and agents commission in connection with the sale of the Property.

## Schedule of personal covenants continued

This covenants shall cease after the death of the Transferor and Eileen Mary Keeler."

## C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 A Transfer of the land in this title and other land dated 11 October 1937 made between (1) Cecil Colman (Vendor) and (2) Frederick Lewis Middleton (Purchaser) contains covenants details of which are set out in the schedule of restrictive covenants hereto.

## Schedule of restrictive covenants

- 1 The following are details of the covenants contained in the Transfer dated 11 October 1937 referred to in the Charges Register:-

"THE Purchaser for himself and his successors in title to the intent and so as to bind not only themselves but all persons in whom the land hereby transferred or any part thereof shall for the time being be vested and to bind such land and every part thereof into whosoever hands the same may come COVENANTS with the Vendors and his successors in title at all times hereafter to observe and perform all and every of the stipulations provisions and conditions set forth in the Schedule hereto.

IT IS HEREBY EXPRESSLY AGREED AND DECLARED that full right and liberty is hereby excepted and reserved unto the Vendor and his successors in title to build upon develop convey and demise all or any part of his remaining property at Hillingdon in such manner and upon and subject to such terms provisions and stipulations as he or they may think fit and to alter waive or vary the same or any of them.

THE SCHEDULE above referred to

(a) Not more than one house shall be erected on the said plot of land and no flats factories or any building (other than a private dwellinghouse with or without coachhouses stables garage and outbuildings belonging thereto) shall be erected on the said plot of land No buildings shall be erected or project in front of the building line shown on the said plan.

(b) No portion of the said plot of land shall be used as a road or way and no bricks or tiles shall be made or burnt upon nor shall any earth chalk flints clay gravel or sand be dug or removed from the land except such as may be necessary in excavating for foundations for buildings No trees shall be cut down without the written permission of the Vendor or his surveyor.

(c) No building which shall be erected on the said plot of land shall at any time hereafter without the consent in writing of the Vendor be used for any other purpose than a private or professional dwellinghouse with stables garage or outbuildings belonging thereto and no trade business or profession (other than that of a Dentist Surgeon Physician Solicitor or Accountant) shall without such previous consent as aforesaid be exercised or carried on or permitted to be exercised or carried on upon the said plot of land nor shall any operative machinery be fixed or placed on the said plot of land No advertisement sign or placard shall be placed on the said plot of land other than that which may be usual for carrying on any of the professions above mentioned or a board of the usual size and description announcing that the premises are to be let or sold and the Purchaser and his successors in title shall keep every part of the premises not built upon as a private ornamental or kitchen or pleasure ground.

(d) Nothing shall at any time be done upon the said plot which may be or grow to be a nuisance to the Vendor or the occupier of any land adjoining or in the vicinity or neighbourhood of the said plot.

Title number NGL301816

## Schedule of restrictive covenants continued

(e) The Purchaser shall forever maintain on the side or sides of the said plot of land marked "T" on the plan annexed hereto within the boundary a good and sufficient fence or good and sufficient fences not less than three feet six inches nor more than five feet six inches nor more than five feet six inches high the fences erected on the said plot of land at the date of this Transfer being deemed to be good and sufficient.

(f) The Purchaser shall not become entitled to any right of light or air which would restrict or interfere with the free use of any adjoining or neighbouring land or premises the property of the Vendor for building or other purposes".

NOTE: The "T" marks referred to in Clause (e) affect the Eastern and Western boundaries of the land in this title.

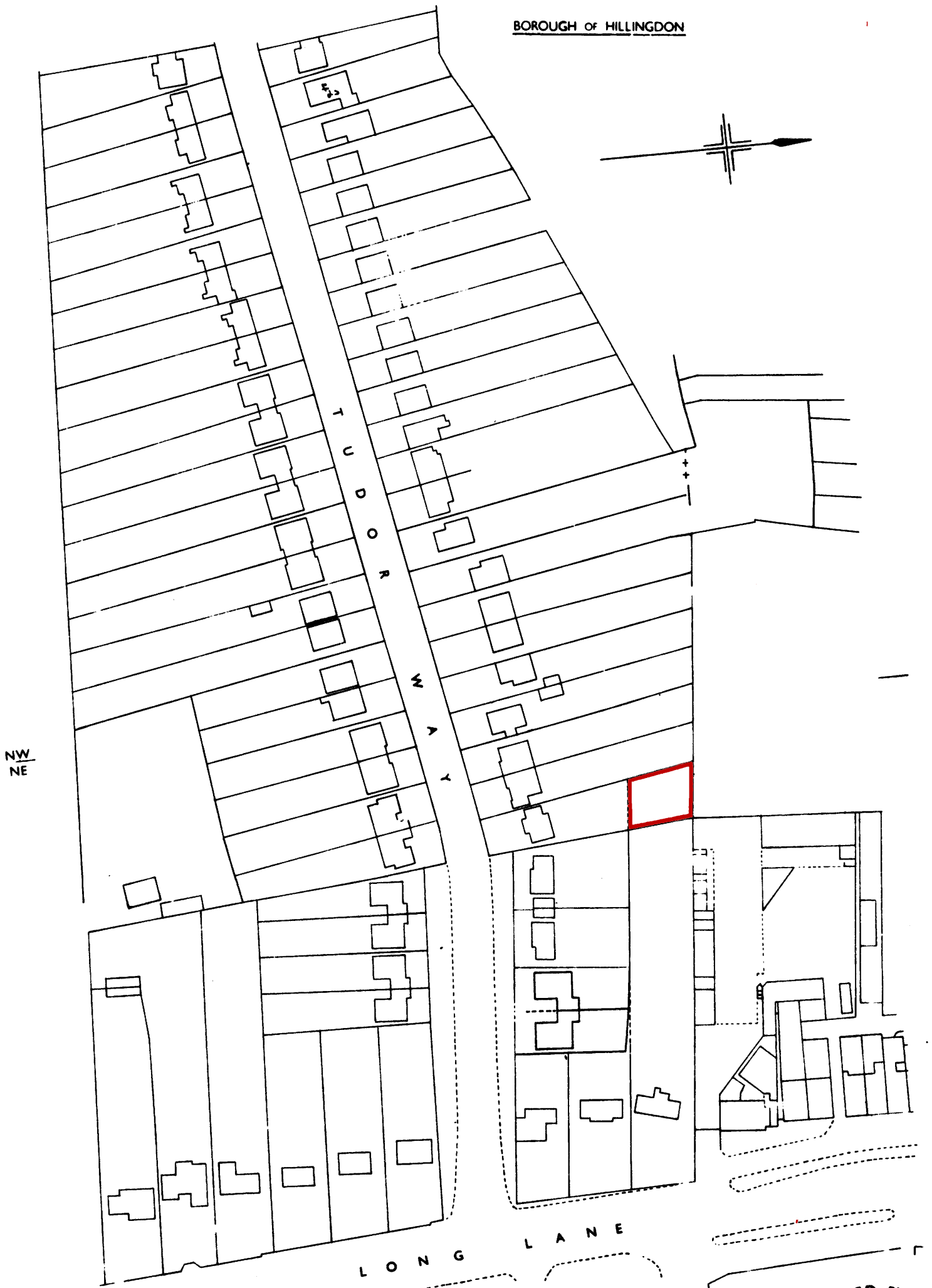
End of register

# H. M. LAND REGISTRY

NATIONAL GRID PLAN TQ 0784 SECTION E  
GREATER LONDON

Scale 1/1250

BOROUGH OF HILLINGDON



NW  
NE

Old Reference XIV 4 P  
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## TITLE No. NGL301816

This is a copy of the title plan on 22 MAR 2018 at 11:36:44. This copy does not take account of any application made after that time even if still pending in HM Land Registry when this copy was issued.

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**Further Changes to the Local Plan Part 2  
Regulation 19 Revised Proposed Submission Version  
Representation Form**

Please read the **Guidance Note** and the **Statement of Representations Procedure** before completing this form. Completed Forms must be received by the Council by **5pm on Tuesday 8<sup>th</sup> December 2015**.

**PART A - Your details**

**Please note:** Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

| 1. Name and Address        |                                       |
|----------------------------|---------------------------------------|
| Title                      | Mr                                    |
| First name                 | Richard                               |
| Last Name                  | Farmery                               |
| Organisation (if relevant) | N/A                                   |
| Unit                       | House number <input type="checkbox"/> |
| House name                 |                                       |
| Address 1                  | <input type="text"/>                  |
| Address 2                  |                                       |
| Town                       | <input type="text"/>                  |
| County                     | <input type="text"/>                  |
| Postcode                   | <input type="text"/>                  |
| Telephone                  | <input type="text"/>                  |
| Email                      | <input type="text"/>                  |

| 2. Name and Address |                                       |
|---------------------|---------------------------------------|
| Title               | Mrs                                   |
| First name          | Sue                                   |
| Last name           | Farmery                               |
| Company             | N/A                                   |
| Unit                | House number <input type="checkbox"/> |
| House name          |                                       |
| Address 1           | As left                               |
| Address 2           |                                       |
| Town                |                                       |
| County              |                                       |
| Postcode            |                                       |
| Telephone           |                                       |
| Email               |                                       |

**PART B - Your responses**

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

**Q1. We are commenting on proposed changes to:** *(please tick relevant box)*

| Local Plan Part 2 |                                   |
|-------------------|-----------------------------------|
|                   | Development Management Policies   |
| ✓                 | Site Allocations and Designations |
| ✓                 | Policies Map (Atlas of Changes)   |

| Technical Reports ( <i>answer Q1 &amp; Q9 only</i> ) |   |
|--|---|
|  | Addendum to Sustainability Appraisal            |
|  | Consultation Statement                          |
|  | Addendum to the Strategic Flood Risk Assessment |

**Q2. Please indicate the Proposed Change on which you wish to comment:**

|  |   |
|--|---|
| Policy number;   | Green Belt; Metropolitan Open Land; Areas Forming Links in Green Chains, Green Belt Extension No. 6 Site allocations (Ammended Oct 2015) P 162, The Dairy Farm and Spinney, Harefield |
| Paragraph number;  |   |
| Table or figure number; or Map number (Atlas of Changes) |   |

**Q3. Do you consider that as a result of the proposed changes, the Local Plan Part 2 is (*please tick*)**

|   | Yes | No |
|---|-----|----|
| Sound?  |     | ✓  |
| Prepared in accordance with the duty to cooperate, legal and procedural requirements? | ✓   |    |

**Q4. If you consider that as a result of the proposed changes the Local Plan Part 2 is unsound, please indicate your reasons below (*Tick relevant box/es*)**

|   |                                     |   |   |
|---|-------------------------------------|---|---|
| ✓ | It has not been positively prepared | ✓ | It is not effective                       |
|   | It is not justified                 | ✓ | It is not consistent with national policy |

**Q5. Please give further details of the reasons why you consider that the proposed changes are not legally compliant, fail to comply with the duty to cooperate or would result in the Local Plan Part 2 as a whole being unsound?**

**Q5A. Please indicate what amendments to the proposed changes are necessary to address these issues.**

*(It will be helpful if you are able to put forward suggested revised wording of any or text. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)*

We would wish to frame our objections under two headings, Legal Compliance and Soundness.

Firstly, we should like to inform you that my wife and I are the owners of the land known as The Spinney. We recently purchased this land (May 2016) and have not had involvement with the process and we wish to object to the proposal to make it 'Green Belt' and bring certain material changes to your attention.

### Legal Compliance

We note that the Local Plan Part 2 should comply with the London Plan 2015, but this is now defunct and has been replaced by the London Plan 2016 as amended in January 2017. It is worthy of note that the 2015 plan was drawn up under a Conservative administration and the new London Plan 2016 under a Labour administration. The aims of these opposing political parties are very different and have resulted in changes to the Plan.

As a result there has been a material change in the requirements of the London Plan and this will have an impact on the Hillingdon Local Plan. The Hillingdon Plan should be withdrawn at this stage to allow it to be redrafted in compliance to the latest London Plan.

### Soundness

However, our main objections lie around the possible designation of the 'Dairy Farm and Spinney' as outlined in the revised Atlas of Changes and Site Allocations and Designations. Page details are shown above under Q2.

The Spinney already has the following protections:

- It is within the Harefield Conservation area, CA-1,
- It is a Grade II site of Nature Conservation, SINC 12,
- Is subject to an Article 4 direction under the Town and Country Planning (Permitted Development) Order 1995, and
- Has two wide ranging tree preservation orders, TPO 3 and TPO 237.

It is also designated as a private garden area having been a substantial part of the garden of Harefield House and never otherwise designated. Photographs taken in the mid-20<sup>th</sup> century show it mainly as lawn, with paths through flower beds and only a few specimen trees.

We have read the reasons for recommending the extension of the Green Belt on page 78 of the Green Belt assessment document.

The reason for recommendation is shown under Map A3.32: The Dairy Farm and the recommendation reads: 'This site meets at least one of the purposes of including land in the Green Belt as identified in NPPF. The boundary of the site should be altered to include the remaining farm area to the west of the Green Belt. The Green Belt boundary would then be more definable and logical. The site therefore merits its current Green Belt designation.'



With regard to the proposed extension shown in this document, it not only includes area within the Dairy farm, but also the Cricket Ground and The Spinney. It also includes the area within the garden of Little Hammonds. In the October 2015 document all of the remaining Dairy Farm land is remove leaving only the Cricket Ground, The Spinney and the area of Little Hammonds. None of these are, nor have ever been, 'farm area'.

We note the reasons given 'to assist in safeguarding the countryside from encroachment', and yet part of the area has materially changed since the initial assessment in that the garden of Little Hammonds has now been built upon and the area of the Dairy Farm is also built upon. Thus the only two areas that this order will cover is The Spinney and the Cricket Ground, areas already adequately protected.

We also see that since the assessment document, the 'Local Plan Part 2 Atlas of Changes' and supporting notes released later, that the revised proposed submission version October 2015 has removed the area of construction within the Dairy Farm. Thus when the assessment document talks of 'The Dairy Farm' and the Atlas of Change talks of 'The Dairy Farm and Spinney' these are factually incorrect because the current Part 2 documents show that none of the Dairy Farm will be included in the extension. The only areas of land proposed now are Little Hammonds, which has been very recently built upon, The Spinney, which is already well protected and the Cricket Ground which is used solely for that purpose and owned by the National Playing Fields Association. Two of the areas of land are not mentioned by name and thus the owners of those may not be aware, nor may not have had the opportunity to properly comment.

Given that effectively the green belt would only now cover two areas of land already adequately protected by the Harefield Village Conservation area and other policies we would contend that this is an unnecessary extension of the Green Belt, does not cover the area identified as requiring protection and is merely 'to make the boundary more definable and logical', which is not a reason for extension under the NPPF.

We would therefore suggest that as there has been a material change from the initial assessment, both in development and location; this area should not be included within the green belt and we would pray in aid the fact that the NPPF notes that new Green Belts should only be established in "exceptional circumstances".

Those exceptional circumstances are not made out as there have been no material changes to The Spinney or Cricket Ground since the UDP of 1998, the Green Belt Review 2006, the saved policies document of 2007 and the previous rejections of this area as an extension of the Green Belt. The normal planning and development policies, bearing in mind the conservation area, are more than adequate. There have been no major changes in circumstances to the area suggested. There is no given consequence for sustainable development. There is no necessity for Green Belt designation as it is not required to restrict sprawl, nor, as it is not countryside, assists in any way in safeguarding with regards to encroachment.

As a result we would say that the decision to include this area is unsound and we would ask you, therefore, please, to reconsider this site and not place it forward for inclusion within the green belt.

**Q6. If your representation is seeking amendments to the proposed changes, do you consider it necessary to participate in the oral part of the examination?**  
(Please tick appropriate box)

No, I do not want to participate in the oral examination

Yes, we would like to participate in the oral examination

---

**Q7. If you wish to participate in the oral part of the examination, please outline why you consider this necessary.**

---

It may be useful to clarify some of the above, especially with regard to the areas covered and the names of each.

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**Q8. If you are commenting on the technical reports that accompany the proposed changes (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment), please provide your comments below.**

N/A

Please continue on a separate sheet if necessary

## **PART C - Progress of the Local Plan Part 2**

**If you would like to be updated on the progress of the Local Plan Part 2, please indicate (tick) which stage(s) you would like to be informed of:**

When the Local Plan Part 2 Plan has been submitted for independent examination.

The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.

The adoption of the Local Plan Part 2.

## Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]