

London Borough of Hillingdon
Local Plan Part 2
Schedule of Representations Received

May 2018



HILLINGDON
LONDON

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Schedule of Respondents' Comments and Officers' Proposed Responses, including Proposals Received in Call for Sites

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
	Development Management	General comments		
24/40	John Williams	Proposed Development Management Policies	It would appear the Council has produced a comprehensive list of proposed policies and we look forward to seeing the detail in due course. Unfortunately some of the good intentions expressed in the list will have been nullified by the recent relaxation of planning law. However we trust that in preparing the new policies the Council will, wherever possible, recognise and endeavour to retain, the urban character of the area.	Noted – the Council has commissioned a townscape character study to inform its Development Management Policies. No change.
38/121	Ruislip Residents Association	Proposed Development Management Policies	It would appear the Council has produced a comprehensive list of proposed policies and we look forward to seeing the detail in due course. Unfortunately some of the good intentions expressed in the list will have been nullified by the recent relaxation of the planning law. However we trust that in preparing the new policies of the Council will, wherever possible, recognise and endeavour to retain, the urban character of the area.	Noted – the Council has commissioned a townscape character study to inform its Development Management Policies. No change.
45/214	Solent Planning on behalf of Bourne Bourne End Investments Ltd	Development Policies- Other	It is considered that the issues listed within the Part 2 consultation document provide a comprehensive list of Development Plan Policies against which to assess development proposals. However, it is the content and wording of these proposed policies which will be key and as such our client will await the opportunity to review and respond to the policies in the final consultation Development Policies DPD.	Noted. No change.
46/217	Deloitte Real Estate on behalf of Universities Superannuation Scheme		USS agrees that the draft Development Management Policies should be set out under the same five principle headings use in Part 1 of the Draft Local Plan, which includes 'the economy'.	Support welcomed.

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47/222	VRG Planning on behalf of Brunel University	Local Plan Part 2	The University made representations to various consultations in conjunction with preparation of the Core Strategy. These representations sought recognition of the continuing need to improve its facilities, in order to remain competitive in the Higher Education sector. They also sought recognition of the important economic contribution that the University makes to the local economy and the potential for this to be enhanced. These points are of particular importance in relation to the formulation of policies relating to the Green Belt.	Noted. No change.
49/225	Nathanial Lichfield on behalf of Cathedral Group	8. Public and Private Amenity Space in Residential Developments 10. Internal Floorspace Standards 19. Car Parking Standards for residential development	It is important to ensure that any policies relating to the following provide a flexible approach rather than rigid standards: <ul style="list-style-type: none"> • 8. Public and Private Amenity Space in Residential Developments • 10. Internal Floorspace Standards • 19. Car Parking Standards for residential development 	Noted – the Council is aware of national planning policy requirements regarding being flexible in the wording and interpretation of planning policies.
	The Economy	General comments		
3/4	Marine Management Organisation		MMO has no comments on this document as the geographical area it covers does not include any area of the sea or tidal river and is therefore not within our remit.	Noted. No change.
6/8	Telereal Trillium on behalf of British Telecommunications plc		No comments.	Noted. No change.
8/10	Spelthorne Borough Council		We have no particular suggestions at this stage to make about the	Noted. No change.

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			content of the plans you are about to embark on.	
18/27	Yiewsley & West Drayton Town Centre Action Group		No specific responses or input to make in this initial consultation. The proposed content of the Local Plan: Part 2 indicates that the plan will contain the provision; scope and detail needed. As this is an initial consultation, it has been assumed there will be a further consultation after definitive data has been compiled and drafted.	Noted. No change.
19/28	Colne Valley Park CIC	Section a) The economy	<p>There should be a specific policy on Farming and the Rural economy. It is farming that maintains the landscape, farmers should be highly valued and offered incentives and protection in order to continue to farm. Farmers provide a Green Bridge around urban areas. However, this is not a one way street and farmers in the Green Belt must in turn expect to reciprocate and contractually supply the food production, tourism, education, recreation, energy and environmental credentials desired by the community.</p> <p>Also, see our comments on section d – policy 6 Farm diversification. We suggest that this policy is moved from section d) and merged with a new policy in section a) to change the emphasis from a negative policy stating what a farmer cannot do because of potential environmental harm to a positive policy stating what a farmer can do to support the economy and the environment.</p>	Farming is a significant use on Green Belt land in the borough. Whilst it is beyond the remit of the Local Plan to define land use and activities on local farms which would support the local economy and environment, it is entirely appropriate for the Plan to seek to safeguard local amenity and the environment when considering new development proposals located on farms.
30/76; 31/94	Phil Rumsey; Veronica Rumsey	The Economy	Support Items 1-9 with a modification to item 5.	Support welcomed.
45/213	Solent Planning on behalf of Bourne Bourne End Investments Ltd	Employment General	With regard to points 1 and 2 of the potential employment development management policies, it is considered essential that specific reference (with detailed plans) is provided to identify the areas for phased release of employment land. Policy E1 and Map 5.1 in the Local Plan Part 1 identifies potential areas for the	Part 2 of the Local Plan will identify areas for the future release of employment land once the findings of the current Employment Land Study are available.

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			<p>phased release of employment land including Yiewsley. It acknowledges the findings of the Employment Land Supply studies which have been undertaken and confirms the potential for the managed release of 17.58 hectares of surplus industrial and warehousing land between 2006 - 2026. Para 5.12 confirms this includes part of the Trout Road area. This relates to the land which our client owns at the Rainbow and Kirby Industrial Estates. The red line site plan which accompanies our clients representations to this consultation identifies the employment area (and adjacent land totalling 2.31 ha) which should be identified for immediate release on this site.</p>	
	The Economy	1. Supply of Employment Land -Protecting the use of land allocated for employment uses.		
12/14	CGMS on behalf of Mayor's Office for Policing and Crime / Metropolitan Police Service	The Economy	<p>This section seeks to protect employment land. Whilst falling outside the 'B' Class definition, policing uses which are suited to employment/industrial land are employment generating and contribute to employment capacity. Generally the policing uses represent no material change from a Light Industrial/Office (B1) or warehousing (B8) use. They also possess an employment density similar to or in excess of 'B' class uses and can operate from warehouse type industrial buildings. Vehicle movements are also similar and the majority of these facilities do not require continued public access and therefore have no requirement to be located in town centres.</p> <p>For these reasons there should be some flexibility in the wording of any policy protecting employment land to allow for policing uses in protected employment areas.</p>	Noted – the Council is aware of national planning policy requirements regarding being flexible in the wording and interpretation of planning policies.
26/62	Nathanial Lichfield and Partners on behalf of British Airways Plc	Supply of Employment Land - Protecting the use of land allocated for Employment Uses	It is noted that the Strategic Objective SO15 of the Local Plan: Part 1 seeks to (1) protect employment land and also (2) to manage the release of surplus employment land for other uses. In this respect the London Plan also confirms that Hillingdon should adopt a 'Limited Transfer' approach to the transfer of	Noted - Part 2 of the Local Plan will identify areas for the future release of employment land once the findings of the current Employment Land Study are available. It is expected that policy criteria for assessing proposed changes of use of employment land to non-employment uses

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			<p>industrial sites to other uses.</p> <p>In relation to the Heathrow Opportunity Area (HOA) it is important that any potential release of employment is carefully managed so as not to prejudice the availability of flexible employment space for airport related activities. Whilst certain employment sites, dependent upon their location may be suitable for alternative use, if it is evident that they are not attractive to the market for commercial use, any proposed changes of use will need to be carefully managed particularly if the London Plan employment targets of the HOA, as well the Policy E2 employment targets, are to be met.</p> <p>We would suggest therefore the Development Management Policies should include policy criteria for assessing proposed changes of use of employment land to non-employment uses.</p>	will be included, drawing on the findings of that Study.
38/122	Ruislip Residents Association	Supply of Employment Land Protecting the use of land allocated for employment uses	We do not believe we have any left!	Part 2 of the Local Plan will include a series of designations for Locally Significant Employment Locations and Locally Significant Industrial Sites.
41/159; 44/187; 55/246; 57/272	Grow Heathrow (May Mackenzie); Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	1. Supply of Land 2. Locations for Employment Growth	The agricultural and horticultural sectors should be protected and enhanced to promote this important historic employment sector.	The Council will consider all development proposals affecting agricultural or horticultural land on their individual planning merits.

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46/218	Deloitte Real Estate on behalf of Universities Superannuation Scheme (USS)	Supply of Employment Land, seeks to protect the use of land allocated for employment use	USS agrees with this policy in principle; however requests that the Council adopts a flexible approach to the management of employment land to avoid the long term protection of employment sites that are no longer viable. This approach would accord with the National Planning Policy Framework's objective of encouraging sustainable development and ensure sustainable economic growth is achieved in the LBH.	Part 2 of the Local Plan will identify areas for the future release of employment land once the findings of the current Employment Land Study are available. The Council is aware of national planning policy requirements regarding being flexible in the wording and interpretation of planning policies.
50/226	Heathrow Airport Ltd (Planning and Programmes)	<p>a) The Economy</p> <ol style="list-style-type: none"> 1. Supply of Employment Land 2. Locations for Employment Growth 3. Changes of Use within Industrial Development. 	<p>HAL supports the protection of employment sites where they are in active use and particularly where such sites support the operation of the airport. We would encourage the Council not to be overly-prescriptive in its protection of employment sites, particularly where sites have been vacant for long periods and where there is no reasonable prospect of them being brought back into effective use. In this respect, the NPPF is clear at paragraph 22 that long term protection of employment sites with no prospect of use should be avoided and where such sites are not being utilised for their intended use, alternate land uses should be considered on their own merits.</p> <p>HAL acknowledges Hillingdon's strategic objective of securing 9,000 new jobs centred in Uxbridge and the Heathrow Opportunity Area. We encourage the Council to define the boundary of the Heathrow Opportunity Area so that the extent of employment growth in this area can be properly planned. HAL agrees with the position in Policy E2 of Part 1 of the Local Plan where it states that employment growth will be directed toward areas of high public transport accessibility. This could include many of the perimeter areas around the airport where they have high levels of accessibility and in particular the public transport interchange in the Central Terminal Area.</p> <p>Changes of use in industrial locations need to be assessed on the basis of demand for the use and whether the site has been vacant for a significant period of time.</p>	<p>Part 2 of the Local Plan will identify areas for the future release of employment land once the findings of the current Employment Land Study are available. The Council is aware of national planning policy requirements regarding the wording and interpretation of planning policies.</p> <p>The definition of a Heathrow Opportunity Area is dependent upon the introduction by the Mayor of London of a wider Opportunity Area Planning Framework. Once this is defined and a Planning Framework (OAPF) drafted by the Mayor, it should then be possible for the Council to bring forward its own detailed area action plan policies for that part of Hillingdon covered by the OAPF.</p>

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59/300	CgMs on behalf of Mayor's Office for Policing and Crime / Metropolitan Police Service	Topic Area: The Economy	<p>This section seeks to protect employment land. Whilst falling outside the 'B' Class definition, policing uses which are suited to employment/industrial land are employment generating and contribute to employment capacity. Generally the policing uses represent no material change from a Light Industrial/Office (B1) or warehousing (B8) use. They also possess an employment density similar to or in excess of 'B' class uses and can operate from warehouse type industrial buildings. Vehicle movements are also similar and the majority of these facilities do not require continued public access and therefore have no requirement to be located in town centres.</p> <p>For these reasons there should be some flexibility in the wording of any policy protecting employment land to allow for policing uses in protected employment areas.</p>	<p>Noted - Part 2 of the Local Plan will identify areas for the future release of employment land once the findings of the current Employment Land Study are available.</p> <p>The Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.</p>
	The Economy	2. Locations for Employment Growth - Protecting the locations of land allocated for employment uses.		
4/5	Orbit Developments (Kerren Phillips)	Economy, Employment, Growth	Heathrow Boulevard, Bath Road and Sovereign Court, Sipson Road should retain their employment status. They should remain in the Heathrow Opportunity Area. The Policies for the Heathrow Opportunity Area should be flexible to allow modern employment uses such as some D1 uses to maximise occupancy and respond to changes in the nature of employment in the area.	<p>The Council will take into account the findings of its Employment Land Study when preparing proposals for the future designation of these current employment sites.</p> <p>The Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.</p>
26/63	Nathanial Lichfield and Partners on behalf of British Airways Plc	Locations for Employment Growth	It is anticipated that the Opportunity Framework DPD for the Heathrow Opportunity Area will in due course set out what proportion of the London Plan 12,000 jobs (indicative employment capacity) will be accommodated in Hillingdon and where. However, it is noted that Part 2 of the Local Plan will include	The Council will take into account the potential for new employment created on identified sites and the position regarding transport infrastructure.

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			<p>proposed Site Allocations which will be reflected on the associated Proposals Map.</p> <p>It is evident therefore that consideration should be given as part of the Part 2 exercise to the locations of these new employment sites to meet this target. In doing so it is important that regard is given to the need for adequate transport infrastructure to accommodate new employment uses and the availability of public transport to ensure that Heathrow Airport and existing related activities are able to operate efficiently.</p>	
46/219	Deloitte Real Estate on behalf of Universities Superannuation Scheme	Locations for Employment Growth, seeks to protect the locations of land allocated for employment uses.	As with Policy 1, USS agrees with the principle of protecting allocated employment land where appropriate, but requests that the wording of the policy is sufficiently flexible to ensure that sites can be assessed on a case by case basis and not protected for employment use where there may be more viable uses for the site. USS considers this to be the most sustainable way economic growth can be achieved and that alternative uses should be acknowledged as providing essential support to the existing economic function of employment areas.	Noted - the Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.
	The Economy	3. Change of Use within Industrial Development - Protecting light industrial uses from change of use to heavy industrial uses.		
26/64	Nathanial Lichfield and Partners on behalf of British Airways Plc	Change of Use within Industrial Development	The Part 2 employment policies should incorporate and encourage sufficient flexibility between the employment uses to provide opportunities for airport related uses in particular in the Heathrow Opportunity Area. It is important, in order to facilitate the continued growth of the airport, to ensure that particular employment use classes are not protected where it is evident that	The Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.

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			market demand seeks alternative employment uses.	
	The Economy	4. Office Development - Support for office development in town centres.		
38/123	Ruislip Residents Association	Office Development Support for office development in town centres	We suggest that existing empty office space be reused before constructing new office space or allowing change of use to offices.	When considering new proposals for office development the Council will consider the availability of office accommodation elsewhere and the needs of competing land uses.
46/220	Deloitte Real Estate on behalf of Universities Superannuation Scheme	Office Development, seeks to support office development in town centres	Whilst USS supports office development, USS urges the Council to consider office development outside of the town centre as well where appropriate. The emerging policy should have sufficient flexibility to acknowledge the merits of out of centre office developments.	The Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.
50/227	Heathrow Airport Ltd (Planning and Programmes)	a) The Economy Office Development Hotel Development	Part 1 of the Local Plan has shown that the strategic direction of employment is moving away from industrial use and towards office based employment. Additionally, the Heathrow Opportunity Area is identified as an attractor for office development, although the boundary is not yet defined. Policy E2 generally directs employment development toward highly accessible locations. However, the proposed approach in the Heathrow Opportunity Area seeks to protect land within the airport boundary for uses directly related to the airport only. This approach appears to be at odds with itself (in that the most accessible locations are not eligible for employment growth) and with the London Plan. The London Plan policies for office and hotel development are clear in stating at Policy 4.2 that offices outside of central London are supported in viable locations with good public transport accessibility, and at Policy 4.5 that hotel development should be	Policy E2 in Part 1 of the Local Plan has been found to be acceptable by the Secretary of State prior to adoption and via the public examination process to be in general conformity with the London Plan. Simply because Heathrow is highly accessible does not in itself make it a suitable location for general commercial development for offices or other uses – i.e. as would be the case with a town centre. The unique operational requirements of a major international airport have to be taken into consideration by the Council. It considers these outweigh any general policy regarding locating commercial offices in highly accessible locations.

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			located close to public transport and opportunity areas. HAL does not agree that only airport related development should be permitted on airport land and recommends that Part 2 policies should be in line with the London Plan's strategic approach of locating office and hotel development in the most highly accessible locations, including Heathrow.	
	The Economy	5. Hotel Development - Support for hotel and similar uses in Uxbridge and other town centres.		
30/77; 31/95	Phil Rumsey; Veronica Rumsey	Hotel Development	Support for Hotel and similar uses in Uxbridge and other town centres away from pollution hotspots such as the Heathrow Villages.	Noted – the Council would normally seek to locate hotel and other commercial development primarily in town centres.
38/124	Ruislip Residents Association	Hotel Development Support for hotel and similar uses in Uxbridge and other town centres	We are not overly served by hotels in the north of the borough at present.	This is not a matter which can be directly addressed by the Council through its Local Plan. It is dependent on market operators choosing where to locate in the borough. The Council would normally look to locate such uses in town centres where they do come forward.
41/160; 44/188; 55/247 ; 57/273	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech) Transition Heathrow	Hotel development	Development of hotels surrounding the airport should be restricted in order to promote employment within sustainable communities.	The Council would normally look to locate such uses in town centres where they do come forward.
	The Economy	6. Uxbridge - Support for the development of Uxbridge as a major		

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		Metropolitan Centre.		
51/235	Nathaniel Lichfield on behalf of Intu Properties plc	Support for the development of Uxbridge as a major Metropolitan Centre	<p>Intu is the owner and manager of intu Uxbridge shopping centre which opened in 2001, and comprises 50,372 sqm of retail and leisure floorspace.</p> <p>Intu supports the designation of Uxbridge as the main urban centre within Hillingdon and a Metropolitan Centre within London. Intu concurs that the growth of retail, leisure and employment development is essential to secure Uxbridge's position in the future and considers that defining Uxbridge as requiring an additional 18,855sqm of net comparison goods floorspace between 2011-26 is a positive step towards achieving this.</p> <p>Intu would support a policy that focuses large scale retail development towards Uxbridge town centre as opposed to the smaller centres in Hillingdon up to 2026, (where development should be at a scale appropriate to their size and location (as specified by the Greater London Authority)). This approach will help secure Uxbridge's position within London's shopping hierarchy, in light of the new large scale retail developments across the city. Intu would also welcome the extension of the Uxbridge town centre boundary, if evidence demonstrated this was necessary to provide for further sustainable retail growth, thereby reducing the need for out of town retail development and also support the retention of the location of the Primary Shopping Frontage.</p> <p>Intu would like to see policies allow for a pragmatic approach to applications for retail development which will not be fixed on achieving a set quantum of retail floorspace per annum. This will encourage more entrepreneurialism and ensure Uxbridge town centre maintains its market position in the area.</p> <p>Intu would support a policy which steers development towards the most sustainable locations in terms of transport infrastructure. It is considered that Uxbridge town centre is currently the most</p>	<p>Noted - the Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.</p> <p>Policy T2 in Part 1 of the Local Plan notes the Council will facilitate improved public transport interchange at Uxbridge and other borough centres. Part 1 of the Plan identifies Uxbridge Metropolitan town centre for employment and retail growth, along with new housing at RAF Uxbridge, which will create significant new users of public transport in Uxbridge. The redevelopment of the bus/Underground station is an important infrastructure improvement which will help to exploit the town's Metropolitan status and create a gateway to Uxbridge and the borough as a whole. There is scope to improve both the frequency and travel times of Underground services between Uxbridge and London, and establish public transport links to the north and south of the borough.</p> <p>This is to be re-iterated in more detail in the Site Allocations to be included in Part 2 of the Plan.</p>

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			<p>sustainable location in Hillingdon for retail development due to its public transport connections and complementary uses and therefore new retail floor space should be focused there.</p> <p>Intu would therefore support a policy that sought to enhance public transport facilities in Uxbridge in order to improve the vitality and viability of the centre. For example, improvements to the interchange at Uxbridge would support links to/from central London, other Metropolitan Centres in outer London and smaller centres within Hillingdon. It is also hoped that policy will support public transport improvements in other Hillingdon centres to improve links to Uxbridge, as the main urban centre in the Borough.</p>	
	The Economy	7. Safeguarding retail uses in Town, District and Neighbourhood Centres - Protecting retail uses in the Town, District and Neighbourhood Centres.		
4/6	Emerson Group on behalf of Orbit Developments (Southern) Limited	Retail Parades	In the ground floor of Sovereign Court, Sipson Road is a retail parade. It should be recognised as such on the Proposals Map. Policies for the parade should be flexible to ensure use changes take place speedily to avoid empty units.	Existing retail parades are already present locally in Sipson and Harlington. This small group of shops will not materially add to this existing provision and is not considered appropriate for formal designation as a separate retail parade.
10/13	Gregory Gray Associates on behalf of The Garden Centre Group		<p>It is noted that only Policy E5 of Part 1 of the Local Plan relates to retail uses and that it is specific to Town and Local Centres. This indicates that new retail development will be required to accord with national policy and that detailed policies will be included within the Development Management Policies DPD.</p> <p>Whilst the NPPF supports a 'town centre first' approach, it also</p>	<p>Noted - the Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.</p> <p>The Council will consider individual planning applications for uses with specialised locational requirements on their merits, generally approach sustainable development proposals positively as required by national planning policy, taking into consideration the need for a sequential test</p>

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			<p>requires Local Planning Authorities to “set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres” (para. 23).</p> <p>Garden centres, such as our client’s site, tend to be located outside of town centres due to their having specific locational requirements. Typically, they require a high proportion of open land for the display of plant material and tend to sell low value, bulky products that are not economically viable to retail within the High Street.</p> <p>Paragraph 28 of the National Planning Policy Framework (NPPF) indicates that “Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:</p> <ul style="list-style-type: none"> • Support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings.....” <p>Given that garden centres are generally found beyond the urban limits, and that Government advice affords support to rural enterprises, it is considered essential for the Council’s detailed Development Management Policies to include a specific policy that would address the issue of new development associated with such specialist retail uses.</p> <p>Accordingly, it is requested that a specific policy relating to garden centres be included in the emerging Development Management Policies Plan. This should be supportive of sustainable new development on such sites, subject to the provisions of the retail policy within the Core Strategy (which itself refers to national policy), any other relevant policies (e.g Green Belt policy) and to the new development not having an adverse impact upon the</p>	<p>and other policy requirements set out in both the Local Plan and London Plan.</p>

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			<p>character or amenities of the area.</p> <p>It is suggested that the wording of the policy could be:</p> <p style="text-align: center;"><i>Policy DM - Garden Centres and Other Specialist Retail Uses Requiring an Out of Centre Location</i></p> <p><i>Sustainable new development associated with existing specialist retailers located beyond the settlements' boundaries will be permitted, subject to other policies within the Development Plan, provided that the new development would support economic growth and would not have an adverse impact upon the character or amenities of the area.</i></p>	
14/17	British Steel Pension Fund	Retail	On the proposals/policies map allocate the site identified in appendix 7 of the representations made on behalf of British Steel Pension Fund (dated 23rd May 2013) for bulky/volume town centre type uses or quasi retail uses that for operational reasons are unsuitable in a town centre location.	The Council considers this site continues to fulfil an important function as employment land in an area of continuing need for job provision to replace former heavy industries based in the area which are now closing or moving away. It is located some distance to the south of the existing town centre boundary and is considered inappropriate for out-of-centre retail use.
38/125	Ruislip Residents Association	Safeguarding retail uses in Town, District and Neighbourhood Centres	We suggest that sympathetic parking policies will help in this.	Noted – this comment has been passed to the Council's parking strategy officers.
51/236	Nathaniel Lichfield on behalf of Intu Properties plc	Safeguarding retail uses in Town, District and Neighbourhood Centres: Protecting retail uses in the Town, District and Neighbourhood Centres	<p>Intu would support a policy that states where applications for town centre uses are not within the defined centre they have to comply with the impact and sequential assessments. This approach accords with national planning policy (NPPF. Paras. 24 and 26).</p> <p>These retail tests must be upheld to resist incremental expansion of out of centre retailing which could undermine the town centre first approach. This is particularly important at this time, in the aftermath of the recession and when increasing internet shopping</p>	<p>Noted - the Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.</p> <p>National planning guidance does not require the Council to re-iterate the contents of national planning policies within the Local Plan. It has already defined a series of primary and secondary frontages within its various town centres. This is a long-standing policy approach it has</p>

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			<p>and non store sales continues to threaten the viability and vitality of town centres. The objective of the future plan is to encourage further growth of Uxbridge town centre so that it remains one of the best in the country for retail and employment. The success will depend on the rigorous application of town centre first principles.</p> <p>Against this background Intu considers a 1,000 sqm threshold for the impact assessment is appropriate. Intu also supports the commitment to ensuring all applications for main town centre uses outside an existing centre will be required to address the sequential assessment, as set out in para. 24 of the NPPF.</p> <p>In addition, the NPPF (Annex 2) makes a distinction between what comprises the centre for retail purposes and other main town centre uses. The definition of a town centre site for retail uses is different from that for other main town centre uses. The reference to 'primary and secondary retail areas' in the context of retail and other town centre uses can be misleading.</p> <p>Intu therefore suggest text included within a policy where this important distinction is clarified.</p> <p>Finally, Intu also considers that other town centre uses (leisure and dining for example) should not be precluded altogether from ground floor units within primary and secondary shopping areas as this is a defined town centre use in accord with the NPPF (Annex 2) and such operations may require a ground floor presence or entrance. To accord with national planning guidance we consider that policy should ensure flexibility in this respect.</p>	<p>taken which does not preclude other non-retail uses from locating within these frontages; it does seek to maintain a proportion of retail uses present in each type of frontage in order to ensure their continued vitality and viability as retail centres.</p>
	The Economy	8. Restaurants and Hot Food Takeaways - Protecting retail uses and preventing change of use to restaurants and hot food take-aways where		

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
		appropriate.		
51/237	Nathaniel Lichfield on behalf of Intu Properties plc	<p>Restaurants and Hot Food Takeaways: Protecting retail uses and preventing change</p> <p>of use to restaurants and hot food take aways where appropriate</p>	<p>Intu supports the general thrust of policies that seek to safeguard retail uses, where appropriate. Intu would object to a policy that would prevent all changes of use from retail uses to restaurants or hot food take aways. Significant challenges to the future of town centres exist and therefore centres will need to evolve in order to respond to the ongoing effects of the recession and prolonged downturn, together with the increase in internet shopping. To remain competitive, vital and viable town centres need to actively encourage other forms of town centre uses, including restaurants, cafes and leisure uses, in order to encourage visitors to the town centre, extend stays and increase visitor spending.</p> <p>With regards to Uxbridge town centre, the most important urban centre, this approach must be carefully balanced to ensure it maintains its important retail role as the main provider of comparison goods across a wide catchment area. Intu will support policies that seek to provide an appropriate mix between Class A1 and Class A3-A5. Intu considers it will be important to strike the right balance between meeting the needs of the changing role of the town centre, whilst seeking to retain the primacy of A1 retail floorspace in the primary retail areas. It is important that flexibility is encouraged to embrace the changing needs of centres.</p> <p>Intu would support a policy to allow additional flexibility for promoting non retail Class A2-A5 uses within the primary and secondary retail area, by providing the Council with the ability to consider applications on a case by case basis. A key consideration should be the degree to which the proposals will benefit the vitality and viability of the City Centre. To the application of inflexible thresholds should be avoided.</p> <p>It is vital that the policy allows a level of flexibility to enable the Council to respond positively to development proposals which would support the viability or vitality of a centre and bringing back into active use units that are vacant. Intu considers that this</p>	Noted - the Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			approach will assist in ensuring that Uxbridge position as a major metropolitan centre is maintained and strengthened.	
	The Economy	9. Small and Medium Sized Businesses - Supporting the development of affordable accommodation for small and medium-sized businesses in appropriate sustainable locations throughout the borough		
	New Homes			
	New Homes	General comments		
26/65	Nathanial Lichfield and Partners on behalf of British Airways Plc	New Homes - Locations for New Housing	The preamble at para. 6.22 to Policy H1 of Part 1 of the Local Plan confirms that in meeting the Borough's housing targets that specific locations will be subject to an assessment of impacts on flood risk, ecology, conservation, the ability to deliver decentralised energy, sustainable transportation, access to green infrastructure and social quality. The London Plan target for the Heathrow Opportunity Area (HOA) also suggests an indicative housing capacity of 9,000 new homes albeit at this stage the London SHLAA (2011-2021) only identifies large sites in the HOA with the capacity to accommodate 318 dwellings. It is evident therefore that the Part 2 policies and the forthcoming Opportunity Framework will face a significant challenge in accommodating and identifying sites to meet these housing targets. In meeting this challenge we would suggest that in addition to the criteria identified at para. 6.22 (see above) it is also important to have	The Council will consider individual planning applications for housing on their merits, generally approaching sustainable development proposals positively as required by national planning policy, taking into consideration the policy requirements set out in both the Local Plan and London Plan.

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			regard to avoiding those areas which are focused on meeting the needs of airport related activities and priority should be given to those areas which are well related to existing services and where there are opportunities to deliver regeneration benefits.	
30/78; 31/96	Phil Rumsey; Veronica Rumsey		Support items 1 to 4 with modifications to all items.	Support welcomed.
58/297	Carter Jonas on behalf of Buccleuch Property Fund	Proposed Development Management Policies (b) - Student Housing	A criteria based policy identifying suitable locations and dealing with sites for Student Housing should be included. Sites should be looked upon favourably that are located in sustainable locations and in accordance with wider general development control policies.	The Council will consider individual planning applications for specialised housing uses such as student hostels on their merits, generally approach sustainable development proposals positively as required by national planning policy, taking into consideration the policy requirements set out in both the Local Plan and London Plan. Specific housing proposals for student accommodation are unusual in the borough. The local housing market (e.g. the private rented sector) meets extensive short term accommodation needs across the borough for individual groups such as students. There is also an extensive amount of campus-based student accommodation located in the borough.
	New Homes	1. Conversion or Subdivision of Dwellings- Conversion or subdivision of residential dwellings into additional units.		
30/79; 31/97	Phil Rumsey; Veronica Rumsey	Conversion or Subdivision of Dwellings	Conversion or subdivision of residential dwellings into additional units should only be permitted in extreme circumstances and not at all in conservation areas.	The Council will consider individual planning applications on their merits, generally approaching sustainable development proposals positively as required by national planning policy, taking into consideration the policy requirements set out in both the Local Plan and London Plan.
38/126	Ruislip Residents Association	Conversion or Subdivision of Dwellings	OK where suitable and where facilities, such as parking, are available. Give preference to sites close to public transport hubs.	The Council will consider individual planning applications on their merits, generally approaching sustainable development proposals positively as required by national planning policy, taking into

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
				consideration the policy requirements set out in both the Local Plan and London Plan.
	New Homes	2. Houses in Multiple Occupation (HMOs)- Change of use of dwellings to Houses in Multiple Occupancy.		
30/80; 31/98	Phil Rumsey; Veronica Rumsey	Houses in Multiple Occupation	Change of use of dwellings to Houses of Multiple Occupancy should not be permitted in Conservation Areas or in buildings of special interest, nor in areas where there is high levels of pollution.	The Council will consider individual planning applications on their merits, generally approaching sustainable development proposals positively as required by national planning policy, taking into consideration the policy requirements set out in both the Local Plan and London Plan.
38/127	Ruislip Residents Association	Houses in Multiple Occupation (HMOs)	These need strong monitoring from the council and this appears not to be available at present.	The Council does monitor licensing and planning application records for Houses in Multiple Occupation and will report its findings in its annual Authority Monitoring Report.
	New Homes	3. Affordable Housing- Provision of affordable housing in residential development schemes.		
5/7	A Sapelli		<p>The Council could align itself with Government support, reinforce it's commitment to ex-servicemen and grow some truly sustainable communities in Hillingdon by enabling self-build development powered by the labour of local ex-servicemen.</p> <p>The ex-servicemen will free up existing housing stock when they move in to their new homes. Small as the scheme may be in its initial stages still it will go some way towards easing local housing pressures. In a recent similar project in Bristol, 14 two-bedroom</p>	Noted - these comments have been passed to the Council's housing service for information and any further action.

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			<p>homes were provided</p> <p>The project should be geared towards currently unemployed ex-servicemen who stand to gain construction skills and qualifications through the project further enabling them to secure employment. The sense of satisfaction and confidence associated with 'building your own home' will also contribute positively to the lives of the ex servicemen.</p> <p>In addition to the labour cost savings (both in terms of initial build and ongoing maintenance) there would be added values of living in a supportive community bonded by a common project, the creation of local icons of achievement, and the generation of new skills.</p> <p>A suggested operational plan for the scheme in brief:-</p> <ul style="list-style-type: none"> ➤ Group of suitable ex-servicemen identified by LBH and form a Community Land Trust (CLT) ➤ CLT liaise with LBH to identify suitable sites ➤ LBH take on a consultancy role to oversee technical design, legal and regulatory compliance; as part of this role LBH calculate a budget for the project and help source & identify funds ➤ By employing a qualified construction trainer CLT would help participants to gain skills and qualifications ➤ The project team would devise a training programme which would be delivered on site before and in parallel with the works. ➤ Following all necessary ground works being carried out professionally CLT build their houses to completion; this would be done in teams with all members expected to work to ensure that all the proposed houses on the site are built together. ➤ Participants will be rewarded for their efforts and a proportion of ownership shall be traded for their 'sweat equity'. ➤ The proportion of the new homes still owned by LBH/funding agencies would be rented to CLT members <p>Full ownership could be negotiated by the tenants through the</p>	

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			existing Right to Buy/Acquire route.	
17/22	Geoff Armstrong, Armstrong Rigg Planning	b) New Homes – 3. Affordable Housing	<p>Current government guidance on tenure should be reflected in policy</p> <ul style="list-style-type: none"> • Opportunities for variable tenures in affordable housing should be provided within policy • Policies should be flexible to allow adaptation to changing Government policies • Viability should form an integral part of any policy relating to affordable housing • The opportunity to provide off-site commuted sums should be included • RSLs should be agreed on a site by site basis with the developer and the LPA • The above will prevent restrictive policies hindering residential development • The NPPF states that policies which seek to provide affordable housing should be 'sufficiently flexible to take account of changing market conditions over time' (paragraph 50) 	The Council will take into account the requirements of national and London Plan policies regarding affordable housing provision with the drafting of policies in Part 2 of the Local Plan.
30/81;31/99	Phil Rumsey; Veronica Rumsey	Affordable Housing	Provision of affordable housing in residential development schemes throughout the borough.	<p>Part 1 of the Local Plan already notes that :</p> <p>“...the Council will seek to maximise the delivery of affordable housing from all sites over the period of the Hillingdon Local Plan: Part 1- Strategic Policies. For sites with a capacity of 10 or more units the Council will seek to ensure that the affordable housing mix reflects housing needs in the borough, particularly the need for larger family units.”</p> <p>It is not possible to seek affordable housing provision on all residential schemes which come forward for development, but where viability allows it to do so it will seek affordable housing provision in appropriate cases.</p>
38/128	Ruislip Residents	Affordable Housing	What price is considered affordable? An important principle but needs to be implemented with more vigour by the Council.	The Council will keep the position with affordable housing provision

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
	Association			under review and informed by periodic Housing Market Assessments.
41/161; 44/189; 55/248 ; 57/274	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	Affordable Housing	Affordable housing provided through community ownership schemes should be promoted through planning policy and grant support. Self build programmes should be promoted as a method of providing affordable housing.	The Council will seek to maximise the delivery of affordable housing from all sites over the period of the Hillingdon Local Plan. It cannot promote particular types of provision through the Local Plan.
45/212	Solent Planning on behalf of Bourne End Investments Ltd	Development Policies - Housing General	Point 7 Affordable housing it is considered essential that the policy provides for some flexibility in the application of affordable housing requirements allowing for consideration of the circumstances of specific sites (particularly allocated sites and sites subject to significant site costs and mitigation such as contamination) and viability. The draft policy should also consider the different ways in which affordable housing can be achieved including the potential for specialist and care housing.	The Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies. Part 1 of the Local Plan already notes that : “...the Council will seek to maximise the delivery of affordable housing from all sites over the period of the Hillingdon Local Plan: Part 1- Strategic Policies.” It will consider the different ways in which affordable housing can be achieved when new development proposals come forward.
	New Homes	4. Provision for Gypsy and Travellers - Criteria governing the location and suitability of sites for Gypsy and Travellers.		
26/66	Nathanial Lichfield and Partners on behalf of British Airways Plc	New Homes - Provision for Gypsy and Travellers	Policy H3 of Part 1 of the Hillingdon Local Plan confirms that the Colne Park site will be protected for its current use but that in considering new sites there should be no significant adverse effects on the amenity of occupiers of adjoining land. Our clients control land adjacent to the Colne Park facility and would have concerns regarding any proposals to expand this site. Whilst any proposed improvements to this facility would be welcomed there have been occasions where the Colne Park site	Noted – the Council will be reviewing the need for affordable housing during the preparation of Part 2 of the Local Plan.

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			<p>has had an adverse effect upon our client's land in terms of access onto private land and fly tipping.</p> <p>Our clients would therefore resist proposals to expand this existing facility on the basis of adverse effects.</p>	
30/82; 31/100	Phil Rumsey; Veronica Rumsey	Provision for Gypsy and Travellers	Criteria governing the location and suitability of sites for Gypsy and Travellers should ensure they are spread across the borough and not in just one area.	Noted – the Council will be reviewing the need for further provision of pitches during the preparation of Part 2 of the Local Plan.
41/162; 44/190; 55/249 ; 57/275	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	Provision for Gypsy and Travellers	Enhanced provision of sites for traditional modes of modular living should be provided. This provision should extend beyond these ethnic groups to facilitate more affordable living options upon boats or other movable structures for all in the borough.	Noted – the Council will be consider the need to include development management policies intended to encourage provision of a wider range of possible alternative forms of affordable housing in Hillingdon during the preparation of Part 2 of the Local Plan.
	Historic and Built Environment			
	Historic and Built Environment	General Comments		

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
11/13	Justine Bayley, Hayes Conservation Advisory Panel	Historic and Built Environment	<p>We are not seeking to insert new policies into the document but wish to ensure that the relevant policies in the London Borough of Hillingdon Unitary Development Plan: Saved Policies 2007 are carried forward into the new Local Plan, ie policies BE1-5 and BE8-12.</p> <p>We regret that policy PR4 has not been followed as we do not believe that the overall plan proposed for the Thorn EMI Complex, Blyth Road, Hayes is of sufficient merit, in terms of enhancing the Conservation area and its setting. We believe the historic building that are being retained are being hidden by the high-rise development planned for the areas around them, destroying their setting, contrary to several of the BE policies.</p> <p>We note that Powergen/Bulls Bridge Site, North Hyde Gardens, Hayes was previously the subject of a specific policy, PR10, and hope that this will be carried forward into the new plan. An appropriate and holistic industrial use needs to be found for this site that also enhances the Bulls Bridge Conservation Area which at present is the subject of separate planning applications (contra PR10). With Nestles' plan to vacate their buildings in the adjacent Conservation Area to the west, the opportunity should be taken to look at the whole area afresh.</p> <p>As this consultation is described as an <u>initial</u> one, we assume we will be consulted later on the details it is intended to include in the new plan.</p>	The Council will be consulting local groups and residents as detailed planning proposals come forward for these sites.
30/83; 31/101	Phil Rumsey; Veronica Rumsey	Historic and Built Environment	Support items 1-35 with modification to items 4 and 16.	Support welcomed.
	Historic and Built Environment	1. Heritage Assets - Development having an adverse impact of Heritage Assets and their settings.		
26/67	Nathanial Lichfield and Partners on behalf of British Airways Plc	Heritage Assets	There is a need to ensure that the heritage policies that are incorporated into Part 2 of the Local Plan are NPPF compliant. In particular, it is necessary to ensure that (1) sufficient weight is attached in the determining of planning applications to the	The Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			<p>desirability of new development making a positive contribution to local character and distinctiveness (NPPF, para. 131) and (2) even where there is harm to the significance of a designated heritage asset that this should be weighed against the public benefits of the proposal including securing its optimum viable use (para. 134).</p> <p>In addition, there would also be merit in ensuring that the provisions and potential benefits of enabling development also are reflected in the Part 2 heritage policies.</p>	
38/129	Ruislip Residents Association	Heritage Assets	We agree that we need to protect those assets that we still have.	Support welcomed.
41/163; 44/1915; 55/250; 57/276	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	Heritage Assets	Existing agricultural and horticultural structures should be maintained and preserved as historic buildings that link the borough to its recent history of market gardens.	The Council will keep its Historic Environment Register under review. It would not be possible for it to make a general listing of all existing agricultural and horticultural structures in the way suggested here.
	Historic and Built Environment	2. Archaeological Remains -Proposals affecting archaeological sites and the need for detailed site appraisals.		
	Historic and Built Environment	3. Listed Buildings - Development affecting listed building and their settings.		
	Historic and Built Environment	4. Conservation Areas - Development affecting the		

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
	Environment	character and appearance of Conservation Areas.		
20/35	Eastcote Village Conservation Advisory Panel		<p>There are three Conservation Areas in Eastcote :- Eastcote Village CA, Eastcote Park Estate CA and Morford Way CA.</p> <p>Morford Way Conservation Area- There is a draft appraisal for the Morford Way Conservation Area in which one recommendation is to extend the CA to include the part of the Field End Road shopping centre that is unchanged from the 1930s when it was built. This is an area of good quality Metro-Land suburb and to include this into the CA would be consistent with Policy HE1. This appraisal is with the Specialist Planning Team, Charmain Baker. Recommendation: The Morford Way CA be extended as per the recommendations made in the draft appraisal 2012.</p> <p>Eastcote Village CA: Eastcote Village was one of the original Conservations Areas, this area would benefit from an up to date Appraisal. The EVCA is included in an Proposed Archaeological Priority Area. This should be upgraded to an Archaeological Priority Area. Recent archaeological digs at Eastcote House Gardens and Bishop Ramsey School have produced evidence of late iron age remains. Recommendations: An Appraisal of Eastcote Village CA be made a priority.</p> <p>The Proposed Archaeological Priority Area be up graded to an Archaeological Priority Area.</p>	<p>The Council will bring forward its conservation area appraisals separately to the preparation of the Local Plan. Its policies will be informed by new evidence base studies on local townscape character and on archaeological assets.</p>
30/84; 31/102	Phil Rumsey; Veronica Rumsey	Conservation Areas	Support items 1 – 35 with modification to items 4 and 16.	<p>Support welcomed.</p> <p>The Council is aware of national planning policy requirements regarding development affecting the character and appearance of Conservation Areas and their surroundings.</p>

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
38/130	Ruislip Residents Association	Conservation Areas	These are important for preserving the character of our towns and villages. There should be no development within a conservation area without planning consent.	The Council is aware of national planning policy requirements regarding in Conservation Areas and surrounding areas.
	Historic and Built Environment	5. Areas of Special Local Character - Preventing development that is harmful to the character and appearance of Areas of Special Local Character		
41/164; 44/192; 55/251; 57/277	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	Areas of Special Local Character	The village character in the borough should be protected, retaining settlements' distinct character and geographic identity, particularly in areas surrounding the airport where the prospect of development and sprawl is most prevalent.	The Council's policies and future development management decisions will be informed by new evidence base studies on local townscape character and on archaeological assets.
	Historic and Built Environment	6. Heritage and Climate Change - Mitigating against the effects of climate change and their impacts on Heritage Assets		
	Historic and Built Environment	7. Planning Applications - Scope of the design content of planning applications		
50/228	Heathrow Airport Ltd	c) Historic and Built	HAL considers that the information provided in support of planning applications should be needs-based and informed by pragmatic	The Council will follow national planning policy requirements regarding assessments and information required in support of planning

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
	(Planning and Programmes)	Environment Planning Applications	pre-application discussion.	applications.
	Historic and Built Environment	8. Public and Private Amenity Space in Residential Developments - Provision of public and private amenity space in residential development		
38/131	Ruislip Residents Association	Public and Private Amenity Space in Residential Developments	Developers are trying to cram too many properties onto each site.	Noted - the Council's policies and future development management decisions will be informed by a new evidence base study on the borough's local townscape character and by national and London Plan planning policies.
41/165; 44/193; 55/252; 57/278	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	Public and Private Amenity Space in Residential developments	Provision of space for community use should be included in all residential development including areas of 'wildlife value' and allotment space.	The Council will take into account the requirements for amenity space provision in all proposed residential developments.
	Historic and Built Environment	9. Trees and Landscaping -Protection and provision of trees and landscaping.		
13/16	Natural England	Policy 9 Tree and Landscaping:	Natural England welcomes the inclusion here and would encourage the Council and developers to look at "soft/green" landscaping options, linking in with other policies and headings to help strengthen the document.	Noted.

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
38/132	Ruislip Residents Association	Trees and Landscaping	We need better enforcement and more tree protection orders where appropriate. Where trees that have to be taken down, more mature, larger stock should be used for replacement. We have tree nurseries in our own borough.	Noted.
41/166; 44/194; 55/253; 57/279	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	Trees and Landscaping	All remaining areas of orchard in the borough should be protected. Any development in the borough should make mandatory contribution to the establishment of areas of 'urban forest' to mitigate carbon emissions, improve air quality and reduce the urban heat island affect.	The Council will keep its agricultural land under review. It would not be possible for it to protect all existing orchards in the way suggested here nor to make contributions by developers to urban forest provision mandatory.
	Historic and Built Environment	10. Internal Floorspace Standards - Minimum floorspace requirements in residential dwellings.		
17/23	Geoff Armstrong Armstrong Rigg Planning	10. Internal Floorspace Standards 11. Garden Sizes 12. Garages 14. Lifetime Homes 15. Implementing Building for Life Standards 16. Carbon Reduction in Residential and Non Residential Development 17. Storage for Refuse and Recyclables in Residential Development	<ul style="list-style-type: none"> All policies relating to these aspects of a development should be flexible and on a site-by-site basis, allowing for viability to be considered The NPPF states at paragraph 17 that development should always seek to secure high quality design and a good standard of amenity for all existing and future occupiers, however flexibility within standards will ensure a greater number of residential developments come forward to address the current housing shortage. Paragraph 14 of the NPPF states that Local Plans should 'meet objectively assessed needs, with sufficient flexibility to adapt to rapid change' and LPA should 'positively seek opportunities to meet the development needs of their area Paragraph 15 states that Local Plans should make it clear that development which is sustainable can be approved without delay 	The Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.
	Historic and Built	11. Garden Sizes - Provision of garden areas relative to the size of		

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
	Environment	dwelling.		
38/133	Ruislip Residents Association	Garden Sizes	Please see item 8 above (Developers are trying to cram too many properties onto each site.	Noted - the Council's policies and future development management decisions will be informed by a new evidence base study on the borough's local townscape character and by national and London Plan planning policies.
41/167; 44/195; 55/254; 57/280	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	11. Garden sizes	Adequate space to offer the potential to grow food should be provided in any new development.	The Council will take into account the requirements for amenity space provision in all proposed developments.
	Historic and Built Environment	12. Garages - Size standards for garages.		
	Historic and Built Environment	13. Security in Residential Development -Designing out crime in residential developments.		
	Historic and Built Environment	14. Lifetimes Homes - Adaptability of homes including providing for wheelchair users.		
	Historic and Built Environment	15. Implementing Building for Life Standards - Standards in residential development to satisfy Building for Life standards.		

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
	Historic and Built Environment	16. Carbon Reduction in Residential and Non Residential Development - Phased reduction of CO2 emission for all types of development.		
30/85; 31/103	Phil Rumsey; Veronica Rumsey	Carbon Reduction in Residential and Non Residential areas	Phased reduction of CO2 and NO2 emissions for all types of development.	The Council is aware of national planning and London Plan policy requirements regarding air pollution.
41/168; 44/196; 55/255; 57/281	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	Carbon Reduction in Residential and Non Residential Development	Renewable energy supply should be integrated into all new development. Strong preference should be given to carbon rich natural building materials such as timbre, hemp, straw and rammed earth in order to lower the embodied energy of new structures and sequester carbon. Retro fit of existing structures to improve energy performance should be considered as a first option and applications for demolition rejected where they are structurally sound.	The Council is aware of national planning and London Plan policy requirements regarding renewable energy and notes that section 10 of policy BE1 in Part 1 of the Local Plan already requires that all new developments should: "Maximise the opportunities for all new homes to contribute to tackling and adapting to climate change and reducing emissions of local air quality pollutants. The Council will require all new development to achieve reductions in carbon dioxide emission in line with the London Plan targets through energy efficient design and effective use of low and zero carbon technologies. Where the required reduction from on-site renewable energy is not feasible within major developments, contributions off-site will be sought."
	Historic and Built Environment	17. Storage for Refuse and Recyclables in Residential Development - Provision of refuse facilities in residential development.		

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
41/169; 44/197; 55/256; 57/282	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	Storage for refuse and recyclables in residential development	Bio digestion of organic waste within residential development should be favoured in planning policy as a method of reducing waste and recovering energy.	The Council is aware of national planning and London Plan policy requirements for waste reduction and management. Where appropriate it may seek to encourage particular types of waste treatment on site such as bio-digestion but it cannot favour this method in the manner suggested.
	Historic and Built Environment	18. Noise and Air Quality in Residential Development - Levels of noise and air quality requirements in residential development.		
41/170; 44/198; 55/257; 57/283	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	Noise and Air quality in Residential development	Noise and air quality should be mitigated by a minimum of 2 trees per new residential unit developed. Any commercial development should be subjected to the same scale of mitigation with sizing appropriate to the development.	The Council is aware of national planning and London Plan policy requirements regarding noise and air quality. it cannot make tree planting mitigation proposals in the mandatory manner suggested here.
	Historic and Built Environment	19. Car Parking Standards for residential development - Car parking standards for residential development.		
17/24	Geoff Armstrong Armstrong Rigg Planning	1Car Parking Standards for Residential Development	<ul style="list-style-type: none"> • Policies on car parking standards should also be flexible, allowing provision to be considered on a site-by-site basis • It is necessary to have an appreciation for increased car ownership with the Borough and the UK as a whole when preparing car parking standards, especially in relation to residential developments • The NPPF states at paragraph 39 that when setting local 	The Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies. It will take local car use into account in setting its detailed parking standards in Part 2.

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			parking standards LPAs should take into account local car ownership levels as well as accessibility of the development, availability of public transport, type, mix and use of the development and the need to reduce use of high-emission vehicles.	
38/134	Ruislip Residents Association	Car Parking Standards for residential development	We suggest you look into under-provision in new planning applications.	The Council is aware of national planning policy requirements regarding car parking standards. It will take local car use into account in setting its detailed parking standards in Part 2.
41/171; 44/199; 55/258; 57/284	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	19. Car Parking Standards for residential development	A maximum of one unit of parking should be provided per unit. Developments with lower allocation should be given preference in planning policy. All parking should be permeable to reduce flood risk.	<p>The Council is aware of national planning policy requirements regarding car parking standards. It will take local car use into account in setting its detailed parking standards in Part 2.</p> <p>Section 9 of policy BE1 in Part 1 of the Local Plan already requires that all new developments should:</p> <p>“Not result in the inappropriate development of gardens and green spaces that erode the character and biodiversity of suburban areas and increase the risk of flooding through the loss of permeable areas...”</p> <p>The use of permeable parking surfaces will be encouraged but local geological and ground water conditions will affect any final requirements.</p>
	Historic and Built Environment	20. Electric Car Charging Points - Provision of electric charging points in residential development.		

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
	Historic and Built Environment	21. Safeguarding Gardens from Development - Safeguarding residential gardens from development.		
38/135	Ruislip Residents Association	Safeguarding Gardens from Development	We fully support this, indeed there has been a lot of local activism on this very point.	Support welcomed.
	Historic and Built Environment	22. Rear Extensions - Scale of residential rear extensions.		
	Historic and Built Environment	23. Side Extensions - Scale of residential side extensions		
	Historic and Built Environment	24. Roof Extensions - Scale of residential roof extensions.		
38/136	Ruislip Residents Association	Roof Extensions	We believe the design needs to be sympathetic to the local vernacular.	Noted - the Council's policies and future development management decisions will be informed by a new evidence base study on the borough's local townscape character and by national and London Plan planning policies.
	Historic and Built Environment	25. Over Dominant Extensions - Overly large residential extensions.		

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
38/137	Ruislip Residents Association	Over Dominant Extensions	Consideration should be given to the effect on neighbours' access to light.	This is a long-standing policy consideration in Hillingdon.
	Historic and Built Environment	26. Privacy and Overlooking -The retention of privacy and amenity for residential dwellings.		
	Historic and Built Environment	27. Basements - Design criteria for basement conversions.		
	Historic and Built Environment	28. Retention of Off-Street Parking -Retention of car parking for residential dwellings.		
38/138	Ruislip Residents Association	Retention of Off-Street Parking	We believe off-street parking is greatly preferable to on-street parking. Only allow conversion of garages to residential use if there is still suitable off-street parking.	Agreed – the Council will follow this general approach where possible.
	Historic and Built Environment	29. Hard surfacing- Hard surfacing in residential gardens.		
24/41	John Williams	Page 5, item 29 Hard surfacing	Assuming this relates to paving of front gardens for parking then provision should be made for compensatory landscaping to enhance the street scene. Otherwise front gardens will become	Noted - the Council's policies and future development management decisions will be informed by a new evidence base study on the borough's local townscape character and by national and London Plan

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			one long strip of hard surfacing behind the pavement.	planning policies. It will take into consideration the impact of front garden use for car parking on the general character and amenity of individual areas.
38/139	Ruislip Residents Association	Hard Surfacing	We suggest that when a front garden is replaced with hard surfacing that compensatory landscaping to improve the streetscape is required. Otherwise front gardens will become one long strip of hard surfacing behind the pavement. We also recommend that the curb drop be limited to maintain on-street parking where practicable. We have concerns about drainage to prevent flash flooding and wonder if water-permeable surfaces can be recommended.	Noted - the Council's policies and future development management decisions will be informed by a new evidence base study on the borough's local townscape character and by national and London Plan planning policies. It will take into consideration the impact of front garden use for car parking on the general character and amenity of individual areas.
41/172; 44/200; 55/259; 57/285	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	29. Hard surfacing	Any hard surfacing must be permeable to reduce flood risk.	Section 9 of policy BE1 in Part 1 of the Local Plan already requires that all new developments should: "Not result in the inappropriate development of gardens and green spaces that erode the character and biodiversity of suburban areas and increase the risk of flooding through the loss of permeable areas..." The use of permeable surfaces will be encouraged but local geological and ground water conditions will affect any final requirements.
	Historic and Built Environment	30. Public Realm in Town, District Centres and in Retail Parades - Improvements to the public realm.		
13/17	Natural England	Policy 30 Public Realm in Town, District Centre and in Retail Parades:	Consideration of "green/soft" landscaping should be incorporated, provision of green infrastructure can be linked to Policy 9 above as well as heading D – Environmental Improvements.	Section 7 of policy BE1 in Part 1 of the Local Plan already requires that all new developments should: "Improve the quality of the public realm and provide for public and

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
				<p>private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity...”</p> <p>This policy already allows the Council to negotiate with developers for such measures as “green infrastructure”.</p>
	Historic and Built Environment	31. Design of Shop Fronts - Design criteria for new shop fronts.		
38/140	Ruislip Residents Association	Design of Shop Fronts	We would like the design criteria to try and prevent 'blind' shop fronts which are not inviting ie. shopfronts that have no traditional window display area, nor even a clear window into the shop. Examples of such 'blind' shop fronts are Ruislip Post Office and M&S Ruislip.	<p>Sections 1 & 2 of policy BE1 in Part 1 of the Local Plan already requires that all new developments should:</p> <p>“1. Achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place;</p> <p>2. Be designed to be appropriate to the identity and context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials and seek to protect the amenity of surrounding land and buildings, particularly residential properties...”</p> <p>These set general design criteria within which the Council can already negotiate with developers to discourage “blind” shop fronts.</p>
	Historic and Built Environment	32. Advertisements on Retail Premises - Design criteria for advertisements		

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
		on retail premises.		
38/141		Advertisements on Retail Premises	These must be as agreed or approved. Enforcement is key.	Noted.
	Historic and Built Environment	33. Hoardings - Temporary hoardings on vacant sites		
38/142	Ruislip Residents Association	Hoardings	These must be properly maintained and be removed on schedule. Again enforcement is key.	Noted.
	Historic and Built Environment	34. External Lighting - Design criteria for external lighting.		
24/42	John Williams	Page 5, Item 34 - External lighting	Include consideration of the impact of floodlighting on surrounding areas and the night skyline e.g. from sports pitch illumination.	Section 2 of policy BE1 in Part 1 of the Local Plan already requires that all new developments should: " Be designed to be appropriate to the identity and context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials and seek to protect the amenity of surrounding land and buildings, particularly residential properties... " (our emphasis) These set general design criteria within which the Council can already negotiate with developers to discourage floodlighting which would have adverse impacts of this type.
38/143	Ruislip Residents Association	External Lighting	We suggest this include consideration of the impact of flood lighting on surrounding areas and the night skyline, eg. from sport pitches. Planning conditions on light installations should be	Section 2 of policy BE1 in Part 1 of the Local Plan already requires that all new developments should:

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			enforced.	<p>“ Be designed to be appropriate to the identity and context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials and seek to protect the amenity of surrounding land and buildings, particularly residential properties...” (our emphasis)</p> <p>These set general design criteria within which the Council can already negotiate with developers to discourage floodlighting which would have adverse impacts of this type.</p>
	Historic and Built Environment	35. Telecommunications Aerials and Apparatus - Location of telecommunications equipment in designated and other areas.		
11/14	Mono Consultants on behalf of Mobile Operators Association	Telecommunications Development	<p>We would take this opportunity to comment that we consider it important that there is a telecommunications policy within the emerging Development Management Document. It is recognised that telecommunications plays a vital role in both the economic and social fabric of communities. National guidance recognises this through Section 5: “Supporting high quality communications infrastructure” of National Planning Policy Framework (March 2012) which provides clear guidance as to the main issues surrounding telecommunications development (NPPF paragraphs 42 and 43). Further advice on the siting and design of telecommunications and good practice procedural guidance is contained within the Code of Best Practice for Mobile Phone Network Development (2002). This builds on the Ten Commitments to ensure that the industry is alive to the concerns of local communities and consultation is built into the development process.</p> <p>The formulation of policy does not exist in isolation and there are numerous documents which will affect the formulation of any telecommunications policy, the most important of these being</p>	A proposed policy on telecommunications will be included in the draft Development Management Policies for inclusion in Part 2 of the Local Plan.

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			<p>NPPF. On this basis we would suggest that a concise and flexible telecommunications policy should be included within the Development Management Document. Such a policy should give all stakeholders a clear indication of the issues that telecommunications development will be assessed against. We would suggest a policy which reads;</p> <p><i>“Proposals for telecommunications development will be permitted provided that the following criteria are met: -</i></p> <ul style="list-style-type: none"> <li data-bbox="875 608 1451 727"><i>(i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;</i> <li data-bbox="875 783 1406 884"><i>(ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;</i> <li data-bbox="875 940 1435 1110"><i>(iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority.</i> <li data-bbox="875 1166 1429 1315"><i>(iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.</i> 	

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			<p><i>When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology."</i></p> <p>We would consider it appropriate to introduce the policy and we would suggest the following;</p> <p>"Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With the growth of services such as mobile internet access, demand for new telecommunications infrastructure is continuing to grow. The authority is keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and siting equipment on existing tall structures and buildings."</p>	
38/144	Ruislip Residents Association	Telecommunications Aerials and Apparatus	The Council has always had a strong policy on this and we hope it will continue with its previous practice.	Noted - a proposed policy on telecommunications will be included in the draft Development Management Policies for inclusion in Part 2 of the Local Plan.
	Environmental Improvement	General Comments		
19/29	Colne Valley Park CIC	Section d) Environmental improvements	<p><u>Colne Valley Park policy</u></p> <p>16% of the London Borough of Hillingdon is located within the Colne Valley Regional Park. It was the first Chief Executive of Hillingdon who showed the vision and foresight to establish the Regional Park in 1965, just one year after the formation of the council. Today Hillingdon is a member of the Colne Valley Park CIC along with 42 other organisations from the public, private and voluntary sectors.</p> <p>There should be a specific policy for the Colne Valley Regional</p>	<p>There is no statutory requirement and the Council considers it unnecessary to include a specific policy on the Regional Park in Part 2 of the Local Plan. It considers that sufficient planning policy protection is given in Part 1 of the Local Plan at policies EM2 and EM3 which seek to maintain Green Belt areas in the borough such as the Colne Valley and recognises at accompanying paragraphs 8.30 and 8.31 its unique large strategic character and quality as part of London's green infrastructure and 'Blue Ribbon' network.</p> <p>These policies reflect and conform with the approach in the London Plan at policy 2.18 with its recognition of the value of the Regional Park</p>

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			<p>Park. This is required as a separate policy to '4: Development in the Green Belt or Metropolitan Open Land' because Green Belt policy has been successful at maintaining open land but has not been so successful at preserving or creating positive sustainable use of land (eg agriculture, nature conservation, recreation)– Green Belt policies say no to development but don't help with finding positive use for land.</p> <p>If integrated and we strongly urge you to do so the Colne Valley Park policy should include the 6 objectives of the Park, namely:</p> <p>Objective 1: To maintain and enhance the landscape, historic environment and waterscape of the Park in terms of their scenic and conservation value and their overall amenity.</p> <p>Objective 2: To safeguard the countryside of the Park from inappropriate development. Where development is permissible it will encourage the highest possible standards of design.</p> <p>Objective 3: To conserve and enhance biodiversity within the Park through the protection and management of its species, habitats and geological features</p> <p>Objective 4: To provide opportunities for countryside recreation and ensure that facilities are accessible to all.</p> <p>Objective 5: To achieve a vibrant and sustainable rural economy, including farming and forestry, underpinning the value of the countryside.</p> <p>Objective 6: To encourage community participation including volunteering and environmental education. To promote the health and social well-being benefits that access to high quality green space brings</p> <p>We would further state that this policy should become a consideration in all development proposals in, or affecting, the</p>	<p>as part of London's strategic open space network (at Map 2.8).</p> <p>Other development management policies to be included in Part 2 will provide a general approach boroughwide to the control of development – alongside national and London Plan policies controlling development in the Green Belt.</p>

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			Park.	
25/52	Environment Agency		Pleased to see points highlighted in our fact sheet have been incorporated in the Environmental section.	Noted.
30/86; 31/104	Phil Rumsey; Veronica Rumsey	Environment Improvements	Support Items 1-22 with modifications to items 4 and 20.	Support welcomed.
52/238	CgMs on behalf of Eastcote Hockey Club	Environmental Improvements	The list of Proposed Policies does not refer to Green Chains in either d) 4 or d) 9. This appears to be inconsistent with the Part 1 Local Plan.	The Council's approach to development in Green Chains is already referred to in Part 1 of the Local Plan at policy EM2. Proposals for changes to existing Green Chain land and for new designations are proposed in the draft Site Allocations and Designations to be included in Part 2.
	Environmental Improvement	1. Low Carbon and Renewable Energy Systems in Residential dwellings -Use of low carbon and renewable energy sources in dwellings.		
17/25	Geoff Armstrong, Armstrong Rigg Planning	1. Low Carbon and Renewable Energy Systems in Residential Dwellings 2. Decentralised Energy 18. Water Efficiency in Homes	<ul style="list-style-type: none"> • These policies should be considered on a site-by-site basis • The suggestion for the inclusion of such policies within developments should come from the developer, rather than the council • The above will ensure more developments come forward, which are no hindered by restrictive policies due to the associated costs 	<p>The Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.</p> <p>It is also aware of national planning and London Plan policy requirements regarding renewable energy and notes that section 10 of policy BE1 in Part 1 of the Local Plan already requires that all new developments should:</p> <p>"Maximise the opportunities for all new homes to contribute to tackling and adapting to climate change and reducing emissions of local air quality pollutants. The Council will require all new development to achieve reductions in carbon dioxide emission in line with the London Plan targets through energy efficient design and effective use of low</p>

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				and zero carbon technologies. Where the required reduction from on-site renewable energy is not feasible within major developments, contributions off-site will be sought."
41/176; 44/204; 55/263; 57/289	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	1. Low Carbon and Renewable Energy Systems in Residential Dwellings	All new development should provide renewable energy systems.	The Council is aware of national planning and London Plan policy requirements regarding renewable energy and notes that section 10 of policy BE1 in Part 1 of the Local Plan already requires that all new developments should: "Maximise the opportunities for all new homes to contribute to tackling and adapting to climate change and reducing emissions of local air quality pollutants. The Council will require all new development to achieve reductions in carbon dioxide emission in line with the London Plan targets through energy efficient design and effective use of low and zero carbon technologies. Where the required reduction from on-site renewable energy is not feasible within major developments, contributions off-site will be sought."
	Environmental Improvement	2. Decentralised Energy- Designing major developments to be able to connect to a Decentralised Energy Network (DEN).		
41/173; 44/201; 55/260; 57/286	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Transition Heathrow	2. Decentralised energy	Preference should be given to schemes that can provide localised energy production both in residential and commercial developments.	The Council will consider all development proposals on their individual planning merits.
	Environmental	3. Living Walls and Roof - Incorporating living roofs		

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	Improvement	into major developments.		
13/20	Natural England		Policy 3) Living Walls and Roofs is welcomed and to be encouraged, it could also be linked to Policy C (30) above.	Noted – this will be considered during the drafting of the Development Management Policies.
38/145	Ruislip Residents Association	Living Walls and Roof	We support this concept and hope it will be applied to the surface structures of HS2.	Noted.
41/174; 44/202; 55/261; 57/287	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	3. Living walls and roofs	All flat roofs should be living in new development. New developments should have minimum of 30% green roof, buildings that have 100% coverage should not be subject to normal planning constraints.	Section 7 of policy BE1 in Part 1 of the Local Plan already requires that all new developments should: “Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity...” This policy already allows the Council to negotiate with developers for such measures as “living roofs”. It cannot make this a mandatory requirement.

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
50/230	Heathrow Airport Ltd (Planning and Programmes)	d) Environmental Improvement 3. Living Walls and Roofs 14. Safeguarding of Biodiversity	<p>HAL understands the benefits of living walls and roofs in supporting biodiversity, attenuating surface water runoff from buildings and providing a natural form of insulation. However, the Council should be aware that living walls and roofs also have the potential to attract birdlife which in turn presents operational safety issues for the airport. Therefore, any policy requiring the provision of living walls and roofs in major developments should reflect the risk to aircraft safety and airport operations.</p> <p>HAL actively manages sites within its landholdings for their biodiversity value and has achieved the Biodiversity Benchmark Award for those areas. In line with the company's biodiversity strategy, any policy should state that the loss of biodiversity features will only be accepted where it will be replaced and enhanced in an alternate location.</p>	<p>The Council does appreciate the concern expressed here regarding the special operational circumstances affecting Heathrow Airport. It will be flexible in the application of its policies partly because of these considerations.</p>
	Environmental Improvement	4. Development in the Metropolitan Green Belt or on Metropolitan Open land- Development affecting the Green Belt and Metropolitan Open Land.		

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
10/12	Gregory Gray Associates on behalf of The Garden Centre Group		<p>Gregory Gray Associates is instructed by our client, Hillingdon Garden Centre, to submit representations in relation to the above document. Our client's landholding, located on Pield Heath Road, Hillingdon extends approximately 4 acres and is located within the Green Belt.</p> <p>It is considered that the detailed Development Management Policies need to specifically address the issue of new buildings within the Green Belt and how they will be viewed. It is proposed that the wording of the policy could state:</p> <p><i>DM New buildings in the Green Belt</i></p> <p><i>The Green Belt boundary is defined on the Policies Map. In order to uphold the purposes of the Green Belt to prevent urban sprawl and to keep land within its designation permanently open, inappropriate development, as defined within national guidance, will not be approved unless the applicant can demonstrate very special circumstances that will clearly outweigh the harm.</i></p> <p><i>Proposals for the limited infilling or the partial or complete redevelopment of previously developed sites will be considered in light of the size, height, type, layout and impact of existing buildings, structures and hardstanding. Such new development will be permitted provided that it does not have a greater impact upon the openness of the Green Belt and the purpose of including land within it. Particular support will be given to proposals that limit the dispersal of development throughout the site or can demonstrate that the openness of the Green Belt will be improved through the rationalisation of existing buildings into a smaller envelope of development within the site.</i></p>	<p>The Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.</p> <p>It is also aware of national planning and London Plan policy requirements regarding development on Green Belt land. It does not consider that the proposed policy would add to these existing policies.</p>
13/21	Natural England		<p>Policies (4) and (5) Green Belt and Metropolitan Open Land, looks at impacts and potential for development and dwellings within these areas and is to be encouraged.</p>	

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
20/36	Eastcote Village Conservation Advisory Panel	Policies EM2 & EM3.	<p>The River Pinn runs through the Eastcote Meadows and this area is classed as a Site of Importance for Nature Conservation. Forms part of the Mayor of London's All London Green grid. The area is also in a Proposed Archaeological Priority Area, this should also be upgraded to an Archaeological Priority Area, as part of the area is within the Eastcote Village Conservation Area.</p> <p>Currently this area is classed as Green Chain, also Blue Ribbon. In line with Policy EM2 of HLP part 1, this area should be considered for Metropolitan Open Land Status.</p> <p>This area is part of the Colne Valley Catchment, LBH is a stakeholder in the Colne Catchment Action network which is working to achieve the standards set down in the European Framework Directive. This involvement should continue.</p> <p>Recommendations.</p> <p>The area is upgraded to Metropolitan Open Land and to an Archaeological priority Area, continues to be classed as Blue Ribbon. Involvement with the Colne Catchment Action Network continues.</p>	Agreed – this section of the River Pinn is included as a new area of Metropolitan Open Land and as part of a proposed Archaeological Priority Area for Eastcote Village in the draft proposed Site Allocations and Designations. The latter proposal stems from the Archaeological Assessment recently completed.
24/43	John Williams	Page 6, items 4 and 5 - Development in the Green Belt and Metropolitan Open Land	Add Green Chains.	The Council's approach to development in Green Chains is already referred to in Part 1 of the Local Plan at policy EM2. Proposals for changes to existing Green Chain land and for new designations are proposed in the draft Site Allocations and Designations to be included in Part 2.
30/87; 31/105	Phil Rumsey; Veronica Rumsey	Development in the Metropolitan Green Belt or Metropolitan Open Land	Prevention of Development on Green Belt Land and Metropolitan Open Land.	The Council's approach to development in the Metropolitan Green Belt or on Metropolitan Open Land is already referred to in Part 1 of the Local Plan at policy EM2.

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32/112	London Square (Quod planning)	Development in the Metropolitan Green Belt or Metropolitan Open Land	<p>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 which may be required to meet the Borough's sustainable objectives.</p> <p>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 which 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.</p> <p>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 which 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.</p> <p>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 need Borough recognising the need for enabling development to fund such provision.</p> <p>Land to the south of Clovelly Avenue and north of Dalton's Farm,</p>	<p>The Council is aware of national planning and London Plan policy requirements regarding development on Green Belt land. It does not consider that the area identified here for release should be de-designated. It will consider the individual merits of any proposals to expand the School when proposals come forward in the light of existing planning policies at that time.</p>

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			Ickenham should be removed from the Green Belt and identified for education purposes supported by enabling residential development on site and at the Douay Martyrs School campus.	
Q37/117	John Blackwell on behalf of London Gaelic Athletic Association	Section D4: Development in the Green Belt or on Metropolitan Open Land	<p>The GAA as a cultural, social and sporting organisation provides for mens and ladies Gaelic Football, Hurling and Camogie at adult level as well as youth activities for the same sports. The GAA has been playing and administering Gaelic games at this site since the early 1970s and we believe that the open space, sport, recreational and social activities both on and off the pitch would be better reflected in an open space, sport and recreational designation or equivalent of the site. The London GAA site in South Ruislip has been developed for sports amenities and sports administrative purposes over a period of a number of years.</p> <p>Notwithstanding our clients' belief that the use and character of their South Ruislip site are such that it would be appropriate to remove the current Green Belt designation, for sites within the Green Belt, policies should clearly set out the criteria for assessing proposals regarding sports pitches and other ancillary pitch sport-related developments.</p> <p>The existing network of sports and recreational facilities should be assessed to ensure that these sites are appropriately designated and this could be done in the context of the open space, sports and recreation strategies that each local authority including London Borough of Hillingdon are required to produce.</p>	<p>The primary purpose of the sports ground use is entirely appropriate to a Green Belt location. If the nature of this use has now changed from that primary purpose, that in itself is not an argument for the Council to de-designate the area as Green Belt.</p> <p>It may be the case that if future proposals come forward for enhancing the facilities for open recreation and pitch sports at the site could be potentially acceptable 'very special circumstance' whereby approval can be given for development within the Green Belt. That will be a matter for determination at the time of the application and within the then planning policy framework.</p>
38/146	Ruislip Residents Association	Development in the Metropolitan Green Belt or on Metropolitan Open land	We suggest you add Green Chains to this policy.	The Council's approach to development in Green Chains is already referred to in Part 1 of the Local Plan at policy EM2. Proposals for changes to existing Green Chain land and for new designations are proposed in the draft Site Allocations and Designations to be included in Part 2.
41/175; 44/203;	Grow Heathrow (May Mackenzie) ; Charlie	4.Development in the Metropolitan Green Belt or	Open space and agricultural land in the green belt should be protected as such. New development should be mitigated by	The Council's approach to development in the Metropolitan Green Belt or on Metropolitan Open Land is already referred to in Part 1 of the

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
55/262; 57/288	Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	on Metropolitan Open land	equal sized habitat creation schemes with an emphasis placed on wild flower meadows for bees and other pollinating insects.	<p>Local Plan at policy EM2.</p> <p>Section 7 of policy BE1 in Part 1 of the Local Plan already requires that all new developments should:</p> <p>“Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity...”</p> <p>This policy already allows the Council to negotiate with developers for such measures as “habitat creation schemes”. It cannot make this a mandatory requirement.</p>
	Environmental Improvement	5. Dwellings in the Green Belt and Metropolitan Open Land - Alterations and extensions to dwellings in the Green Belt or on Metropolitan Open Land.		
	Environmental Improvement	6. Farm Diversification - Farm diversification for employment related uses.		
19/30	Colne Valley Park CIC	Farm diversification	<p>In order to be allowed to develop their farm business planning policy should be modified to allow a range of diversified activity particularly within existing farmsteads. However, a robust definition of agricultural activity is needed to ensure that the green belt as a whole is maintained.</p> <p>In return for permitted developments and/or planning consent the farmer should be prepared to fulfil his-her role as producer of local food and custodians of the environment by entering into</p>	<p>Local Plan policies have to conform to national planning policies regarding farm diversification. It would be difficult for the Council to provide a comprehensive list of uses which might be considered acceptable, as proposed here and any contractual arrangement would fall outside the remit of the Local Plan.</p>

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			contractual reciprocal agreements with the local authority to perpetuate farming and the Green Belt in Hillingdon. This policy should be moved from section D into a new 'farming and the rural economy' policy in section A.	
41/177; 44/205; 55/264; 57/290	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	Farm Diversification	Farm land should be kept as green space devoted to growing of some sort.	Farm land in the borough is already normally covered by Green Belt or Metropolitan Open Land status, therefore heavily protected against any future development by London Plan and Local Plan Part 1 policies and therefore likely to remain in agricultural use during the Plan period.
		7. Tourist, Facilities in the Countryside -Tourism facilities in the countryside.		
	Environmental Improvement	8. Outdoor Advertising in Rural Areas -Outdoor advertisement displays in the countryside.		
	Environmental Improvement	9. Development in Green Edge Locations - Development in fringe locations to the Blue Ribbon Network and Green Spaces.		
13/22	Natural England		Policies (9) and (10) relate to Development in Green Edge Locations and the Blue Ribbon Network which is also welcomed.	Support welcome.
16/20	Middlesex Branch of the Inland Waterways	Environmental Improvements	Across the waterway system people have been living on boats for many years. Some of these residential boaters do not have a home mooring but are designated as continuous cruisers, many of	The Council will discuss this proposal with the Canal and River Trust as it primarily concerns the management of moorings. Sufficient capacity for housing development has been identified for the Plan period without

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
	Association	(Development in Green Edge Locations)	<p>them roaming widely across the network in a progressive journey. The Navigation Authority (Canal & River Trust) conditions for a continuous cruising licence impose requirements on continuous cruisers which are intended to ensure that other boat owners or hirers are able to enjoy leisure use of the waterway network.</p> <p>For many years there were no significant issues associated with this but in recent years there has been an increase in the numbers of people living on boats without a home mooring and sometimes staying within a narrow geographic area. No-where is this more acute than in the London area where the number of boats overstaying on moorings often for residential purposes, has increased. This is because of the pressures on accommodation in the London area and the lack of affordable residential moorings.</p> <p>The time limit rules for staying at designated visitor moorings or at other points along the canal (generally a maximum stay of 14 days) are being widely ignored by boat owners who have no home mooring. As a result many leisure boat owners are put off cruising in the London area for fear that they will be unable to find suitable overnight moorings.</p> <p>In order to address this issue the Inland Waterways Association (IWA) has recently published a document entitled A Proposal for Reducing Overstaying Boats in the London Area.</p> <p>The IWA supports the provision of more "Off-Line" residential moorings in the London Area and will press navigation authorities, local authorities and other stakeholders to develop strategies for the provision of more residential moorings in their plans.</p> <p>Along with a number of measures to allow better enforcement of mooring rules, the IWA are also proposing the introduction of a transitional arrangement to allow the reduction of the boats moored in the area to be carried out in a controlled manner, that is seen to be fair both to the over staying moorers, and those who stay within the rules and wish to visit London.</p>	the need for new residential moorings being brought forward.

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			<p>The transitional arrangement will be made possible by the provision of a new type of mooring, controlled by the Canal & River Trust, to be known as an On-Line Community Mooring. This is intended to satisfy the need for a type of mooring available for those boats without home moorings, or those who need to spend considerable time moored, in the London area.</p> <p>The IWA have produced a list of possible sites for Community Moorings (Eleven of these sites are within the boundaries of the London Borough of Hillingdon).</p> <p>RESIDENTIAL USE OF ON-LINE COMMUNITY MOORINGS ON THE GRAND UNION CANAL</p> <p>Applications for new residential moorings at sites designated by the Canal & River Trust as Community Moorings will normally be considered favourably providing that the following conditions are met:</p> <p>(i) The number of boats moored at any one point should not be more than ten.</p> <p>(ii) The proposal incorporates appropriate facilities to allow safe and secure access between vessels and the bank, without interfering or endangering those using canalside walkways;</p> <p>(iii) Any provision for car parking must not adversely affect the amenities of the waterway, and adequate services facilities (e.g. water supply, sewage and waste disposal facilities) should be available within a reasonable cruising distance;</p> <p>(iv) Mains electricity should be provided where it is considered that the use of engines or generators would be liable to cause nuisance to nearby occupants;</p> <p>(v) The applicant submits a Mooring Agreement in support of the proposal. Such Management Agreements will specify the length of time that a permit holder can stay on a Community Mooring before</p>	

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			they need to move to a new site	
16/21	Middlesex Branch of the Inland Waterways Association	Environmental Improvements (Development in Green Edge Locations)	<p>Across the waterway system people have been living on boats for many years. Some of these residential boaters do not have a home mooring but are designated as continuous cruisers, many of them roaming widely across the network in a progressive journey. The Navigation Authority (Canal & River Trust) conditions for a continuous cruising licence impose requirements on continuous cruisers which are intended to ensure that other boat owners or hirers are able to enjoy leisure use of the waterway network.</p> <p>For many years there were no significant issues associated with this but in recent years there has been an increase in the numbers of people living on boats without a home mooring and sometimes staying within a narrow geographic area. No-where is this more acute than in the London area where the number of boats overstaying on moorings, often for residential purposes, has increased. This is because of the pressures on accommodation in the London area and the lack of affordable residential moorings.</p> <p>The time limit rules for staying at designated visitor moorings or at other points along the canal (generally a maximum stay of 14 days) are being widely ignored by boat owners who have no home mooring. As a result many leisure boat owners are put off cruising in the London area for fear that they will be unable to find suitable overnight moorings.</p> <p>In order to address this issue the Inland Waterways Association (IWA) has recently published a document entitled A Proposal for Reducing Overstaying Boats in the London Area.</p> <p>Along with a number of measures to allow better enforcement of mooring rules and the introduction of new Community Mooring sites the IWA also supports the provision of more affordable "Off-Line" residential moorings to reduce the number of boats without home moorings in the London Area. "Off-Line" moorings are docks, basins or marinas connected to the canal but not forming part of the navigational route. The IWA will press navigation authorities, local authorities and other stakeholders to develop strategies for the provision of more residential moorings in their</p>	The Council will discuss this proposal with the Canal and River Trust as it primarily concerns the management of moorings. Sufficient capacity for housing development has been identified for the Plan period without the need for new residential moorings being brought forward.

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			<p>plans.</p> <p>Proposed Policy:</p> <p>RESIDENTIAL USE WITHIN PROPOSED OR EXISTING OFF-LINE MOORINGS ON THE GRAND UNION CANAL</p> <p>Applications for residential moorings at proposed or existing off-line mooring sites on the Grand Union Canal will normally be considered favourably providing that the following conditions are met:</p> <p>(i) Adequate services facilities (e.g. water supply, sewage and waste disposal facilities) should be available at the off-line mooring site.</p> <p>(ii) Mains electricity should be provided to residential moorings;</p> <p>(iii) The applicant submits a Mooring Agreement in support of the proposal. Such Management Agreements will specify the length of time for a residential mooring contract.</p> <p>(iv) Mooring fees for residential berths, inclusive of car parking and other site services, will be charged at a fixed percentage, to be agreed with the Planning Authority, over and above the berthing fee for other non residential (leisure use) boats at the same off-line mooring site.</p>	
19/31	Colne Valley Park CIC	Development in Green Edge Locations.	Clarity is needed that this refers to development adjacent to, but not inside, the Blue Ribbon Network and Green Spaces and the Colne Valley Park.	Noted – the Council will take this into consideration when drafting any proposed Development Management Policy.

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
24/44	John Williams	Page 6, item 9 - Developments in Green Edge Locations	Add Green Chains.	Noted – the Council will take this into consideration when drafting any proposed Development Management Policy.
38/147	Ruislip Residents Association	Development in Green Edge Locations	We suggest you add Green Chains to this policy.	Noted – the Council will take this into consideration when drafting any proposed Development Management Policy.
		10. Blue Ribbon Network -Development affecting the delivery of the Catchment Management Plans for the River Crane and Colne. Design and access requirements for waterside.		
25/53	Environment Agency	10 Blue Ribbon Network and 14 Safeguarding of Biodiversity -	<p>Aim to reach good ecological status or potential (WFD). Building in close proximity to any watercourse can lead to destabilisation and encroachment of ecological interest. The watercourses most at risk are the Crane, Colne and Pinn. New development that occurs adjacent to watercourses must allow for the preservation or creation of a buffer zone free from built development. This will protect the important natural habitat associated with watercourses and adjacent land. It is positive that the Catchment Management Plans for the Rivers Crane and Colne will be referenced within the policy.</p> <p>General requirements</p> <ul style="list-style-type: none"> • Buffer zones (8m for main w/course and 5m for canal), native planting, removal of non-natives species. Sustainable drainage measures that prevent pollution entering watercourse. • Deculverting, removing concrete channels and bank, softening & regrading of banks, creating green belt buffer zone. 	Noted.

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			<ul style="list-style-type: none"> Seek opportunities to link to neighbouring open spaces or create new green spaces, green corridors, buffer zones along rivers. 	
27/72	Canal and River Trust	Grand Union Canal	<p>The Local Plan: Part 1 makes good reference to the value of the Grand Union Canal within the borough, as an amenity, biodiversity, transport and education resource. The policies of the Local Plan: Part 2, should continue to promote this, and ensure that development enhances and contributes to the canal environment and its positive use.</p> <p>The Canal & River Trust, as owner and navigation authority of the Grand Union Canal, have been working with stakeholders in Hillingdon to improve the canal and maximise its potential in the regeneration of waterside sites. These include John McDonnell MP, the Hillingdon Canal Partnership (which includes members of the Hayes Town Partnership and West Drayton Town Centre Action Group, Groundwork, Thames21 and Stockley Park).</p> <p>Issues we would like to see covered, with reference to the canal, include moorings, access, biodiversity, transport and management. We are also keen that the canal in LB Hillingdon be viewed comprehensively with crossovers into neighbouring boroughs – and particularly the Slough Arm, which is less well used than the main line of the Grand Union Canal.</p> <p>The Trust (as previously British Waterways) had begun work on a waterspace strategy, and we would be pleased to meet with officers to discuss our main aspirations for the canal environment in LB Hillingdon.</p>	A considerable amount of policy protection covering these concerns is already given by London Plan and Local Plan Part 1 policies. The Council will discuss whether further policy coverage is required with the Canal and River Trust.
38/148	Ruislip Residents Association	Blue Ribbon Network	We will need a new site and new facilities for Hillingdon Outdoor Activities Centre (HOAC) as the HS2 viaduct across the Colne Valley will make the current site unusable.	Noted.
50/229	Heathrow Airport Ltd (Planning and Programmes)	d) Environmental Improvements	HAL agrees that sustainable water management policies should be applied to new development and the range of policies headings	It is unclear whether an airport-specific policy of this kind would be required in the Local Plan Part 2, given that the permit system operated

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
		10. Blue Ribbon Network 11. Critical Drainage Areas 12. Management of Flood Risk 16. Water Quality 17. Protection of Ground Water resources 19. Water Efficiency in Non-Residential Development	<p>would seem to be appropriate. However, Heathrow is a unique site within the context of the Borough and the wider area and operates an extensive and complicated water supply, distribution and drainage network that would not be reflected elsewhere in the Borough. It is therefore our view any policies relating to water management and drainage at the airport would need to be specific to the airport and would be better suited to fall within the overarching Heathrow Airport policy.</p> <p>HAL is developing an improvement plan to upgrade the airport surface water pollution control system in consultation with the Environment Agency. The improvements will support the Water Framework Directive objectives and are a requirement of HAL's Environmental Permits for discharging surface water runoff. The permits are regulated by the Environment Agency. The improvement plan will provide the agreed basis for meeting appropriate water quality standards from airport surface water runoff.</p>	<p>by the Environment Agency will cover this issue. The Council will continue to liaise with Heathrow Airport Limited on its improvement plan and keep its existing policies under review.</p>
	Environmental Improvement	11. Critical Drainage Areas -Development affecting Critical Drainage Areas.		
	Environmental Improvement	12. Management of Flood Risk - Development proposed in Flood Risk Zones.		

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
25/54	Environment Agency	12. Management of Flood Risk –	<p>The policy should steer new development away from areas at highest risk of flooding and following a sequential approach.</p> <ul style="list-style-type: none"> • Incorporation of SuDs(Sustainable Drainage Systems) hierarchy plus links to additional benefits for biodiversity, water quality (WFD) and green infrastructure. • Requiring development to achieve Greenfield runoff rates aspirations of London Plan Policy 5.13 • The Surface Water Management Plan should be used to develop policy approach to reduce surface water flood risk, including retrofitting of SuDs where appropriate • Use of SFRA's recommendations (planning) to formulate specific criteria on how developments can reduce flood risk, be resistant and resilient (climate change adaptation & mitigation) safety of occupants and refer to SFRA for more specific requirements. • Focus long-term – use of Thames CFMP – flood storage, are there areas of 3b functional that need protection from unsuitable development? 	The Council will liaise with the Environment Agency during the drafting of Development Management Policies covering flooding and Surface Water Management.
	Environmental Improvement	13. Sustainable Drainage Systems -Use of sustainable drainage systems, the control of surface water run off rates and the use of water efficiency.		
13/23	Natural England		Policy (13) Sustainable Drainage Systems (SuDs) are welcomed and have a role to play in enhancing biodiversity and ecology within an area, together with helping to alleviate urban heat island affects. The policy can be linked green infrastructure provision as part of a holistic approach to development opportunities.	Noted.
25/55	Environment Agency	13 SuDs	Please note that only infiltrative SuDs techniques should be permitted in appropriate ground conditions (i.e. infiltration should	Noted.

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			not be permitted through contaminated and/or within shallow groundwater table due to the risk of mobilising contaminants and polluting controlled waters).	
	Environmental Improvement	14. Safeguarding of Biodiversity- Protection and enhancement of biodiversity features.		
13/18	Natural England	Heading C Environmental Improvements	Hillingdon is close to the South West London Water Bodies RAMSAR and Special Protection Area (SPA), includes the Ruislip Woods National Nature Reserves as well as several Sites of Special Scientific Interest (SSSIs). Biodiversity and the natural environment can lead to various opportunities, not just for wildlife activity and connection, but also health, recreation, contributing to climate change adaptation and improving quality of life. This should be made explicit in the Local Plan and policies included to ensure the borough's green infrastructure is designed to deliver multiple functions.	<p>The Council already make this explicit in Part 1 of the Local Plan. The Vision statement there contains an aim that:</p> <p>“Improved environment and infrastructure is supporting healthier living and helping the borough to mitigate and adapt to climate change: Areas lacking the social, physical and green infrastructure required to support healthy lifestyles have been identified and measures are well under way to address these.”</p> <p>A set of strategic objectives to deliver the Vision include the following:</p> <p>“SO3: Improve the quality of, and accessibility to, the heritage value of the borough's open spaces, including rivers and canals as areas for sports, recreation, visual interest, biodiversity, education, health and well being. In addition, address open space needs by providing new spaces identified in Hillingdon's Open Space Strategy.</p> <p>SO8: Protect and enhance biodiversity to support the necessary changes to adapt to climate change. Where possible, encourage the development of wildlife corridors.</p> <p>SO9: Promote healthier and more active lifestyles through the provision of access to a range of sport, recreation, health and leisure facilities.”</p>

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13/24	Natural England		Safeguarding of Biodiversity (policy -14) refers to the protection and enhancements of biodiversity features, this is welcomed in view of the proximity of Nationally Designated sites within and adjacent to the Borough. See also other comments in respect to Local Wildlife Sites.	Support welcomed.
13/25	Natural England	Local wildlife sites	If the proposal site is on or adjacent to a local wildlife site, e.g. Site of Nature Conservation Importance (SNCI) or Local Nature Reserve (LNR) the authority should ensure it has sufficient information to fully understand the impact of the proposal on the local wildlife site, and the importance of this in relation to development plan policies, before it determines the application.	Noted.
13/26	Natural England	Biodiversity enhancements	<p>Development applications can provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. Hillingdon should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with Paragraph 118 of the National Planning Policy Framework.</p> <p>Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that <i>'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'</i>. Section 40(3) of the same Act also states that <i>'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'</i>.</p>	<p>Section 7 of policy BE1 in Part 1 of the Local Plan already requires that all new developments should:</p> <p>"Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity..."</p> <p>This policy already allows the Council to negotiate with developers on opportunities to incorporate features into their designs which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes.</p>
13/27	Natural England	Landscape enhancements	Applications also provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green space provision and access to and contact with nature. Landscape	Section 7 of policy BE1 in Part 1 of the Local Plan already requires that all new developments should:

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider new development and ensure that it makes a positive contribution in terms of design, form and location, to the character and functions of the landscape and avoids any unacceptable impacts.	<p>"Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity..."</p> <p>This policy already allows the Council to negotiate with developers on green space provision and access to and contact with nature. It has also undertaken landscape and townscape character assessments as part of its Local Plan evidence base to inform policy drafting for Part 2 and future development management decisions.</p>
19/32	Colne Valley Park CIC	14. Safeguarding of Biodiversity	The Colne Valley Park CIC supports this, biodiversity is objective 3 of the Colne Valley Park and contained in LBH Core Policy 4.	Support welcomed.
41/178; 55/265; 57/291	Grow Heathrow (May Mackenzie); Grow Heathrow (Heathrow Greentech); Transition Heathrow	14. Safeguarding of biodiversity	Areas of 'wild' land should be protected and preserved. Undeveloped land should be planned into the urban matrix and linked into corridors to maintain biodiversity.	It is not clear what areas of "wild land" are referred to but the Council 's Local Plan, the London Plan and national planning policies together already offer a considerable degree of policy protection for the borough's open and green spaces.
44/206	Charlie Cooley	14. Safeguarding of biodiversity	Areas of 'wild' land should be protected and preserved.	It is not clear what areas of "wild land" are referred to but the Council 's Local Plan, the London Plan and national planning policies together already offer a considerable degree of policy protection for the borough's open and green spaces.
	Environmental Improvement	15. Development of Land Affected by Contamination - Restoration of contaminated land.		

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25/56	Environment Agency	15 Land Contamination	It is positive that brownfield sites are mentioned but also need to ensure that there are no further impacts to land quality from new developments too. We will require a Preliminary Risk Assessment (PRA) to be submitted with a planning application for sites known or suspected to be contaminated.	Noted.
	Environmental Improvement	16. Water Quality -Water quality targets for new development.		
13/19	Natural England		The council should consider the role of the natural environment under this section/objective, together with the Carbon Reduction identified under heading C (16). Incorporating the natural environment into the built environment can significantly contribute to climate change adaptation including through flood storage, reducing rainwater runoff and ameliorating the urban heat island effect. We recommend that the role the natural environment can play in climate change adaptation is drawn out further in the Local Plan, and policies tightened to reflect this.	Noted – the Council considers that its existing Part 1 policies already offer considerable support and protection in this respect, e.g. at policy EM1, in conjunction with London Plan policies.
41/179; 44/207; 55/266; 57/292	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	16. Water quality	Developments with constructed wetlands to improve water quality should be favoured. All surfaces should be permeable to clean and filter ground water.	Policy EM 6 in Part 1 of the Local Plan already encourages the provision of sustainable urban drainage systems in all development. It states: "The Council will require all development across the borough to use sustainable drainage systems (SuDS) unless demonstrated that it is not viable. The Council will encourage SuDS to be linked to water efficiency methods. The Council may require developer contributions to guarantee the long term maintenance and performance of SuDS is to an appropriate standard."
	Environmental Improvement	17. Protection of Ground Water resources - Development within a Source Protection Zone,		

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		Safeguard Zone or Water Protection Zone.		
25/57	Environment Agency	17 Protection of Ground Water Resources	<p>Good to see groundwater resources mentioned but surface water quality also needs to be protected.</p> <p>Ground Source Heat Pumps –We expect all developers to follow our published Environmental Good Practice Guide which details the environmental risks of all types of schemes and how these can and should be mitigated. We will require a risk assessment for both the abstraction and discharge from the schemes we regulate. We expect developers to assess risks for schemes we do not regulate and we should be made aware of GSHC proposals on contaminated land or in a SPZ1</p>	Noted – paragraphs 8.87 – 8.93 and policy EM 6 explain the Council's approach already regarding protecting surface water quality.
	Environmental Improvement	18. Water Efficiency in Homes -Residential development and the Code for Sustainable Homes.		
25/58	Environment Agency	18 & 19 Water Efficiency	We are pleased to see the intention to include policies in this area which set standards in line with the Code for Sustainable Homes and BREEAM.	Support welcome.
	Environmental Improvement	19. Water Efficiency in Non Residential Development -Non residential development and BREEAM standards for water efficiency.		
25/59	Environment Agency	18 & 19 Water Efficiency	We are pleased to see the intention to include policies in this area which set standards in line with the Code for Sustainable Homes	Support welcome.

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			and BREEAM.	
	Environmental Improvement	20. Air -Development to be 'air quality neutral'.		
30/88; 31/106	Phil Rumsey; Veronica Rumsey	Air	Development to provide reduction in pollutants as opposed to being neutral.	The Council has to be guided here by the requirements of national and London Plan policies. It will keep its policies under review if it becomes possible to seek reductions in pollutant emissions.
50/231	Heathrow Airport Ltd (Planning and Programmes)	d) Environmental Improvement 20. Air	<p>HAL acknowledges the position in Part 1 of the Local Plan where it seeks under strategic objective SO10 an improvement in air quality, while SO11 seeks to minimise air quality pollutants from new development and transport. It is acknowledged that the southern two thirds of the Borough is an AQMA and that policies specific to air pollution will be brought forward in the Part 2 document, including the Heathrow Area Policies LDD.</p> <p>The supporting text around air quality suggests that all development exploiting the benefits of Heathrow is a negative contributor to air quality (para. 8.134). While we recognise that this may be referring to development around the airport, we must clarify that the current regime of airport infrastructure renewal, including terminal and operational improvements, adopt environmental improvement and mitigation methods and practices wherever feasible. The strategic policies regard S106 or CIL funding as an appropriate form of mitigation, however the current on airport schemes should also be considered.</p>	Clarification noted regarding air quality and comments regarding S106 agreements and / or CIL charges applying to on-airport development.
	Environmental Improvement	21. Noise -Ambient noise level standards.		
50/232	Heathrow Airport Ltd (Planning and Programmes)	d) Environmental Improvement	The existing policy context around noise is clear in how noisy development and noise sensitive development should be considered in the planning process. The NPPF states at various	The full implications of the proposed zoning of types of development will be considered by the Council during the drafting of Development

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
		21. Noise	<p>places that noise sensitive development should not be sited near noisy development, while the London Plan Policy 7.15 seeks to reduce noise by minimising existing and proposed noise from development proposals, separating noise sensitive development from noisy development and promoting new technologies and practices and the source of noise.</p> <p>Policy EM8 of the Local Plan Part 1 is clear in stating that noise sensitive development and noise generating development will only be supported if the impacts can be mitigated. However, we believe that the Development Management policy on noise should go further in so far as it seeks to protect development from high levels of aircraft noise by specifically stating that planning permission will be refused for all noise sensitive development (namely residential, nursing/care homes, schools/ educational establishments, hospitals/healthcare facilities) within the 69dBA Leq contour. Between the 69 and 63dBA Leq contours there should be a restriction on residential development that avoids family accommodation being provided and other smaller one bed and studio accommodation should only be accepted with high levels of sound insulation/ ventilation. There should be a presumption against non-residential noise sensitive development in this zone given that the new Aviation Policy Framework states that noise exposure up to this level requires insulation to be provided for existing buildings, so it seems reasonable to avoid putting new community facilities in these noise exposure areas, unless there is an overwhelming case to override this general presumption against new development. Between 63 and 57dBA LAeq contours all new built development, including residential extensions, should have high levels of sound attenuation and ventilation.</p>	Management Policies.

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
	Environmental Improvement	22. Minerals and Waste - Protection, extraction processing of aggregates and restoration of mineral sites, operation of waste disposal sites and operation of rail depot facilities.		
19/33	Colne Valley Park CIC	Minerals and Waste	This policy should include specific wording to ensure that all minerals and waste sites within the Colne Valley Park should have a restoration plan that achieves the 6 objectives of the Colne Valley Park (see the proposed Colne Valley Park policy).	The objectives of the Colne Valley Park are not statutory requirements for the Council to consider when future restoration schemes come forward in the Park. There is no need for a separate policy to this effect in the Local Plan.
25/60	Environment Agency	Minerals and Waste	<p>Position Statement E1 of our Groundwater Protection: principles and practice (GP3), states that we will object to any proposed landfill site in groundwater Source Protection Zone 1 (SPZ1). For all other proposed landfill site locations, a risk assessment must be conducted based on the nature and quantity of the wastes and the natural setting and properties of the location.</p> <p>We would be pleased to meet with you as you progress your local plan and would be happy to comment on any informal drafts of policies if you would find this helpful. We look forward to working with you.</p>	Noted.
38/149	Ruislip Residents Association	Minerals and Waste	We need a policy that will cover HS2 worksites and tunnel spoil removal.	The Council's general development management policies will be expected to adequately cover any environmental or amenity concerns arising from the proposed HS2 works without the need for a specific policy.
41/180; 44/208; 55/267;	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow	Minerals and waste	Provision of bio digestion facilities should be central to waste management strategies and developments that provide this	The Council is aware of national planning and London Plan policy requirements for waste reduction and management. Where appropriate it may seek to encourage particular types of waste treatment on site

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
57/293	(Heathrow Greentech); Transition Heathrow		should be favoured.	such as bio-digestion but it cannot favour this method in the manner suggested.
	Transport and Infrastructure			
	Transport and Infrastructure	General Comments		
24/49	John Williams	Page 8	Add a section for Educational Facilities to include a review of future demand for educational facilities.	The Council will include a section on future school sites in its draft proposed Site Allocations and Designations.
30/89; 31/107	Phil Rumsey; Veronica Rumsey	Transport and Infrastructure	Support Items 1-8 with modifications to Items 2, 6, 7 and 8.	Support welcomed.
	Transport and Infrastructure	1. Accessibility and Transport Objectives- Improving accessibility and meeting sustainable transport objectives.		
24/45	John Williams	Page 7, item e)1 - Accessibility and Transport Objectives	Include an overall review of the current and projected volume of traffic and primary routes with a view to introducing measures to avoid future gridlock.	Traffic management is not within the remit of the Local Plan; it is dealt with instead by the Council's Local Implementation Plan. This comment has been passed to the Council's transport policy team.
24/46	John Williams		Review access to the South Ruislip Industrial/Retail Park to avoid HGVs travelling through Ruislip/ Ruislip Manor town centres.	Traffic management is not within the remit of the Local Plan; it is dealt with instead by the Council's Local Implementation Plan. This comment has been passed to the Council's transport policy team.

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
26/68	British Airways Plc (Nathaniel Lichfield and Partners)	Accessibility and Transport Objectives	<p>In principle, the objective of protecting road capacity in the Heathrow Opportunity Area (HOA) for airport related activities is supported. This is particularly important given the employment and housing targets that have been set for the HOA. This objective needs to be reflected in the application of Policy T1 when steering development to the most appropriate locations to reduce impact on the transport network in the HOA.</p> <p>The policy objective of facilitating improvements to public transport interchanges, in particular at Heathrow Airport, is also supported. The Part 2 policies and the Local Implementation Plan (LIP) should 'flesh out' how this is to be achieved and the mechanisms for funding these improvements.</p> <p>The need to improve north/south links in the Borough is also endorsed. There is a need in particular to ensure that the employees and customers within the Borough of Hillingdon that work at or use Heathrow Airport are able to travel using public transport. At present, north/south links in the Borough are not as strong as the east-west public transport links. Again, it is hoped that the Part 2 policies, as well as the LIP, will set out details on the measures and mechanisms for achieving this.</p>	<p>Noted.</p> <p>It is for the Council's Local Implementation Plan to set out the measures and mechanisms required.</p>
38/150	Ruislip Residents Association	Accessibility and Transport Objectives	<p>We recommend that the policy includes an overall review of the current and projected volume of traffic and the primary routes, with a view to introducing measures to avoid future gridlock. Review access to South Ruislip industrial/retail park to avoid HGVs travelling through Ruislip / Ruislip Manor town centres.</p>	<p>Traffic management is not within the remit of the Local Plan; it is dealt with instead by the Council's Local Implementation Plan. This comment has been passed to the Council's transport policy team.</p>
41/181; 44/209; 55/268; 57/294	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	Accessibility and transport	<p>All new residential development should be linked by walking distance to bus or train routes.</p>	<p>Policy T1 in Part 1 of the Local Plan in effect meets this concern. It states:</p> <p>"The Council will steer development to the most appropriate locations in order to reduce their impact on the transport network. All development should encourage access by sustainable modes and include good cycling and walking provision."</p>

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
54/242	Transport for London (Borough Planning)	Freight	This policy should refer to the use of delivery and servicing plans (DSP) and construction and logistic plans (CLP). These are relevant should the development generate a high level of freight traffic and/or if in close proximity to a sensitive section of the road network, for example the Strategic Road Network or Transport for London Road Network. Reference on the use of the Blue Ribbon Network for freight transport should also be included.	These are matters which the Council will take into consideration through its Local Implementation Plan.
	Transport and Infrastructure	2. Heathrow Airport - Development at Heathrow Airport; maintaining air transport movements within current limits; improving air quality and reducing levels of congestion.		
1/1	Heathrow Airport Ltd (Safeguarding)		<p>Aerodrome Safeguarding</p> <p>Aerodromes important to the national air transport system are officially safeguarded by the Civil Aviation Authority and the process of ensuring that their operation and development is not inhibited is an integral part of the town planning system. A safeguarding map is derived from a series of protected three-dimensional surfaces above and around the aerodrome. The extent of the surfaces spans out to 15km centred on the Aerodrome Reference Point (ARP) for Heathrow Airport Ltd.</p> <p>Within this area the Planning Authority must consult the Airport Operator on development where the height of any building, structure, erection or works would affect the operation of the airport or the safe movement of aircraft i.e. potentially penetrate the protected surface. The aerodrome uses a variety of navigational aids, radio aids and telecommunications systems to facilitate air traffic control and aircraft movements.</p> <p>A new building, structure or extension because of its size, shape,</p>	Noted.

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			<p>location or construction materials can affect this equipment so the aerodrome must also be consulted to enable an assessment to be made of the potential impact on navigational aids. In addition, at night and in low visibility conditions pilots rely on approach and runway lights to align their plane with the runway and touch down at the correct point. Lighting elements of a development also have the potential to distract or confuse pilots, particularly in the immediate vicinity of the aerodrome and the aircraft approach paths. Safeguarding assessments therefore also consider the impact of lighting proposals for developments.</p> <p>Government advise that applicants should initiate discussions with the Planning Authority and the Airport Operator at an early stage before submitting an application to ensure that they understand the constraints and provide the information which will be needed for a detailed assessment to be made of the proposal e.g. a construction methodology or navigational impact assessment,. If the Planning Authority propose to grant permission or impose conditions contrary to the safeguarding advice of the Airport Operator, they must notify the Civil Aviation Authority and demonstrate they have assessed the application in the light of Government guidance and provide a statement of reasons. Ultimately, the application could be referred to the Secretary of State who has the power to issue a Direction.</p> <p>Safeguarding issues should only prevent development taking place were absolutely necessary to maintain the safe operation of the airport and the movement of aircraft. The safeguarding process rather seeks to mitigate the adverse impacts of development through; alternative design, appropriate landscaping and planting schemes, by conditions restricting how a development operates and may be extended. Legal agreements will be used to deal with aspects of a development, such as implementation of a Bird Hazard Management Plan, which cannot be satisfactorily covered by planning conditions.</p>	

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
1/2	Heathrow Airport Ltd (Safeguarding)		<p>Wind Turbine Developments</p> <p>The safeguarding requirements for Heathrow Airport includes a circle with a 30 kilometres radius drawn from the aerodrome reference point to indicate the area within which the Planning Authority must consult the Airport Operator on proposed wind turbine development. This recognises the fact that the introduction of wind-powered generator turbines as an alternative energy policy can create problems for aviation. In addition to their potential for presenting a physical obstacle to air navigation, wind turbines can affect radar and other electronic aids to air navigation from radio frequency interference (the rotating blades create electromagnetic disturbance which can degrade the performance of these systems and cause incorrect information to be received). The amount of interference depends on a number of factors; the number of turbines, their size, construction materials, location and shape of blades. A wind turbine development is also likely to be the subject of consultation with the Civil Aviation Authority (CAA), NATS En Route Ltd. (NERL) and the Ministry of Defence (MOD). Government advise applicants to initiate discussions with the Planning Authority and the Airport Operator at an early stage in the process and before submitting an application to ensure that they understand the constraints and provide the information to enable a detailed assessment to be made of the proposed development i.e. a navigational impact assessment study. Where it is determined that a planning application for a proposed development may have an effect on navigational or other aeronautical systems, simulation or other types of interference modelling of the effects of the development may need to be conducted before a decision can be made on the application. It is usual for the developer to bear the cost of the modelling.</p>	Noted.
26/69	British Airways Plc (Nathaniel Lichfield and Partners)	Heathrow Airport	Whilst the policy objectives of Policy T4 of Part 1 of the Local Plan are noted there is now a clear need to make progress with the Opportunity Framework, in consultation with LB Hounslow, in order to provide clear guidance on how the London Plan targets	The Council welcome the offer of involvement by the respondents once work on the Opportunity Framework commences. This is an initiative in support of the London Plan which the Mayor of London will lead on. It is likely to follow on from the review of the London Plan, now under way, when growth figures for London may be revisited and updated, together

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			<p>and growth with this Opportunity Area are to be accommodated.</p> <p>Our clients welcome the opportunity to contribute to the preparation of the Opportunity Framework to ensure that the economic importance of the Airport is recognised and that the anticipated growth can be properly managed. Consistent with our representations on other parts of the Part 2 consultation we would comment that real improvements in public transport accessibility need to be delivered if the objective of achieving a modal shift away from the car is to be achieved. In the intervening time the need to protect highway capacity for airport related users and provide flexibility, where justified, in relation to car park standards will, in our clients' view, be necessary to ensure that the economic importance and operation of the Airport is not prejudiced.</p>	with the outcome of work by the Davies Commission.
30/90; 31/108	Phil Rumsey; Veronica Rumsey	Heathrow Airport	With future development at Heathrow Airport, the Council should seek to maintain air transport movements within current limits; improve air quality and reduce levels of congestion and noise.	Part 1 of the Local Plan already seeks to keep appropriate development within the area covered by the airport and related development within the immediate vicinity. It cannot limit air traffic movements but will look to reduce levels of congestion and noise from associated development in the vicinity of the airport.
41/182; 44/210; 57/295	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Transition Heathrow	Heathrow Airport	No expansion of Heathrow Airport.	This is beyond the remit of the Local Plan.
55/269	Grow Heathrow (Heathrow Greentech)	Heathrow Airport	Heathrow Airport already has made considerable damage to the environment and the community, so there should be no further expansion and be encouraged to reduce their operations.	This is beyond the remit of the Local Plan.
50/233	Heathrow Airport Ltd (Planning and Programmes)	e) Transport and Infrastructure 2. Heathrow Airport	<p>HAL is encouraged by the Council's desire to adopt a Heathrow Area LDD and a Heathrow OAPF (with the GLA). To date, the content of these documents, including the boundary definition has been vague, however it is our intention to work collaboratively with the Council and the GLA in framing these documents.</p> <p>While we acknowledge the Council's position on the expansion of</p>	<p>The Council welcomes the offer of continuing working co-operatively with the respondents on a future Opportunity Area Framework in conjunction with the Mayor of London who will be leading this work.</p> <p>Any text in the Plan on the Davies Commission would quickly fall out of date and will not be included.</p>

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			<p>the airport, both in size and air traffic movements, it is important that any future documents nevertheless support the refurbishment and renewal of Heathrow's infrastructure particularly where this will also lead to environmental improvements in the way the airport operates, or in the performance of buildings/energy use/lower emissions.</p> <p>Additionally, we feel it is important that Part 2 acknowledges the current review of airport capacity in the South East of England which may inform a Government decision on where additional airport capacity will be located. To this end, we recommend that the supporting text to any policy on Heathrow should be along the following lines:</p> <p>"The Government has set up an Airports Commission to examine airport capacity in the South East of England, which will include whether to expand hub capacity at Heathrow Airport. Whatever the recommendation of the Commission and the subsequent decision of Government, the Council acknowledges that the landscape of Heathrow Airport will undergo significant change. The Council will need to respond to these changing circumstances at the appropriate time which may include revisions to the Local Plan."</p> <p>Heathrow's role as a major public transport hub should also be considered and supported in Part 2. We have mentioned the location of office and hotel uses on airport land where they are in convenient reach of these interchanges, however we also regard the upgrade and improvement of underground, rail, bus and coach facilities being priority areas for any future documents. Heathrow's extensive public transport facilities and services, especially local bus services, provide significant benefits to the local communities around the airport and should be acknowledged and supported. Any further improvements that are likely to increase the airport's accessibility and public transport mode share should also be supported.</p> <p>The Development Management DPD also needs a specific policy</p>	<p>The role of the airport at national, regional and local levels is already acknowledged in Part 1 of the Plan and there is no need to re-iterate this in Part 2.</p> <p>The Council accepts the need to include a specific policy in its Development Management Policies regarding Public Safety Zones.</p>

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			regarding Public Safety Zones to ensure that the number of people living, working and/or congregating in the PSZ is not increased as a result of new development.	
54/244	Transport for London (Borough Planning)	Heathrow	TfL is currently undertaking a feasibility study for a new hub airport for London. A mayoral report 'A New Airport for London Part III' will expand upon the Mayoral priorities and aspirations on air travel and will be published shortly.	Noted.
	Transport and Infrastructure	3. RAF Northolt- Civil flights at RAF Northolt		
24/47	John Williams	Page 7, item e)3 -RAF Northolt	Mitigate the effects of any increase in aircraft movements on traffic in West End Road.	The Council will look to its Local Implementation Plan to mitigate the impact of any additional traffic resulting from increased aircraft activity at Northolt.
26/70	British Airways Plc (Nathanial Lichfield and Partners)	Northolt Airport	<p>Whilst the growth of civil flights at RAF Northolt is not a substantive concern in terms of competition with Heathrow Airport the potential for increased activity to add to local road congestion is. Allowing civil flights to increase without proper consideration being given to the potential effects upon highway capacity and the need to improve public transport accessibility is a real concern.</p> <p>We would suggest that the Part 2 polices should include a policy specific to Northolt Airport which addresses the above issue.</p>	Noted.
38/151	Ruislip Residents Association	RAF Northolt	This policy need to include plans to mitigate the effects of increases in aircraft movements on traffic in West End Road.	Noted.
	Transport and Infrastructure	4. Car Parking Standards -Car parking standards for different type of uses, the		

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
		submission of travel plans and transport assessments and the provision of electric charging points for vehicles.		
10/12	Glaxo Smith Kline (Nathaniel Lichfield and Partners)	Car Parking Standards	<p>GSK is currently the largest employer at Stockley Park and whilst they support and encourage improvements to public transport to enable this location to become more accessible the fact remains that in relative terms it is poorly served and has a low PTAL level. This position is unlikely to substantively change in the foreseeable future even if proposals to improve north/south public transport links, as encouraged by the Part 1 Local Plan, are delivered. There remains therefore a major challenge for GSK to fully utilise their property asset by ensuring their employees are able to travel easily to the Stockley Park location.</p> <p>This situation has become exacerbated by the fact that current car parking standards do not reflect the trend for employee / floorspace densities to increase as large companies make more efficient use of their real estate assets.</p> <p>Against the above background we believe that the Part 2 Development Management policies need to incorporate a review of car parking standards for office developments. Such a review would be justified and timely as the 2011 London recognises that in Outer London the application of restrictive car park standards, relative to more generous standards outside of London, have been a disincentive to office investment.</p> <p>Policy 6.13 of the London Plan therefore provides flexibility in setting office parking standards, if Outer London Boroughs wish to adopt a more appropriate standard, noting that this should be done via a Development Plan Document. The Part 2 plan offers such an opportunity to review car parking standards for B1 office proposals which we believe should also be extended to existing</p>	Car parking standards generally are being reviewed by the Council as part of work involved in drafting its Development Management Policies.

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			offices where a clear business case can be made.	
12/15	Matthew Roe (CGMS on behalf of Mayor's Office for Policing and Crime / Metropolitan Police Service		Point 4 deals with car parking for different types of uses. In terms of the police, it should be recognised that car parking is entirely influenced by operational needs and thus should be assessed on a site by site basis, as opposed to a specific policy.	The Council will always take the individual merits of a planning application into account when considering proposals submitted to it for planning permission.
15/19	The Theatres Trust	e) Transport and Infrastructure Provision	Please include 'sui generis' in a car parking standards schedule for item 4.	By definition, Sui Generis uses cover a wide range of activities and it will not be possible to come forward with a specific car parking standard for this group.
17/26	Armstrong Rigg Planning, Geoff Armstrong	e) Transport and Infrastructure 4. Car Parking Standards 8. Developer Contributions to the Provision of Local Infrastructure	<ul style="list-style-type: none"> Car parking standards should reflect the increasing car ownership which exists Developer Contributions should be considered on a site-by-site basis and allow for viability This will ensure that contributions sought are compliant with the NPPF which states at paragraph 204 that obligations should only be sought where they are necessary to make the development acceptable in planning terms, directly relate to the development and fairly and reasonable relate in scale and kind to the development. therefore, developer contributions should be assessed on a site-by-site basis Policies which relate to developer contributions to be sought need to ensure that figures are not set too high, as high rates of developer contributions could seriously restrict development within the borough, as developers consider the viability of developments and seek alternative locations which may offer lower contribution rates. This could result in a negative effect upon the economy of the borough and the supply of housing. 	The Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies. It will take local car use into account in setting its detailed parking standards in Part 2.

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
26/71	British Airways Plc (Nathaniel Lichfield and Partners)	Car Parking Standards	<p>Whilst the proposals to improve public transport accessibility to Heathrow Airport are fully supported it is likely to remain the case that a high proportion of Heathrow's employees and customers will need to travel to the airport by car.</p> <p>Furthermore, the London Plan recognises that in Outer London the application of restrictive car parking standards, relative to more generous standards outside of London, has been a disincentive in relation to office investment. Policy 6.13 of the 2011 London Plan therefore provides flexibility in setting office parking standards if Boroughs wish to adopt a more generous standard noting that this should be done via a Development Plan Document.</p> <p>The Part 2 plan offers an opportunity to review car parking standards for B1 office proposals which we believe should also be extended to existing offices where a business case can be made.</p>	Car parking standards generally are being reviewed by the Council as part of work involved in drafting its Development Management Policies.
54/241	Transport for London (Borough Planning)	Cycle parking	<p>The policies that have been included are considered to be consistent with the London Plan transport policies however there are key omissions that TfL would expect to see included to ensure full conformity.</p> <p>Cycle parking</p> <p>In accordance with London Plan policy 6.9 'Cycling' this policy should reference the London Plan minimum standards and also provide guidance on appropriate cycle parking locations and the provision of changing and showering facilities for employment use.</p>	<p>Cycle parking standards generally are being reviewed by the Council as part of work involved in drafting its Development Management Policies.</p> <p>It is not considered necessary to repeat the standards included in the London Plan in addition to these revised standards.</p>
54/243	Transport for London (Borough Planning)	Coaches	Considering the presence of Heathrow airport and the subsequent prevalence of hotels within Hillingdon a policy on the provision of coach parking should be included in accordance with London Plan policy 6.13 'Parking'	Coach parking standards are being reviewed by the Council as part of work involved in drafting its Development Management Policies.

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
59/301	CgMs on behalf of Mayor's Office for Policing and Crime / Metropolitan Police Service	Topic Area: Transport And Infrastructure	Point 4 deals with car parking for different types of uses. In terms of the police, it should be recognised that car parking is entirely influenced by operational needs and thus should be assessed on a site by site basis, as opposed to a specific policy.	The Council will always take the individual merits of a planning application into account when considering proposals submitted to it for planning permission.
	Transport and Infrastructure	5. Safeguarding Recreational, Leisure and Community Facilities - Safeguarding the use of recreational, leisure and community facilities.		
12/16	Matthew Roe (CGMS on behalf of Mayor's Office for Policing and Crime / Metropolitan Police Service		Point 5 seeks to safeguard existing community facilities. The MOPAC believe facilities should be safeguarded unless replacement facilities are proposed on or off site which serve the needs of the area; or the development will enable the delivery of approved strategies for service improvements. This no net loss approach allows for the objectives of the MOPAC strategies to be met, by allowing the release of parts of the estate to allow reinvestment in policing.	The Council will always take the individual merits of a planning application into account when considering proposals submitted to it for planning permission.
15/18	The Theatres Trust	e) Transport and Infrastructure Provision	<p>We would support a policy at item 5 to protect community facilities and suggest that an all-inclusive description is contained within the text for clarity and continuity, such as - <i>community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.</i></p> <p>This would obviate the need to provide examples, and would cover the infrastructure as stated in item 70 of the National Planning Policy Framework on page 17 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</p>	The Council will always take the individual merits of a planning application into account when considering proposals submitted to it for planning permission.

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			<p>the community.</p> <p>A typical policy would state, for example, that the council will protect existing community, cultural and social facilities by resisting their loss or change of use unless replacement facilities are provided on site or within the vicinity which meet the need of the local population; or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision, and it has been demonstrated that there is no demand for another similar use on site.</p>	
24/48	John Williams	Page 8, item e) 5 - Safeguarding Recreational, Leisure and Community Facilities	There is a need not only to safeguard existing facilities but also to review and provide for future needs.	Agreed – the Council will keep its plan under review in future to ensure it provides for future needs.
37/118	John Blackwell on behalf of London Gaelic Athletic Association	Section E5: Safeguarding Recreational, Leisure and Community Facilities	<p>The GAA as a cultural, social and sporting organisation provides for mens and ladies Gaelic Football, Hurling and Camogie at adult level as well as youth activities for the same sports. The GAA has been playing and administering Gaelic games at this site since the early 1970s and we believe that the open space, sport, recreational and social activities both on and off the pitch would be better reflected in an open space, sport and recreational designation or equivalent of the site.</p> <p>The London GAA site in South Ruislip has been developed for sports amenities and sports administrative purposes over a period of a number of years.</p> <p>The Proposed Development Management Policies issued under the Hillingdon Local Plan: Part 2 Consultation Paper identify the safeguarding of the use of recreational, leisure and community facilities as a priority under item 4 of Section (e) Transport and</p>	The Council considers that sufficient protection is already given in this area by policies in the National Planning Policy Framework, London Plan and Part 1 of the Hillingdon Local Plan. It is not necessary to further add to this in Part 2.

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			<p>Infrastructure. We fully support this as a priority and welcome the inclusion of policies not only seeking to safeguard but also, we suggest, positively encouraging the enhancement of existing sports facilities (such as those at West End Road, South Ruislip). Such an approach would be consistent with the guidance of the National Planning Policy Framework (NPPF) and be in accordance with the Strategic Policies of the Local Plan Part 1. These documents advise that policies should be based on an up-to-date assessment of need and existing provision of open space, sports and recreational facilities. In addition to identifying sites for new development, they should assess facilities and their scope for improvement and expansion.</p> <p>The existing outdoor, pitch and built sport and leisure facilities of the Borough are important assets, serving the communities in which they are located and, in some instances, the wider area, as in the case of the GAA's facility at Ruislip. The potential for upgrading or enhancing facilities, (particular where contributing to local community provision), should be recognised and encouraged in Part 2 of the Plan in a similar manner to that in which Policy EM5 (Sport and Leisure) of Part 1 of the Hillingdon Local Plan (November 2012) seeks to safeguard, enhance and extend the network of sport and leisure facilities in the borough.</p>	
41/183; 44/211; 55/296; 57/296	; 57/272 hrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech; Transition Heathrow	Safeguarding Recreational, Leisure and Community Facilities	Change of use from community facilities should not be permitted.	The Council will not be able to completely prevent changes of use in the manner proposed here.
59/302	CgMs on behalf of Mayor's Office for Policing and Crime / Metropolitan Police Service	Topic Area: Transport And Infrastructure	Point 5 seeks to safeguard existing community facilities. The MOPAC believe facilities should be safeguarded unless replacement facilities are proposed on or off site which serve the needs of the area; or the development will enable the delivery of approved strategies for service improvements. This no net loss approach allows for the objectives of the MOPAC strategies to be met, by allowing the release of parts of the estate to allow	The Council will always take the individual merits of a planning application into account when considering proposals submitted to it for planning permission. It will take London Plan policies into account regarding community uses.

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			reinvestment in policing.	
	Transport and Infrastructure	6. Medical and Health Facilities -Provision of medical and health facilities within town centres.		
30/91; 31/109	Phil Rumsey; Veronica Rumsey	Medical and Health Facilities	Provision of medical and health facilities within town centres and the villages.	The Council cannot use the Local Plan to direct medical services into the Heathrow Villages. It will take local health care needs into account when considering future applications for planning permission in the area.
38/152	Ruislip Residents Association	Medical and Health Facilities	We believe existing facilities need more parking provision for patients, especially badge holders.	Car parking standards are being reviewed by the Council as part of work involved in drafting its Development Management Policies.
	Transport and Infrastructure	7. Religious Worship and Assembly -New build and conversion of buildings for religious facilities.		
2/3	Streamside Gospel Hall Trust (Tim Douss)		I believe that it is important to make adequate provision for the religious and spiritual needs of the local community and that this must be considered within any Local Plan. As a Trustee of a local Church Group we would like to see specific provision made for the accommodation of local community groups to include the following considerations. "A commitment to support community organisations throughout the Borough, including diverse faith communities, in recognition of the social, spiritual and moral needs of our communities." As I am sure you will appreciate, that these requirements are intertwined with the very existence of local communities and need to be, not only recognised but provided for	Part 1 of the Local Plan already makes clear the Council's commitment to improve the provision of community facilities throughout the borough.

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			positively.	
30/92; 31/110	Phil Rumsey; Veronica Rumsey	Religious Worship and Assembly	New Build of buildings for Religious facilities. No Conversions of existing buildings.	It will not be possible to prevent all changes of use in the manner proposed – the Council must consider each planning application on its merits.
34/114	Hillingdon Inter Faith Network	7. Religious Worship and Assembly New build and conversion of buildings for religious facilities	To be explored: <ul style="list-style-type: none"> • specific statements regarding the need for community planning to better reflect the changing demographics of community need as identified through the latest census analysis so as to address potential community tension. • opportunities for identifying suitable space which is not required for domestic or commercial use so that new religious assembly places can be made available. 	Part 1 of the Local Plan already makes clear the Council's commitment to improve the provision of community facilities throughout the borough.
	Transport and Infrastructure	8. Developer Contributions to the Provision of Local Infrastructure -Funding of local infrastructure.		
007/9	Highways Agency (Steven Hall)		The HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's strategic road network (SRN) on behalf of the Secretary of State for Transport. 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. Sections of the M4 and M25 are currently congested during the peak hour period. Consequently, we would be concerned if any material increase in traffic were to occur on these sections of the SRN as a result of development in Hillingdon without careful consideration of mitigation measures. DfT circular 02/2007 (Planning and the Strategic Road Network) sets out how the HA will take part in the	Noted.

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			<p>development of Local Plans from the earliest stages. Please see HA Planning protocols guidance. http://www.highways.gov.uk/our-road-network/planning/</p> <p>On an advisory basis, we also reiterate the importance of the production of Transport Assessments in order to support any development likely to have significant transport implications. The HA will be particularly interested to see reference to transport and infrastructure. The HA support the inclusion of the Infrastructure Schedule within the Core Strategy to identify the schemes planned within the borough. The infrastructure schedule currently lists the HA Managed Motorways programme of works. We are currently considering how the Managed Motorways might be delivered on the M4 between Junctions 3 and 12.</p>	
9/11	Zoe Taylor on behalf of Drs Garsin, Madhok, Donner & Ramchandani, Belmont Medical Centre	RAF Uxbridge	<p>We are a GP Practice within Uxbridge and are very concerned about the lack of medical services that it seems are being made for this site.</p> <p>Pressure is already being put upon practices in the area within the present increases in the population in Uxbridge. We understand that a new school will be required on this site. This development as obviously it will be housing a large community, thousands of new residents will need GP services too. There is no extra capacity with us or other local practices. We feel this is in need of urgent attention as local practices will not be able to maintain their high standards of care if they are expected to manage the residents on this new development.</p>	The Council is aware of the need for new health care provision at St Andrews Park and will continue to discuss further provision there during the Plan period with the appropriate health service agencies.
30/93; 31/111	Phil Rumsey; Veronica Rumsey	Developer Contributions to the Provision of Local Infrastructure	Funding of Local Infrastructure and Planning Enforcement teams.	In major development schemes the Council does already seek contributions towards such services where considered to be appropriate.

1) DEVELOPMENT MANAGEMENT POLICIES (September 2014)

- The following schedule reports on comments received during the consultation on the initial September 2014 Proposed Submission Draft Development Management Policies document, and includes the Council's proposed response.

Appendix 1: Development Management Policies: Schedule of Representations Received and Officer Responses
February 2015

ID	Rep No	Individual/ Organisation	Para, Policy, Map	Summary of Representation	Council Response
Chapter 1: Introduction					
No representations received.					
Chapter 2: Economy					
70	12	Nathaniel Lichfield & Partners on behalf of British Airways	Paragraph 2.8-2.10	<p>Supports the assessment made in paragraph 4.27 and paragraph 4.30 that land at Bath Road, Hayes and Covert Farm, Heathrow is not suitable for housing development, but are concerned that the allocation of the sites as Locally Significant Employment Sites may restrict the flexibility of these sites in terms of being developed for non-employment airport related use such as hotels.</p> <p>Support the removal of the Former Perry Oaks Sludge Works Site from the Green Belt, as well as SINC designation and the safeguarding of the Heathrow Bus Interchange Land, which should be developed further as an improved public transport interchange.</p>	<p>Designated employment sites on Bath Road have been identified for retention in the Council's Employment Land Study.</p> <p>Support for the Perry Oaks site is noted and welcomed.</p> <p><u>No Proposed Change</u></p>
9	1	Museum of London Archaeology	Paragraph 5.1–5.15	<p>One of the 12 core principles that underpin both plan-making and decision-taking within the NPPF is to 'conserve heritage assets 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'.</p> <p>The current wording does not take heritage significance into account but apparently</p>	<p>Paragraph 5.3 refers to the section in the NPPF which states that local authorities should conserve heritage assets in a manner that is appropriate to their significance. This is reflected in Policy DMHB1 (Heritage Assets).</p> <p>However, the representor has put forward proposed wording to ensure that this message is reinforced in the</p>

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				<p>applies policy regardless of the significance of a heritage asset.</p> <p>The new message of the presumption in favour of sustainable development in the NPPF does not come across. This applies to paragraphs 5.4, 5.5, 5.7, policy DMHB1, Policy DMHB2 (setting), and paragraph 5.13. Quotes Paragraph 139 of the NPPF which states that 'Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets'.</p> <p>There is no mention of such assets in the current wording of the text, with specific reference to paragraph 5.7 and Policy DMHB1 (Heritage Assets) . Suggests revised wording for the relevant paragraphs.</p>	<p>supporting text to Policy DMHB1 (Heritage Assets). Officers are happy to incorporate these changes.</p> <p><u>Proposed Change</u></p> <p>Paragraphs 5.1 - 5.15 will be amended in the light of the representation to ensure that the significance of heritage assets is fully considered.</p>
21	1	The Emerson Group	DME1	<p>Policy DME1 (Employment Uses in Designated Sites) is a logical approach to categorising the hierarchy of employment sites in the Borough.</p> <p>Support the provisions set out in (D) and (E) of the policy as an equitable way of assessing the introduction of other uses within such areas.</p>	<p>Support noted and welcomed</p> <p><u>No Proposed Change</u></p>
81	2	Deloitte Real Estate on behalf of USS	DME1	<p>Own Units 1-16, Liddall Way Industrial Estate on Horton Road, which is designated as a Preferred Industrial Location by Policy SEA 1 (Strategic Industrial Locations) of the Site Allocations document.</p> <p>USS broadly supports Policy DME1</p>	<p>Designated employment areas have been identified for uses B1, B2 and B8 in accordance with the conclusions of the Council's Employment Land Study.</p> <p><u>No Proposed Change</u></p>

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				<p>(Employment Uses in Designated Sites), but requests that the wording is amended to acknowledge the important role that sustainable alternative employment generating uses can have in the promotion of sustainable economic growth.</p> <p>Alternative uses such as classes C1, D2, retail or sui generis uses can positively contribute to employment provision and existing employment sites should not be constrained to the more limited range of B uses when they may not be viable.</p> <p>Alternative uses, such as hotels, can complement existing business functions and offer a higher density of employment opportunities than some B uses, such as warehousing. This more flexible approach would be compliant with Paragraphs 14 and 17 of the NPPF.</p>	
19	2	Rapeys LLP on behalf of LaSalle Investment Management	DME1 (C) Policy DME1 (D) Paragraph 2.8	<p>a) Whilst paragraph 2.8 recognises that amenity type uses for industrial occupiers could be supported on designated employment sites, this should not be restricted to industrial occupiers only. Furthermore, this should be incorporated in Policy DME1 (Employment Uses in Designated Sites) as uses permissible on designated sites.</p> <p>b) Consider that Odyssey Business Park is in a highly sustainable location for housing and Policy DME1 (D) should recognise that such sites are suitable for residential use, and could be released for alternative uses. Consider that Policy DME1 (D) as currently drafted is too restrictive, and does not allow for sufficient</p>	<p>a) An additional policy criterion F) will be included into Policy DME1 (Employment Uses in Designated Sites).</p> <p>Proposed Change</p> <p>Insert additional criterion F) <i>'Proposals for ancillary development which supports occupiers and workforce on designated employment sites, such as workplace crèches, cafes and small scale food outlets will be considered on a case by case basis'</i>.</p> <p>Following the inclusion of this additional policy criterion, paragraph 2.8 will no longer be necessary and therefore is</p>

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				<p>flexibility to respond to changing economic circumstances. Therefore object to criterion '<i>There is no realistic prospect of the land being used for industrial or warehousing purposes in the future</i>'</p> <p>Also object to criterion '<i>Sites have been vacant and consistently marketed for a period of 2 years</i>' as this criterion would place an unnecessary barrier for sites, which are designated as employment land of local importance. Suggest that the marketing period should be reduced from 2 years to 12 months.</p>	<p>deleted.</p> <p>b) The primary intention of draft Policy DME1 is to ensure sufficient industrial land capacity by 2026. Both policy criteria are derived from the industrial site retention/release criteria set out in the London Plan's Land for Industry and Transport Supplementary Planning Guidance.</p> <p>Odyssey Business Park is identified in the Council's latest Employment Land Study for designation as a Locally Significant Employment Location (LSEL). These sites are considered suitable for B1, B2 and B8 uses.</p> <p>The designation does not allow flexibility for other uses to be developed on the site.</p> <p><u>No Proposed Change</u></p>
63	5	Rapleys LLP on behalf of Cedarwood Asset Management	DME1 Chapter 4 Map A	Support the Council's recognition of Venturis Park within a Strategic Industrial Location, albeit consider that an element of trade counter use should also be acceptable on the site.	<p>Support noted and welcomed.</p> <p>Ancillary trade counters as a subsidiary element of an overall employment proposal on designated employment sites would be considered on a case by case basis. It is not considered necessary to include reference to trade counter use in the policy.</p> <p><u>No Proposed Change</u></p>
59	1	ALPS Group on behalf of Nestle	DME1 DME2	a) Request that the 2 nd bullet point of Policy DME 1 (Employment Uses in Designated Employment Sites) should be removed.	a) The policy criterion is derived from the industrial site retention/release criteria set out in the London Plan's

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			DMH7 DMHB5 DMHB6 DMHB18 DMHB19 DMHB20 DMHB21 DMEI1 DMEI3 DMEI8 DMCI4 DMCI5 DMCI8 DMT6	<p>b) Express reference should be made that the housing mix in policy DMH2 (Housing Mix) will be applied having regard to local and site-specific circumstances as should affordable housing requirements set out in DMH7 (Provision for Affordable Housing).</p> <p>c) Consider that DMHB5 (Locally Listed Buildings) should reflect that a locally listed building can be demolished where tests set out in the NPPF can be met and DMHB6 (Conservation Areas) should reflect paragraph 133 of the NPPF.</p> <p>d) DMHB18 (Housing Standards) should be flexible to take account of changes in national standards and amenity space standards as well as residential density should be brought in line with the mayoral standards in the London Plan.</p> <p>e) Request the deletion of DMEI3 (Decentralised Energy) and that DMCI4 (Open Spaces in New Development) should have regard to local and site specific circumstances.</p> <p>f) Suggest incorporating DMCI5 (Children's Play Spaces) into DMHB21 (Play Space) and amending the policy to include reference to the London Plan child yield calculations.</p> <p>g) Consider that new development should meet the play space requirements for the new development alone and not the existing deficit.</p> <p>h) Note that car parking standards exceed those set out in the London Plan consider that car parking should take account of local and site specific circumstances, reflect PTAL and</p>	<p>Land for Industry and Transport Supplementary Planning Guidance and accords with the requirements of planning guidance for London.</p> <p><u>No Proposed Change</u></p> <p>b) Table associated with DMH2 (Housing Mix) reflects the conclusions in the Council's Housing Market Assessment.</p> <p>It is important that housing needs are taken into account in the assessment of residential development schemes. Applicants will be required to deliver schemes that either contribute to meeting these needs, or demonstrate why the needs cannot be met.</p> <p>The affordable housing requirements set out in DMH7 (Provision for Affordable Housing) are provided subject to viability.</p> <p>The residential density standards set out in Table 3 are based on those contained in the London Plan and have been developed to be specific to local circumstances.</p> <p>c) Agree. Policy DMHB5 (Locally Listed Buildings) needs to take account of paragraph 135 of the NPPF. Policy DMHB6 (Conservation Areas) needs to refer to paragraph 133 NPPF.</p> <p><u>Proposed Change</u></p> <p>Policy DMHB5 to be reworded to take</p>

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				be expressed as maximums.	<p>account of paragraph 135 of NPPF. Policy DMHB6 to refer to paragraph 133 of NPPF.</p> <p>d) As a London Borough, the Council is guided by the provisions of the London Plan.</p> <p>No Proposed Change</p> <p>e) DME13 reflects the requirements of the London Plan. DME14 takes account of the provisions Green Belt policy in the National Planning Policy Framework.</p> <p>No Proposed Change</p> <p>f) These policies already reflect the provisions London Plan child yield calculations.</p> <p>No Proposed Change</p> <p>g) No developments will be required to take account of existing deficits in addition to the requirements generated by the development proposals.</p> <p>No Proposed Change</p> <p>h) Car parking standards take account of the flexibility given to local standards contained in the Further Alterations to the London Plan. In addition, they are reflective of the local circumstances in Hillingdon.</p> <p>No Proposed Change</p>
36	2	Rapleys LLP on behalf of HPHA	DME2	Consider that the Development Plan should recognise the existing and approved uses on	Officers are of the view that Rackspace City already constitutes an established

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		Ltd		<p>site and identify Rackspace City as being a key office location, outside of other identified strategic employment designations.</p> <p>Suggest amending DME2 (Employment Sites Outside of Designated Employment Areas) to explicitly state that it is not relevant to employment sites, which have been vacant/unused for a significant period of time. On such sites, alternative uses should be considered acceptable in principle.</p>	<p>office location. No further designation is required to re-enforce this.</p> <p><u>No Proposed Change</u></p> <p>This issue is already addressed in the policy criteria.</p> <p><u>No Proposed Change</u></p>
38	3	Solent Planning on behalf of Bourne End Investments Ltd	DME2	<p>Whilst Policy DME2 (Employment Sites Outside Designated Employment Areas) confirms that the loss of employment land may be permitted in certain circumstances, it makes no specific reference to the identified and allocated former employment sites which have been identified through the Sites and Allocations document to meet housing requirements.</p> <p>For robustness, certainty and hence to make the policy sound it is considered essential that the wording of the policy is amended which confirms the principle of the release of employment land on identified sites.</p>	<p>Officers acknowledge the benefits of identifying areas of designated employment land that are to be lost for other uses. As many of these releases relate to locally designated or strategically important sites, the suggested amendments should be made to policy DME1(Employment Uses in Designated Employment Sites).</p> <p><u>Proposed Change</u></p> <p>Part D will be amended as follows:</p> <p>Other uses will be acceptable in <i>SILs</i>, LSIS and LSELs only where:</p> <p>An additional bullet point will be added to part D) of the policy:</p> <p><i>Where the site is proposed to be released from its designated land use in this Plan</i></p>
53	22	Cllr Janet Duncan	DME 2	<p>Bullet point 2 of policy DME2 (Employment Uses Outside of Designated Sites) does not consider suitability of access. The following</p>	<p><u>Proposed Change</u></p> <p>Revise third bullet point to read:</p>

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				text should replace the second bullet point of the Policy: "the site is unsuitable for industrial reuse or development because of its size, shape, location or lack or unsuitability of access".	<i>'site is unsuitable for industrial reuse or development because of size, location or lack of suitable access'</i> .
91	6	Garden City Estates Residents Association	DME2	Suggest revised wording of the third bullet point to read, 'site is unsuitable for industrial reuse or development because of size, location or lack of suitable access.	<u>Proposed Change</u> Revise third bullet point of DME2 (Employment Uses Outside of Designated Sites) to read: <i>'site is unsuitable for industrial reuse or development because of size, location or lack of suitable access'</i> .
21	3	The Emerson Group	DME3	Support the thrust of DME3 (Office Development) and the list of exceptions set out therein.	Support noted and welcomed. <u>No Proposed Change</u>
56	3	Heathrow Airport Ltd	DME3	Policy DME3 (Office Development) will negatively affect the future development management of the airport and Heathrow's public transport nodes such as the CTA, T4, T5. Heathrow Airport should be included in the plan as a sustainable office location. HAL would be willing to accept a policy requirement which states that before airport land is released for non-airport related offices, it must be demonstrated that no other airport use can be accommodated on the site.	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. <u>No Proposed Change</u>
70	4	Nathaniel Lichfield & Partners on behalf of British	DME3	Support the approach set out, but question whether the constraint in effect imposed by paragraph (C), which discourages changes of use of existing office floor space, is	The criteria contained in paragraph C) relate to part A of the Policy, which sets out the areas where the Council is seeking to accommodate the majority of

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		Ltd		<p>site and identify Rackspace City as being a key office location, outside of other identified strategic employment designations.</p> <p>Suggest amending DME2 (Employment Sites Outside of Designated Employment Areas) to explicitly state that it is not relevant to employment sites, which have been vacant/unused for a significant period of time. On such sites, alternative uses should be considered acceptable in principle.</p>	<p>office location. No further designation is required to re-enforce this.</p> <p><u>No Proposed Change</u></p> <p>This issue is already addressed in the policy criteria.</p> <p><u>No Proposed Change</u></p>
38	3	Solent Planning on behalf of Bourne End Investments Ltd	DME2	<p>Whilst Policy DME2 (Employment Sites Outside Designated Employment Areas) confirms that the loss of employment land may be permitted in certain circumstances, it makes no specific reference to the identified and allocated former employment sites which have been identified through the Sites and Allocations document to meet housing requirements.</p> <p>For robustness, certainty and hence to make the policy sound it is considered essential that the wording of the policy is amended which confirms the principle of the release of employment land on identified sites.</p>	<p>Officers acknowledge the benefits of identifying areas of designated employment land that are to be lost for other uses. As many of these releases relate to locally designated or strategically important sites, the suggested amendments should be made to policy DME1(Employment Uses in Designated Employment Sites).</p> <p><u>Proposed Change</u></p> <p>Part D will be amended as follows:</p> <p>Other uses will be acceptable in SILs, LSIS and LSELs only where:</p> <p>An additional bullet point will be added to part D) of the policy:</p> <p><i>Where the site is proposed to be released from its designated land use in this Plan</i></p>
53	22	Cllr Janet Duncan	DME 2	<p>Bullet point 2 of policy DME2 (Employment Uses Outside of Designated Sites) does not consider suitability of access. The following</p>	<p><u>Proposed Change</u></p> <p>Revise third bullet point to read:</p>

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				text should replace the second bullet point of the Policy: "the site is unsuitable for industrial reuse or development because of its size, shape, location or lack or unsuitability of access".	<i>'site is unsuitable for industrial reuse or development because of size, location or lack of suitable access'</i> .
91	6	Garden City Estates Residents Association	DME2	Suggest revised wording of the third bullet point to read, 'site is unsuitable for industrial reuse or development because of size, location or lack of suitable access.	<u>Proposed Change</u> Revise third bullet point of DME2 (Employment Uses Outside of Designated Sites) to read: <i>'site is unsuitable for industrial reuse or development because of size, location or lack of suitable access'</i> .
21	3	The Emerson Group	DME3	Support the thrust of DME3 (Office Development) and the list of exceptions set out therein.	Support noted and welcomed. <u>No Proposed Change</u>
56	3	Heathrow Airport Ltd	DME3	Policy DME3 (Office Development) will negatively affect the future development management of the airport and Heathrow's public transport nodes such as the CTA, T4, T5. Heathrow Airport should be included in the plan as a sustainable office location. HAL would be willing to accept a policy requirement which states that before airport land is released for non-airport related offices, it must be demonstrated that no other airport use can be accommodated on the site.	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. <u>No Proposed Change</u>
70	4	Nathaniel Lichfield & Partners on behalf of British	DME3	Support the approach set out, but question whether the constraint in effect imposed by paragraph (C), which discourages changes of use of existing office floor space, is	The criteria contained in paragraph C) relate to part A of the Policy, which sets out the areas where the Council is seeking to accommodate the majority of

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		Airways		<p>appropriate.</p> <p>Consider that the effect of paragraph (C) would be to unduly constrain the need for flexibility and place a priority on the protection of office sites.</p> <p>Suggest making clear that paragraph (C) does not apply to the Heathrow perimeter area for this reason.</p>	<p>its office growth.</p> <p>These areas are identified as areas of growth for offices in the Mayor of London's London Office policy review. Changes of use from office to other uses should only be allowed very specific circumstances.</p> <p><u>No Proposed Change</u></p>
74	3	DLP Planning on behalf of McGovern Brothers (Haulage) Limited	DME3	<p>Policy DME3 (Office Development) should be amended to recognize the significance of the Heathrow Opportunity Area, which is recognised in the January 2014 Further Alterations of the London Plan as having an indicative employment capacity of 12,000 and a minimum of 9,000 new homes.</p>	<p>The boundary of the Heathrow Opportunity Area will be developed through the joint Opportunity Area Framework with the London Borough of Hounslow.</p> <p><u>Proposed Change</u></p> <p>This will be updated as and when the review of the Local Plan Part 1 is undertaken.</p>
82	4	Deloitte Real Estate on behalf of CEMEX Properties Ltd	DME3	<p>Policy DME3 (Office Development) should be amended to recognize the significance of the Heathrow Opportunity Area. Suggest wording to include '<i>and the Heathrow Opportunity Area</i>'.</p>	<p>The development of the Heathrow Opportunity Area is a strategic matter that will be progressed through the development of a joint Opportunity Area Planning Framework with the London Borough of Hounslow.</p> <p>In accordance with policy E3 of the Local Plan Part 1, this matter will be addressed through the production of Local Development Document for the Heathrow Area. It is therefore not a matter for Local Plan Part 2.</p> <p><u>No Proposed Change</u></p>

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36	1	Rapleys LLP on behalf of HPHA Ltd	DME3 Map 1.1	<p>Suggest that Rackspace City should be identified as an appropriate location for new office space. Policy DME 3 (Office Development) should confirm that proposals for office uses will be acceptable in Rackspace City.</p> <p>Welcome, subject to the proposed amendment of Policy DME3 and the comments, that both Rackspace City and adjacent Asda/mixed use site are "white land" and do not have any specific allocation.</p>	<p>Support noted and welcomed.</p> <p>Officers are of the view that Rackspace City already constitutes an established office location. No further designation is required to re-enforce this.</p> <p><u>No Proposed Change</u></p>
86	1	Eastcote Residents Association	DME4 Paragraph 2.2	<p>Request that the following heritage sites are associated with Policy DME4 (Visitor Attractions): Manor Farm Ruislip with the Great Barn, Motte & Bailey, Eastcote House Gardens, Stables Dovecote and Walled Garden with the link to Long Meadow.</p> <p>Also suggest that in paragraph 2.29 the last bullet point could be given greater weight by revising to read</p> <p>'Many historic features including Ancient Monuments, Grade II listed buildings, gardens, inns, barns and churches.' Further suggest that DME4 (Visitor Attractions) could read 'The Council will take steps to encourage visitors to heritage and other sites and will, in principle, support ...'</p>	<p>It is agreed that these assets should be referred to as visitor attractions associated with DME4.</p> <p><u>Proposed Change</u></p> <p>Redraft supporting text associated with policy DME4 (Visitor Attractions) to refer to visitor attractions in paragraph 2.29.</p>
23	1	Eastcote Conservation Panel	DME4, DMH6, DME15, paragraph 2.29	<p>Paragraph 7.27 states that there 14 Green Flags within the Borough. There are actually 28 covering many different types of open spaces.</p> <p>Paragraph 2.29 should be enhanced to give</p>	<p>The Plan should identify the correct number of Green Flag sites in the borough.</p> <p><u>Proposed Change</u></p>

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				<p>examples of heritage sites, especially those recently restored with funding from the Heritage Lottery Fund, such as Manor Farm Ruislip and Eastcote House Gardens.</p> <p>Suggests that the last bullet point in paragraph 2.29 should read 'Many historic features including Ancient Monuments, Grade II listed buildings, gardens, inns, barns and churches. Suggests rewording Policy DME4 (Visitor Attractions) to include 'The Council will take steps to encourage visitors to Heritage sites' as well as section 4.16/Policy DMH6 (Garden and Backland Development) to reflect the wording of section 53 of the NPPF.</p> <p>Omitting the word 'back' from DMH6 (Garden and Backland Development) and section 4.16 will make it easier to resist planning applications to develop side and front gardens, which can drastically alter the appearance and cause harm to the local area.</p> <p>Request that the wording of policy DMEI5 Development in Green Chains be the same as Policy EM2 (Green Belt, Metropolitan Open Land and Green Chains). As currently worded it seems less robust.</p>	<p>Amend paragraph 7.27 to refer to 28 rather than 14 Green Flag sites.</p> <p>Include reference to the Manor Farm Complex Ruislip and Eastcote House Gardens- HLF funded projects in the list of local and regional destinations in paragraph 2.29:</p> <p>Add an additional bullet point to paragraph 2.29 to read:</p> <p><i>Heritage assets such as Ancient Monuments, listed buildings, historic towns and villages, parks and gardens.</i></p> <p>Reword the first paragraph of DME4 (Visitor Attractions) to read:</p> <p>....The Council will <i>encourage visitors to heritage sites and will</i> support, in principle, proposals that enhance the visitor offer in the borough, subject to:</p> <p>Insert additional bullet point into Policy DMH6 (Garden and Backland Development) in relation to the importance of gardens in terms of their contribution to the character of areas.</p> <p>It is considered that the Policy DMEI5 (Development in Green Chains) carries the same message as Policy EM2 in the Local Plan Part 1.</p>
30	1	Ruislip Residents Association	DME4 DMH6 DMHB16	Consider that the Local Plan Part 2 provides a good basis for the future development of the area.	a) It is agreed that these destinations could be included as visitor attractions in the borough.

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			DME14 DME15 DMT1	<p>a) Suggest specifically mentioning The Manor Farm Complex in paragraph 2.29 as it includes several visitor attractions i.e. Winston Churchill Hall, Great Barn, Cow Byre, Library, Motte and Bailey site and Manor Farmhouse Heritage Centre.</p> <p>b) Suggests giving further consideration to limiting development in front and side gardens as part of Policy DMH6 (Garden and Backland Development).</p> <p>c) Caution against encouraging developers to adopt cladding systems without adequate evidence of their durability, ease of maintenance and cost effectiveness as part of policy DMHB16 (Living Walls and Roofs).</p> <p>d) Wish to see Policy DMEI5 (Development in Green Chains) amended to include important parts of the current Local Plan Policy EM2 Green Belt, Metropolitan Open Land and Green Chains - Clause (iv) of the draft Policy should be amended as follows: "the provision and improvement of suitable recreational facilities <u>where they are compatible with the conservation value of the area, and retain the openness of the Green Chain.</u>"</p> <p>e) Ruislip Station, Station Approach, off Pembroke Road should be added to the list of Key Transport Exchanges as it serves both Metropolitan and Piccadilly tube lines and seven bus routes.</p>	<p>Proposed Change</p> <p>Include reference to the Manor Farm Complex Ruislip and Eastcote House Gardens- HLF funded projects in the list of local and regional destinations in paragraph 2.29.</p> <p>Add an additional bullet point to paragraph 2.29 to read:</p> <p><i>Heritage assets such as Ancient Monuments, listed buildings, historic towns and villages, parks and gardens.</i></p> <p>Reword the first paragraph of DME4 (Visitor Attractions) to readThe Council will <i>encourage visitors to heritage sites and will</i> support, in principle, proposals that enhance the visitor offer in the borough, subject to:</p> <p>Proposed Change</p> <p>b) Insert additional bullet point on the importance of gardens in terms of their contribution to the character of areas into Policy DMH6 (Garden and Backland Development).</p> <p>Proposed Change</p> <p>Policy DMHB16 (Living Walls and Roofs) will be deleted and an additional criteria relating to living walls and roofs will be added to Policy DMEI1 (Sustainable Development Standards).</p> <p>c) Policy DMEI5 (Development in Green Chains) already contains</p>

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					<p>provisions to ensure that development is compatible with the conservation value of an area and retains openness.</p> <p><u>No Proposed Change</u></p> <p>d) Key transport interchanges have been carried forward in to the Local Plan from the Local Plan Part 1. Future review of the strategic identification of public transport interchanges will take these comments into account.</p> <p><u>No Proposed Change</u></p>
56	4	Heathrow Airport Ltd	DME5	Consider that the transport interchanges located at the CTA, Terminal 5 and Terminal 4 should be acknowledged as meeting the criteria of 'other sustainable locations' given the high public transport accessibility and the ability to receive hotel guests direct from terminals. Without this reference to the terminal locations, the Policy is contrary to London Plan Policy 4.5	<p>The Council seeks to locate airport related uses within the airport boundary, whilst other uses such as office or hotel development are directed to appropriate locations on the Heathrow perimeter.</p> <p><u>No Proposed Change</u></p>
70	5	Nathaniel Lichfield & Partners on behalf of British Airways	DME5	Welcome the recognition in the preamble to draft Policy DME5 (Hotel and Visitor Accommodation) (paragraph 2.30) that the hotel industry based around Heathrow Airport is a significant contributor to Hillingdon's economy, but suggest that the policy should give consideration to accommodating hotel uses in accessible locations in close proximity to Heathrow Airport to contribute and enhance the economic offer of the Airport through the provision of facilities such as conference and meeting space and restaurants.	<p>Hotels would be considered as acceptable in sustainable locations in close proximity to the airport, subject to other policies in the Plan. Amendments are not required to confirm this point.</p> <p><u>No Proposed Change</u></p>

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86	2	Eastcote Residents Association	DME6, 4.16	<p>The wording in 4.16 and Policy DME6 (Accessible Hotels and Visitor Accommodation) should be changed to reflect the wording of paragraph 53 of the NPPF.</p> <p>Rather than referring to back gardens or backland development Policy DMH6 Garden and Backland Development) and 4.16 should omit the word 'back, so that all gardens are protected by the Policy'.</p>	<p><u>Proposed Change</u></p> <p>Policy DMHB 6 (Garden and Backland Development) will be amended to refer to the protection of front and side gardens, as well as back gardens.</p>
Chapter 3: Town Centres					
43	2	RPS Planning and Development on behalf of Albermarle Development	DMTC1	<p>Consider that the inclusion of 'scale' criterion in Policy DMTC1 (Town Centre Development) is unnecessary and duplicates provisions in the London Plan. Request deletion of criterion A.</p> <p>As drafted Policy DMTC1 is inconsistent with the NPPF sequential and impact tests applicable to town centre uses.</p> <p>The test set out in part B should only relate to non-allocated edge of centre and out of centre sites.</p> <p>The use of terminology different to that in the NPPF causes confusion.</p>	<p>The criterion requiring development proposals to be consistent with the scale and function of the centre is derived from London Plan Policy 2.15 and it is agreed that it duplicates provisions in the London Plan. In accordance with the NPPF, the draft Policy seeks to set out policy for the consideration of main town centre uses, which cannot be accommodated in or adjacent to town centre. Whilst the draft Policy takes account of the sequential test to be applied in considering proposals for main town centre uses, the policy may benefit from bringing the terminology used in criteria B) ii) and B) iii) closer in line with the terminology used in the NPPF. The tests for impact assessments in criterion B iv) represent</p>

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					<p>local floor space thresholds that have been set for Hillingdon in accordance with paragraph 26 of the NPPF.</p> <p><u>Proposed Change</u></p> <p>Insert:</p> <p><i>'all proposals for town centres uses will be expected to comply with other relevant policies in the development plan for Hillingdon'</i></p> <p>in the supporting of paragraph 3.7.</p> <p>Delete criterion A.</p> <p>Revise criterion B) to bring in line with NPPF terminology:</p> <p><i>The Council will</i></p> <p><i>A) Expect proposals for main town centre uses to demonstrate that there are no available or suitable sites in a town centre where an edge of centre or out of centre location is proposed, using a sequential approach;</i></p> <p><i>B) Consider the effect of the proposal, either individually or cumulatively, on the vitality and viability of existing town centres, through the preparation of an impact assessment where development of over 200 sqm of gross retail floorspace and over 1000 sqm for all other main town centres uses is proposed in edge of centre or out of centre locations.</i></p>

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72	1	Burnett Planning & Development Ltd on behalf of Deutsche Alternative Asset Management Ltd	DMTC1	<p>Consider that Policy DMTC1 (Town Centre Development) is inconsistent with the NPPF's retail and sequential tests and the London Plan. The Policy should reflect guidance contained in the NPPF.</p> <p>Suggest deleting criterion i of Part B which is a consideration that would be taken into account in a development management decision and is not an appropriate test in this Policy.</p> <p>Further suggest referring to 'suitable' sites being available in criterion ii and to 'significant adverse' impact in criterion iv.</p> <p>No justification is provided for the requirement of an impact assessment for out of centre development over 200 sqm. Unless this threshold can be justified, the NPPF threshold of 2,500 sqm should be used and the Policy should state that smaller proposals may require impact assessment where it is clear that the scale, form and location of the proposal is likely to have significant impact on town centres.</p>	<p><u>Proposed Change</u></p> <p>Whilst the draft Policy takes account of the sequential test and impact tests to be applied in accordance with the NPPF in considering proposals for main town centre uses, the Policy may benefit from bringing the terminology used in criteria B) closer in line with the terminology used in the NPPF.</p> <p>The draft Policy is intended to be used in the development management process and residential amenity is a key consideration in the consideration of development proposals in out of centre locations. The tests for impact assessments in criterion B iv) represent local floor space thresholds that have been set for Hillingdon in accordance with paragraph 26 of the NPPF.</p> <p><u>Proposed Change</u></p> <p>Revise criterion B) to bring in line with NPPF terminology.</p> <p><u>No Proposed Change</u></p> <p>It is not considered that the phrase 'deleterious impact' is any more or less restrictive than 'significant adverse impact'.</p> <p><u>No Proposed Change</u></p> <p>The threshold for impact assessment is contained in the Local Plan Part 1.</p> <p><u>No Proposed Change</u></p>

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89	1	Nathaniel Lichfield & Partners on behalf of Intu Properties plc	DMTC 1	Support this Policy that encourages a 'town centre first' approach to retail and town centre uses. In order to secure the vitality and viability of town centres, main town centre uses must be directed to town centres. This will protect Hillingdon's shopping hierarchy.	Support noted and welcomed.
12	1	Montagu Evans LLP on behalf of Aviva Investors	DMTC1 and paragraph 3.9	<p>a) Support for the continued identification of the Lombardy Retail Park as part of the Uxbridge Town Centre.</p> <p>b) Policy DMTC1 (Town Centre Development) and supporting text is unclear in its meaning when read as a whole as the Policy states that proposals for main town centre uses in out-of-centre locations will only be permitted where an impact assessment is provided for proposals involving over 200 sqm of gross retail space.</p> <p>c) Supporting text paragraph 3.9 also refers to the 200 sqm threshold, which is ambiguously worded. Suggest amending paragraph 3.9 to state "the Council will require an impact assessment for any retail proposal in out-of-centre locations, which exceeds 200 sqm gross retail space". This would then be consistent with the sentence that follows and the wording of Policy DMTC 1(Town Centre Development).</p>	<p>a) Support noted.</p> <p>b) Comments noted. The Policy should be amended to be consistent with paragraph: 5.45 of the Local Plan Part 1:</p> <p><u>Proposed Change</u></p> <p>Amend Policy DMTC 1 (Town Centre Development): (B)(iv) as follows:</p> <ul style="list-style-type: none"> <i>For over 200 metres of gross retail floorspace, and Retail proposals not within town or district centres, which exceed 200 square metres of additional gross retail floorspace; and</i> <p>c) It is agreed that further clarification on the threshold should be provided in Policy DMTC1 (Town Centre Development).</p> <p><u>Proposed Change</u></p> <p>Revise paragraph 3.9 to replace 'not within the town or district centre' with '<i>in out of centre locations</i>'. This corresponds to suggested wording closer in line with NPPF terminology and will be consistent with the wording of</p>

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					Policy DMTC1.
43	4	RPS Planning and Development on behalf of Albermarle Development	Paragraph 3.14, Appendix B	Concerned about inconsistencies in the way town centre boundaries have been defined. Suggest revisiting the town centre boundary for South Ruislip to include SA17 the Arla Foods site.	<p>The Local Plan Part 1 Strategic Policies document does not propose changes to the town centre hierarchy in the borough.</p> <p>A full review of the centres hierarchy including local parades will be undertaken as part of a revision to the Local Plan Part 1 document.</p> <p><u>No Proposed Change</u></p>
89	2	Nathaniel Lichfield & Partners on behalf of Intu Properties plc	DMTC 2	<p>Support the protection of the ground floor in Primary Shopping Areas for retail uses, but object to requirements that:</p> <ol style="list-style-type: none"> A minimum of 70% of the frontage is retained in retail use; A5 hot food takeaways are limited to a maximum of 15% of the frontage; The proposed use will not result in the separation of Class A1 uses of no more than 12m interruption in the frontage of A1 shops or a concentration of non-retail uses which could be considered to cause harm to the vitality and vibrancy of the town centre. <p>Supports policies that seek to provide an appropriate mix between Class A1 and Class A3-A5, but consider it is important to strike the right balance between meeting the needs of the changing role of the town centre.</p> <p>Would support a policy that provides the Council with the ability to consider applications on a case by case basis, with a key</p>	<p>The 50% and 70% thresholds for Primary and Secondary Shopping Frontages correspond to the approach set out in strategic Policy E5 (Town and Local Centres) of the Local Plan Part 1. The draft Policy intends to establish and maintain A1 retail as the predominant use in primary and secondary shopping areas to ensure frontages as kept as areas of active retailing activity and interruptions in the shop frontage are minimised.</p> <p>The Secondary Frontages provide greater opportunities for a diversity of uses as do other areas within the town centre outside Primary and Secondary Retail Frontages. Whilst it is acknowledged that A3 uses can help to encourage centre vibrancy and vitality, the Council does not intend to allocate separate restaurant hub areas.</p> <p><u>No Proposed Change</u></p>

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				<p>consideration being the degree to which the proposals will benefit the vitality and viability of the town centres.</p> <p>Consider that the 2nd part of the Policy also includes arbitrary requirements for Secondary Shopping Areas that are too prescriptive.</p> <p>Would however support the proposed thresholds of this Policy if separate restaurant hub areas are allocated that are excluded from the tight restrictions.</p> <p>Suggests the following wording to be included in this policy: "A3 Hub Areas: The restrictions set out within DMTC2 (Primary and Secondary Shopping Area) 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"</p>	
11	1	Walsingham Planning	DMTC2	<p>Considers that policy DMTC2 (Primary and Secondary Shopping Area) should not require the retention of 50% of the Secondary Shopping Frontage in Class A1 use when some of the centres do not even have this level of Class A1 frontage at present. This is overly prescriptive and does not conform to the pro-economic development aims of the NPPF.</p> <p>Suggests including more flexibility in the Policy to allow for changes in the commercial market and demand for Class A1 floor space.</p>	<p>The objective to retain a high proportion of retail uses in Primary and Secondary Frontages is consistent with the Local Plan. The draft Policy intends to establish and maintain A1 retail as the predominant use in primary and Secondary Shopping areas to ensure frontages are kept as areas of active retailing activity and interruptions in the shop frontages are minimised. However, Secondary Frontages provide greater opportunities for a diversity of uses as do other areas within the town centre.</p> <p><u>No Proposed Change</u></p>

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46	2	Cllr Ian Edwards	Table 1.2	Requests including Violet Avenue in Yiewsley as a Local Parade.	Centre hierarchy and boundaries, including Local Parades, will be subject to a comprehensive review as part of the review of the Local Plan Part 1. <u>No Proposed Change</u>
21	4	The Emerson Group	DMTC3	Broadly support DMTC3 (Maintaining the Viability of Local Centres and Local Parades) but are concerned about criteria (B) relating to local parades. The list of parades set out in table 1.2 covers a range of locations and sizes of shopping areas and each of those have their own characteristics Suggest adding further test to Policy DMTC3 (Maintaining the Viability of Local Centres and Local Parades) whereby it can be demonstrated that marketing of a vacant unit has been carried out for 6 months or at most one year without success, to justify an exception to criterion (Bii).	Criterion B of the draft Policy seeks to protect and enhance the function of Local Parades by maintaining retail as the dominant use. Any long term vacancy would be considered as a material consideration as part of the development management process. <u>No Proposed Change</u>
43	1	RPS Planning and Development on behalf of Albermarle Development	DMTC3	Consider that the inclusion of 'scale' criterion in Policy DMTC 3 (Maintaining the Viability of Local Centres and Local Parades) is unnecessary and duplicates provisions in the London Plan. Request deletion of criterion A iii)	<u>Proposed Change</u> Insert: <i>'all proposals for town centres uses will be expected to comply with other relevant policies in the development plan for Hillingdon'</i> in the supporting text to paragraph 3.7. Delete criterion A iii) from DMTC3.

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79	1	SSA Planning on behalf of KFC Ltd	DMTC4	<p>The harm that Policy DMTC4 (Location and Concentration of Town Centre Uses) seeks to prevent has not been identified. It will also be impossible to assess whether the policy has been effective.</p> <p>No monitoring criteria are proposed by which to measure success and no action is suggested to deal with any failure to be effective that may be assessed on review.</p> <p>Request the deletion of part (B) of Policy DMTC4 and the inclusion or a reference within part (A) to a definition of what will be considered an unacceptable concentration of the uses listed in part (A).</p>	<p>The harmful impact that a concentration of the uses referred to in criterion A can potentially have on local amenity, character and function of an area, noise levels, traffic generation and community safety in town centres are identified in the supporting text contained in paragraphs 3.20 - 3.31.</p> <p>Further clarification on the potential impacts of hot food takeaway on childhood obesity will be added to the supporting text in paragraphs 3.25 - 3.27 to make explicit the Council's rationale for proposing policy criterion B in relation to schools.</p> <p>The effectiveness of the Policy, if adopted, will be monitored through the Council's Annual Monitoring Report, which uses a number of indicators in relation to retail capacity.</p> <p><u>Proposed Change</u></p> <p>Insert new paragraph into supporting text to read:</p> <p><i>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 draft Policy DMTC2.</i></p>

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					<p>Part B is considered superfluous as the part i) of the Policy seeks to avoid adverse impacts due to an unacceptable concentration of these uses in one area. This provision would include adverse impacts on the sensitive uses listed in Part B.</p> <p><u>Proposed Change</u> Propose removal of part B of the policy.</p>
79	2	SSA Planning on behalf of KFC Ltd	DMTC4	<p>Consider that it is not clear what if any part of the evidence base relates to draft Policy DMTC 4 (Location and Concentration of Town Centre Uses) and in particular part (B) thereof. In the absence of any such reference or background, it is difficult to see how there can be justification.</p> <p>The supporting text at paragraphs 3.29 refers to several types of harm that night-time economy uses might be associated with. However, as restaurants and hot food takeaways are dealt with in the previous section of supporting text, it is not at all clear that they are included as potential sources of such harms.</p> <p>Seek the deletion of part (B) of Policy DMTC4 of the draft Local Plan and the inclusion within part (A) or a reference within part (A) to a definition of what will be considered as an unacceptable concentration of the uses listed in part (A).</p>	<p>Locally, there has been an increase in childhood obesity rates since 2005/06. The evidence for increasing levels of childhood obesity in Hillingdon is set out in the Council's Joint Strategic Needs Assessment 2014, which can be accessed on the Council's website. Promoting healthier lifestyles and ensuring all children have a healthy start in life is a key priority for the borough.</p> <p>By definition an unacceptable concentration is one which would have an adverse cumulative impact on the amenity of an area.</p> <p><u>Proposed Change</u> Include the JSNA into the evidence base for the Local Plan Part 2. Insert new paragraph into supporting text to read: <i>In considering unacceptable concentration of hot food takeaways, drinking establishments, betting shops, night clubs, casinos</i></p>

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					<p><i>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 Draft policy DMTC2.</i></p> <p>Part B is considered superfluous as the part i) of the Policy seeks to avoid adverse impacts due to an unacceptable concentration of these uses in one area. This provision would include adverse impacts on the sensitive uses listed in Part B.</p> <p><u>Proposed Change</u></p> <p>Propose removal of part B of the Policy.</p>
79	3	SSA Planning on behalf of KFC Ltd	DMTC4	<p>Consider that full regard has not been given to national policy and advice in preparing Policy DMTC4 (Location and Concentration of Town Centre Uses), a reasoned justification for the draft Policy has not been provided and the supporting text at paragraphs 3.25-3.27 of the draft Local Plan does not explain what a "sensitive community use" might be or why restaurants or hot food takeaways should be resisted in proximity to them or to schools.</p> <p>Request the deletion of part (B) of Policy DMTC4 of the draft Local Plan and the inclusion within part (A) or a reference within part (A) to a definition of what will be considered an unacceptable concentration of the uses listed in part (A).</p>	<p>The National Planning Policy Framework recognises the important role of the planning system in creating healthy communities. Diet is a key determinant both of general health and obesity levels and fast food takeaways are linked to childhood obesity, which in turn can reduce life expectancy and increase poor health.</p> <p>The proliferation of takeaway food shops in the borough, especially in proximity to schools, is therefore a cause for concern, which the Council seeks to address through Policy DMTC4 (Location and Concentration of Town Centre Uses). By definition an unacceptable concentration is one which would have an adverse</p>

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					<p>cumulative impact on the amenity of an area. What may be considered sensitive community uses is explained by way of examples in paragraph 3.22.</p> <p><u>Proposed Change</u></p> <p>Insert new paragraph into supporting text to read:</p> <p><i>In considering unacceptable concentration of hot food takeaways, 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 draft policy DMTC2</i></p> <p>Part B is considered superfluous as the part i) of the Policy seeks to avoid adverse impacts due to an unacceptable concentration of these uses in one area. This provision would include adverse impacts on the sensitive uses listed in Part B.</p> <p><u>Proposed Change</u></p> <p>Propose removal of part B of the policy.</p>
79	4	SSA Planning on behalf of KFC Ltd	DMTC4	Consider plan unsound because the specific harm that the policy seeks to prevent or issues it seeks to address have not been identified. It is also difficult to link it to any policy of the NPPF and because the onus is on the plan-making authority to establish consistency, it	The harmful impact that a concentration of the uses referred to in criterion A can potentially have on local amenity, character and function of an area, noise levels, traffic generation and community safety in town centres are identified in

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				<p>must be assumed at this stage that the Policy does not comply.</p> <p>Request the deletion of part (B) of Policy DMTC 4 (Location and Concentration of Town Centre Uses) of the draft LP and the inclusion within part (A) or a reference within part (A) to a definition of what will be considered an unacceptable concentration of the uses listed in part (A).</p>	<p>the supporting text contained in paragraphs 3.20 - 3.31.</p> <p>Insert new paragraph into supporting text to read:</p> <p><i>In considering unacceptable concentration of hot food takeaways, 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 draft Policy DMTC2.</i></p> <p>Part B is considered superfluous as the part i) of the Policy seeks to avoid adverse impacts due to an unacceptable concentration of these uses in one area. This provision would include adverse impacts on the sensitive uses listed in Part B.</p> <p><u>Proposed Change</u></p> <p>Propose removal of part B of the Policy.</p>
79	5	SSA Planning on behalf of KFC Ltd	DMTC4	<p>Consider that the draft Policy is not based on any objectively assessed development requirement. The fact that neither proximity nor sensitivity is defined means that the Policy could have the effect of banning restaurants and hot food takeaways from a large majority of the borough. Because no assessment has been made of the number of hot food</p>	<p>The intention of draft Policy DMTC4 is to regulate the concentration of the town centre uses specified in criterion A in out of centre locations. What may be considered sensitive community uses is explained by way of examples in paragraph 3.22.</p> <p>Part B is considered superfluous as the</p>

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				takeaways that might be refused as a result of this or what the social, economic or environmental impacts of that might be, it is not possible to balance these impacts.	part i) of the Policy seeks to avoid adverse impacts due to an unacceptable concentration of these uses in one area. This provision would include adverse impacts on the sensitive uses listed in Part B. <u>Proposed Change</u> Propose removal of part B of the policy.
89	3	Nathaniel Lichfield & Partners on behalf of Intu Properties plc	DMTC4	Generally support the thrust of policy DMTC4 (Location and concentration of town centre uses) , but suggests amendments to state that where proposals come forward in close proximity to residential properties, they will be expected to demonstrate that there will not be unacceptable disturbance or loss of amenity. A strong market has been identified for food and beverage uses in Uxbridge town centre and consider 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.	The need to protect residential amenity is taken account of in criterion A of this policy. Whilst it is acknowledged that restaurants and drinking establishment can have a positive impact on the vitality and viability of town centres, the Council seeks to ensure an appropriate mix and balance of complimentary town centre uses that support a vibrant and viable shopping destination in town centre locations. <u>No Proposed Change</u>
87	1	Planware	DMTC4, paragraph 3	Object to DMTC4 (Location and Concentration of Town Centre Uses) on the basis that: a) there is no mention in the supporting text to justify part B of the Policy, which relates to location of hot food takeaways to schools and sensitive uses, b) the Policy will overly restrict growth, c) the Policy takes an ambiguous view of hot food takeaways in relation to the proximity of	The Policy seeks to address the cumulative adverse impact of the uses identified in Policy DMTC4 (Location and Concentration of Town Centre Uses). It is not considered that this will affect growth in the borough. It is not considered that Part B of the policy is necessary to address this issue and as such it will be deleted.

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				<p>schools, applying a blanket approach to restrict development,</p> <p>d) that the impact of the Policy has not been assessed, including the potentially negative impact that it may have on the local community, employment provision or to sustainability</p> <p>e) that the Policy has a disproportionate effect on land use planning and the economy, when taking into account the limited purchases made by school children and</p> <p>f) that no consideration is given to the achievement of sustainable development</p> <p>g) that no mention of the sequential test is made in the policy. Also object to supporting text at paragraph 3.20 and consider that it should be removed.</p>	<p>Proposed Change</p> <p>Delete Part B of the Policy DMTC4.</p>
99	1	Chris Thomas Ltd on behalf of British Sign & Graphics Association	DMTC5 (E) (F) and DMHB14 (c), 3.34, 5.52, 5.56	<p>There is no specific requirement for the Local Plan to contain advertisement control policies. Consider both DMTC5 (Shopfronts) and DMHB14 (Streets and the Public Realm) and their supporting text to be muddled and confusing.</p> <p>Suggest bringing together the relevant advice on shopfronts and advertisements in 1 or 2 comprehensive policies. Agree that poorly designed and sited shop signs can have an adverse impact, but considers this does not provide evidential support for DMTC5 (E) and (F).</p> <p>The proposed restriction of shop sign content to the shop name is contrary to the</p>	<p>It is agreed that the guidance on advertisements could be brought together as one section in chapter 5 Historic and the Built Environment under the heading Streets and the Public Realm.</p> <p>Draft policy DMTC5 (Shopfronts) will be amended to cross refer to this section where appropriate, but will not contain significant amounts of further guidance in relation to advertisements.</p> <p>Proposed Change</p> <p>Delete criteria E and F in Policy DMTC5 (Shopfronts) and cross refer to DMHB14</p>

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				<p>Regulations.</p> <p>Agrees that illumination to shopfronts should avoid light pollution as stated in paragraph 3.34 but this does not justify the proposed ban on all flashing and internally illuminated box lights. Each proposal should be considered on its merit.</p> <p>Suggests that paragraphs 5.52-5.56 should be reordered and omit reference to specific kinds of advertisements.</p> <p>The proposed restrictions in paragraph 5.52 are not justified and advertisements must be permitted provided it does not detract from amenity or public safety.</p> <p>Suggests combining paragraph 5.53 and 5.56 and consider there is no justification for the proposed ban on fully illuminated fascia panel and other signs.</p> <p>The last 2 sentences in paragraph 5.56 contradict the first part of the paragraph and therefore the advice given is confusing.</p> <p>The remainder of Policy is wholly acceptable.</p>	(Streets and the Public Realm).
14	1	Chris Thomas Ltd on behalf of Outdoor Media Centre (OMC)	DMTC5 and DMHB14 (c), 5.52, 5.56	a) The Local Plan does not have to contain advertisement control policies. Consider both DMTC5 (Shopfronts) and DMHB14 (Streets and the Public Realm) and their supporting text to be muddled and confusing. Suggest bringing together the relevant advice on shopfronts and advertisements in 1 or 2 comprehensive policies.	a) Officers are of the view that the guidance on advertisements could be brought together as one section in Chapter 5 of the DMP (Historic and the Built Environment), under the heading Streets and the Public Realm. Other policies in the Plan that are related to advertisements such as those in Chapter 3 (Town Centres) will be

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				<p>The illumination to shopfronts should avoid light pollution as stated in paragraph 3.34 but this does not justify the proposed ban on all flashing and internally illuminated box lights.</p> <p>b) Each proposal should be considered on its merit. Suggests that paragraphs 5.52-5.56 should be reordered and omit reference to specific kinds of advertisements as all are advertisements within the statutory definition. The proposed restrictions in paragraph 5.52 are not justified and advertisements must be permitted provided it does not detract from amenity or public safety.</p> <p>c) Suggests combining paragraph 5.53 and 5.56 and consider there is no justification for the proposed ban on fully illuminated fascia panel and other signs.</p> <p>d) Consider that the last 2 sentences in paragraph 5.56 contradict the first part of the paragraph and therefore the advice given is confusing.</p> <p>e) Considers the remainder of policy wholly acceptable.</p>	<p>amended to cross refer to this section where appropriate, but will not contain significant amounts of further guidance.</p> <p>b) Paragraph 5.52 will be amended to state that advertisements should not have an adverse impact on the character and amenity of a particular area. In making this assessment the Council will consider the siting, design and cumulative impact of the proposal. High level designs are unlikely to be permitted unless they make a positive contribution to the appearance of the building on which they are displayed.</p> <p>c) Paragraph 5.56 states that flashing signs will not generally be considered as acceptable in Conservation Areas. This principle has been carried forward from the current HDAS document and is not considered to be contrary to the national planning guidance.</p> <p>d) This issue will be considered as part of the review of the proposed approach to advertisements.</p> <p>e) Support noted and welcomed.</p> <p><u>Proposed Change</u></p> <p>Officers propose to amend the Development Management Policies in accordance with the above comments.</p>
44	1	Ickenham Residents Association	DMH6 DMHB18	a) Suggest including a description/definition of a Local Centre in the context of the other designations.	a) Hillingdon's Town Centre Network comprises a hierarchy of centres, which are shown spatially on map 5.3 in the

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				<p>b) Unsure of the rationale for the exclusion of some of Ickenham's shopping areas and recommend including all of the shops both sides of the High Rd in the town centre boundary. Suggest including Glebe Avenue parade as a shopping parade.</p> <p>c) Ask that the rationale for reference to living above shops in paragraph 4.7/4.8 be explained in the document.</p> <p>d) We feel that policy DMH6 (Garden and Backland Development) should refer to 'garden developments' to additionally encompass on gardens to the side of homes.</p> <p>e) Are not clear why the various conservation areas are designated and whether Ickenham could/should (already does?) have a Management Plan for its CA.</p> <p>f) DMHB18 (Housing Standards) needs updating to include secondary school provision.</p> <p>g) Much of Ickenham's Glebe Estate is deficient in play space since the Compass Theatre playground was removed.</p> <p>h) Seek clarification of the status of new playgrounds within new housing developments.</p> <p>i) Would like the whole of the Ickenham Marshes Complex to be recognised as Green Belt, including the section south of the Metropolitan Line railway. It fulfils all the same criteria for Green Belt designation as the land that surrounds it.</p> <p>j) Would like to ensure that Glebe Allotment</p>	<p>Local Plan Part 1 Strategic Policies and are explained in Table 1.1 of the draft Development Management Policies. A description of what constitutes a Local Centre is also set out in Table 1.1 and paragraph 3.15 of the Development Management Policies.</p> <p>b) Centre hierarchy and boundaries, including local parades, will be subject to a comprehensive review as part of the review of the Local Plan Part 1.</p> <p>c) Residential development within town centres can contribute to its vitality and residential uses above retail uses at ground floor level provides much needed housing without compromising the primary retail function of a centre or parade, thereby supporting urban regeneration policies. Paragraph 4.8 sets out the rationale for making reference to residential uses above shops within the context of the housing mix policy.</p> <p>d) DMH6 (Garden and Backland Development) will be amended to refer to a presumption against development front, side and back gardens associated with housing.</p> <p>e) Do not support as Paragraph 5.22 covers this. However the paragraph could be redrafted to be clearer on conservation area designation criteria. Ickenham does not have an appraisal or a management plan as yet. See</p>

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				site's recent addition to the borough's list of 'statutory sites' is confirmed in the relevant Local Plan maps.	website. <u>Proposed Change</u> Review wording of paragraph 5.22 f) DMHB18 (Housing Standards) is not related to school provision. g) Policy DMCI 5 states that in areas of deficiency, there will be a requirement for new provision to be made to meet benchmark standards for accessibility to play space provision. h) The Council will seek to resist the loss of new housing within housing developments. i) Ickenham Marshes complex is designated as Green Belt. j) Allotments are classed as community infrastructure and will be protected as such under the provisions of Policy reference DMCI2 (New Community Infrastructure).
Chapter 4: New Homes					
26	2	Nexus Planning on behalf of Hillingdon Hospital NHS	Chapter 3	Paragraph 3.2 states that the Site Allocations and Designations document identifies specific sites to meet housing delivery targets in the short term (2011-2016) and medium term	Comments noted. The housing data trajectory will be updated to reflect deliverable sites from the year of

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		Foundation Trust		<p>(2016-2021), whilst broad locations for residential development in the last 5 years of the plan are identified. Whilst this appears to be consistent with the advice set out in paragraph 47 of the NPPF, we do not believe this to be the case.</p> <p>Suggest that paragraph 3.2 is amended to make it clear that the Allocations and Designations document identifies housing sites to meet the housing delivery targets for the short term (years 1 to 5) and medium term (years 6-11), starting from the date of its adoption. Paragraphs 3.4 to 3.9 and Tables 3.2 and 3.2 should be amended to set out clearly the housing supply position at the date of adoption, by recording dwelling completions up to 2015 and re-phasing the anticipated delivery of identified housing sites in years 1 to 5 (2015-2020) and years 6 to 10 (2020-2025) accordingly.</p>	<p>adoption.</p> <p><u>Proposed Change</u></p> <p>5 year supply of units will be amended to commence from the expected adoption date of the Local Plan Part 2.</p>
78	1	Nexus Planning on behalf of East and North Hertfordshire Trust	4.3	<p>The statement that 'the Allocations and Designations document identifies specific sites for residential development to provide 5 years worth of housing supply' is inaccurate, misleading and inconsistent with the NPPF in the light of the London Plan's revised housing targets.</p> <p>Whilst the approach to phasing the delivery of new dwellings appears to be consistent with the advice set out in Paragraph 47 of the NPPF, do not believe this to be the case.</p> <p>Suggest amending paragraph 3.2 of the Local Plan Part 2 (Site Allocations & Designations) to make it clear that the document identifies</p>	<p>Further to the publication of the Inspector's report for the FALP, Hillingdon's revised annual monitoring target of 559 units will be incorporated into the Plan. In addition to this, the 5-year monitoring period will run from the year of adoption (2015).</p> <p><u>No Proposed Change</u></p>

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				housing sites to meet the housing delivery targets for the short term (years 1 to 5) and medium term (years 6-11), starting from the date of its adoption. If the plan is adopted in 2015, the phasing of housing delivery will need to be rolled forward to identify sites for the short term and medium term.	
65	2	Nathaniel Lichfield & Partners on behalf of Purplexed LLP	Table at Paragraph 4.9	<p>The Housing Mix table associated with policy DMH2 (Housing Mix) does not include provision for any 1 bed units and only 4% two bed units in the private sector. This is unrealistic and inconsistent with the supporting text, particularly as Crossrail is likely to make parts of the borough more attractive to young people who are likely to require 1 and 2 bed units.</p> <p>Suggest amending the table and make clear in the supporting text that variations will be acceptable in areas of higher public transport accessibility.</p>	<p>Table associated with DMH2 (Housing Mix) reflects the conclusions in the Council's Housing Market Assessment.</p> <p>It is important that housing needs are taken into account in the assessment of residential development schemes. Applicants will be required to deliver schemes that either contribute to meeting these needs, or demonstrate why the needs cannot be met.</p> <p><u>No Proposed Change</u></p>
39	3	Carter Jonas on behalf of Buccleuch Property	DMH2	<p>The suggested housing mix set out in Policy DMH2 (Housing Mix) for the private market, intermediate and social / affordable rented sector is completely distorted in favour of 3 / 4 bed units and there is no justification for this.</p> <p>There are two inevitable consequences of this Policy that are closely interlinked. First, owing to this lower density of development, a significant proportion of sites will not be viable for housing development. Second, even where development is viable, developing at this low density will lead to a shortfall in the number of units being delivered and the Council will thus</p>	<p>Table associated with DMH2 (Housing Mix) reflects the conclusions in the Council's Housing Market Assessment.</p> <p>It is important that housing needs are taken in to account in the assessment of residential development schemes. Applicants will be required to deliver schemes that either contribute to meeting these needs, or demonstrate why the needs cannot be met.</p> <p>The viability of the proposed schemes have been assessed as part of part of the Whole Plan Viability Study,</p>

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				<p>fail to meet its housing targets.</p> <p>Suggest alternative housing mix that will enable the Council and London's housing needs to be met across all sectors.</p>	<p>produced as an evidence base study for the Plan.</p> <p><u>No Proposed Change</u></p>
40	2	Jon Dingle Ltd on behalf of Access Self Storage	DMH2	<p>Consider that the preference for 3 / 4 bed units for all types of housing tenure in Policy DMH2 (Housing Mix) is not justified. The low densities arising from such development would lead to significant difficulties in terms of maximising the development potential of sites, the viability of developing such sites, and, as a consequence, making it very difficult for the Council to meet its housing targets.</p> <p>Suggest that a more balanced mix, reflecting the high demand for all sizes of units across all tenure types would be more appropriate.</p>	<p>The Table associated with DMH2 (Housing Mix) reflects the conclusions in the Council's Housing Market Assessment.</p> <p>It is important that housing needs are taken in to account in the assessment of residential development schemes. Applicants will be required to deliver schemes that either contribute to meeting these needs, or demonstrate why the needs cannot be met.</p> <p><u>No Proposed Change</u></p>
38	4	Solent Planning on behalf of Bourne End Investments Ltd	DMH2 Paragraphs 4.7 to 4.9, Tenure Table	<p>The table associated with Policy DMH2 (Housing Mix) suggests there will be no 1-bed flats within private housing schemes. It is wholly inappropriate to preclude housing sizes within such a housing mix policy and this must be assessed on a site by site basis in the context of the wider proposed housing mix.</p> <p>Further, the level of 2-bed units is considered too low. The housing mix table is inconsistent with the recognition of the need for a mixture of unit sizes and smaller units detailed in paragraphs 4.7 to 4.9.</p> <p>Further, the 2013 London Strategic Housing Market Assessment and Hillingdon Local Plan Part 1 do not set any such restriction on</p>	<p>Table associated with DMH2 (Housing Mix) reflects the conclusions in the Council's Housing Market Assessment.</p> <p>It is important that housing needs are taken into account in the assessment of residential development schemes. Applicants will be required to deliver schemes that either contribute to meeting these needs, or demonstrate why the needs cannot be met.</p> <p><u>No Proposed Change</u></p>

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				<p>smaller units within the housing mix.</p> <p>The approved scheme for Rainbow and Kirby Industrial Estates (38058/APP/2013/1756) approved in July 2014 includes 25 no. 1-bed units as part of the housing mix. For this site and other sites in the borough, the type and form of units will be a balance between the site, its constraints, layout, local context, local demand as well as the identified housing need.</p> <p>Request that the housing mix table associated with Policy DMH2 is amended to provide for an appropriate level of 1-bed and 2-bed units within the preferred housing mix. A mix of approx 15% 1-bed 15% 2-bed and the remaining 70% 3 and 4 bed would still achieve the Council aim for a balance towards larger family units.</p>	
27	1	Northwood Residents' Association	DMH6 DMH7 DMTC2 DMTC3 DMTC5 DMHB24 DME15 - DME18	<p>a) Proposed Policy DMH6 (Garden and Backland Development) should place greater emphasis on retaining all viable trees.</p> <p>Replacing is not usually an acceptable solution given the long lead time before any replacement tree can become mature.</p> <p>b) There should be few, if any, "exceptional circumstances" in which the proposed Policy DMH7 (Provision of Affordable Housing) should allow reduce or remove altogether the "affordable" element of a scheme.</p> <p>c) Given the ever-changing nature of retail shopping (internet etc) and its effect on "traditional" shopping areas, the 70% and 50% fixed retail unit tests in policy DMTC2 (Primary and Secondary Shopping Areas) might be or</p>	<p>a) Officers propose to introduce an additional policy relating to trees in the borough</p> <p>b) Policies are required to incorporate a degree of flexibility to take account of local circumstances. Overall, it is considered that the Policy meets the Council's objective to deliver affordable housing in the borough.</p> <p>c) The 50% and 70% thresholds reflect the requirement contained in the NPPF to retain a high proportion of retail uses in Primary and Secondary Frontages and correspond to the approach set out in strategic policy E5 of the Local Plan Part 1. The draft Policy intends to</p>

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				<p>become over-restrictive and lead to empty units when other Class A uses may be acceptable. Paragraph A of Policy DMTC3 (Maintaining the Viability of Local Centres and Local Parades) should require that any change of use from A 1 in a Local Centre should be subject to the additional test of "range and choice" as is currently proposed for local shopping des in paragraph B. Also consider the proposed Policy would benefit from including within it concepts, currently contained in the London Plan, encouraging competitiveness and developing within town centres a sense of place and identity for sustainable local communities.</p> <p>d) Consider in relation to policy DMTC5 (Shopfronts) that security should prevail over design where the two are incompatible when planning applications for security grills are being considered.</p> <p>e) Part A of Policy DMHB24 (Basement Development) should refer to the possible effect on structural stability of existing nearby properties and should entitle the Council to require the applicant to submit as part of the application a structural survey report.</p> <p>f) Consider that the Plan is not strong enough to protect trees. In particular existing Saved Policies 8E38 and 8E39 are not replicated in the draft policies and there appears to be no planning recognition of the protection and enforcement mechanisms of Tree Preservation Orders. These omissions need to be positively addressed.</p>	<p>establish and maintain A1 retail as the predominant use in Primary and Secondary Shopping Areas to ensure frontages are kept as areas of active retailing activity and interruptions in the shop frontages are minimised. However, Secondary Frontages provide greater opportunities for a diversity of uses as do other areas within the town centre outside Primary and Secondary Retail Frontages. It is agreed that the draft policy may benefit from keeping the wording in criterion A ii a) consistent with the wording in criterion B i). It is not considered necessary to duplicate the provisions of the London Plan in the Local Plan Part 2.</p> <p><u>Proposed Change</u></p> <p>Replace 'type' in criterion A ii a) of DMTC3 with 'choice'.</p> <p>d) External security grills can have a severely detrimental impact on the appearance of a building and character of a street. Policy DMTC5 seeks to reconcile the need for crime prevention with the need to protect the visual quality of the built environment, aiming to ensure shop front security measures cause minimal impact to the appearance of the shop front and the street scene.</p> <p><u>No Proposed Change</u></p> <p>e) The structural stability of the application site and surrounding properties is a building control matter</p>

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					that is assessed outside of planning. <u>No Proposed Change</u> f) Officers propose to introduce an additional policy relating to trees in the borough.
39	4	Carter Jonas on behalf of Buccleuch Property	DMH7, 4.25	<p>Consider that the wording of DMH7 (Provision of Affordable Housing), part A) ii) is unnecessarily restrictive by requiring a minimum of 35% of all new homes to be affordable, even where viability and other considerations would suggest otherwise. Feel this is unduly onerous and inflexible and inconsistent with the London Plan.</p> <p>Suggest rewording to read 'The Council will seek 35% of all housing to be provided as affordable housing, subject to viability and site specific circumstances on sites of 10+ more units, with tenure split (70% Social / Affordable Rent and 30% Intermediate) as set out in Policy H2 of the Local Plan Part 1.</p> <p>Request that for the same reasons, part D) should be deleted because this repeats A) ii). Under F), and clarification should be provided on what might constitute 'exceptional circumstances'.</p>	<p>The provisions of policy DMH7 A), ii) reflect the conclusions of the Council's Affordable Housing Study, which have been carried forward in to the Local Plan Part 1.</p> <p><u>No Proposed Change</u></p>
53	11	Cllr Janet Duncan	Page 38	Proposes new Policy DMH1 to read: "Where new housing is proposed or converted, obscured glazed windows to any rooms other than bathrooms should be resisted in order to maximize natural light, reduce the energy consumption of occupants and provide more	<p>This is a detailed design matter that will be addressed in subsequent guidance associated with new buildings.</p> <p><u>No Proposed Change</u></p>

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				acceptable living standards for residents."	
53	12	Cllr Janet Duncan	Page 38	Proposes new policy to state: "New housing should not be permitted on sites and in areas where air quality is above the legally safe limit to protect health."	<p>The NPPF has a presumption in favour of sustainable development. Whilst there is support in the NPPF for meeting air quality limits there is also a need to ensure all mitigation is proactively explored. However, officers are of the view that revisions to Policy DME118 (Air Quality) could be made to clarify the intention of the policy.</p> <p><u>Proposed Change</u></p> <p>Reword Policy DME118 (Air Quality) to read:</p> <p><i>Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with, and contribute towards meeting, EU limit values and national objectives for pollutants. Proposals should, as a minimum: be at least air quality neutral; include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; actively contribute towards the continued improvement of air quality, especially within the AQMA.</i></p>
53	13	Cllr Janet Duncan	Page 38	Considers that an increase in housing provision should be accompanied by an appropriate increase in health, education, community, recreational and leisure facilities and these should be secured before	The Development Management Policies and Site Allocations document will be updated to reflect the latest position with regards to health and education facilities.

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				<p>occupancy of any housing.</p> <p>At present, new housing proposals are being permitted with no or very little accompanying provision of social infrastructure to support both existing and new residents.</p> <p>Proposes new policy to read "Increase in housing provision should be accompanied by an appropriate increase in health, education, community, recreational and leisure facilities and these should be secured before occupancy of the housing takes place in order to avoid unacceptable and undue pressures on existing residents, as well as insufficient provision for new residents."</p>	<p>Developer contributions for community facilities are already addressed through the existing systems of CIL and S106 Contributions in Policy DMCI8 (Planning Obligations and Community Infrastructure).</p>
91	9	Garden City Estates Residents Association	Page 38	<p>A policy is required which will ensure that new housing is only delivered in areas where air quality is above legally safe limits.</p>	<p>The NPPF has a presumption in favour of sustainable development. Whilst there is support in the NPPF for meeting air quality limits there is also a need to ensure all mitigation is proactively explored. However, officers are of the view that revisions to Policy DMEI18 (Air Quality) could be made to clarify the intention of the Policy.</p> <p><u>Proposed Change</u></p> <p>Reword Policy DMEI18 to read:</p> <p><i>Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with, and contribute towards meeting, EU limit values and national objectives for pollutants. Proposals should, as a minimum: be at least air quality neutral; include sufficient</i></p>

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					<i>mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; actively contribute towards the continued improvement of air quality, especially within the AQMA.</i>
91	8	Garden City Estates Residents Association	Page 38	Consider that there is a need to deliver a sound strategic policy which requires maximization of natural light and reduced energy consumption. Suggest new policy to read 'Obscured glazing to any room other than bathrooms should be resisted in order to maximize natural light.'	This is a detailed design matter that will be addressed in subsequent guidance associated with new buildings. <u>No Proposed Change</u>
Chapter 5: Historic and the Built Environment					
32	1	Natural England	Chapter 5, DMHB14, DMHB16 DMEI1 Paragraph 6.5 DMEI 4 DMEI 5 DMEI 6 DMEI 7 DMEI 8 DMEI 9 DMEI 11 Paragraph 7.2	a) Consider that under the Streets and Public Realm section (Chapter 5, paragraph 5.46) the Council should give consideration to Green Infrastructure (GI) and or soft landscaping including permeable surfaces where appropriate. b) Suggest that soft landscaping and or GI could be referenced in policy DMHB14 (Streets and Public Realm), and consideration should be given to linking this to policy to DMHB16 (Living Walls and Roofs). c) Broadly support DMHB16 and suggest linking the policy to DMHB14. d) Welcome and support paragraph 6.5, 7.2, DMEI7 (Biodiversity Protection and Enhancement) and the inclusion of techniques that enhance biodiversity in the DMEI1	a) Officers agree that there is scope to include references to Green Infrastructure in policy DMHB14 b) Agree. Amend Policy DMHB14 - Streets and Public Realm to better reflect the functions and connectivity of landscaping and green infrastructure. <u>Proposed Change</u> Paragraph A criteria iii of the policy should be amended as follows: iii) ensuring landscaping treatment serves a purpose and contributes to <i>local green infrastructure and where appropriate, provides safe and direct to the ease of pedestrian and cycle movement through the space;</i> and

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			DMCI 3 DMCI 4 DMT 5	<p>(Sustainable Design Standards), encouraging the Council to ensure the borough's green infrastructure is designed to deliver multiple functions.</p> <p>e) Suggest making references to the All London Green Grid (ALGG to further strengthen the document. Broadly support DMEI4, DMEI5, (Green Belt, Green Chains) DMEI8, DMEI9 (Waterside Development and Farm Diversification), DMEI11 (Water Management), DMCI3 (Public Open Space Provision) and DMCI4 (Open Spaces in new Development)</p> <p>f) Suggest considering not allocating glasshouses in areas where housing would be considered to be unacceptable in respect of DMEI9 (Farmland Diversification) and linking DMEI11 (Water Management) to DMEI1 (Sustainable Design Standards).</p> <p>g) Consider that the Council should look at previously developed brown-field land initially in respect of policy DMCI4 and that housing should be sited in the most suitable sites, avoiding environmental impacts of designated sites or identifies that the benefits of development would outweigh any harm – the approach should be, avoid, mitigate, compensate, in that order.</p> <p>h) Broadly support Policy DMT5 (Pedestrians and Cyclists) and suggest linking these routes to green infrastructure provision. Are aware of the proposals for Heathrow and is in discussion with the Airports Commission and prospective developers.</p>	<p>c) Support for DMHB16 is welcomed and noted. The policy will be linked to Policy DMEI1: Sustainable Design Standards.</p> <p>d) Support for DMEI1 and DMEI7 noted.</p> <p>e) Agree cross-references to Green Infrastructure, open space and biodiversity provision would strengthen document as well as references to All London Green Grid.</p> <p><u>Proposed Change</u></p> <p>Include cross referencing to Green Infrastructure, open space and biodiversity provision and references to All London Green Grid in paragraph 7.23. Suggested wording to be added to end of the paragraph:</p> <p><i>The strategic importance of these green spaces is reflected in the All London Green Grid River Colne and Crane Area Framework.</i></p> <p>f) Proposals for glasshouses will be assessed on their merits, against other policies and provisions in the Plan. There is no requirement for a specific policy reference on this matter.</p> <p>g) The majority of new housing development in the borough will be delivered on brownfield land. Sites have been identified to minimise environmental impact. Proposals for residential development that come forward as planning applications will be</p>

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					<p>assessed against other policies in the Plan to minimise environmental impact. As such, it is not considered that there is a need for Proposed Changes to address this issue.</p> <p>h) Support for the Policy is welcomed and noted.</p> <p><u>Proposed Change</u></p> <p>The supporting text to Policy DMCI3 (Public Open Space) in Chapter 7 will be amended to include new supporting text, prior to paragraph 7.30:</p> <p><u>Proposed Change</u></p> <p><i>The provision of natural areas may be required as part of this policy to ensure local communities have access to an appropriate mix of green spaces which provide for a range of recreational needs. In this regard Natural England's Accessible Natural Greenspace Standard may be applied when considering any new, augmentation to, or reconfiguration of open space.</i></p>
39	5	Carter Jonas on behalf of Buccleuch Property	DMHB1	<p>Policy DMHB1(Heritage Assets) is not consistent with the NPPF as it affords non-designated heritage assets the same policy protection as designated heritage assets.</p> <p>The distinction is important because, in respect</p>	<p><u>Proposed Change</u></p> <p>Reword DMHB1 (Heritage Assets) to distinguish between non designated and designated heritage assets.</p>

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				<p>of the former, the tests relate to substantial harm or total loss, whereas in respect of the latter the test is in relation to scale of any harm of loss and the significance of the heritage asset.</p> <p>Further state that the tests included within the draft policy is too onerous. Suggest revised wording that refer explicitly to designated heritage assets.</p>	
65	7	Nathaniel Lichfield & Partners on behalf of Purplexed LLP	DMHB1	<p>Criteria A ii) of Policy DMHB1 (Heritage Assets) is not compliant with government policy.</p> <p>When considering the impact of a proposed development the significance of a designated heritage asset should be identified and the degree/level of harm considered.</p> <p>Where a proposed development will lead to substantial harm to or total loss of the significance of designated heritage asset, paragraph 133 of the NPPF is clear that 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 that other criteria applies.</p>	<p>Proposed Change</p> <p>Reword DMHB1 (Heritage Assets) to distinguish between non designated and designated heritage assets.</p>
66	1	Nathaniel Lichfield & Partners on behalf of Workspace Group	DMHB1	<p>When considering the impact of a proposed development the significance of a designated heritage asset should be identified and the degree/level of harm considered.</p> <p>Where a proposed development will lead to substantial harm to or total loss of significance</p>	<p>See the above comment.</p> <p>Proposed Change</p> <p>Reword relevant policies to refer to NPPF.</p>

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				<p>of a designated heritage asset, paragraph 133 of the NPPF is clear that 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 that other criteria applies.</p> <p>Furthermore, paragraph 134 identifies that where a development proposal will lead to less than substantial harm, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.</p>	
92	7	Inland Waterway Association	DMHB 1, DMHB6, DHMB 25, DME15, DME 18	<p>a) The policies fail collectively to provide a clear strategy to realise the potential of the canal network within the Borough for regeneration and recreation.</p> <p>b) Paragraph 5.1 of Policy DMHB1 (Heritage Assets) should record the Grand Union Canal, the Paddington Arm and the Slough Arm as heritage assets within the London Borough of Hillingdon.</p> <p>c) The rest of the canal should be designated as a Conservation Area, including not just the Canal and River Trust controlled water space and towpath but also other important features on private land adjoining the route of the canal, including landscape.</p> <p>d) Policy DMHB6 (Conservations Areas) should be revised to read 'New development, including alterations and extensions to existing buildings, within a conservation area or on a site directly adjoining a conservation area, will</p>	<p>a) The canal network will be managed in the context of all policies in the Local Plan.</p> <p><u>No Proposed Change</u></p> <p>b) The policy does not provide an exhaustive list of heritage assets in the borough. As such it is not considered that canals need to be recorded as such.</p> <p><u>No Proposed Change</u></p> <p>c) No evidence has been provided to justify the designation of the canal network as a heritage asset.</p> <p><u>No Proposed Change</u></p> <p>d) Noted.</p> <p>Wording from paragraph 72 of the Act as quoted refers to development within a conservation area, not works on the</p>

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				<p>be expected to preserve or enhance the significance of the conservation area by making a positive contribution to the character and appearance of the conservation area.</p> <p>e) Policy DMHB25 (Moorings) should be expanded to state that the Council will support the establishment of residential or leisure moorings as part of development in waterside locations provided that they satisfy the criteria above.</p>	<p>boundary. The issue here is regarding setting and is covered by paragraph 132 of the NPPF.</p> <p><u>No Proposed Change</u></p> <p>e) The Policy provides a Framework to assess the development proposals for all moorings. It is not considered necessary to refer to specific types of moorings.</p> <p><u>No Proposed Change</u></p>
41	4	DP9 on behalf of Royal Brompton and Harefield NHS Trust	DMHB3, paragraphs 5.11 - 5.14, map 13.7	<p>Consider that the terminology 'Archaeological Priority Area' in the Archaeological Desk-based Assessment in Policy DMHB3 (Archaeological Priority Areas) is not consistent with the Archaeological Assessment produced by CGMS.</p> <p>There is no clear evidence that remains are located at Harefield Hospital. Accordingly, the designation as an Archaeological Priority Area is not appropriate. If anything, the site could be more suitably designated as an Archaeological Priority Zone.</p>	<p><u>Proposed Change:</u></p> <p>The CgMs Consulting report notes in paragraph 2.4.1.2 that the Hospital site is of archaeological interest as it forms part of an ancient hunting park. Paragraph 5.11 will be redrafted to include the potential to have deposits.</p>
65	14	Nathaniel Lichfield & Partners on behalf of Purplexed LLP	DMHB5	DMHB5 (Locally Listed Buildings) implies that demolition of locally listed buildings will only be considered if it can be demonstrated that the community benefits of the proposal outweigh retention of the locally listed building. The wording is misleading as any new building will	The Policy refers to community benefits, not appearance. However, it should be redrafted to take account of paragraph 135 of the NPPF, which sets out how development proposals affect the

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				not replicate the features of the locally listed building but will create a new modern building.	significance of heritage assets. <u>Proposed Change</u> Redraft Policy DMHB5 to take into account paragraph 135 of NPPF.
60	1	Ruislip Village Conservation Area Panel	DMHB6, DMHB7, DMHB4 DMHB6 DMHB3	<p>Consider the plan overall to be well thought out, but some wording is weak.</p> <p>Suggest classing the whole of Manor Farm as tourist attraction and applaud the spirit of Policy DMHB6 (Conservation Areas) and Policy DMHB7 (Areas of Special Local Character).</p> <p>Note Policy DMHB4 (Listed Buildings) and Policy DMHB5 with approval. Are pleased that a large part of the Ruislip Conservation Area is also an Archaeological Priority Area and request that courtyards on either side of the Great Barn, duck pond and St Martin's Approach are included in the Manor Farm MOL designation.</p> <p>Suggest including Bishop Winnington Ingram School Playing Fields and Parkway Green as MOL land. Welcome SINC extensions in Ruislip, Northwood and Eastcote.</p>	<p>Support noted and welcomed.</p> <p>Proposed Change</p> <p>It is agreed that Manor Farm should be identified as a tourist destination in policy DME5: Hotels and Visitor Accommodation.</p> <p>MOL boundaries are based on the study undertaken by the Council. Whilst minor changes can be made to the boundaries, additional evidence would be required to justify new MOLs.</p> <p><u>No Proposed Change</u></p>
52	1	Chris Boulton	DMHB8	Considers that this policy should be applicable to the extensions of existing properties as well as new houses. Proposes to revise wording 'new houses' to 'new development' or 'new development and extensions to dwellings'	<u>Proposed Change</u> The Policy will be amended to ensure that that new development respects the specific development considerations in this area.

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91	11	Garden City Estates Residents Association	DMHB12	Policy DMHB12 (High Buildings and Structures) does not provide sufficient information on appropriate height of new build.	<p>In addition to Policy DMHB12 (High Buildings and Structures), the Council has produced a townscape character assessment as an evidence base for the Local Plan Part 2. This will be used as a material consideration in the assessment of proposals involving tall buildings.</p> <p>Paragraph 5.45 states that developers will need to take account of this Study when preparing design and access statements. As such is not considered that further reference to assessment criteria are needed in the Policy.</p> <p><u>No Proposed Change</u></p>
53	14	Cllr Janet Duncan	DMHB12, page 50	<p>In relation to Policy DMHB12 (High Buildings and Structures) it is unacceptable that new development is being permitted that is higher than buildings of importance, landmark buildings of the area and buildings that determine the character of the area, if the character and built heritage is to be preserved and carried forward.</p> <p>Suggests insertion of the additional policy criteria</p> <p>(xiii) Be subsidiary in height to landmark buildings, buildings of importance or those that determine the character of the area.</p> <p>(xiv) Be subsidiary in height to heritage assets and respect their setting.</p>	<p>The Council's policy on high buildings has been developed to reflect the latest townscape character study.</p> <p><u>No Proposed Change</u></p>
56	5	Heathrow Airport	DMHB12	Part xi) of Policy DMHB12 High Buildings and	Support noted and welcomed.

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		Ltd		Structures requires that high buildings should comply with aviation and navigation requirements. HAL supports this inclusion and recommends that developers are advised to contact HAL when considering proposals for large structures in the vicinity of the airport.	Where appropriate, HAL is already consulted in relation to tall buildings. <u>No Proposed Change</u>
70	8	Nathaniel Lichfield & Partners on behalf of British Airways	DMHB12	Welcome the requirement within Policy DMHB12 (High Buildings and Structures) that high buildings and structures must "comply with aviation and navigation requirements and not interfere, to an unacceptable degree, with telecommunication, television and radio transmission networks".	Support noted and welcomed. <u>No Proposed Change</u>
53	15	Cllr Janet Duncan	DMHB13	Suggests adding additional clause to DMHB13 (Design of Development) "In order to respect and preserve Hillingdon's green and open character and help to mitigate flood risk, at least 30% of redevelopment sites should be soft landscaped and include specimen trees."	Policies on flooding and water management have been developed in discussion with specialist officers to minimise flood risk. <u>No Proposed Change.</u>
53	16	Cllr Janet Duncan	DMHB15	Proposes new sub paragraph (vi) for Policy DMHB15 (Planning for Safer Places) to read "Ensure in all new residential development that all amenity space and children's play areas are overlooked by the development to maximise natural surveillance and safety for users."	The Policy already includes provision to maximise natural surveillance. <u>No Proposed Change</u>
91	12	Garden City Estates Residents Association	DMHB15	Some developments have recently been built either without adequate recreation /children's play areas (Porters Way developments) or having such spaces in inappropriate areas, which cannot be easily supervised. This has	The Policy already includes provision to maximise natural surveillance. <u>No Proposed Change</u>

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				led to an increase in crime and antisocial behaviour in some developments. Suggest adding 'Ensure in all new developments that amenity space and children's recreation areas are positioned so that they can be easily supervised from all neighbouring properties'.	
35	1	Peacock & Smith on behalf of Morrison Supermarket	DMHB16	Object to Policy DMHB16 (Living Walls and Roofs) as it seeks to impose unnecessary detail and is conflict with paragraph 59 of the NPPF. Consider that the Policy is seeking to impose particular tastes upon development and is therefore contrary to paragraph 60 of the NPPF. Although there are a number of disadvantages with the installation of a living roof, such as construction and maintenance issues, the Policy elevates living roofs over all other types of sustainable development options.	<u>Proposed Change</u> Policy DMHB16 (Living Walls and Roofs) will be deleted. Additional criteria regarding living walls and roofs will be added to policy DME11 (Sustainable Building Design).
36	4	Rapleys LLP on behalf of HPHA Ltd	DMHB16	Policy DMHB16 (Living Walls and Roofs) should be explicit that not all development is appropriate for these measures.	<u>Proposed Change</u> Policy DMHB16 (Living Walls and Roofs) will be deleted. Additional criteria regarding living walls and roofs will be added to policy DME11 (Sustainable Building Design).
56	6	Heathrow Airport Ltd	DMHB16	Consider that major developments at airports should be exempt from DMHB16 (Living Walls and Roofs).	<u>Proposed Change</u> Policy DMHB16 (Living Walls and Roofs) will be deleted and an additional criteria relating to living walls and roofs will be added to Policy DME11

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					(Sustainable Development Standards).
63	4	Rapleys LLP on behalf of Cedarwood Asset Management	DMHB16	Consider that "reasonable justification" in Policy DMHB16 (Living Walls and Roofs) as to why proposals cannot incorporate living walls, and living roofs onto "all parts of the available roof space", should include measures of "practicality and viability".	<u>Proposed Change</u> Policy DMHB16 (Living Walls and Roofs) will be deleted and an additional criteria relating to living walls and roofs will be added to Policy DMEI1 (Sustainable Development Standards).
65	13	Nathaniel Lichfield & Partners on behalf of Purplexed LLP	DMHB16	<p>Policy DMHB16 (Living Walls and Roofs) identifies that all new major development should incorporate a living wall where appropriate.</p> <p>Furthermore paragraph 5.63 supporting this policy identifies "... <i>Whilst it is unlikely to be able to deliver living walls on all elevations, as a minimum developers will be expected to provide part of an elevation as a living wall.</i></p> <p>Such a requirement is unrealistic. Innovative building design should not be restricted by such a requirement and given the maintenance needs and that new buildings may not be located in positions where the conditions are suitable for living walls, it is requested that the policy is amended.</p>	<u>Proposed Change</u> Policy DMHB 16 (Living Walls and Roofs) will be deleted and an additional criteria relating to living walls and roofs will be added to Policy DMEI 1 (Sustainable Development Standards).
70	9	Nathaniel Lichfield & Partners on behalf of British Airways	DMHB16	It is unrealistic to include living roofs/walls in all major developments. The Policy is overly prescriptive and should be replaced by a new policy which provides a general encouragement for environmental measures to be included in building design.	<u>Proposed Change</u> Policy DMHB 16 (Living Walls and Roofs) will be deleted and an additional criteria relating to living walls and roofs will be added to Policy DMEI 1 sustainable development standards.

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65	11	Nathaniel Lichfield & Partners on behalf of Purplexed LLP	5.71-5.72	In accordance with the Mayor of London's Housing SPD the Development Management Policies should clarify that bedrooms over 11.5sqm will be considered to be double rooms and not rooms over 10sqm.	<u>Proposed Change</u> Amend Table 1 in accordance with the Mayor of London's latest standards to confirm that bedrooms over 11.5 sqm will be considered as double rooms.
65	10	Nathaniel Lichfield & Partners on behalf of Purplexed LLP	DMHB18	DMHB18 (Housing Standards) should provide flexibility in connection with meeting the Council's private amenity space standards. It is unclear why the Policy departs from the Mayor's Housing Design Guide (standard 4.10.3) relating to balcony sizes. The standard referred to in policy DMHB18 should be amended accordingly.	The standards contained in DMHB18, Table 2 reflect those contained in Hillingdon's Design and Access Statement (HDAS). The Housing Design Guide remains an interim document and the borough's local standards are considered to take precedence. <u>No Proposed Change</u>
39	6	Carter Jonas on behalf of Buccleuch Property	DMHB 19, Table 2	The amount of private outdoor amenity space required for all housing units exceeds the guidance set out in the London Plan Housing SPG. Consider that the standards set in Table 2 are far too onerous and inflexible and would impact on a site's development potential and viability. There is no justification for a standard that is between 6 and 10 times the standard required by the London Plan. Suggest revised Table 2 including a range for private amenity space.	The outdoor amenity space standards are carried forward from the Hillingdon Design and Access Statement (HDAS) Residential Layouts Supplementary Planning Document. <u>No Proposed Change</u>
40	3	Jon Dingle Ltd on behalf of Access Self Storage	DMHB20, Table 3	The standards set out in Table 3 are not in accordance with Table 3.2 - Sustainable Residential Quality (SRQ) density matrix (habitable room and dwellings per hectare) of the London Plan.	Table 3 reflects the densities and settings contained in Table 3.2 of the London Plan. <u>No Proposed Change</u>

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				The reference within Policy DMHB20 (Residential Density), Table 3 to housing types is unduly restrictive and not consistent with the London Plan. Table 3 should be amended to be consistent with the London Plan.	
65	9	Nathaniel Lichfield & Partners on behalf of Purplexed LLP	DMHB20, Table 3	<p>Whilst the London Plan identifies that Local Authorities can establish their own density matrix the densities noted in Table 3 are inappropriately low and do not address accessible sites outside the town centre.</p> <p>Given the acute housing need within London it is considered that the low densities set out in the matrix should be reviewed and that additional flexibility should be provided.</p>	<p>Table 3 has been discussed with Mayor of London to ensure consistency with the London Plan. The figures are based on Table 3.2 of the London Plan and have been developed to reflect circumstances.</p> <p><u>No Proposed Change</u></p>
39	7	Carter Jonas on behalf of Buccleuch Property	DMHB20, Table 3	<p>Consider that the standards set out in Table 3 are not in accordance with Table 3.2 - Sustainable Design Quality (SRQ) density matrix (habitable room and dwellings per hectare) of the London Plan.</p> <p>As a consequence a significant proportion of sites will not be viable for housing development and even where development is viable, developing at this low density (and not maximising the potential of a site) will lead to a shortfall in the number of units being delivered. Suggest revised density ranges in line with the London Plan.</p>	<p>The proposed densities in Table 3 are based on those contained in Table 3.2 of the London Plan. The GLAs response to the Plan does not raise concerns regarding a lack of consistency.</p> <p>The Whole Plan Viability Assessment confirms that the majority of sites are economically viable.</p> <p><u>No Proposed Change</u></p>
52	1	Chris Boulton	DMHB22	Policy DMHB22 (Alterations and Extensions to Residential Dwellings) should include limits for two storey rear extensions. Suggests including Part of HDAS paragraph 6.4 and all of paragraph 6.5 should be as shown in the	<p><u>Proposed Change</u></p> <p>The Policy will be amended to ensure that that new development respects the specific development considerations in</p>

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				attachment.	this area.
93	1	Mono Consultants Ltd on behalf of Mobile Operators Association	Paragraph 5.109	<p>While both NPPF and the Code of Best Practice on Mobile Network Development in England both encourage mast and site sharing, there will be instances where it is not technically or operationally possible.</p> <p>Suggest that the final sentence is changed to: "It is important to ensure that any telecommunications developments are of a suitable design taking into consideration heritage assets, height, scale and materials of the site and local area."</p>	<p><u>Proposed Change</u></p> <p>It is suggested that the paragraph 5.109 is amended to reflect the technical difficulties associated with site sharing.</p> <p><u>Proposed Change</u></p> <p><i>Taking account of the technical feasibility, it is important to ensure that any telecommunications developments are of a suitable design, taking into consideration heritage assets, height, scale and materials of the site and the local area.</i></p>
93	2	Mono Consultants Ltd on behalf of Mobile Operators Association	DMHB26	<p>While telecommunications developments should be sympathetically designed' the provision of advanced, high quality electronic communications infrastructure may, in some instances, result in some minor impacts. In these instances it is important that the visual impact of an installation is balanced against the Government's objective to 'provide advanced, high quality communications infrastructure.'</p> <p>Suggest on that basis that Criterion (ii) of Policy DMHB26 (Telecommunications) is changed to: "They do not have an unacceptable effect on the character or appearance of the building or the local area,".</p> <p>Additional clarity can be given to Criterion (iii) of Policy DMHB26 by changing the wording to: "if proposing a new mast, it has been demonstrated that there is no possibility for use</p>	<p>Proposals for new telecommunications equipment will be assessed in the same way as other forms of development in the borough. It is not considered that criteria i), ii) or iii) of policy DMHB26 (Telecommunications) are overly prescriptive.</p> <p><u>No Proposed Change</u></p> <p>The comments regarding the ICNIRP standards are noted.</p> <p><u>Proposed Change</u></p> <p>Incorporate proposed amendments to criteria iv)</p>

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				<p>of alternative site, mast sharing and the use of existing buildings."</p> <p>The requirement for details of frequency modulation and power output to be submitted with planning applications for telecommunications developments has been removed from the latest version of the Code of Best Practice 2013.</p> <p>Request that criterion (iv) of Policy DMHB26 is amended as follows: "it includes a Declaration of Conformity with International Commission on Non Ionizing Radiation Protection Public Exposure Guidelines."</p> <p>Suggest new policy wording for policy DMHB26 as an alternative to the amendments suggested above.</p>	
53	21	Cllr Janet Duncan	Paragraph 5.74	<p>Lifetime homes should accommodate mobility needs of residents who may develop a permanent or temporary disability during their lifetime otherwise they are not lifetime homes. Suggests introducing new policy stating "All new homes should be built to Lifetime Homes standards and have at least one car parking space allocated to it to secure lifetime mobility for residents. Additional parking space for carers should be considered as required."</p>	<p>New homes will be built in accordance with parking standards set out in Appendix A of the Development Management Policies.</p> <p><u>No Proposed Change</u></p>
91	7	Garden City Estates Residents Association	Paragraph 5.74	<p>Consider that the current document does not take into account the need to deliver 'Lifetime Homes' i.e. homes which will meet the needs of residents throughout their lifetime including policies to secure lifetime mobility for residents. Suggest the inclusion of a new policy to read 'New housing needs to be built to lifetime</p>	<p>Paragraph 5.74 of the Plan refers to the need to meet Lifetime Home standards.</p> <p>New homes will be built in accordance with parking standards set out in Appendix A of the Development Management Policies.</p>

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				homes standards and have at least 1 car park space allotted to it to ensure that the accommodation can be used by those who need assisted living'.	<u>No Proposed Change</u>
Chapter 6: Environmental Improvements					
63	3	Rapleys LLP on behalf of Cedarwood Asset Management	DMEI1	Consider that it should be an "aspiration" rather than a "requirement" for a minimum of BREEAM "Very Good", in order to allow for cases to be considered on their own merits.	The requirement to meet a BREEAM standard of 'Very Good' is considered to be consistent with the requirements of the London Plan. <u>No Proposed Change</u>
70	6	Nathaniel Lichfield & Partners on behalf of British Airways	DMEI1	Policy DMEI1 (Sustainable Design Standards) requires non-residential development to achieve a minimum of 'Very Good' under the relevant BREEAM assessment. There may be circumstances where this BREEAM level cannot be achieved. Additional wording should be added to the policy to state that this requirement need not be met where reasoned justification can be provided.	Policy DMEI1 (Sustainable Design Standards) is considered to be in accordance with Policy 5.3 of the London Plan and the Mayor's Sustainable Design and Construction SPG. Most boroughs require buildings to meet a BREEAM standard of 'Very Good'. <u>No Proposed Change</u>
58	1	Greater London Authority	DMEI2 DMEI3 DMEI6 SEA1	a) Overall, consider draft plan to be in general conformity with the London Plan. b) Suggest revised wording for DMEI2 (Reducing Carbon Emission) to ensure emphasis is on developments that can genuinely not meet the target on-site. Consider reference to 'current allowable solution cost' as ambiguous and request that policy should make clear how carbon is priced. Suggest clarifying the source of load reduction	a) Support noted and welcomed. <u>No Proposed Change</u> b) The Policy will be amended to reflect the GLA's suggestions. c) This Policy goes further in requiring not just new development to be water neutral but alterations and refurbishments to aim for water neutrality as well.

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				<p>targets/percentages set out in DME12.</p> <p>c) Point out misinterpretation in DME16 (Water Efficiency in Non-Residential Developments) of paragraph 5.62 of London Plan with regards to water neutrality.</p> <p>d) Suggest identifying the Regionally Important Geological site in Hillingdon on the Policies Map and including relevant policy.</p> <p>e) Point out that the draft FALP includes a higher annual housing target and that the Local Plan Part 1 will need to be reviewed following adoption of the FALP.</p> <p>f) Suggest that net change in MOL, Green Belt and Green Chain land is included.</p> <p>g) Suggest that paragraph 4.11 in revised to make clear that Prologis Park is a strategically significant industrial location.</p> <p>h) Support the designation of Stonefield Way and North Uxbridge as SILs and raise no objection to the de-designation of the Cape Boards site.</p>	<p><u>No Proposed Change</u></p> <p>d) The Policies Map will be amended to identify designated Regionally Important Geological sites.</p> <p>e) The content of the FALP is noted. The Local Plan Part 2 will be updated to include reference to Hillingdon's revised housing target contained in the FALP.</p> <p><u>Proposed Change</u></p> <p>Review annual housing target and the Local Plan Part 1 following adoption of the FALP to be in conformity with the London Plan.</p> <p>f) The comments regarding the Green Chain and Green Belt are noted.</p> <p><u>Proposed Change</u></p> <p>A table showing the net change in MOL, Green Belt and Green Chain land will be inserted.</p> <p>g) Prologis Park will be referred to in the Plan as a Strategic Industrial Location.</p> <p><u>Proposed Change</u></p> <p>Revise wording of paragraph 4.11 to read '<i>...has been designated as a strategically significant industrial location as part of the Hayes Industrial Area</i>'.</p> <p>h) Support noted and welcomed.</p>
37	1	D.K. Symes	DME11	Operational activities, which include 'mineral development', should be excluded from these	DME11 (Sustainable Design Standards), DME12 (Reducing Carbon Emissions)

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		Associates	DMEI2 DMEI3 paragraph 6.60 MIN1 MIN3	<p>specific policies by means of a text insertion into paragraph 6.1 or a new paragraph.</p> <p>Suggest adding activities, namely mineral extraction and its associated / ancillary activities, and engineering operations into the Green Belt section to make clear that these activities are NOT inappropriate within the Green Belt and MOL. Suggests amending paragraph 6.60 to confirm the Council will ensure it has permitted reserves of at least 1.75 million tonnes (i.e. delete 'to a total' and replace with 'to at least').</p> <p>Are supportive of sites identified in MIN1 (Safeguarded Areas for Minerals), but suggest entitling Policy 'Preferred Areas for Minerals' to reflect advice in NPPF. As currently worded MIN3 (Prior Extraction) does not reflect NPPF Guidance at paragraph. 143 bullet point 5 and should be reworded to make clear that if there is a recognised need for the non-mineral development that prior extraction will not result in the site being rendered unsuitable for the non-mineral development.</p> <p>The introduction of the test of 'overriding' is not found in the NPPF and puts an unreasonable burden on the developer. MIN 10 (Noise Impacts) should refer to the Technical Guidance instead of MPG11 which was withdrawn when the NPPF was published.</p>	<p>and DMEI3 (Decentralised Energy) provide the default position. BREEAM standards apply to permanent non-residential buildings. Applicants unable to meet this Policy will need to provide material evidence, such as the temporary nature of the proposed development.</p> <p><u>Proposed Change</u> paragraph 6.6 add "<i>where feasible</i>" after "layout of development"</p> <p><u>Green Belt</u> - Any application for mineral extraction in the Green Belt will be able to justify appropriateness of development by referring to the NPPF.</p> <p><u>Proposed Change</u> <u>Paragraph 6.60</u> - LB Hillingdon is required by the London Plan 2011 Policy 5.20 Aggregates (D) (c) to make provision for a landbank apportionment up to 2031 of "at least 1.75 million tonnes".</p> <p><u>Proposed Change</u> In paragraph 6.60 replace "a total of" with "<i>at least</i>".</p> <p>MIN 1(Safeguarded Areas for Minerals) - NPPF paragraph 143 bullet point 3 requires local planning authorities to "define Minerals Safeguarding Areas" in preparing Local Plans. MIN 1 is titled</p>

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					<p>"Safeguarded Areas for Minerals" in accordance with the NPPF.</p> <p><u>No Proposed Change</u></p> <p>Policy MIN 3 (Prior Extraction) refers specifically to the sites listed in Policy MIN 1(Safeguarded Areas for Minerals). Bullet points i) ii) and iii) provide circumstances where prior extraction will not be required, in line with NPPF paragraph 143 bullet point 5 "where practicable and environmentally feasible".</p> <p><u>No Proposed Change</u></p> <p>MIN 10 (Noise Impacts) refers to outdated national policy guidance</p> <p><u>Proposed Change</u></p> <p>Replace "MG11" with "<i>Planning Practice Guidance</i>"</p>
26	1	Nexus Planning on behalf of Hillingdon Hospital NHS Foundation Trust	Paragraph 6.16	Paragraph 6.16 is contrary to NPPF paragraph 89. Suggest rewording paragraph 6.16 to include 'unless they qualify as one of the exceptions outlined in paragraph 89 of the NPPF.	<p>Residential uses would constitute inappropriate development in the Green Belt. As such there is no inconsistency between paragraphs 6.14 and 6.16 of the Development Management Policies.</p> <p>Officers note the provisions for infill development in the NPPF but do not consider that large numbers of residential units would meet this provision.</p> <p>Furthermore, it is unlikely that residential units would be considered as</p>

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					appropriate infill within the boundaries of an operational hospital site. <u>No Proposed Change</u>
78	2	Nexus Planning on behalf of East and North Hertfordshire Trust	Paragraph 6.16	<p>Conclude that paragraph 6.16 as currently drafted does not comply with paragraph 89 of the NPPF, which lists exceptions to inappropriate development in the Green Belt.</p> <p>Note that exceptions set out in paragraph 6.14 are not consistent with paragraph 6.16.</p> <p>Suggest amending paragraph 6.16 to read "New dwellings are inappropriate development in the Green Belt and Metropolitan Open Land unless they qualify as one of the exceptions outlined in paragraph 89 of the NPPF.</p> <p>Where dwellings already exist, alterations and extensions will be acceptable, provided they do not result in disproportionate additions over and above the size of the original building."</p>	<p>Residential uses would constitute inappropriate development in the Green Belt. And as such there is no inconsistency between paragraphs 6.14 and 6.16 of the Development Management Policies.</p> <p>Officers note the provisions for infill development in the NPPF. However, such development should be appropriate to its location and setting. It is unlikely that residential units would be appropriate infill on the hospital site.</p> <p><u>No Proposed Change</u></p>
41	3	DP9 on behalf of Royal Brompton and Harefield NHS Trust	DMEI4	Harefield Hospital is a long established site in the Green Belt and it is important that the Local Plan does not inhibit its growth. Feel that draft policy fails to reflect advice in the NPPF, particularly in relation to infilling.	<p>Any proposals for infilling will be assessed in accordance with advice contained in the NPPF.</p> <p><u>No Proposed Change</u></p>
56	7	Heathrow Airport Ltd	DMEI4, DMEI5, DMEI6 Paragraph number 2.33, 8.49	With these policies in place, coupled with the strength of adopted and tested national policy on Green Belt development, HAL does not consider that the risk of Green Belt encroachment is an adequate reason to prevent non-airport related development on airport land. Request that references to airport development encroaching on the Green Belt	<p>It is considered reasonable to include such references to protect the Green Belt.</p> <p><u>No Proposed Change</u></p>

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				due to non-airport uses on airport land should be removed.	
71	10	London Wildlife Trust	Paragraph 6.26	Generally support wording, but suggest the addition of the Wildlife Trust to the listed stakeholder partners. London Wildlife Trust is currently working closely with the Environment Agency on river enhancement projects in Hillingdon.	Support noted and welcomed. <u>No Proposed Change</u>
71	1	London Wildlife Trust	DMEI5	Consider that the Policy DMEI5 (Development in Green Chains) should be worded more strongly to read that development will be resisted unless' instead of will only be supported if.	With a limited number of exceptions, policies in the Plan have been written in a positive light to reflect the presumption in favour of sustainable development contained in the NPPF. This means that policies state that development will, rather than will not be allowed, subject to certain criteria. Officers consider Policy DMEI5 to be sufficiently strong and clear. <u>No Proposed Change</u>
98	1	Environment Agency	DMEI5	Support paragraph 6.19 and Policy DMEI5, but feel that the Policy could be stronger by requiring that developments not only reinforce the linkages between existing Green Chains, but also create new green infrastructure wherever possible to provide new areas of habitat and amenity space for people.	New Green Chains will be identified on the basis of appropriate evidence. <u>No Proposed Change.</u>
86	3	Eastcote Residents Association	DMEI5, Green Belt, MOL, Green Chains	The wording of Policy DMEI5 (Development in Green Chains) should be amended to precisely reflect the Local Plan Part 1 Policy EM2 Green Belt, Metropolitan Open Land and Green Chains). Also support the submission by Lesley Crowcroft, Eastcote Conservation Panel	With a limited number of exceptions, policies in the Plan have been written in a positive light to reflect the presumption in favour of sustainable development contained in the NPPF. This means that policies state that development will

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				regarding changing the status of various green spaces in the Eastcote/Ruislip area	rather than will not be allowed, subject to certain criteria. Officers consider Policy DMEI5 (Development in Green Chains) to be sufficiently strong and clear. <u>No Proposed Change</u> Support for Eastcote Conservation Panel's representation noted.
6	1	Brian Collins	DMEI5	Urges the Council to retain the Green Chain designation for Pinn Meadows and to keep the existing Green Chain policy to give the greatest possible protection from future development.	Metropolitan Open Space designation offers more protection to green spaces than Green Chains designation. <u>No Proposed Change</u>
71	8	London Wildlife Trust	DMEI6 , paragraph 6.20	Consider that the explanatory text to Policy DMEI6 (Development in Green Edge Locations) should be more specific as to locations covered. The list of locations should also specifically include Green Chains, Sites of Importance for Nature Conservation, and Nature Reserves.	Paragraph 6.20 explicitly refers to Green Belt, Metropolitan Open Land, Green Chains and "other green spaces" which covers all other green spaces not specified such as Nature Reserves. Agree that Policy DMEI6 could include references to Green Chains, Sites of Importance for Nature Conservation and Nature Reserves to provide clarity. <u>Proposed Change</u> In Policy DMEI1 add: <i>"Green Chains, Sites of Importance for Nature Conservation, Nature Reserves"</i> after "Metropolitan Open Space".
71	9	London Wildlife Trust	DMEI6, paragraph 6.21	Suggest that the explanatory text, including the landscaping requirement should specifically	Paragraph 6.21 - Policy DMEI6 requires techniques to enhance biodiversity and

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				refer to biodiversity enhancements.	<p>applies to all development proposals which would include those in Green Edge Locations. This could be made clearer in the supporting text.</p> <p><u>Proposed Change:</u></p> <p>Add the following to the supporting text:</p> <p><i>All new development proposals in 'green edge' locations will be expected to secure a sustainable design and layout, including incorporating techniques that enhance biodiversity as set out in Policy DME11.</i></p>
71	2	London Wildlife Trust	DME17	Welcome and support Policy DME17 (Development of Land Affected by Contamination)	<p>Support noted and welcomed.</p> <p><u>No Proposed Change.</u></p>
71	3	London Wildlife Trust	DME18	Policy DME18 (Waterside Development) should make additional reference to biodiversity improvements in relation to rivers and canals. Suggest adding 'and biodiversity' after 'waterside environment' in the 5th line of the Policy.	<p><u>Proposed Change</u></p> <p>Add "and biodiversity" to Policy DME18, 2nd paragraph:</p> <p>Development located in or adjacent to watercourses should enhance the waterside environment and biodiversity by demonstrating a high design quality which respects the historic significance of the canal and character of the waterway and provides access and improved amenity to the waterfront.</p>

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98	2	Environment Agency	DMEI8	<p>The Policy is sound but would be more effective if some of the supporting text to the policy was contained within the policy itself.</p> <p>The Waterside Development Policy offers the opportunity to set out the main principles that applicants need to achieve, but the policy doesn't clearly set this out in its current form.</p> <p>The Agency welcomes the specific requirements developments are expected to achieve in paragraph 6.31, but recommend these are included within Policy DMEI8 (Waterside Development). Also recommend the policy requires developments to (wherever feasible) restore and naturalise rivers in accordance with the actions proposed within the Thames River Basin Management Plan, and that S106 contributions may be sought to achieve this if restoration cannot be achieved on site.</p> <p>It is strongly recommended that the Policy highlights the importance of incorporating Sustainable Drainage Features alongside waterways. Welcome the reference to expecting development to contribute to improvements to biodiversity improvements to the canal, but recommend this is extended to all types of watercourse and highlight the use of native planting and the removal of non-native species and to minimise light spill on waterside corridors.</p> <p>The Policy should include specific aspirations from proposed developments along these tributaries including the resolution of</p>	<p>Discussions will take place with the Environment Agency to confirm the exact wording that they would like to see in the Policy.</p>

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				misconnections.	
98	3	Environment Agency	DME10	<p>The recommendations and development principles from the SFRA and SWMP should directly inform Policy DME10 (Management of Flood Risk) so it is clear what developments in flood risk areas should be achieving to reduce the risk of flooding. It is recommended that:</p> <p>a) the wording is amended to reflect the fact that sites within Flood Zones 2, 3a and 3b will be required to pass the sequential test before submitting a Flood Risk Assessment; and</p> <p>b) 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 so that more vulnerable developments are placed in the least risky areas of the site.</p> <p>Further suggest considering how windfall sites, not included in the site allocations, will be sequentially tested and that there is additional text to make it clear that the LLFA will be responsible for assessing flood risk in critical drainage areas.</p> <p>It is unclear in what type of scenario it is envisaged that developments may make contributions in addressing surface water flood risk. Further information should be provided on this aspect of the Policy.</p> <p>Recommend that the Policy requires development to minimise the vulnerability of the development to flood risks through design and layout. In addition flood storage areas should be protected and provided for wherever</p>	<p>Policy DME10 (Management of Flood Risk) is informed by the SFRA and SWMP which is referenced in the associated wording.</p> <p><u>Proposed Change</u></p> <p>Site Allocations document informed by the SFRA should have reference to the SFRA and associated flood risk information within it to make it clearer.</p> <p>Although sequential test wording should not just repeat NPPF it is agreed that it should be made clearer in the Policy that for any windfall sites an agreed sequential test and area for the sequential test agreed early prior to any review of the detail of the FRA taking place.</p> <p>Roles and responsibilities on who reviews what is not appropriate for inclusion into the Policy. It is contained within the SFRA.</p> <p>Agree changes to the offsite contributions should be for all flood risks.</p> <p>Future flood risks and climate change for events over design standard.</p> <p>No site allocations are next to flood defences, therefore this is a comment for windfall sites. However agree to amend Policy to reference defences in last paragraph to demonstrate that the</p>

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				possible. Where development is proposed next to flood defences the applicant is expected to demonstrate that the defence would be adequate for the lifetime of the scheme. Where required, they are replaced or repaired to ensure this is the case.	risk level to the site is managed for the foreseeable future.
98	5	Environment Agency	DME11	This Policy has very strong requirements for the use of SuDs and it is positive that Policy 5.13 of the London Plan has been used as a framework for demonstrating an appropriate SuDs system. Suggest considering: a) if the same standard should be applied to all development within critical drainage areas b) liaising with Newham who are looking at this issue and drafting up a policy approach. c) encouraging developments to incorporate multiple SuDs.	Support noted and welcomed <u>Proposed Change</u> Amend Policy so that all developments not including household developments should reduce run off to greenfield run of rates.
98	6	Environment Agency	DME12	The Agency is pleased to see a commitment to improving water quality. Requiring developers to use SuDs will contribute to improving water quality associated with urban diffuse pollution, which we would encourage the promotion of, but is unlikely to have contribute significantly in the reduction of phosphates. Have concerns that it could be very onerous for applicants to demonstrate the requirements set out in the Policy	<u>Proposed Change</u> Discussions will take place with the Environment Agency to confirm the exact wording that they would like to see in Policy DME112 (Water Quality).

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				<p>Suggest that the Policy is altered to remove the load reduction targets and instead encourages developers to incorporate a robust SuDs management train to address the issues of urban diffuse pollution.</p> <p>Further suggest that development management policy could expect applicants to submit a Water Framework Directive Assessment or as part of an Environmental Statement.</p>	
98	7	Environment Agency	DME17	<p>Policy DME17 (Development of Land Affected by Contamination) is sound and prepared in accordance with the duty to cooperate, legal and procedural requirements.</p> <p>The Policy itself does not explicitly outline what a developer is expected to submit as part of an application on a site where contamination is known or suspected.</p> <p>The Policy should also encourage the re-use of brownfield sites to ensure remediation where necessary and to prevent development from being adversely affected by the presence of unacceptable levels of soil pollution.</p>	<p>The Policy states the applicant must have at the planning application stage 'demonstrated that contamination issues have been adequately assessed and the site can be safely remediated so that the development can be made suitable for the proposed use.' It is not the intention of the Policy to list the documents that are expected to be submitted as part of an application on a site where contamination is known or suspected. What is required at the planning application stage could vary from site to site, but it should be sufficient to determine the application. Details of what is required and what needs to be submitted is provided in the supplementary planning guidance document on land contamination, which is referred to in paragraph 6.53.</p> <p>The role of developers and requirements, former uses etc. are set out in paragraphs 6.51 to 6.53 and in more detail in the Supplementary</p>

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					<p>Planning Guidance document on land contamination.</p> <p>Noted.</p> <p><u>Proposed Change</u></p> <p>Amend explanatory paragraphs to make the above clearer. Also make reference to the National Planning Practice Guidance, which is a live document and could change.</p> <p>Update the site allocation and designation table to refer to what would be the minimum requirement, which can change based on what contamination is found and refer to in the Development Management Policies. The following text is suggested:</p> <p><i>"In addition to the National Planning Policy Guidance available online, the Council has adopted a Supplementary Planning Guidance document on Land Contamination which is available on the Council website. This provides detailed guidance on information required to be submitted with the planning application. The Council's approach to land contamination and its administration during the course of the development will be guided by this document and relevant up to date best practice guidance. Sufficient information on contamination and remediation to help determine the application needs</i></p>

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					<p><i>to be provided with the application."</i></p> <p>This is a land contamination policy, and therefore 'brownfield' as a term has not been used. It should be noted that all allocations for new homes are located on 'previously developed land' or 'brownfield' land; therefore the Policy is used to encourage the reuse of previously developed sites. There is more information on the term in the Supplementary Planning Guidance document on land contamination.</p> <p>The Policy does indicate necessary remedial works are implemented and the development needs to be made suitable for use, which is required to 'prevent development from being adversely affected by the presence of unacceptable levels of soil pollution.'</p> <p>The protection of groundwater is addressed in Policy DME113 (Protection of Groundwater Resources). The land contamination policy indicates remediation of controlled waters may also be necessary as part of any development works.</p> <p>Suggest reference is made to the Environment Agency's guidance on groundwater when the Supplementary Planning Guidance on land contamination is updated to an Supplementary Planning Document.</p> <p><u>No Proposed Change</u></p>

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63	1	Rapleys LLP on behalf of Cedarwood Asset Management	DMEI18	Consider that the policy DMEI18 (Air Quality) should be amended to confirm that each case should be "taken on its own merit".	<p>The Policy sets out the general principles that new development in the borough will need to comply with. It is not considered that there a need to specify that development will be taken on its own merits.</p> <p><u>No Proposed Change</u></p>
70	7	Nathaniel Lichfield & Partners on behalf of British Airways	DMEI18	<p>Policy DMEI18 (Air Quality) potentially places an embargo on all development within the surrounding location of Heathrow Airport to the clear detriment of the local economy and the operation of Heathrow Airport.</p> <p>It is unreasonable to require developments that are in areas already above the national and European regulated levels to demonstrate reductions in emissions to ensure air quality levels for existing receptors are met. Unless it is clear that this policy does not unduly restrict development it should be deleted.</p>	<p>The NPPF states in paragraph 124 that planning policies should sustain compliance with and contribute towards meeting EU limit values or national objectives. It is proposed to reword Policy DMEI18 (Air Quality) to better reflect this. The Policy does not restrict development, it requires development to be appropriately mitigated and for it to contribute towards the improvement of air quality.</p> <p><u>Proposed Change</u></p> <p>Reword Policy DMEI18 to read:</p> <p><i>Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with, and contribute towards meeting, EU limit values and national objectives for pollutants. Proposals should, as a minimum: be at least air quality neutral; include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; actively contribute towards the continued improvement of air</i></p>

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					<i>quality, especially within the AQMA.</i>
53	17	Cllr Janet Duncan	DMEI10	<p>Considers that flood risk and increasing air pollution in the borough require robust measures at all levels to address these issues.</p> <p>Proposes new paragraph in Policy DMEI10 (Management of Flood Risk) to read</p> <p>"Programmes of tree planting will be supported in streets and public places to help reduce flood risk and trap air pollution."</p>	<p>Officers recognise the issues associated with flooding and air quality in the borough. The provisions proposed to address these issues have been developed in discussion with specialist officers.</p> <p><u>No Proposed Change</u></p>
54	3	Thames Water	DMEI10	<p>Supports the inclusion of Policy DMEI10 (Management of Flood Risk) However it is not considered to be effective as there is no reference to sewer flooding. Any flood risk policy should therefore include reference to sewer flooding and an acceptance that flooding could occur away from the flood plain as a result of development where off site infrastructure is not in place ahead of development. Request that reference is made to all forms of flooding, including sewer flooding.</p>	<p>Support for Policy DMEI 10 noted.</p> <p>The policy itself refers to all sources of flooding and there is no need to include specific reference to sewer flooding. Additional references to all types of flooding could be added to the supporting text.</p> <p><u>Proposed Change</u></p> <p>Remove "including surface water flooding" from policy. Add all types of flooding to paragraph 6.41.</p>
91	13	Garden City Estates Residents Association	DMEI 10	<p>Flood risk must be alleviated. Wherever possible as much green space around new development should be provided.</p>	<p>Agree. There should be a reference to the management of climate change and future flood risk which should support the inclusion of green spaces where possible for this purpose.</p> <p><u>Proposed Change</u></p> <p>Include reference to the management of climate change and future flood risk. Support the inclusion of green spaces</p>

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					where possible for this purpose.
36	3	Rapleys LLP on behalf of HPHA Ltd	DMEI11	Suggest amending Policy DMEI11 (Water Management (SUDS) to confirm that measures will be informed by site and, development specific considerations.	The appropriate choice of SUDS will always be informed by site-specific considerations. It will be through the drainage assessment that developers have an opportunity to provide this information. <u>No Proposed Change</u>
56	8	Heathrow Airport Ltd	DMEI11	The expectations of Policy DMEI11 (Water Management) are also unclear in terms of the requirement to 'demonstrate an integrated approach to surface water runoff'. The policy needs to be more specific in terms of its expectations so that the development requirements are fully understood. Similarly, no definition of greenfield run off rate is provided in the policy. This needs to be clearly defined.	It is not considered that the policy is too prescriptive. Some representors have stated that the policy is too prescriptive. <u>No Proposed Change</u>
63	2	Rapleys LLP on behalf of Cedarwood Asset Management	DMEI11	Consider that the policy DMEI11: (Water Management) should be amended to confirm that each case should be "taken on its own merit".	The appropriate choice of SUDS will always be informed by site-specific considerations. It will be through drainage assessment that developers have an opportunity to provide this information. <u>No Proposed Change</u>
65	6	Nathaniel Lichfield & Partners on behalf of Purplexed LLP	DMEI11	Consider that policy DMEI11 (Water Management) is not reasonable as it does not provide enough flexibility for sites where it is not feasible to provide greenfield runoff rates.	<u>Proposed Change:</u> Officers will review water management policies to ensure sufficient flexibility in accordance with the NPPF. Amended policies will be issued for a second round

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					of consultation.
56	9	Heathrow Airport Ltd	DMEI12	It is not considered that policy DMEI12 (Water Quality) should be applied to Heathrow considering that all of the Airport's surface water flows are regulated and licensed by the Environment Agency.	The wording of this policy will be discussed with the Environment Agency. Further amendments may be made in the light of their comments. <u>No Proposed Change</u>
65	5	Nathaniel Lichfield & Partners on behalf of Purplexed LLP	DMEI12	Policy DMEI12 (Water Quality) is too descriptive and not considered to be appropriate for a local plan policy. Request that the policy be deleted or a less detailed policy drafted that seeks to ensure that developments do not have an adverse impact on water quality.	<u>Proposed Change:</u> Officers will review water management policies to ensure sufficient flexibility in accordance with the NPPF. Amended policies will be issued for a second round of consultation.
65	8	Nathaniel Lichfield & Partners on behalf of Purplexed LLP	DMEI15	Requiring developers to achieve the highest target possible for water efficiency in policy DMEI15 (Water Efficiency) is neither realistic nor achievable.	The policy is intended to refer to the achieving the highest possible rating for the water efficiency section in the Code for Sustainable Homes, not for all the sections which is realistic and achievable. <u>Proposed Change</u> Amend policy to read: <i>"..and aim to achieve the highest possible rating for the water efficiency section of the Code for Sustainable Homes (CSH)"</i>
74	2	DLP Planning on behalf of McGovern Brothers	DMEI17	Broadly support Policy DME17 (Redevelopment of Land affected by contamination), but suggest that the wording is amended to include reference to financial viability. Suggest insertion "taking account of	Support noted and welcomed. Applicants proposing the loss of features of bio-diversity value will be required to meet the provisions of

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		(Haulage) Limited		the overall financial viability of a proposed scheme".	DME17, regardless of the financial viability of a proposed scheme. <u>No Proposed Change</u>
82	3	Deloitte Real Estate on behalf of CEMEX Properties Ltd	DME17	Broadly support Policy DME17 (Development of Land Affected by Contamination), but suggest that the wording is amended to include reference to financial viability. The policy should be worded to include the wording 'taking account of the overall financial viability of a proposed scheme'.	Regardless of viability considerations the Council would not permit development on a site which is subject to contamination. <u>No Proposed Change.</u>
53	18	Cllr Janet Duncan	DME18	Suggests new bullet heading for policy DME1 18 (Air Quality) (i) New housing will be resisted on sites and in areas where air quality is above the legally safe limit for human health; and new bullet heading (ii) Trees which trap air pollution will be part of landscaping schemes for development proposals.	<u>Proposed Change</u> Reword Policy DME18 to read: <i>Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with, and contribute towards meeting, EU limit values and national objectives for pollutants. Proposals should, as a minimum: be at least air quality neutral; include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; actively contribute towards the continued improvement of air quality, especially within the Air Quality Management Area.</i>
56	10	Heathrow Airport Ltd	DME18	Support policy DME18 (Air Quality) insofar as it seeks air quality neutral development proposals, but question wording of the second	<u>Proposed change:</u> Reword Policy DME1 18 to read:

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				<p>sentence which suggests that new development proposals in areas exceeding EU limit values will be required to demonstrate reductions in emissions to meet those values. Suggest rewording to require that development proposals within areas of excess should aim to achieve air quality improvements over the baseline situation or at the very least aim to be air quality neutral.</p>	<p><i>Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with, and contribute towards meeting, EU limit values and national objectives for pollutants. Proposals should, as a minimum: be at least air quality neutral; include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; actively contribute towards the continued improvement of air quality, especially within the AQMA.</i></p>
65	4	Nathaniel Lichfield & Partners on behalf of Purplexed LLP	Policy DMEI18	<p>Feel that it is unreasonable to require developments that are in areas already above the national and European regulated air quality levels to demonstrate reductions in emissions to ensure air quality levels for existing receptors are met. These matters may be out of the control of developer, making the policy un-implementable.</p>	<p>The NPPF states in paragraph 124 that planning policies should sustain compliance with and contribute towards meeting EU limit values or national objectives. It is proposed to reword Policy DMEI 18 to better reflect this. The policy does not restrict development, it requires development to be appropriately mitigated and for it to contribute towards the improvement of air quality.</p> <p><u>Proposed Change:</u></p> <p>Reword Policy DMEI 18 to read:</p> <p><i>Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with, and contribute towards meeting, EU limit values and national objectives for pollutants. Proposals should, as a minimum: be at least air</i></p>

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					<i>quality neutral; include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; actively contribute towards the continued improvement of air quality, especially within the AQMA.</i>
91	14	Garden City Estates Residents Association	DMEI18	Air quality is an issue of concern to the residents of West Drayton. Traffic pollution is increasing and there are some areas between the wards of Yiewsley and West Drayton where pollution levels are only marginally under safe levels. It is important therefore for development not to increase pollution levels and that new development which uses HGVs is not built in areas where air quality is already poor. Suggest adding 'New housing will be resisted on sites and in areas where air quality is above legally safe limits for human health.	<p>Policy DMT7 - Freight is intended to ensure that impacts from freight movement are minimised. Recommend amendment to policy to strengthen and clarify.</p> <p>Proposed Change</p> <p>POLICY DMT7: Freight</p> <p>(A) Development proposals that generate a high number and/or intensity of transport and movements such as those for relating to logistics and distribution, or freight, will be required to demonstrate that they are conveniently locate to enable (i) direct routing to the strategic road network; and Proposals must ensure that there is (ii) no deleterious impact on residential areas, local amenity or the highway network.</p>
16	4	Matthews and Son LLP on behalf of Henry Streeter Ltd	Paragraph 6.58	<p>Paragraph 6.58 recognises that the Borough is a major source of recycled construction materials.</p> <p>Whilst the LAA identifies certain aggregates recycling facilities in the Borough the draft Plan does not appear to recognise Policies 5.18 and</p>	The (emerging) West London Waste Plan safeguards all existing waste recycling sites and supports the development of aggregates recycling facilities through policies such Policy WLWP1 - Provision of New Waste Management Facilities. This states

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				5.20 of the London Plan, These Policies should be recognised in contributing to the delivery of the Plan.	<p>that:</p> <p>"Non apportioned Waste</p> <p>Development of management capacity will be supported in principle that contributes to net self sufficiency for:</p> <p>a) Construction, Demolition and Excavation Waste in accord with the waste hierarchy with particular support for the production of material suitable for use as substitutes for virgin materials such as recycled aggregates".</p> <p><u>Proposed Change:</u></p> <p>Officers agree that policies should be included to reduce the environmental impact of aggregates extraction.</p> <p>Insert the following policy:</p> <p><u>Policy number to be determined</u></p> <p><i>To reduce the environmental impact of aggregates, the Council will make appropriate use of planning conditions dealing with restoration, aftercare and re-use of mineral sites including the use of suitable construction, demolition and excavation waste to restore original ground levels.</i></p> <p>Agree that a policy for safeguarding of railheads is required as in the London Plan at Policy 5.20.</p> <p><u>Proposed Change:</u></p> <p>Insert the following paragraph and</p>

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					<p>policy:</p> <p>Aggregates railheads</p> <p><i>6.xx There are four operational aggregates railheads in the borough used for importing and exporting materials, at Hayes, West Drayton, West Drayton Tavistock Road and West Ruislip. Combined, the railheads import approximately 905,000 tonnes of crushed rock per year. The London Plan requires the safeguarding of railheads with existing or potential capacity for aggregate distribution. Railhead safeguarding is necessary for the proper maintenance of a managed aggregates supply system and will support the efficient transport and distribution of aggregates, particularly in reducing reliance on road transport.</i></p> <p><u>Policy number to be determined</u></p> <p><i>The Council will safeguard the existing railheads at Hayes, West Drayton, West Drayton Tavistock Road and West Ruislip from alternative use. Applications for alternative uses will need to demonstrate that there is no real prospect of a transport use continuing or being reintroduced on the site.</i></p> <p><i>Proposals for new railhead capacity</i></p>

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					<p><i>will be supported.</i></p> <p><i>Proposed development adjacent to the railheads should not undermine the continued viability of the railhead and will need to demonstrate that acceptable levels of noise, dust, light and air emissions derived from the existing railhead would be tolerable to the proposed development. Engagement with railhead owners in identifying necessary mitigation will be actively encouraged.</i></p>
16	2	Matthews and Son LLP on behalf of Henry Streeter Ltd	MIN 1 MIN 2	<p>Policy MIN1 only partially recognises the NPPF and NPPG and confuses the requirement to identify new sites for mineral extraction and to define Mineral Safeguarding Areas. This seems to be perpetuated from the Local Plan Part 1: Strategic Policies that incorporates references to 'Preferred Mineral Safeguarding Areas', which is not a defined term in the NPPF or the NPPG.</p> <p>Equally, the Local Aggregates Assessment describes these as 'Preferred Mineral Areas', all then being described in the Local Plan: Part 2 Development Management Policies (the DMP) as 'Mineral Safeguarding Sites.</p> <p>The Development Management document does not:</p> <ul style="list-style-type: none"> a) identify new sites but defines MSA and expects these to deliver the apportionment stated in paragraph 6.60 and 6.62., b) develop the requirements to develop Minerals Consultation Areas or show any on a 	<p>Local Plan Part 1: Strategic Policies - Map 8.6 is titled "Minerals Areas for Safeguarding" and the legend shows "Mineral Areas for Safeguarding". The review of the Local Plan Part 1 will address any conformity issues. Policy MIN 1 is called "Safeguarded Areas for Minerals" and it lists three sites or areas for safeguarding in accordance with NPPF paragraph 143. There is no requirement in the NPPF paragraph 143 or the NPPG to identify new sites.</p> <p>The Local Aggregates Assessment 2014 concludes that the borough has fully satisfied its obligation to make provision for the supply of land won sand and gravel aggregates in line with the London Plan provided the three safeguarded sites proposed in Local Plan Part 2 continue to be monitored as these sites will be needed for future mineral extraction.</p>

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				<p>plan.</p> <p>If the intention is that the defined MSAs deliver the Borough's allocation then the approach should be as set out in the NPPG and the NPPF where appropriate sites are identified. The plan is not deliverable because it fails to identify sites in accord with the relevant parts of NPPF/NPPG.</p> <p>Land south of Harmondsworth Quarry and north of the A4 as well as Land at Bedford Court should be identified as specific sites and the sites listed in MIN1 considered as Preferred Areas.</p> <p>The plan does not set out the most appropriate strategy when considered against the reasonable alternatives based on proportionate evidence and is not based on objectively assessed need. Suggest deleting MIN1 and MIN2 and replacing with a policy that establishes specific sites, Preferred Areas or Areas of Search.</p>	<p>The three safeguarded sites will yield a total of 4.75 million tonnes which is sufficient to meet the London Plan apportionment for 14 years therefore no further sites will be required.</p> <p><u>Proposed Change</u></p> <p>Replace the first paragraph in policy MIN 1 as follows:</p> <p>The Council will protect the following sites as preferred minerals safeguarded areas for the extraction of sand and gravel reserves.</p> <p><i>The following areas will be protected for the extraction of sand and gravel reserves</i></p>
16	5	Matthews and Son LLP on behalf of Henry Streeter Ltd	Paragraph 6.65	<p>Paragraph 6.65 is too simplistic and does not reflect societal demands for minerals which need to be balanced, amongst others, against the aspirations of local residents. Industry does not create any demand for minerals; it satisfies the needs of society.</p> <p>Would welcome justification for the approach to planning for mineral extraction set out in paragraph 6.65.</p>	<p><u>Proposed Change:</u></p> <p>Replace the first sentence of para 6.65 with the following:</p> <p><i>Minerals extraction in the borough is considered in broad terms to be an optimum compromise between societal demands for building materials and the aspirations of local residents who would prefer to see a cessation of quarrying.</i></p>

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16	3	Matthews and Son LLP on behalf of Henry Streeter Ltd	MIN4	The NPPF Paragraph 143 (bullet 6) states that in preparing Local Plans, LPAs should take into account the cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality. In this context the basis for Policy MIN4 is not clear and therefore cannot be consistent with National Policy, effective, justified or positively prepared. In particular evidence for the choice of 165 hectares should be provided together with the special factors that exempt the sites in MIN1. Suggest adding further justification for MIN4 or delete as appropriate.	Paragraph 6.65 refers to the detrimental effect on the local environment of working all remaining reserves simultaneously, "particularly through cumulative impact on the area south of the M4 motorway". <u>No Proposed Change</u>
98	4	Environment Agency	N/A	Are satisfied that an addendum to the SFRA has been carried out using the most up to date information and that the sequential test has been undertaken appropriately.	Support noted and welcomed. <u>No Proposed Change</u>
54	2	Thames Water	N/A	Requests the inclusion of a new policy regarding water and waste water infrastructure to serve new development and submit suggested wording consistent with Paragraph 156 of the NPPF and Policy 5.14 of the London Plan.	<u>Proposed Change</u> New policy provision to be included in the DMP requiring new development proposals to ensure there is sufficient capacity in the waste water network. The policy will apply to allocated and windfall sites. Wording to be consistent with paragraph 156 of NPPF and Policy 5.14 of the London Plan.
96	1	Friends of Lake Farm; Hayes Community Development Forum	DMEI 17 DMEI18 DMT 6	a) Consider that DMEI 18 (Air Quality) is an inadequate local interpretation of national policy and guidance and that local policy on air quality should be strengthened. b) Further note that Sustainability Appraisal Objective 'To improve air quality ...' has a	a) The re-wording of Policy DMEI 18 should address this concern. <u>Proposed change:</u> Reword Policy DMEI 18 to read: <i>Development proposals should</i>

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				<p>target 'Reversion of the AQMA' but feel this does not have sufficient clarity of meaning.</p> <p>c) Indications in the Local Plan Part 1 in relation to the use of biomass for AQMAs and an updated Air Quality SPD have not been taken account of in the Local Plan Part 2.</p> <p>d) Policy DMT6 (Vehicle Parking) and the associated schedule at Appendix A is not in conformity with the London Plan.</p> <p>e) Policies relating to nature conservation in the Plan are not consistent with national planning guidance and are not in conformity with the London Plan 2011. The Local Plan is being advanced without a clear and transparent evidence base for nature conservation.</p> <p>f) Designations do not accurately reflect the nature value of at least 2 significant open spaces, Lake Farm Country Park and Cranford Park. As the Biodiversity Action Plan (BAP) is not being progressed the Local Plan is not consistent with London Plan 2011's requirement that species/habitats protection and enhancement/extent is through BAP targets.</p> <p>g) Policy DME17 (Biodiversity Protection and Enhancement) is inconsistent with national guidance. Suggest revising the Sustainability Appraisal's Recommendation 1 to ensure that it requires a net environmental gain in line with NPPF.</p> <p>h) In the interests of nature conservation, the provision of public open space and accuracy,</p>	<p><i>demonstrate appropriate reductions in emissions to sustain compliance with, and contribute towards meeting, EU limit values and national objectives for pollutants. Proposals should, as a minimum: be at least air quality neutral; include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; actively contribute towards the continued improvement of air quality, especially within the Air Quality Management Area.</i></p> <p>b) The wording of the target for the Air Quality SA Objective in Appendix 2 will be changed from "reversion" to "revocation". This is a defined legal process under the local air quality management regime. Official revocation of the AQMA would occur when the local authority was satisfied that air pollution levels had been brought down to within the national objectives and EU limit value standards.</p> <p><u>Proposed change:</u></p> <p>Replace "reversion" to "revocation" in Target for SA Objective "To improve air quality standard that is acceptable for human and ecological health"</p> <p>c) Biomass - the Mayor's SPG on Sustainable Design and Construction sets out guidance on the implementation of air quality neutral assessments, as</p>

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				<p>the School Site 2 Lake Farm Hayes should be redrawn to fit the actual perimeter boundary of the school.</p> <p>i) Paragraph 7.29 of the Development Management Policies seeks to protect open space provision and promote the provision of new open spaces in the areas of deficiency identified in the Open Space Strategy, but such have not been brought forward in Local Plan Part 2 Atlas of Changes, Policies Map and Site Allocations and Designations. This is not in conformity with the London Plan 2011 Policy 7.18C.</p> <p>j) Despite commitment in the Local Plan Part 1, leisure and recreation sites have not been brought forward in Local Plan Part 2 and Quiet Areas have not been identified and protected in Local Part 2 either. Local Plan Part 2 also fails to consider local green space designations, provides no steer for neighbourhood planning and fails to set out arrangements for allocating the proportion of CIL receipts to local communities.</p> <p>k) Consider that the likely loss of employment sites may well be in excess of that predicted by the Employment Land Study and contrary to the London Plan's policies and SPG.</p>	<p>defined in the Council's Policy. With regard to energy sources, this establishes benchmarks for building emissions, which all new development must comply with. This sets emission standards for all new CHP and also includes biomass plant.</p> <p>Where compliance cannot be achieved, developers are required to prepare strategies to demonstrate how the excess will be mitigated on or off-site.</p> <p>Air Quality SPG update - the delay in updating the SPG has been due to the emerging relevant documents such as the new National Planning Policy Guidance, the Further Alterations to the London Plan and the relevant Mayor's SPGs. Once all are officially adopted the Council will prepare a timetable for the update of the Air Quality document to reflect up to date guidance.</p> <p><u>No Proposed Change</u></p> <p>d) Consider DMT6 - Vehicle Parking and Appendix A - car parking accords with London Plan Policy 6.13. The supporting text gives detailed background to the requirement.</p> <p><u>Proposed change:</u></p> <p>Amend Policy DMT6 and Cycle parking standards to refer to the cycling standards in the London Plan.</p> <p>e) The Council is confident in its approach to this issue. The Mayor of</p>

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					<p>London has not raised concerns regarding the Council's approach to the protection of nature conservation sites.</p> <p>f) The nature conservation value of sites is based on work being undertaken by the Mayor of London's London Ecology Unit. Further work to assess the status of SINC's will be undertaken in support of the Local Plan Part 2 documents prior to the public examination process.</p> <p><u>No Proposed Change</u></p> <p>g) Recommendations in the Sustainability Appraisal are considered to be sound.</p> <p><u>No Proposed Change</u></p> <p>h) Agree.</p> <p><u>Proposed Change:</u></p> <p>The school boundary will be redrawn to reflect the perimeter of the school site.</p> <p>i) Areas of open space deficiency are identified in the Open Space Strategy. This is referred to in the document and will be considered as a material consideration. There is not a specific requirement to identify these areas in the Local Plan Part 2</p> <p><u>No Proposed Change</u></p> <p>i) Proposed development in areas of deficiency identified in the Open Space Strategy will be encouraged to provide accessible open space. The Council will</p>

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					<p>ensure that proposals meet standards for amenity space as set out in the Plan in accordance with Policy DMCI 4. Policy DMCI 3 seeks to protect and enhance public open space provision.</p> <p><u>No Proposed Change</u></p> <p>j) Leisure and recreation provision is addressed in Chapter 7 of the Development Management Policies. The allocation of CIL funds is set out in it Regulation 123 list.</p> <p>k) The 2014 Employment Land Study Update identifies 18.5 ha that could be released to other uses over the plan period. The total amount of employment land to be released is broadly in line with the conclusions of the evidence base.</p>
Chapter 7: Community Infrastructure					
15	1	Crown Church	Paragraphs 7.2, 7.15, 7.16	<p>Seeks to ensure that faith groups and places of worship are clearly identified within any definition of community infrastructure, e.g. paragraph 7.2.</p> <p>Would also like to see 7.15 to be more strongly influenced by the London Plan's positive commitment to identify needs of faith groups and mechanisms to address these needs.</p> <p>Considers that the Council should show greater ambition to address the lack of provision for faith groups and make clearer the</p>	<p>Places of worship are included in the definition of community infrastructure and would be subject to the provisions of policies DMCI1 (Retention of Existing Community, Sport and Education Facilities) and DMCI2 (new Community Infrastructure) in the DMP.</p> <p>As stated in paragraph 7.16 the specific needs of faith should be raised through Hillingdon's Inter Faith Forum. The Council will assist in meeting these</p>

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				picture of how individual faith groups interact with the Council on these matters.	needs wherever possible. <u>No Proposed Change</u>
28		Sport England	DMCI 1	<p>Policy DMCI 1 (Retention of Existing Community Infrastructure) places an onus upon the applicant to demonstrate that the loss of existing facilities would not lead to a shortfall in provision.</p> <p>This is not in accordance with paragraph 73 of the NPPF and puts an undue onus on the applicant, who would need to carry out a borough-wide study to demonstrate such a case.</p> <p>The Council should undertake a Playing Pitch Strategy or Built Facility Strategy, which clearly assess existing and future sporting needs and identifies and names specific sites which are found to be surplus and thus appropriate for development. Part C (ii) seeks to address matter which should rightly be dealt with by Environmental Health. Request this part of the policy be deleted as it is unnecessary.</p> <p>Part C (iii) suggests that the loss of sporting facilities would be deemed acceptable if the redevelopment of the site would secure an over-riding public benefit. In the absence of a clear and robust evidence base, it will be difficult for the Council as decision maker on any planning application to assess the community benefit of the existing sporting use.</p> <p>Consider that the policy is therefore hugely subjective and creates uncertainty. Suggest rewording to read: "...the redevelopment of the site would secure an over-riding public sporting</p>	<p>Officers recommend that a Playing Pitch Strategy should be prepared prior to the examination of the Local Plan Part 2.</p> <p>An assessment of whether the loss of a facility would result in an over-riding public benefit will be assessed on a case- by case basis. Whilst there may be circumstances where a loss may be justified, the presumption to retain sporting facilities remains and therefore it is not considered necessary to remove this requirement.</p> <p><u>No Proposed Change</u></p>

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				benefit."	
53	19	Cllr Janet Duncan	DMC11	Considers that this policy DMC11 (Retention of Existing Community Infrastructure) is not worded strongly enough to protect existing facilities and should be amended to read: "Proposals involving ... will not be permitted unless ..."	With a limited number of exceptions, policies in the Plan have been written in a positive light to reflect the presumption in favour of sustainable development contained in the NPPF. This means that policies state that development will be allowed, rather than will not be allowed, subject to certain criteria. <u>No Proposed Change</u>
57	1	Savills on behalf of London Diocesan Fund	DMC11	Object to DMC11 (Retention of Existing Community, Sport and Education Facilities) on the basis that: a) the demonstration that there is no requirement for a building in continued community use because of the condition or location should be a test in itself to justify the loss of it b) the policy is unduly onerous and restrictive and contains mutually exclusive criteria c) one of the tests being satisfied is sufficient. Suggest revised wording for DMC11. Seek to include Ladygate Lane, Ruislip and Glovers Grove as a site allocation.	Policy DMC11 reflects the provisions of Policy C11 in the Local Plan Part 1 which seeks to resist the loss of community facilities. Officers are of the view that community infrastructure is important in promoting healthy communities and social cohesion and should be subject to a high level of protection. The policy sets out specific circumstances where the loss of community infrastructure will be allowed. These criteria are stringent, but are not considered to be inconsistent with the NPPF. <u>No Proposed Change</u>
91	1	Garden City Estates Residents Association	DMC11	The south of the borough has seen spaces for sport being used to deliver new housing. The situation is now that facilities for community, sport and education are insufficient to meet the needs of existing residents.	Policy DMC1 1 seeks to retain existing community, sport and education facilities. The need for community facilities on existing sites has been identified in the Site Allocations

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				No more existing facilities should be lost and the Local Plan Part 2 should reflect this. The Plan should strengthen policies in order to protect existing facilities. Policies should be strengthened to indicate that all existing Community, Sport and Education facilities will be protected from development.	document where appropriate. <u>No Proposed Change</u>
86	3	Eastcote Residents Association	Paragraph 7.27	Paragraph 7.27 on Page 109 refers to there being 16 Green Flag sites in the borough. Amendments should be made to reflect the actual number, which is 28 Green Flag sites and that Hillingdon has the highest number of Green Flags in the country.	The Local Plan will be amended to reflect the correct number of Green Flag sites in the borough. <u>Proposed Change</u> Paragraph 7.27 change "16" to "28"
53	20	Cllr Janet Duncan	DMCI8	Considers that there is evidence that CIL contributions are causing developers to reduce the provision of affordable housing in schemes. There is ambiguity as to which policy should take precedence. In view of the pressing need for affordable housing, it is proposed that housing provision be maximised. Suggests additional section to policy DMCI8 (Planning Obligations and Community Infrastructure) "D) Where CIL contributions reduce the provision of affordable housing on a site this should be reviewed to maximise the amount of affordable housing provided."	CIL contributions are fixed and cannot be offset against affordable housing contributions. <u>No Proposed Change</u>
91	2	Garden City Estates Residents Association	DMCI8	There is evidence that as a result of CIL charges, developers are reducing the level of affordable housing contributions. Policies need to be robust so that CIL will not be affecting social/affordable housing allocations on new development.	CIL contributions are fixed and cannot be offset against affordable housing contributions. Policy DMH7: Provision of Affordable Housing has been written as strongly as possible to ensure that an appropriate level of affordable housing is delivered.

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					<u>No Proposed Change</u>
91	10	Garden City Estates Residents Association	Chapter 7: Community Infrastructure	<p>The plan does not take into account the experience of local people where new housing has been delivered over the past decade and where necessary infrastructure to support the new residents has not been put in place.</p> <p>Suggest adding a new policy to read 'Increase in housing provision should be accompanied by appropriate increase in health, education, community recreational and leisure facilities before occupancy of new housing in order to ensure that there is no unacceptable and undue pressure on existing residents.' There is already a deficiency in respect to services and the gap needs to be filled before additional development proceeds.</p>	<p>As part of the production of the Local Plan Part 1 the Council produced a Strategic Infrastructure Plan, setting out the amount and type of infrastructure needed to support growth in the borough over the 15 year Plan period.</p> <p><u>Proposed Change</u></p> <p>The Council will update the Local Plan Part 2 to reflect the Council's latest position relating to schools and healthcare facilities.</p>
Chapter 8: Transport and Aviation					
41	2	DP9 on behalf of Royal Brompton and Harefield NHS Trust	DMT1	Consider threshold in Policy DMT 1 (Managing Transport Impacts) for transport assessment is unduly restrictive and seek clarification on how Table 8 applies to mixed use development.	<p>The requirement for a travel assessment and travel plan to ascertain car parking numbers together with cycle parking and provision for emergency and service vehicles is considered appropriate for a hospital. Policy DMT6 allows variance to this requirement depending on the size and impact of the proposal.</p> <p>Appendix A - Table 1 a) no 2 - " Multiple users of parking facilities" addresses multiple users and mixed use.</p> <p><u>No Proposed Change</u></p>

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17	1	Highways Agency	DMT1, DMAV2, paragraph 8.12	<p>The HA would be concerned if any material increase in traffic were to occur on sections of the strategic road network as a result of development in Hillingdon.</p> <p>Suggest that Policy DMT1 (Managing Transport Impacts) should refer specifically to the strategic road network in point (v), but are generally content with the rest of the wording for the policy.</p> <p>The Local Plan should not to rely on future transport assessments for individual applications. A transport assessment covering the cumulative impacts of the Local Plan development as a whole over the plan period is required.</p> <p>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.</p> <p>Paragraph 8.12 states that "Development proposals for new or altered access on higher order roads than local access roads will be required to demonstrate no suitable alternative access point..." However, new accesses will not be allowed onto roads that are approaching motorway standard, including the A3113, in accordance with Transport Circular 02/2013.</p> <p>c) Policy DMAV2 (Heathrow Airport) bullet point A (iii) states that development within the boundary will only be supported where "there is no increase in traffic and congestion from the</p>	<p>The strategic transport impacts have already been assessed for the adopted Local Plan Part 1 which identifies generally the numbers and locations of new housing for the life of the Plan. Part 1 also incorporates the infrastructure schedule which includes transport proposals. Therefore on a strategic level assessment has been undertaken.</p> <p><u>Proposed Change</u></p> <p>Policy DMT1 (Managing Transport Impacts)</p> <p>A (v) have no significant adverse transport impacts on the local and wider environment, <i>in particular the strategic road network.</i></p> <p>The comment about Paragraph 8.12 that new accesses will not be allowed onto roads approaching motorway standard in accordance with Transport Circular 02/2013 is noted. However, these roads are TLRN roads administered by TfL and therefore an amendment to Paragraph 8.12 is recommended.</p> <p><u>Proposed Change</u></p> <p>"Development proposals for new or altered vehicular access on <i>the Borough's</i> higher order roads than local access roads will be required to demonstrate no suitable alternative access point and no deleterious impact</p>

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				<p>proposal". Since any development could potentially generate traffic this statement could be considered ambiguous and should be reworded "there is no detrimental impact to the safe and efficient operation of local and strategic transport networks".</p>	<p>on high way or pedestrian safety and movement. <i>Proposals that affect highways administered by Transport for London Route Network or the Highways Agency will be required to seek the approval of the relevant authority</i></p> <p>c) Agree Policy DMAV2 Heathrow Airport point A (iii) should be reworded to be less ambiguous.</p> <p><u>Proposed Change</u></p> <p>(A) Development proposals within the Heathrow Airport boundary will only be supported where:</p> <p>iii) "there is no increase in traffic and congestion from the proposal detrimental impact to the safe and efficient operation of local and strategic transport networks".</p>
74	4	DLP Planning on behalf of McGovern Brothers (Haulage) Limited	DMT2	<p>The proposed requirements set out in Policy DMT2 (Highways Impacts), bullet points (i) to (v) only address the safe and efficient movement of the highway. It is considered that this policy should be widened so that it is more obviously compatible with the range of highway matters addressed by NPPF paragraph 32.</p> <p>Draft Policy DMT2 sets out additional requirements that are not consistent with the NPPF. These should be modified or removed.</p>	<p>In addition to safe and efficient movement, paragraph 3.2 of the NPPF requires Transport Assessments to address</p> <ul style="list-style-type: none"> • sustainable transport modes - this point is addressed in Policy DMT 4 • improvements to the transport network that cost effectively limit the significant impacts of development. This point is addressed in criteria (v) of the policy DMT2. <p><u>Proposed Change</u></p>

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					Part A of Policy DMT2 (Highways Impacts) should be amended as follows: Development proposals must be compatible with the safe and efficient movement of the highway and therefore must ensure that:
82	5	Deloitte Real Estate on behalf of CEMEX Properties Ltd	DMT2	Suggest widening the scope of Policy DMT2 (Highways Impacts) so that it is more obviously compatible with the range of highway matters addressed by NPPF paragraph 32. Also consider that draft Policy DMT2 sets out additional requirements that are not consistent with the NPPF and should be modified accordingly.	In addition to safe and efficient movement, Paragraph 3.2 of the NPPF requires Transport Assessments to address: <ul style="list-style-type: none"> • sustainable transport modes - this point is addressed in Policy DMT4 • improvements to the transport network that cost effectively limit the significant impacts of development. This point is addressed in criteria (v) of the policy DMT2. <p><u>Proposed Change</u></p> Part A of Policy DMT2 (Highways Impacts) should be amended as follows: Development proposals must be compatible with the safe and efficient movement of the highway and therefore must ensure that:
70	10	Nathaniel Lichfield & Partners on behalf of British Airways	DMT4	Welcome the Council's support and promotion for the enhancement of public transport facilities at key interchanges, such as at the Heathrow Bus Interchange. Also endorse need to improve north/south links in the Borough.	Supported noted and welcomed. <u>No Proposed Change</u>

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53	2	Cllr Janet Duncan	DMT5	<p>Development proposals can sometimes cause longer or more difficult journeys for pedestrians and cyclists. Existing facilities need to be protected for these users to encourage walking and cycling.</p> <p>Suggests amending Policy DMT5 (Pedestrians and Cyclists) with additional sub paragraph (iv): "No lengthening or increased difficulty being caused to existing pedestrian and cycle access."</p>	<p>Officers propose to amend the supporting text to Policy DMT5 - (Pedestrians and cyclists) page 125 paragraph 8.23.</p> <p><u>Proposed Change</u></p> <p>8.23 All development proposals are required to provide good connectivity for pedestrians and cyclists and good permeability within the site where relevant.</p> <p>Connections are required to be of high quality, with safety and ease of access in mind. Development <i>proposals must ensure that any existing pedestrian or cycle access is retained without deterioration to convenience or usability.</i></p> <p>Public routes must comply with the principles of Secured by Design through consultation with Hillingdon's Designing Out Crime Officer.</p> <p><u>Proposed Change</u></p> <p>Policy DMT5 Pedestrian and cyclists</p> <p>(A) 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:</p> <p><i>(i) The retention and, where appropriate, enhancement of any</i></p>

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					<p><i>existing pedestrian and cycle route</i></p> <p>(ii) (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;</p> <p>(iii) (ii) the provision of well signposted, attractive pedestrian and cycle routes separated from vehicular traffic where possible; and</p> <p>(iv) (iii) the provision of cycle parking and changing facilities in accordance with Appendix A, Table 1 or, in agreement with Council.</p>
41	1	DP9 on behalf of Royal Brompton and Harefield NHS Trust	DMT6	Request clarification in Policy DMT6 (Vehicle Parking) on car parking requirements for hospitals.	<p>Typographic error.</p> <p><u>Proposed Change</u></p> <p>Amend Appendix A - Table 1 b) parking requirements for Hospitals to include:</p> <p><i>Car parking on an individual basis using a transport assessment and a travel plan.</i></p>
53	3	Cllr Janet Duncan	DMT6	<p>Considers that Policy DMT6 (Vehicle Parking) should be amended to include provision for the successful local policy of providing vehicle parking spaces for residents over 65.</p> <p>Suggests amending Part (B) of policy DMT6 (Vehicle Parking) by inserting: "people over 65" after "wheelchair users" to read: "All car parks provided for new development will be required</p>	<p>Officers recognise the benefits of this proposal but are of the view that there is not a suitable evidence base to justify specific parking standards for residents over 65. Disabled parking standards will be provided in accordance with the Council's Accessible Hillingdon SPD.</p>

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				to contain conveniently located reserved spaces for wheelchair users, people over 65 and those with restricted mobility ..."	
70	11	Nathaniel Lichfield & Partners on behalf of British Airways	DMT6	<p>Support proposals to improve public transport accessibility in Policy DMT6 (Public Transport Interchanges); but consider it likely that without investment in major infrastructure a high proportion of journeys to Heathrow will continue to be undertaken by car.</p> <p>Recognising the above, welcome the provision in Policy DMT6 that although development must comply with the Borough parking standards, the Council may agree to vary these requirements.</p>	<p>Support noted and welcomed.</p> <p>A key aspect of Hillingdon's Local Plan Part 1 is the improvement of north/south public transport links in the borough. These are subject to a number of improvement schemes including the Council's Local Implementation Plan.</p> <p><u>No Proposed Change</u></p>
53	4	Cllr Janet Duncan	DMT7, page 129: Freight	<p>The whole of Hillingdon is an Air Quality Management Area but 50% of all air pollution is caused by HGVs. High HGV generating uses should therefore be carefully located to protect human health and comply with general Part 1 policies and national and European policies.</p> <p>Suggests adding new paragraph to Policy DMT7 (Freight)</p> <p>"Proposals giving rise to a high generation of HGVs must be carefully located due to their disproportionately high impact on air quality and human health."</p>	<p>Policy DMT7 - Freight is intended to ensure that impacts from freight movement are minimised. Recommend amendment to policy to strengthen and clarify.</p> <p><u>Proposed Change</u></p> <p>POLICY DMT7: Freight</p> <p>(A) Development proposals that <i>generate a high number and/or intensity of transport and movements such as those</i> relating to logistics and distribution, or freight, will be required to demonstrate that they are conveniently locate to enable (i) direct routing to the strategic road network; and Proposals must ensure that there is (ii) no deleterious impact on residential areas, local amenity or the highway network.</p>

Appendix 1: Development Management Policies: Schedule of Representations Received and Officer Responses

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ID	Rep No	Individual/ Organisation	Para, Policy, Map	Summary of Representation	Council Response
91	3	Garden City Estates Residents Association	DMT6, page 128	There is a need to encourage all development to provide reserved car park spaces for vulnerable categories of residents. Suggest adding the phrase 'people over the age of 65' to list of vulnerable people requiring spaces re parking provision.	Development management policy (DMT6) set out provisions for car parking which includes the existing blue badge and brown badge (for older residents with restricted mobility). The recommendation for new criteria for car parking eligibility has been passed to the appropriate department to be considered separately. <u>No Proposed Change</u>
91	4	Garden City Estates Residents Association	DMT 7, page 129	The Yiewsley and West Drayton areas are experiencing very high levels of HGV movements due to illegal use of some very large industrial sites. It is vitally important that sites which may need high HGV generating uses should be located in areas which are away from residential areas in order to preserve and protect human health. Suggest adding new paragraph to policy DMT 7 Page 129. 'Proposals giving rise to a high generation of HGVs must be carefully located due to their disproportionately high impact on air quality.'	Policy DMT7 - Freight is intended to ensure that impacts from freight movement are minimised. Recommend amendment to policy to strengthen and clarify. <u>Proposed Change</u> POLICY DMT7: Freight (A) Development proposals that <i>generate a high number and/or intensity of transport and movements such as those</i> relating to logistics and distribution, or freight, will be required to demonstrate that they are conveniently locate to enable (i) direct routing to the strategic road network; and Proposals must ensure that there is (ii) no deleterious impact on residential areas, local amenity or the highway network.

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70	1	Nathaniel Lichfield & Partners on behalf of British Airways	DMAV1	Support policy DMAV1 (Safe Operation of Airports) which promotes the continued safe operation of Heathrow Airport and give specific support to ensuring that sensitive uses are not located in areas significantly affected by aircraft noise.	Support noted and welcomed. <u>No Proposed Change</u>
53	5	Cllr Janet Duncan	DMAV1,	Duplication of "Which may" in second line needs to be removed.	<u>Proposed Change</u> Duplication will be removed from the Plan
56	11	Heathrow Airport Ltd	DMAV1	Consider that the policy should include more specific noise restrictions and suggest additional wording to be included in relation to cranes.	It is considered that the policy provides the Council with sufficient flexibility to manage the potential impacts of noise. <u>No Proposed Change</u>
70	2	Nathaniel Lichfield & Partners on behalf of British Airways	DMAV2	Policy DMVA2 (Heathrow Airport) will need to be reviewed once future plans for Heathrow Airport are confirmed through national airport policy. This should be explicitly recognised in the policy. Suggest adding the word "significant" before "increase" in criteria (iii) as well as before "deterioration" in criteria (iv) and before "adverse" in criteria (v) to ensure that airport related development can still come forward where environmental effects are negligible or can be sensibly addressed through mitigation measures.	Any significant changes to national policy regarding Heathrow airport will be incorporated in the review of the Local Plan Part 1. Officers agree that the word "significant" should be added to the policy criteria in relation to traffic. <u>Proposed Change</u> Criteria iii) of policy DMAV2 iii) There is not <i>significant</i> increase in traffic and congestion from the proposal. <u>Proposed Change</u> Criteria v) of policy DMAV3 <i>There are no other significant environmental impacts; where relevant ;</i>

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					<p><i>an environmental impact and/or transport assessment will be required with appropriate identification of mitigation measures; and</i></p> <p>In relation to criteria iv) however, and in accordance with policy DME118 proposals should as a minimum be air quality neutral.</p> <p><u>No Proposed Change</u></p>
56	12	Heathrow Airport Ltd	DMAV2, 8.45, 8.49	<p>The statistics used at paragraph 8.45 relate to 2010 figures and are therefore out of date. Challenge the assertion at paragraph 8.45 in relation to Heathrow as major source of pollution.</p> <p>Consider that policy is inconsistent with the NPPF and the London Plan.</p> <p>Challenge a number of statements in paragraph 8.49, including that:</p> <p>a) development related to the airport has been controlled to locate within the airport boundary</p> <p>b) unrelated development that occurs on airport has the potential to create pressure on the Green Belt and contribute to congestion.</p>	<p><u>Proposed Change</u></p> <p>Factual or statistical information that is out of date will be deleted or replaced where appropriate.</p> <p>Comments regarding paragraph 8.49 are noted and clarification has been undertaken as follows:</p> <p>8.49. Measures are in place to tackle noise, emissions and congestion. Development directly related to the airport should be has been controlled to locate within the boundary and not outside. Unrelated development which occurs within the airport boundary has the ability to result in pressure for development on Green Belt and other off-airport sites to cater for directly related needs as well as contributing to congestion. The Council seeks to protect "airport related uses" by restricting development for non-essential activities and ensuring that ancillary facilities (such as shops), are limited to those needed for airport users</p>

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					only and do not become major attractors to the non-travelling public in their own right. Development not directly related to the operation of the Airport will not be supported within its boundary.
70	3	Nathaniel Lichfield & Partners on behalf of British Airways	DMAV3	<p>Are concerned about allowing flights to increase without proper consideration being given to the potential effects upon highway capacity and the need to improve public transport accessibility in relation to RAF Northolt.</p> <p>Are aware that the RAF has announced that its 7,000 commercial movements per year will be increased to 12,000 over the next three years.</p> <p>Support policy DMAV3 (RAF Northolt) and the restrictions attached with reference to transport and noise impacts to ensure these are mitigated appropriately.</p>	<p>Aircraft movements are not a matter for the Local Plan.</p> <p><u>No Proposed Change</u></p>

2) SITE ALLOCATIONS AND DESIGNATIONS , September 2014

- The following schedule reports on comments received during the consultation on the initial September 2014 Proposed Submission Site Allocations and Designations document, and includes the Council's proposed response.

Appendix 2: Site Allocations and Designations: Schedule of Representations Received and Officer Responses

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ID	Rep No	Individual/ Organisation	Para, Policy, Map	Summary of Representation	Council Response
Chapter 1: Introduction					
No representations received					
Chapter 2: A Vision for Hillingdon					
76	1	CBRE Planning on behalf of CBRE Global Investors	Chapter 2, 3 and 4	<p>Supports the principles contained within Chapters 2 and 4 of the Site Allocations document, the Council's vision of improving accessibility to local jobs, housing and facilities.</p> <p>The plan is sound, but suggests identifying 25 - 31 Fairview Business Centre in the plan as a 'residential-led mixed use site' allocation.</p> <p>Consider that the inclusion of this site would strengthen the wider regeneration aspirations for Hayes and support the delivery of housing in the area by specifically allocating the site for residential led mixed use development.</p> <p>The site could accommodate a minimum 50 dwellings or significantly more should it be developed together with the adjacent site (Union House) and would be available in the short to medium term.</p> <p>Support the removal of the 'Industrial and Business Area' allocation in the Policies Map and the allocation of a number of adjacent sites for residential-led development.</p> <p>Consider it feasible that the use of the site could be changed when the government's proposals to extend permitted development beyond 2016 come into force.</p>	<p>Support noted and welcomed.</p> <p>This site is not identified in the Local Plan evidence base and is not proposed to be allocated at this stage.</p> <p>Further discussions to take place with landowners to assess the development potential of this site.</p> <p><u>No Proposed Change</u></p>

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Chapter 3: identifying sites for new homes					
86	4	Eastcote Resident Association	Page 29, Tables 3.1 and 3.2	<p>The following corrections are required. a) Initial House, 150, Field End Road, Eastcote, Cavendish Ward - the number of dwellings has been increased from 42 to 45, b) Former RAF Eastcote Eastcote/East Ruislip Ward, now known as Pembroke Park - There have been numerous applications to increase the density which is believed to be around 400 units per hectare.</p> <p>The following sites have been omitted: a) 216 Field End Road, Eastcote, Cavendish Ward - 11 flats with 1 ground floor retail unit, approved at appeal; and b) Audit House, 260 Field End Road, Eastcote, Cavendish Ward, change of use from B1 to C3 to create 22 self contained flats.</p>	<p><u>Proposed Change</u></p> <p>The Site Allocations document will be amended to ensure that the document contains the correct planning history for these sites.</p> <p>The Local Plan only includes larger housing sites as specific allocations, however the identified sites would still be included as sources of potential supply in the Council's Annual Monitoring Report.</p> <p><u>No Proposed Change</u></p>
78	3	Nexus Planning on behalf of East and North Hertfordshire Trust	Paragraph 3.1 and 3.2	<p>It will be necessary to make changes to the Hillingdon Local Plan Part 2, including changes to Paragraphs 3.1 and 3.2, to ensure that it is consistent with the up to date development plan, including the revised housing targets in the London Plan.</p> <p>For the same reasons, it will also be necessary to undertake a partial review of the Local Plan Part 1, including changes to Policy H1 and the explanatory text.</p> <p>Suggest that Paragraph 3.2 is amended to make it clear that the allocations document identifies housing sites to meet the targets for the short term (years 1 to 5) and medium term (years 6-</p>	<p><u>Proposed Change</u></p> <p>Updates will be incorporated into the plan as follows:</p> <p>The Plan will be amended to take account of the revised housing target contained in the FALP.</p> <p>The Local Plan Part 1 will be updated in due course, following the full review of the London Plan which is identified in the report.</p> <p>The housing trajectory will be updated to reflect deliverable sites from the year of</p>

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				<p>11), starting from the date of its adoption.</p> <p>Paragraphs 3.4 to 3.9 and Tables 3.2 and 3.2 will need to be amended accordingly, to set out clearly the housing supply position at the date of Local Plan Part 2 adoption, by recording dwelling completions up to 2015 and re-phasing the anticipated delivery of identified housing sites in years 1 to 5 (2015-2020) and years 6 to 10 (2020-2025) accordingly.</p>	<p>adoption.</p>
26	3	Nexus Planning on behalf of Hillingdon Hospital NHS Foundation Trust	Paragraph 3.1 and 3.2	<p>Paragraph 3.2 should be amended to make it clear that the Allocations document identifies housing sites to meet the housing delivery targets for the short term (years 1 to 5) and medium term (years 6-11), starting from the date of its adoption.</p> <p>Paragraphs 3.4 to 3.9 and Tables 3.2 and 3.2 should be amended to set out clearly the housing supply position at the date of adoption, by recording dwelling completions up to 2015 and re-phasing the anticipated delivery of identified housing sites in years 1 to 5 (2015-2020) and years 6 to 10 (2020-2025).</p> <p>If it is assumed that the Local Plan Part 2 is adopted in 2015, this will mean that housing delivery will need to be rolled forward to identify sites for the short term (2015-2020) and medium term (2020-2025). Paragraphs 3.4 to 3.9 and Tables 3.2 and 3.2 will need to be amended accordingly, to set out clearly the housing supply position at the date of adoption, by recording dwelling completions up to 2015 and re-phasing the anticipated delivery of identified housing</p>	<p><u>Proposed Change</u></p> <p>The FALP target for Hillingdon of 559 units has been agreed by the Inspector and will be incorporated into the Plan.</p>

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				sites in years 1 to 5 (2015-2020) and years 6 to 10 (2020-2025) accordingly.	
26	4	Nexus Planning on behalf of Hillingdon Hospital NHS Foundation Trust	Table 3.2	<p>The Mount Vernon Hospital site represents a significant opportunity to meet the long term needs of the Trust. Propose that the site is identified for housing and included in the list of allocated housing sites at Table 3.2 for delivery in the short term, i.e. within 5 years following adoption. Propose a 5.4 ha site with capacity for 170 dwellings because it:</p> <ul style="list-style-type: none"> a) represents a key element of the Trust's proposals for the sustainable, healthcare led development at the Mount Vernon Hospital site, for which there is a demonstrable need b) forms part of the exceptional circumstances case put forward by the Trust to secure the release of land at the Mount Vernon Hospital site from the Green Belt. Proposed housing development represents substantial part of funding for Trusts plans. c) is considered suitable and its development will contribute towards meeting and exceeding the minimum housing requirement for Hillingdon d) will be part of an integrated mixed use development which will make efficient and effective use of land which is already substantially developed but significantly under-utilised. e) With the exception of a small area situated in the eastern part, all of the site is classified as 	<p>The release of Green Belt land is not necessary to meet Hillingdon's current housing target contained in the Local Plan Part 1 or the revised target contained in the Further Alterations to the London Plan. This is reflected in policy EM2 of the Local Plan Part 1, which seeks to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains in Hillingdon.</p> <p>Policy 7.16 of the London Plan states that the Mayor strongly supports the current extent of London's Green Belt. As such the London-wide Strategic Housing Land Availability Assessment, which formed the basis of Hillingdon's revised Annual Monitoring target for housing provision, did not identify sites in the Green Belt.</p> <p>The response to matters raised by the Trust is as follows:</p> <ul style="list-style-type: none"> a) The Council accepts that there may be a need for additional operational development at Mount Vernon. However, no evidence is provided that the Trust's objectives for sustainable healthcare provision cannot be met within the existing built envelope of the site. b) The contribution that the new housing would make to The Trust's plan is not, in itself, considered to be a very

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				<p>previously developed land.</p> <p>f) The exceptions to inappropriate development in the Green Belt identified in paragraph 89 of the NPPF do not preclude the redevelopment of previously developed land for residential use.</p> <p>Consider it also necessary to identify the site on the Policies Map (Atlas of Changes) as a housing site.</p>	<p>special circumstance that would justify development in the Green Belt.</p> <p>c) The site is not required to meet the revised housing monitoring target contained in the Further Alterations to the London Plan.</p> <p>d) Subject to meeting other policies in the Plan the Council does not necessarily object to infill development relating to the operational use of the site within the existing built envelope.</p> <p>e) There is no evidence to confirm that the site constitutes previously developed land.</p> <p>f) Redevelopment of the site on the scale proposed does not constitute an exception to inappropriate development in the Green Belt.</p> <p><u>No Proposed Change</u></p>
78	4	Nexus Planning on behalf of East and North Hertfordshire Trust	Table 3.2	The Trust proposes that land at the Mount Vernon Hospital site is identified as a housing site in the Site Allocations and Designations document and is included in the list of allocated housing sites at Table 3.2 for delivery in the short term, i.e. within 5 years following the date of adoption.	<p>The site is not required to meet the revised housing target contained in the FALP.</p> <p><u>No Proposed Change</u></p>
23	2	Eastcote Conservation Panel	Table 3.2	a) Ask that Pinn Meadows keeps its Green Chain designation alongside the proposed MOL designation. Consider that a dual designation	A dual designation would not afford greater protection for the site.

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				<p>will afford this area as much protection against inappropriate development as possible.</p> <p>b) Note following errors and omissions in Table 3.2:</p> <ul style="list-style-type: none"> • 216 Field End Road, Eastcote, Cavendish Ward: 11 flats with 1 ground floor retail unit was approved at appeal, but has been omitted from the table. • Initial House, 150 Field End Road, Eastcote Cavendish Ward: The number of dwellings has been increased from 42 to 45. • Former RAF Eastcote Eastcote/East Ruislip Ward. The density has been increased to around 400 dwellings. 	<p><u>No Proposed Change</u></p> <p><u>Proposed Change</u></p> <p>Ensure that appropriate Site Information tables in the Site Allocations document reflect the latest permissions granted.</p>
92	3	Inland Waterway Association	Policy SA 3	<p>Consider that policy SA3 in the Site Allocations document (Eastern End of Blyth Road) fails to take account of the potential of sites adjacent to the Grand Union Canal, which should be included to create a larger and more significant redevelopment area at the southern gateway into Hayes town centre.</p> <p>These sites should include the entire area between the canal and Clayton Road up to the boundary with Trevor Road.</p> <p>Suggest that Site B is extended to include the entire area between the canal and Clayton Road up to the boundary with Trevor Road and policy criteria are amended accordingly and require the provision of residential moorings in accordance with Policy DMHB25.</p>	<p>Officers are aware of the potential development opportunities between Clayton Road and will be seeking to bring forward sites in accordance with the conclusions of the Council's updated Employment Land Study.</p> <p>Provision for residential moorings will be provided where this is considered to be appropriate</p>

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ID	Rep No	Individual/ Organisation	Para, Policy, Map	Summary of Representation	Council Response
92	1	Inland Waterway Association	Policy SA 10	<p>a) Consider policy SA10 (Nestle) in the Site Allocations document is unsound because it proposes a density that would result in inappropriately high buildings that would be detrimental to the character of the Grand Union Canal.</p> <p>b) In addition the number of units proposed on Site B is contradictory between the SA 10 Policy (171 units) and the Site Information schedule (207 units). Suggest proposing a mixed-use development in which the number of units is determined by the designation of the site as a Conservation Area (Botwell Nestles, Hayes Map 22.4), and removing reference to higher density development being located along the canal frontage.</p> <p>c) Consider that the policy criteria should include a statement requiring that the new development should allow a significant part of the Nestle building to remain an important landmark along the canal and suggest correcting the Site Information schedule to reflect the policy criteria.</p>	<p>a) The proposed density on SA10 is based on the London Plan density matrix, contained in Table 3.2 of the London Plan.</p> <p><u>No Proposed Change</u></p> <p>b) <u>Proposed Change</u></p> <p>Inconsistency between the policy and the Site Information Schedule will be corrected.</p> <p><u>c) Proposed Change</u></p> <p>The policy will be amended to ensure that heritage assets are fully taken in to account.</p> <p>Amend Site Allocations document to refer to Blue Ribbon policy and density adjacent to the canal.</p> <p>Further discussions will take place with the landowner to develop proposals for the site that are economically viable and meet local needs.</p>
5	1	AME on behalf of National Grid	Policy SA10	<p>NG has two high voltage overhead lines and two underground cable routes within Hillingdon's administrative area, as well as a substation.</p> <p>No gas transmission pipelines are located within the administrative area but NG owns and operates the local gas and electricity distribution network in Hillingdon.</p> <p>SA10 is located within close proximity to North Hyde substation and high voltage underground</p>	<p>The issue of overhead and underground cables will be addressed as detailed proposals come forward for the site.</p> <p><u>Proposed Change</u></p> <p>The Infrastructure considerations box in the Site Information table will note the presence of cables, the need for discussions with national grid and should be amended to incorporate the following text:</p>

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				<p>cables and there may need for further essential utility development at the site.</p> <p>Request 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 cable(s) must be maintained at all times. .</p>	<p>Site is within close proximity to North Hyde sub-station. <i>New buildings should not be located beneath power lines. Site specific proposals should be discussed with National Grid at the earliest possible stage.</i></p>
39	1	Carter Jonas on behalf of Buccleuch Property	Policy SA10	<p>Welcomes the support provided for the opportunity to comprehensively redevelop site SA10 (Nestle), but consider that the mix of uses and density of development that might be achieved is unnecessarily constrained by the draft proposals for Site A and Site B.</p> <p>The justification for the provision of new B1 and B2 floorspace within the scheme is not clear and is likely to have a significant impact on the viability of development. This should be excluded. Also, it should be acknowledged that the site will be built in phases.</p> <p>The sites have potential to include a significant number of new homes, potentially accommodating up to 1,800 units. Other land uses that are considered appropriate for the site include a hotel, student housing, small scale retail and commercial, education, leisure and community facilities.</p>	<p>The Employment Land Study provides support for the release of this key site for non employment uses.</p> <p>The proposed higher percentage of non residential uses reflects its proximity to the town centre and the former industrial use of the site</p> <p>The density figures on sites A and B are based on the PTAL rating and reflect Table 3.2 in the London Plan.</p> <p>The site is not expected to be delivered until the final 5 years of the Plan. Given the uncertainties associated with the site at the present time it is difficult to be more specific but officers would wish to encourage comprehensive redevelopment proposals, rather than individual portions of the site coming forward on a piecemeal basis.</p> <p>Further discussions will take place with the landowner to develop proposals for the site that are economically viable and meet local needs.</p>

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					<u>No Proposed Change</u>
40	1	Jon Dingle Ltd on behalf of Access Self Storage	Policy SA10	<p>Welcomes the identification of SA10 (Nestle) for comprehensive redevelopment, but the current draft proposals for Sites A and B are inappropriately restrictive in terms of the uses identified and the percentages of the area for various uses.</p> <p>High density may be appropriate in locations other than along the canal, such as the road frontages. The allocation should acknowledge that individual sites could come forwards for development within a wider framework.</p>	<p>Given the proximity of the site to Hayes town centre and its current industrial use, officers are of the view that the site should retain a percentage of employment generating uses.</p> <p>The higher percentage of non residential uses on site B reflects its proximity to the town centre.</p> <p>The density figures on sites A and B are based on the PTAL rating and reflect Table 3.2 in the London Plan.</p> <p>The site is not expected to be delivered until the final 5 years of the Plan.</p> <p>Given its size and importance, the site should be subject to comprehensive redevelopment. Officers would not wish to see the site come forward on a piecemeal basis.</p> <p>Further discussions will take place with the landowner to develop proposals for the site that are economically viable and meet local needs.</p> <p><u>No Proposed Change</u></p>
59	2	ALPS Group on behalf of Nestle	Policy SA10	<p>Consider that the proposed division between Sites A and B for site SA10 (Nestle) is inaccurate and that site B is not available for development at present.</p> <p>Suggest optimising the residential capacity of</p>	<p>The purpose of identifying sites A and B together is to provide an uninterrupted strip of development which is linked to Hayes town centre. Without site B, development on the Nestle site will be isolated from</p>

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				the site and that the plan should express dwelling yield as a target and range, subject to detailed scheme design. Further consider that the plan should not specify a minimum site area for employment but seek the comprehensive development to include the provision of viable employment uses. Request deletion of reference to the need for a sports pitch and consider the requirement for education use is unclear and not justified by evidence.	<p>Hayes town centre.</p> <p>Officers have sought discussions with Nestle to understand the timescale for the delivery of this key site. In the absence of any further information, both sites A and B have not been identified for delivery until the final 5 years of the plan.</p> <p>The NPPF requires local authorities to identify broad locations for sites that are likely to be delivered in this timescale. Given the current vacancy levels, the Council is of the view that site B has the potential to deliver residential led mixed use development in this period.</p> <p>Further discussions will take place with the landowner to develop proposals for the site that are economically viable and meet local needs.</p> <p><u>No Proposed Change</u></p>
65	3	Nathaniel Lichfield & Partners on behalf of Purplex LLP	Policy SA10	Considers that the site SA10 (Nestle) should be updated to reflect the most recent planning history of the site.	<p><u>Proposed Change</u></p> <p>Text will be updated in accordance with the latest planning history.</p> <p>Further discussions will take place with the landowner to develop proposals for the site that are economically viable and meet local needs.</p>
80	1	CgMs Consulting on behalf of Elite Group	Policy SA10	Considers policy SA10 (Nestle) to be a suitable land use designation and fully supports the inclusion of the policy in the Site Allocations document and the re-designation of the site for	Given its size and importance, the site should be subject to comprehensive redevelopment. Offices would not wish to see the site come forward on a piecemeal

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				<p>residential purposes.</p> <p>Concerns that the priorities and potential of No. 3 Viveash Close, which forms a small part of the allocation, will not be met if a single comprehensive plan is proposed for the whole of the area. A more flexible approach is proposed, seeking the same priorities of the policy, but allowing for landowners to manage the development of their own sites.</p> <p>The density guidelines set out in the emerging Development Management Policy are not relevant to the proposed site. Given the site's location adjacent to Hayes and Hillingdon Railway Station, it should be considered suitable for more intense residential development than the guidelines imply.</p>	<p>basis.</p> <p>Further discussions will take place with the landowner to develop proposals for the site that are economically viable and meet local needs.</p> <p><u>No Proposed Change</u></p>
92	6	Inland Waterway Association	Policy SA14	<p>The site plan associated with policy SA14 in the Site Allocations document (Royal Quay) is incorrect. An outline planning application was submitted in May 2013 for a much larger area and permission was granted in October 2013. Suggest updating the map for SA 14 and the relevant planning history in the Site Information schedule.</p>	<p><u>Proposed Change</u></p> <p>The Site Information schedule will be updated to reflect the latest planning history for this site.</p>
43	3	RPS Planning and Development on behalf of Albermarle Development	Policy SA 17	<p>Support proposed allocation as mixed use, but point out that the introductory text still uses terminology 'Industrial Business Area'.</p> <p>Supporting site information requires updating to reflect the Council's resolution to grant permission for mixed use development and to refer to a PTAL rating of 3.</p>	<p><u>Proposed Change</u></p> <p>Text relating to Industrial Business Areas will be removed.</p>

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94	1	Gerald Eve LLP on behalf of Royal London (CIS) Ltd	Policy SA18	<p>Site SA 18 in the Site Allocations document (Chailey Industrial Estate) has separate site ownerships, which are in very different situations in terms of occupation, and should therefore not be included as a single site allocation.</p> <p>It is considered that that either a separate site allocation is required for each site or that the Matalan site should be removed from the Site Allocations document all together.</p> <p>Given that the Matalan site covers approximately 40% of draft allocation Site B, once removed, the remainder could be brought forward for residential development.</p> <p>The plan is not positively prepared, not justified, and not effective and therefore not sound.</p> <p>Any reference to density should be removed from the site allocation wording. The density proposed for the site is significantly below its potential capacity, which is at least 310 units. Density levels should be negotiated and agreed as part of the planning application process.</p> <p>The site information designation of "Industrial Business Area" should be removed as, according to Atlas of Changes Map 1.1(v), the site can now be removed from this employment area.</p>	<p>The Council wishes to see the entire site brought forward as part of a comprehensive redevelopment scheme that complements the adjacent Hayes Town Centre.</p> <p>Given that there is little prospect of the Matalan portion of the site coming forward for residential development officers are of the view that it could be removed from the allocation.</p> <p>The proposed residential density of 110 uph is consistent with Table 3.2 of the London Plan.</p> <p>Textual inconsistency will be addressed.</p> <p>Given the location of the site, officers are keen to retain a proportion of employment generating uses on the site. The proportion of employment, residential and other uses is still subject to discussion with the landowner.</p>
97	1	Phase 2 Planning and Development Ltd	Policy SA18	<p>Object to the proposed status of the Argent Centre as a 'Strategic Industrial Location' and the failure to identify the Argent Centre as being a potential area for managed release of</p>	<p>The Argent Centre is not identified for release in the Council's Employment Land Study and has therefore not been identified for release.</p>

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				<p>employment land.</p> <p>There is a need for further employment/ industrial land release in the DPD, as identified by the Council's own evidence base, to meet other development objectives.</p> <p>To make the DPD "effective" and therefore "deliverable" Policy 18 and Policy SEA 1 should be amended to include reference to the Argent Centre at Pump Lane, Hayes as suitable for release from employment/industrial allocation. The site is 'available', 'deliverable' and 'suitable' for alternative uses and would specifically meet an identified need for additional comparison and convenience retailing.</p> <p>Part of the Argent Centre should be specifically identified as a site for release from employment and shown as a future extension to Hayes town centre. Such a proposal would be complimentary to the proposed extension of the town centre onto the Chailey Industrial Estate.</p>	<p>The Argent Centre forms part of the Pump Lane cluster of the Hayes Industrial Area, which is an existing designation (Preferred Industrial Location) It was surveyed as part of the 2014 Employment Land Study Update and found to have key strategic characteristics supportive of employment land activities, such as good/ very good access to the strategic road network.</p> <p>In response to the evidence found, the Pump Lane cluster designation is proposed to be retained, with the exception of the Chailey Industrial Estate.</p> <p><u>No Proposed Change</u></p>
92	2	Inland Waterway Association	Policy SA19	<p>Consider the policy criteria for Site SA19 (Silverdale Road/Western View) to be unsound as they make no reference to the preservation of Shackles Dock in any future development.</p> <p>Request that policy criteria are reworded to include the following: 'Shackles Dock should be retained and restored for paddle sport or other appropriate water space uses.</p> <p>The design proposals for the site must include an independent feasibility study to examine the extension of Shackles Dock to its original</p>	<p>The inclusion of Shackles Dock in the site boundary will require prior agreement from the site owner and a viability assessment to demonstrate that the site has a realistic prospect of being delivered for residential use. In addition, there are a number of heritage issues that would need to be addressed.</p> <p>However, subject to these issues being addressed officers are of the view that Shackles dock, and in particular Benlow works, could potentially be allocated for</p>

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				<p>historic length. The scope and terms of the feasibility study are to be agreed with the Council.</p> <p>The existing warehouse to the north of Shackles Dock should be restored and converted to a new use appropriate to its location next to the dock. Active ground floor uses should be provided along the canal frontage.</p> <p>Development along the canal frontage directly facing the Vantage, Cardinal and Navigation buildings of High Point Village should be limited to a maximum of four storeys.</p> <p>Development of the remainder of the canal frontage to the east should be no more than five storeys in height.</p> <p>Higher density development should be located at the centre of the main part of the site.</p> <p>Class A3 uses should be provided either at the existing public house site or at other locations visually connected to the canal towpath.</p>	<p>residential use in the Site Allocations and Designations document.</p> <p><u>No Proposed Change</u></p>
25	1	GL Hearn on behalf of Dairy Crest Ltd	Policy SA 20	<p>Advise that site is currently in use as a Dairy Crest depot but the emerging allocation includes two parcels of land that are not owned by Dairy Crest Ltd. The principle of the allocation is welcomed and it is expected that the site will come forward for residential development in the short term with the indicative phasing of 2016-2021.</p> <p>The land to the south of Dairy Crest Ltd's site would not be suitable for residential development and should not be retained as part</p>	<p>The area to the south of the Dairy Crest has been included to act as a green buffer between existing housing and new development on the Dairy Crest site.</p> <p>The owner of the area to the south of Dairy Crest has been contacted to determine their support for the proposed allocation. A decision on whether to include land in the allocation will be taken when a response has been received.</p>

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				of Policy SA 20. This would ensure that a higher density development could come forward on the remainder of the site.	
8	1	Iver Parish Council	Policy SA 25	<p>Specific reference is made to planning application reference 751/APP/2014/3294: West London Industrial Park, Iver Lane, Uxbridge UX8 2XS.</p> <p>Object due to increase of HGV traffic through Iver. If granted, a condition limiting working hours would need to be imposed to protect residents' quality of life.</p>	<p>The proposal for change of use to storage and distribution (751/APP/2014/3294) was approved on 20 November 2014. In determining the application, careful consideration has been given to the issue of traffic generation on the public highway and it is considered that the proposal would not have a detrimental effect on the existing highway given the level of vehicular movements expected. Conditions are attached to the planning permission that control the vehicle movements, hours of operation and delivery and given such, the development would therefore not be detrimental to the character or amenities of surrounding properties.</p> <p><u>No Proposed Change</u></p>
5	2	AME on behalf of National Grid	Policy SA 25	<p>SA25 is crossed by National Grid's high voltage overhead line VW 275kv route.</p> <p>Advise developers and planning authorities to take into account the location and nature of existing electricity transmission equipment when considering planning developments.</p> <p>Seek to encourage high quality and well planned development in the vicinity of its high voltage overhead lines.</p>	<p>Overhead lines are identified as a constraint in the Site Allocations document.</p> <p><u>Proposed Change</u></p> <p>Insert the following comments into the Infrastructure considerations section of the Site Information table of policy SA25:</p> <p><i>New buildings should not be located beneath power lines.</i></p>
29	1	Trade Sale	Policy SA 25	Object in capacity of the site owner to the	The identification of the Cape Boards site

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				<p>allocation of the Cape Boards site for a residential led mixed use redevelopment on the following basis that:</p> <p>a) the site is occupied by a number of established commercial uses and is subject to a variety of leases and is not, therefore, currently available for redevelopment;</p> <p>b) The site is a contaminated site and remediation would be costly;</p> <p>c) the quality of the residential environment that could be achieved would be compromised by adjoining waste and industrial uses;</p> <p>d) there are high voltage overhead electricity pylons which run to the west of the site. Any residential development would need to be located at least 50 metres from the pylons, which would reduce the potential developable footprint by about 3.2 acres. Suggest that Policy SA25 be deleted.</p>	<p>for housing has been assessed at a number of levels.</p> <p>The site is identified in the Mayoral SHLAA as being suitable for residential development and contributes to the Council's current housing target.</p> <p>It is identified as being viable for residential development in the Whole Plan Viability Study.</p> <p>Whilst it is currently identified as a strategic industrial location, this designation is proposed to be removed in the Site Allocations document, with the support of the Mayor.</p> <p>The site is not subject to significant physical constraints that would prevent residential development, including flood risk.</p> <p>An assessment of the broad transport considerations concludes that there are no significant transport concerns.</p> <p>The site is identified in the final 5 year period for the Local Plan. The NPPF requires the identification of 'broad areas' where the development could take place and places less emphasis on deliverability.</p> <p>On this basis the site should remain in the Local Plan for residential use for this period.</p> <p><u>No Proposed Change</u></p>

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92	5	Inland Waterway Association	Policy SA 25	<p>Suggest that the proposed number of dwelling units in the Site Information schedule for policy SA25 (Cape Boards) could be achieved with a low rise suburban setting characterised by a mixture of two and three storey buildings across the site.</p> <p>A concentration of higher buildings adjacent to the canal would destroy the current attractive setting of the Grand Union Canal.</p> <p>Request a statement in the policy requiring 'higher densities to be located adjacent to the canal' should be deleted. Instead, the development principles should include a requirement that the development should preserve all the existing trees located along the eastern boundary with the Grand Union Canal.</p>	<p>The proposed number of units has been determined through an analysis of the London Plan density matrix, contained at Table 3.2 of the London Plan.</p> <p>The Local Plan Part 1 notes that the Grand Union Canal will have a role to play in the regeneration of the Hayes and West Drayton corridor. Officers are of the view that higher densities should be focussed along the canal to maximise the benefit of this key feature.</p> <p>The implementation of other policies relating to landscape and heritage will ensure that such development does not have an adverse impact on the amenity or character of the canal.</p> <p><u>No Proposed Change</u></p>
92	4	Inland Waterway Association	Policy SA 27	<p>The policy criteria for site SA27 (Hayes Bridge) should be rewritten to include 'Development proposals should incorporate canal side improvements, including the provision of residential moorings to be agreed with the Council.</p>	<p><u>Proposed Change</u></p> <p>Revise Site Allocations document to include canal side improvements.</p> <p><u>Proposed Change</u></p> <p>The Site Information table will be amended to state that:</p> <p><i>The potential for residential moorings will be explored as part of the development scheme for this site.</i></p>
55	1	Rolfe Judd Planning on behalf of	SA28, paragraph 3.7 and map	<p>The inclusion of Padcroft Works as an allocated site is sound and justified, given the extant consent for 208 housing units. A planning</p>	<p><u>Proposed Change</u></p> <p>The Old Coal Yard site will be identified for</p>

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		Kitewood Ltd	17.27	<p>application has been submitted which takes great care not to blight the development potential of the adjacent COMAG site.</p> <p>Suggest revising the site boundary for SA28 to make clear that both the TIGI and COMAG sites be designated as suitable sites for residential development at a density comparable to the extant permission for 208 units. It is possible and indeed probable, that the COMAG site will come forward as a development site over the life of the Local Plan.</p> <p>It is also considered that the neighbouring site to the south of Tavistock Road the former Coal Depot site has the potential to deliver a substantial mixed use development in light of the forthcoming Crossrail station at West Drayton. The Council should give serious consideration to allocating the Coal Depot site.</p>	<p>residential-led mixed use development in the Local Plan. Further discussions with the site owner will be required to bring forward this scheme.</p> <p>The COMAG and TIGI sites are located on the Western side of the Grand Union canal, within the Yiewsley town centre boundary. Whilst these sites are located on land designated for industrial uses, further investigation is required to assess whether they are suitable and deliverable for residential-led mixed use development.</p> <p><u>No Proposed Change</u></p>
46	3	Cllr Ian Edwards	SA 28 & SA 29, Appendix B	Requests reviewing Yiewsley town centre boundary in light at Padcroft Works and Trout Road development.	<p>The Padcroft works and Trout Road sites do not include any retail uses and have therefore not been incorporated into the town centre boundary</p> <p><u>No Proposed Change</u></p>
92	5	Inland Waterway Association	Policy SA 29	The Site Information schedule for policy SA29 (Trout Road, Yiewsley) is out of date and should be revised to reflect the latest planning history.	<p><u>Proposed Change</u></p> <p>The Site Information schedule associated with the policy will be updated to reflect the latest planning history for this site.</p>
38	2	Solent Planning on behalf of Bourne End	Policy SA 29	The site is suitable to accommodate a pure residential scheme of approximately 200 units.	The mix of uses in the consented scheme is appropriate given the town centre location

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		Investments Ltd		<p>Viability is a key issue and whilst it was initially envisaged that commercial and retail uses would be provided on the site, there is now considerable concern that this may affect the viability of the site to be built out as a whole.</p> <p>Note that Site SA 28 retains only 190 sq metres B1 floorspace and is located fully within the defined District Centre where it is considered more appropriate to expect a more mixed use development including retail and commercial uses.</p> <p>Consider on this basis that it is wholly reasonable and sound in policy terms to allow for a more comparable full residential allocation at the Rainbow Park Site SA29.</p> <p>Propose that the allocation wording be amended to provide greater flexibility and recognise the suitability of the site for a pure residential development.</p>	<p>of this site.</p> <p>No evidence has been submitted to demonstrate that consented scheme is unviable.</p> <p>The scheme has been assessed as part of the Whole Plan Viability Assessment and is considered to be viable.</p> <p><u>No Proposed Change</u></p>
54	1	Thames Water	Comments made on numerous sites allocated in the Local Plan	<p>Have concerns regarding waste water services in relation to proposed sites at West End Road, Trout Road, The Old Vinyl Factory and Gatefold Building, St Andrews Park, St Andrew's Park – Annington Homes Site, SITE B - Land to the South of the Railway, including Nestle Site, Nestle Avenue, Silverdale Road/Western View, Royal Quay, Summerhouse Lane, Porters Way, Padcroft Works, High Street / Bakers Row, Hayes Bridge, former Vehicle Testing Station, Charles Wilson Engineers, Cape Boards Site and 269-285 Field End Road. Drainage infrastructure is likely to be required to ensure</p>	<p><u>Propose Change</u></p> <p>Amend Site Information tables for these sites in the Site Allocations document to refer to the need for the developer to bring forward adequate waste water services for the sites listed.</p>

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				sufficient capacity is brought forward ahead of the development.	
69	2	English Heritage	Comments made on numerous sites allocated in the Local Plan	<p>The heritage implications associated with the designated residential sites have not been fully considered: Packet Boat House, Packet Boat Lane; Initial House, Field End Road; Land to the South of the Railway, including Nestle Site, Nestle Avenue, Hayes; Western Core, Hayes; Royal Quay, Summerhouse Lane;</p> <p>Chailey Industrial Estate, Pump Lane; Silverdale Road/Western View, Hayes; 148-154 High Street / 25-30 Bakers Row; St Andrews Park; Cape Boards Site, Iver Lane; Padcroft Works, Tavistock Road; Trout Road, Yiewsley; and Uxbridge Health Centre, Chippendale Way. Make a recommendation in relation to the SA findings for all of these sites.</p>	<p><u>Proposed Change</u></p> <p>Amend Site Information tables for these sites in the Site Allocations document to identify appropriate heritage implications.</p>
53	9	Cllr Janet Duncan	Comment relates to all sites allocated in the Local Plan.	<p>Considers that for all sites designated for new homes, provision must be made for health and education facilities as an absolute minimum before any new homes are occupied.</p> <p>Provision should also be made for community facilities within development sites either for community groups to run or purchase, as required.</p>	<p><u>Proposed Change</u></p> <p>The Local Plan will be amended to ensure that it reflects the Council's latest position on school place provision. In addition, the latest position with regards to healthcare provision will also be reflected.</p> <p>Policy DMCI 1 seeks to retain existing community, sport and education facilities. Where appropriate, the need for community facilities on existing sites has been identified in the Site Allocations document.</p> <p><u>No Proposed Change</u></p>

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32	2	Natural England	General comments on Chapters 3 and 5	<p>New developments should provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes, together with green space provision. The Council should also consider the issue of fragmentation of existing sites through development proposals and recreational pressure on same</p> <p>The provisions of Chapter 5 are broadly supported.</p>	<p>Support noted and welcomed.</p> <p><u>No Proposed Change</u></p>
95	1	Alliance Planning on behalf of Elms Estate Harlington LLP	Proposed new site	<p>Seek to highlight the absence of any housing allocations at Harlington, and more seek the allocation of 'The Elms' site to the east of Harlington High Street.</p> <p>Given the ongoing presence of long-established commercial uses throughout the site, the fact that it immediately adjoins the existing settlement and that it is developed rather than open in character, the site at The Elms should be excluded from the Green Belt.</p> <p>Seek the inclusion of an additional policy allocating the site at The Elms as a residential development opportunity and the deletion of the site from the Green Belt.</p> <p>Without additional sites such as that at The Elms, there is insufficient capacity within Harlington to meet local needs for housing and continue to provide for the managed expansion of the settlement.</p> <p>It is also unclear whether adequate</p>	<p>The site is not identified in the SHLAA and is not required to meet the Council's housing monitoring target.</p> <p><u>No Proposed Change</u></p>

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				<p>consideration has been given to meeting unmet housing need arising elsewhere within the wider housing market area as it is not sufficient for the Hillingdon Local Plan to merely satisfy its own requirements.</p> <p>The site meets a range of development criteria in the Plan and should therefore be allocated for development.</p>	
42	1	GVA on behalf of Transport for London	Proposed new site	Respond in the capacity of land owner of Green Lane / Station Approach, Northwood and propose that the site is reconsidered and taken forward as a mixed use allocation within the Site Allocations DPD.	<p>To date, no specific proposals have been submitted for this site.</p> <p><u>No Proposed Change</u></p>
42	2	GVA on behalf of Transport for London	Proposed new site	Have concluded initial engagement with the local community and reviewed the outcome. This identified general support from the local community for TfL to bring forward a mixed-use development. Are keen to work closely with the Council and request meeting to discuss the proposed site allocation.	<p>To date, no specific proposals have been submitted for this site.</p> <p><u>No Proposed Change</u></p>
91	5	Garden City Estates Residents Association	Proposed new site	<p>Support the removal of the Old Coal Yard site Tavistock Road from its IBA designation.</p> <p>It is vital that for all sites designated for housing, provision is made for health and education and community facilities before any new homes are occupied.</p> <p>No new development should be allowed to proceed without all services being in place up front.</p> <p>Sites should be identified for new secondary</p>	<p>Support noted and welcomed.</p> <p><u>Proposed Change</u></p> <p>Site to be allocated in Site Allocations and Designations document for appropriate mixed use residential led scheme.</p> <p>The Local Plan documents are being updated to reflect the need for secondary</p>

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				schools in the Plan.	schools in the borough.
46	1	Cllr Ian Edwards	Proposed new site	Requests the allocation of the Old Coal Yard site at Tavistock Road for future development.	<u>Propose Change</u> Officers proposed to allocate the Old Coal Yard Site for an appropriate mixed use development scheme.
62	1	Douay Martyrs School, Roman Catholic Diocese of Westminster and Trustees of Guys Investment Limited	Proposed new site	Highlights the need for additional school places in the borough. Suggests that consideration should be given to the expansion of the Douay Martyrs School onto a portion of the Glebe farm site, which is designated Green Belt	<p>The latest position regarding secondary school provision in the Borough is set out in the School Capital Programme Update report to Cabinet in November 2014.</p> <p>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 as predicted in previous forecasts. In particular, the forecast need for additional secondary school places is higher in the north / central parts of the Borough, which is where there tends to be higher numbers of pupils living outside the Borough travelling to a Hillingdon school.</p> <p>Officers are developing recommendations for consideration by Members to meet this secondary school places need - initially focusing on the next five year horizon and to be informed by targeted feasibility studies undertaken to date of specific secondary schools sites to assess their suitability for expansion.</p> <p>Officers have completed an initial appraisal of secondary school sites across the</p>

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					<p>Borough to identify those suitable for expansion. The initial findings have been reported to the relevant Cabinet Members. These indicate that subject to further site feasibility testing, the need for additional secondary school places over the 4 years can be met from expansion of existing schools.</p> <p>Following discussions with the schools, those sites which are deemed suitable for expansion will be considered for the next stage of feasibility testing, which includes site specific surveys. Once the feasibilities have been completed the sites to be developed will be reported to Cabinet for approval.</p> <p>Additional need will be completed following the assessment of this process.</p> <p>Proposed Change</p> <p>Update the Local Plan to reflect the latest position on Secondary School provision.</p>
100	1	Heine Planning Consultancy	Evidence Base: Gypsy & Traveller Needs Assessment	<p>The September 2014 GTAA carried out by the Council is not robust and cannot be relied upon because:</p> <p>a) it was published late in the day in September 2014 and its existence was not made known to those working for Travellers in the district,</p> <p>b) it appears to ignore the findings of two recent appeal decisions for New Years Green Lane and Jackets Lane,</p>	<p>a) September 2014 GTAA was made available on the Council website at the start of the consultation period along with other evidence base documents. The GTAA's existence was discussed at numerous meetings of the Hillingdon Travellers Forum (May 2014, July 2014, September 2014 and November 2014). A workshop was organised specifically for Travellers to take part in a survey to inform the GTAA in March 2014. Surveys were made available</p>

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				<p>c) it does not follow the methodology set out in the 2007 DCLG guidance,</p> <p>d) it fails to include all known sites in the district,</p> <p>e) it fails to consider the ethnic breakdown of all families with a need,</p> <p>f) it fails to include the needs of housed Travellers of which there are many, especially in the Harefield area,</p> <p>g) there is no consideration of in-migration and the needs of families displaced from Hillingdon on account of the lack of sites,</p> <p>h) it appears to wrongly assume a high turnover rate at Colne Park. Based on recent appeal decisions it is not accepted that there is an additional need for just 3-4 pitches over the plan period.</p> <p>There is an immediate need for at least 4 pitches from the three appeals recently considered/ pending.</p> <p>It is not accepted that this identified need should all be accommodated at the existing Colne Park site because:</p> <p>1) the Council has failed to consider the suitability of other sites,</p> <p>2) it does not address the needs of those seeking to self provide,</p> <p>3) it would be difficult to integrate families of other ethnic backgrounds on a site that is overwhelmingly occupied by Irish Travellers,</p>	<p>at the Bell Farm Christian Centre. The final GTAA was publicised at the Hillingdon Travellers Forum meeting on 24 September 2014 just after its publication and a copy of the GTAA was sent via email to all Forum members on 27 September 2014.</p> <p>b) The appeal decisions were taken into account and the appellants were interviewed for the survey.</p> <p>c) The Government's most up to date planning policy position for Traveller is contained in the document 'Planning for Traveller Sites' issued in March 2012. It does not prescribe a specific method for assessing Gypsy and Traveller needs.</p> <p>d) Every attempt was made to include all known sites in the area and these sites were included in the GTAA.</p> <p>e) Ethnic breakdown of Travellers interviewed was noted when information was provided.</p> <p>f) It was extremely difficult to survey Travellers living in bricks and mortar accommodation as ethnicity of council tenants is not known. Attempts were made to contact this hard to reach group through surveys made available at the Bell Farm Christian Centre.</p> <p>g) In-migration was considered through discussions with officers in neighbouring authorities</p>

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				<p>4) existing plots on Colne Park are small and cramped; there are drainage issues and the site is located on the edge of a flood zone,</p> <p>5) the site is located within the Green Belt and expansion of this site would not be consistent with other relevant Local Plan policies.</p> <p>The Plan fails to have regard to the outcome of recent appeal decisions for Gypsies and Travellers and 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.</p> <p>The policy approach to Gypsy and 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, or</p> <p>i) para 47 of the NPPF which requires full objectively assessed need appraisal,</p> <p>ii) para 50 of the NPPF to provide a wide choice of homes to meet local need,</p> <p>iii) para 85 of the NPPF on Green Belt Boundaries, para 4 PPTS which seeks to promote private sites,</p> <p>iv) para 6 of the PPTS which requires a robust evidence base and para 15 PPTS which requires any alterations to the Green Belt boundary to be made through the Local Plan process.</p>	<p>h) turnover rate was confirmed by the Colne Park Manager</p> <p>Based on an assessment of the turnover at Colne Park and projected population growth rate, officers believe that 4 new pitches will fulfil the need for additional pitches over the next five years, in line with NPPF requirements.</p> <p>1) Colne Park is deliverable and considered to be the most suitable site to accommodate additional pitches.</p> <p>2)) those seeking to self provide can submit a planning application for consideration. The will be determined using the criteria contained in Policy H3 of the Local Plan Part 1.</p> <p>3) the NPPF does not require separate sites for those of different ethnic backgrounds within the Traveller community.</p> <p>4) the number of plots on Colne Park has already been reduced from 30 to 21. Drainage issues have been attended to and even during the worst flooding last year, Colne Park was not affected.</p> <p>5) Colne Park has been designated as a Traveller site for many years. New pitches will be provided as infill development within its existing boundaries.</p>

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90	1	Hillingdon Canals Partnership	General (site development in relation to Grand Union Canal)	<p>Specific proposals made in the Plan fail to give sufficient attention to the role of the Grand Union Canal as a focal point for recreation and physical activity, its contribution to the environment or the potential impetus it could give to the regeneration of town centres such as Hayes and West Drayton.</p> <p>It is requested that</p> <p>a) as part of the Local Plan the Council develops a strategy for optimising the environmental, recreational, transport and regeneration benefits of the Grand Union Canal along its whole length through the Borough</p> <p>b) the Council review how the frontage of the canal could be used as a spur to town centre regeneration in Hayes and West Drayton</p> <p>c) the Council considers designating the whole length of the canal in Hillingdon as a Conservation Area and develop policies to promote the provision of moorings and associated facilities</p> <p>d) the Council investigates how the canal frontage of the Nestles site could be used in a creative way, including the possibility of a water-based education and a recreation centre with a mooring for the floating classroom plus a footbridge linking the site to the towpath and Hayes Town Centre.</p> <p>e) the Council examines the possibility of developing the frontage on the southern side of the canal between Station Road Hayes and</p>	<p>The adopted Local Plan Part 1 contains a reference to the need to promote the Canal as a focal point for regeneration in the south of the borough. It is not considered that further references are needed to reinforce this message.</p> <p>Where specific development sites in the Site Allocations and Designation document are located adjacent to the canal it is agreed that it should be incorporated into the design process. Appropriate reference will be included in the Site Information schedules for relevant sites, including Nestle.</p> <p>It is not considered appropriate to designate the whole canal as a conservation area.</p> <p>The Council will assess any proposals for a water based education facility, however a specific requirement and funding mechanism would need to be identified before such a facility could be included in the Local Plan.</p> <p>The release of sites on the southern side of the canal will be guided by the conclusions of the Council's Employment Land Study (ELS).</p> <p>A more detailed examination of the GUC will be included in the forthcoming Heathrow Area Action Plan.</p> <p><u>Proposed Change</u></p>

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				Printing House Lane f) the Council ensures the protection of Shackles Dock and the continuation of a public house facility in any development of the Silverdale Road/Western View.	It is agreed that the canal could be referred to as a feature that will guide the development criteria for individual sites, including Nestle.
Chapter 4: Rebalancing Employment Land					
85	1	Barton Wilmore on behalf of Powerday	Policy SEA 1	<p>A recent planning application for a Materials Recycling Facility (MRF) and civic amenity site with a capacity of 950,000 tonnes was subject to a full Environmental impact assessment which found that the site was suitable for the proposed use, but was refused.</p> <p>To overcome objections, Powerday is preparing a revised planning application which reduces the capacity of the site to 450,000 tonnes. Request that Land at the Old Coal Depot, Tavistock Road should be reallocated as an existing industrial location.</p> <p>Consider that it is extremely concerning that the Council is seeking to de-allocate the land for industrial uses and, 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. Object to the current approach set out in relation to designated industrial and employment sites.</p>	<p>The London Plan (2011) Policy 4.4 Managing Industrial Land and Premises and Map 4.1 requires Hillingdon to adopt a 'Limited Transfer' approach to the transfer of industrial sites to other uses. The Local Plan Part 1: Strategic Policies (adopted November 2012) notes that there is more employment land than currently needed and 17.58 hectares of surplus industrial and warehouse land could be released from 2011 - 2026. A review of all employment and industrial land was undertaken as part of the 2014 update to the Employment Land Study (URS February 2014). The study recommends that along with other sites, West Drayton Depot fulfils a distinct employment purpose and given its particular characteristics it should be retained and monitored as an employment site. However it may not be necessary or appropriate to designate it as a Local Strategic Industrial Site (LSIS).</p> <p><u>No Proposed Change</u></p>
34	1	Savills on behalf	4.20-4.22, 4.25,	Stockley Park Phase 3 site should be included in	The Phase 3 site is currently identified in the Council's UDP as a locally designated

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		of Prologis	4.26	<p>the designation as a LSEL.</p> <p>Paragraph 4.21 states that the designation of existing Industrial and Business Areas as either Locally Significant Employment Sites or Locally Significant Industrial Sites depends on whether the focus of the sites is either industrial in nature or relates to other employment generating uses.</p> <p>However, Phase 3 has never been in employment use. It has lain vacant for the past 30 years. The draft designation does not therefore take into account the particular site circumstances and, as currently worded, would not assist in bringing forward the economic development that is envisaged.</p> <p>Phase 3 should have a more flexible allocation to include industrial or logistics employment uses, in addition to B1 uses.</p> <p>The site allocation is not sound, as it does not take into account the planning history of the wider site, the particular site characteristics and land ownership.</p> <p>Can find no explanation for redrawing the designation to remove the western bounds of phase 3 and do not consider that the west part of the existing site forms any of the five purposes of the Green Belt as set out in the NPPF.</p> <p>Request that the format and extent of the designation of Phase 3 of the Stockley Park LSEL is reconsidered in order to provide a designation that is fully justified, positive and in</p>	<p>Industrial Business Area. The London Plan indicates that Locally Significant Employment Sites should be designated as either:</p> <p>Locally Significant Industrial Sites: Intended to be suitable for industrial and warehouse activities; or</p> <p>Locally Significant Employment Locations (LSEL): These are intended to have a light industrial, office, research and development role.</p> <p>The Council's most recent Employment Land Study indicates that the site should be designated as a LSEL. This is consistent with the existing uses on Stockley Park which are office rather than industrial focused.</p> <p>The alternative approach would be to retain the site as Green Belt.</p> <p><u>No Proposed Change</u></p>

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				compliance with National Policy.	
19	1	Rapleys LLP on behalf of LaSalle Investment Management	Paragraph 4.24 and Map G: Odyssey Business Park	<p>LaSalle seeks to ensure that there is an appropriate policy framework for the Odyssey Business Park in South Ruislip that secures the site's long term future as offices whilst allowing flexibility to ensure that policy can respond to changing economic circumstances in the future.</p> <p>Consider that the recognition of the importance of Odyssey Business Park as a Locally Significant Employment Location is appropriate. Would, however, object to the designation of Odyssey Business Park as a LSEL, unless changes are made to the Development Management Policies for proposals within LSELS.</p>	<p>The site is proposed to be designated as LSEL in response to the evidence set out in the 2014 Employment Land Study Update. Although located outside of the town centre, the Odyssey Business Park is an existing office location and an LSEL designation will help to protect the site from potential changes of use.</p> <p><u>No Proposed Change</u></p>
43	5	RPS Planning and Development on behalf of Albermarle Development	Paragraph 4.29 and Map K: Braintree Road, South Ruislip	Support the proposed deletion of the Arla Foods and Aviva retail units from the Industrial Business Area shown on Map K.	<p>Support noted and welcomed.</p> <p><u>No Proposed Change.</u></p>
67	1	Vincent and Gorbong on behalf of Mrs Diane Frank, Mrs Catherine Bechade and Belikat PTY Ltd	Proposed extension to Springfield Road SIL.	<p>Proposes an extension to the Springfield Road Strategic Industrial Location into the Green Belt. The proposed area is located to the west of Bullsbrook Road and to the north of Hayes Gate Football Club</p> <p>The site does not merit its current Green Belt designation and should be removed.</p>	<p>Officers do not agree that land at Springfield Road should be removed from the Green Belt. The current boundary of the Green Belt area is clear and defensible whereas removal of the land would create a less clear Green Belt boundary. The land is also proposed for designation as a Nature Conservation Site of Metropolitan or Borough Grade I importance, indicating the wider environmental importance of the land to the borough. Furthermore, the Council</p>

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					has identified a surplus of Employment Land and is seeking to reduce the amount rather than increase it and is therefore not seeking to expand the Springfield Road SIL. <u>No Proposed Change</u>
36	5	Rapleys LLP on behalf of HPHA Ltd	Proposed allocation: Hyde Park, Hayes	Hyde Park Hayes should benefit from its own site allocation. The final use should take into account and complement, the surrounding Millington Road area. The allocation should confirm that the site is appropriate for a number of uses defined as "economic development" in the National Planning Policy Framework, such as B class uses, "amenity" or "service" uses, leisure and small scale retail. The final use of the site should be informed by market forces and not be 'fixed' through policy.	Hyde Park Hayes is an established office development and the Council is unlikely to object to proposals that are consistent with this. As such, a separate allocation is not required. <u>No Proposed Change</u>
Chapter 5: Green Belt, Metropolitan Open Land, Green Chains, Nature Conservation					
18	1	Woolbro Holdings	Paragraphs 5.1 - 5.10	Believe plan is unsound as it has not considered all potential Green Belt opportunities.	A thorough review of the Green Belt has been undertaken. <u>No Proposed Change</u>
26	5	Nexus Planning on behalf of Hillingdon Hospital NHS Foundation Trust	Paragraphs 5.1 - 5.10	Propose land at the Mount Vernon Hospital site to be removed from Green Belt as identified in Appendix 2 of representation. Land at the hospital has undergone significant development and is dominated by built up form, diminishing its contribution to the Green Belt and	a) The specific operational needs for Mount Vernon hospital have not been clearly explained to the Council. b) The benefits of co-locating healthcare facilities are acknowledged. Subject to meeting other policies in the plan the

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				<p>its ability to serve the purpose of designation. Only a small part west of and adjacent to Northwood Cricket Club is open and undeveloped land. Consider that retention of the land in the Green Belt will frustrate urban regeneration. It is considered that:</p> <p>(a) there is an acknowledged strategic and local need for improved and expanded health care provision and residential accommodation for staff,</p> <p>(b) there are significant operational health care and sustainability benefits of co-locating existing and new facilities,</p> <p>(c) the exceptions to inappropriate development set out at Paragraph 89 of the NPPF are not sufficient to meet the strategic long term needs for future healthcare,</p> <p>(d) the release of the land from the Green Belt will allow for some limited housing development to take place which is essential to the financial viability and delivery of improved healthcare provision in the area,</p> <p>(e) the removal of the land from the Green Belt will result in net gains across the economic, social and environmental dimensions of sustainable development.</p> <p>(f) Reviewed boundaries will last beyond the plan period and are likely to be permanent. Consider it necessary to amend paragraph 5.5 to 5.7, the list of proposals on page 103 and the subsequent details of Green Belt Allocations set out on page 104 to 107 of the Site Allocations</p>	<p>Council does not necessarily object to the development of healthcare facilities within the existing build envelope of the site. However, sufficient justification has not been provided to develop outside of the site boundary.</p> <p>c) The Local Plan Part 2 is not the appropriate mechanism to address strategic healthcare needs in the borough. These should be examined as part of the next update to the Council's Strategic Infrastructure Plan (SIP) and incorporated in to the next review of the Local Plan Part 1 Strategic Policies document.</p> <p>d) The financial viability of the Trust's Plan is not considered to be a very special circumstance that would justify development in the Green Belt.</p> <p>e) Officers do not agree that the removal of land from the Green Belt would lead to gains across social, economic and environmental dimensions. It is more likely that the scheme would result in economic benefits at the expense of environmental considerations. This is contrary to the principle of 'mutual benefits' contained in the NPPF. This matter can only be fully explored through a full sustainability assessment.</p> <p>f) Sufficient evidence has not been provided to justify the permanent alteration of Green Belt boundaries in the vicinity of</p>

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				and Designations document to confirm the removal of the land at the hospital site from the Green Belt and the Policies Map (Atlas of Changes).	the site.
78	5	Nexus Planning on behalf of East and North Hertfordshire Trust	Paragraphs 5.1 - 5.10	<p>The Mount Vernon Hospital site represents a significant opportunity to meet the long term needs of the Trust and other occupiers. Seek</p> <p>a) the removal of the land identified on the map from the Green Belt,</p> <p>b) the allocation of the part of the site for housing; and</p> <p>c) the exclusion of land from the proposed extension of the site of Grade 1 Nature Conservation Importance.</p>	<p>The strategic policies in the Local Part 1 do not make provision for release of the Green Belt land to meet housing targets.</p> <p>Large scale Green Belt release is not necessary to meet Hillingdon's current or future housing allocation contained in the Local Plan Part 1 and London Plan. The SHLAA did not include provision for the release of Green Belt land which is contrary to policies in the London Plan. As such, officers are of the view that the site should not be allocated.</p> <p><u>No Proposed Change</u></p>
74	1	DLP Planning on behalf of McGovern Brothers (Haulage) Limited	Paragraphs 5.1 - 5.10	<p>Request that representation is read in conjunction with representation from Deloitte Real Estate on behalf of CEMEX UK.</p> <p>Are concerned that two significant material considerations - the demonstrable requirement for additional housing in the borough, and the need to provide a spatial context for the Heathrow Opportunity Area - are not currently being addressed.</p> <p>The FALP identifies an annual target for Hillingdon (2015-2025) of 559 dwellings.</p> <p>Also identifies Frogs Ditch Farm as a site in that could be brought forward as a contribution to</p>	<p>The strategic issues of housing need and the Heathrow Opportunity Area are addressed in the Local Plan Part 1: Strategic Policies.</p> <p>The most up to date Housing Market Assessment for West London was produced in 2010 and indicates an annual need for Hillingdon to provide 415 units per annum.</p> <p>The boundary of the Heathrow Opportunity Area will be developed through the joint Opportunity Area Framework with the London Borough of Hounslow.</p>

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				<p>local housing supply.</p> <p>Understand that a spatial planning framework for the Heathrow Opportunity Area has still not been prepared and consider this to be a serious omission which should be addressed now through the plan-making process.</p> <p>The Part 2 documents are unsound with these key omissions, and therefore fail all four tests of soundness. It is suggested that:</p> <ul style="list-style-type: none"> a) the preparation of an interim housing policy addressing the revised housing requirements for the Borough, as set out in the FALP; b) consequent changes to Development Management Plan paragraphs 1.1 / 1.2 and 4.2 and Site Allocations and Designations paragraphs 3.1 and 4.1/4.2; c) the insertion of a policy regarding a spatial planning framework for the Heathrow Opportunity Area. <p>Consider that Frog's Ditch Farm on Shepiston Lane and the adjoining CEMEX site do not merit its current Green Belt designation and should therefore be included in the schedule of proposed Green Belt deletions.</p>	<p>This will be updated as and when the review of the Local Plan Part 1 is undertaken.</p> <p>Following the issue of the FALP Inspector's report, the Local Plan Part 2 will be updated to reflect the revised housing target contained in the FALP.</p> <p>However, in order to meet this target it is not considered necessary to release significant areas of Green Belt land. The Council does not accept the need to release land at Frogs Ditch Farm from the Green Belt.</p> <p><u>No Proposed Change</u></p>
81	1	Deloitte Real Estate on behalf of USS	Paragraphs 5.1 - 5.10	<p>Hayes Park on Meadhouse Lane is an established business park and does not serve any of the purposes for including land in the Green Belt. It should therefore be removed.</p>	<p>Hayes Park constitutes a low density grouping of industrial buildings by occupied by HJ Heinz and United Biscuits. The site is sparsely developed and does not have clearly defined boundaries. Given its location adjacent to Hayes Park officers are of the view that it would not be suitable for</p>

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					<p>a significantly higher level of development.</p> <p>Whilst the site retains some development it meets the purposes of including land in the Green Belt and should retain its current status.</p> <p><u>No Proposed Change</u></p>
71	7	London Wildlife Trust	Paragraphs 5.1 - 5.10	Welcomes proposed additions to the Green Belt, Metropolitan Open Land and Green Chain additions.	<p>Support noted and welcomed.</p> <p><u>No Proposed Change</u></p>
51	1	John Oswell	Paragraphs 5.1 - 5.10	Considers that land known locally as Charville Fields and Hayes Park situated in Charville Ward does not have the right protection and needs to be upgraded in order to be protected against speculative developers in the area.	<p>Charville Fields is currently designated as Green Belt, which provides the highest level of protection for this land. It is not considered that further designations would offer an additional level of protection.</p> <p><u>No Proposed Change</u></p>
50	1	John McDonnell MP	Paragraphs 5.1 - 5.10	Considers that land known locally as Charville Fields and Hayes Park situated in Charville Ward does not have the right protection and needs to be upgraded in order to be protected against speculative developers in the area.	<p>Charville Fields is currently designated as Green Belt, which provides the highest level of protection for this land. It is not considered that further designations would offer an additional level of protection.</p> <p><u>No Proposed Change</u></p>
46	4	Cllr Ian Edwards	Page 103, Proposed Designations	Requests for land south of Trout Road that is not within the nature conservation site to be deleted from the Green Belt.	<p>The area below Trout Road is within Flood Zone 3 which would preclude any further development. There is no justification for removing the area from Green Belt designation.</p> <p><u>No Proposed Change</u></p>

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30	2	Ruislip Resident Association	Page 103 Proposed Designations	<p>Suggest dual designation for Haydon Hall Park, Eastcote House Gardens and Cheney Street Parkway, Kings College Playing Fields, Manor Farm and Winston Churchill Hall, Field End Recreation Ground, Ruislip Manor, New Pond Playing Fields, Sidmouth Drive Recreation Grounds and West End Road Open Space.</p> <p>Also suggest adding Bessingby Playing Fields, Park Way Green, BWI School, Southcote Rise and, Warrender Park, Myrtle Ave as new green chains/MOLs.</p>	<p>Dual designation does not afford greater protection than single designation.</p> <p><u>No Proposed Change</u></p>
31	1	Friends of Pinn Meadows	Page 103, Proposed Designations and DMEI5	<p>Believe that Kings College Playing Fields, Manor Farm, Haydon Hall Park and Eastcote House Gardens should keep their Green Chain designation alongside the Metropolitan Open Land 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 (Development in Green Chains).</p> <p>Park Way Green, Park Way, Ruislip Manor abuts a railway corridor adjacent to open space at Columbia Avenue and together they form a Green Chain link and therefore this area should be given Green Chain Status. Warrender Park and Highgrove Woods are adjacent valuable Green Spaces that should be designated as Metropolitan Open Land.</p>	<p>Metropolitan Open Land designation offers a higher level of protection than a Green Chains designation.</p> <p><u>No Proposed Change</u></p> <p>With a limited number of exceptions, policies in the Plan have been written in a positive light to reflect the presumption in favour of sustainable development contained in the NPPF. This means that policies state that development will, rather than will not be allowed, subject to certain criteria.</p> <p>Policy DMEI 5 offers exactly the same protection to Green Chains and Green Belt identified in Local Plan Part 1 Policy EM2.</p> <p><u>No Proposed Change</u></p>
48	1	Michael Philpott	Page 103, Proposed	Feels Metropolitan Open Land designation does not afford sufficient protection for Kings College Playing Field and seeks dual MOL/green chain	Dual designation does not afford greater protection than single designation.

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			Designations	designation.	<u>No Proposed Change</u>
49	1	Carey Philpott	Page 103, Proposed Designations	Seeks dual designation MOL/Green Chain for Pinn Meadows.	Dual designation does not afford greater protection than single designation. <u>No Proposed Change</u>
84	1	Martin Cartwright MCIM	Page 103, Proposed Designations	Oppose the proposal to remove Pinn Meadows and other cherished sites such as Eastcote House Gardens and Manor Farm from Hillingdon's Green Chain and to designate them instead as Metropolitan Open Land. Urge the Council to retain the Green Chain designation for Pinn Meadows and to keep the existing Green Chain policy to give the greatest possible protection from future development.	The proposed MOL designation provides a higher level of protection for the site than the existing Green Chain. A dual designation could lead to confusion regarding the status of the site. <u>No Proposed Change</u>
20	1	Oak Farm Resident Association	Page 103, Proposed Designations	The strategic approach towards the protection of green spaces in Local Plan Part 1 adopted policy EM2 has not been applied to the detailed green space policies in the Local Plan Part 2. OFRA suggests dual designation of Green Chain and Metropolitan Open Land for all green sites and suggest that any figures for extra developments for housing put forward by Government are scrutinised by Planners and Councillors as figures are in many cases greater than required.	Dual designation of Green Chain/ MOL land does not afford greater protection than a single designation. <u>No Proposed Change</u>
45	1	Margaret and Martin White	Page 103, Proposed Designations	Requests retention of the Green Chain designation in addition to MOL status, for Haydon Hall Park, Eastcote House Gardens and Cheney Street Parkway at High Road Eastcote, Kings College Playing Fields, Manor	The proposed Metropolitan Open Land designation offers a higher level of protection than a Green Chain designation. <u>No Proposed Change</u>

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				Farm and Winston Churchill Hall, Falling Lane Recreation Ground, Field End Recreation Ground, Torcross Road and Mount Pleasant Parkway and New Pond Playing Fields.	
82	2	Deloitte Real Estate on behalf of CEMEX Properties Ltd	Pages 104 - 106	<p>Consider that Frog's Ditch Farm, Shepiston Lane does not merit its current Green Belt designation and should therefore be included in the schedule of proposed Green Belt deletions. Instead, the site should be identified for residential development.</p> <p>The CEMEX site currently has an agricultural use but has previously been a landfill site, which results in poor agricultural yield. The land is of limited scale and isolated from other agricultural holdings. The neighbouring site is owned by McGovern Brothers (Haulage) Limited and is in use by Hayes Gate Plant Hire for the storage of plant hire, scaffolding, trenching equipment including the parking of associated vehicles and the operation of an associated groundwork.</p> <p>Accordingly the present lawful uses are not consistent with a Green Belt designation and the site should be added to the list of Green Belt deletions.</p>	<p>The release of Frogs Ditch Farm is not necessary to meet the revised housing target in the FALP.</p> <p><u>No Proposed Change</u></p>
53	8	Cllr Janet Duncan	Page 116, Map 8	Lake Gardens should be left as Metropolitan Open Land, rather than being upgraded to Green Belt, to more accurately reflect its situation as an island site.	<p>Designation as Green Belt will provide greater protection and as the site adjoins Green Belt land, this designation is more appropriate.</p> <p><u>No Proposed Change</u></p>
61	1	Ruislip,	Page 120, Map	Support designation of most of Manor Farm site	MOL boundaries are based on the study

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		Northwood, Eastcote Local History Society	11	as MOL. Suggest the inclusion of courtyards on either side of the Great Barn, the Duck Pond and St Martin's Approach car park, previously site of the Manorial Dovecote.	undertaken by the Council. Whilst minor changes can be made to the boundaries, additional evidence would be required to justify new MOLs. <u>No Proposed Change</u>
77	1	Ask Planning on behalf of KSIMC	New Green Chain Proposal 16: Ruislip Manor Sports & Social Club	<p>Object to the inclusion of Ruislip Manor Sports and Social Club, Grosvenor Vale, Ruislip as part of Green Chain link Site 16 on the basis that</p> <p>a) the designation will place an unnecessary constraint on the aspirations of current and future owners and users of the sports ground, and their desire for expansion and constant improvements; and</p> <p>b) the designation will virtually afford the site a similar status as Green Belt land or a Metropolitan Open Space, and in the process would place a significant constraint on the future use of the site for recreation and sports activities.</p> <p>The proposed Green Chain will not provide a suitable link with other green areas.</p> <p>There is no need for a green chain designation because the use of the site is already regulated by the policies and standards of Sport England. The recreational needs of KSIMC's members should be addressed instead of being discouraged. There are other sites that are more or equally suited for the 'Green Chain' in Ruislip Manor and elsewhere.</p>	<p>Ruislip Manor Sports and Social Club meets the criteria of policy DME15 as a designated Green Chain on the basis that it constitutes a valuable site for recreation.</p> <p>The Council is keen to protect this important site from other forms of development.</p> <p>In response to the points raised by the representor, officers are of the view that:</p> <p>a) In accordance with criteria iv) of the policy the proposed Green Chain designation will not necessarily prevent the improvement of recreational facilities at the site.</p> <p>b) The Green Chain designation does not carry the same weight as Green Belt or MOL. These designations do not prevent the use of the site as recreational facilities.</p> <p>Notwithstanding the existing protection afforded to the site, officers are of the view that the site meets the policy criteria and should be designated accordingly.</p> <p><u>No Proposed Change</u></p>

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71	11	London Wildlife Trust	Table 6.1	Welcome and support the proposed extensions to SINCS.	Support noted and welcomed.
71	12	London Wildlife Trust	Table 6.2	Welcome and support the proposed extensions to SINCS.	Support noted and welcomed
67	2	Vincent and Gorbong on behalf of Mrs Diane Frank, Mrs Catherine Bechade and Belikat PTY Ltd	Proposed Extension SINC Ext 6	Object to the extent of proposed extension to SINC Ext 6 (Yeading Brook/Minet Country Park). Have produced an ecological report demonstrating that the proposed SINC extension does not meet recognised criteria for designation. Request to remove the proposed designation as shown on the plan provided.	In accordance with the recommendations for the Cabinet report a full review of all SINCS in the borough will be undertaken prior to the examination. <u>No Proposed Change</u>
68	1	DP9 on behalf of Red & Yellow	Proposed extension SINC Ext 11	Object to proposed SINC Ext 11 (Medipark, Harefield). Have carried out ecological survey work demonstrating that the site does not merit its proposed designation.	Rationale for the SINC extension is based on work undertaken by the London Ecology Unit in 2005. In accordance with the recommendations for the Cabinet report a full review of all SINCS in the borough will be undertaken prior to the examination. <u>No Proposed Change.</u>
10	2	Harefield Tenants and Residents Association (HTRA) (Tina Ward)	Proposed Extension SINC Ext 11	Supports SINC Ext 11: Medipark. The Medi Parc Site is next to ancient wood has been a haven for flora and fauna for decades. It supports a wide range of species, including amphibians, reptiles, birds, invertebrates and bats and should be protected.	Support noted and welcomed. <u>No Proposed Change</u>
41	1	DP9 on behalf of Royal Brompton	Proposed Extension SINC	There is limited analysis as to why a SINC is proposed on the Medipark site and what impact	Rationale for the SINC extension is based on work undertaken by the London Ecology

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		and Harefield NHS Trust	Ext 11	this would have on the future of the site.	<p>Unit in 2005.</p> <p>In accordance with the recommendations for the Cabinet report a full review of all SINC in the borough will be undertaken prior to the examination.</p> <p><u>No Proposed Change</u></p> <p>Propose to review SINC details prior to Examination.</p>
78	6	Nexus Planning on behalf of Hillingdon Hospital NHS Foundation Trust	Proposed Extension SINC Ext 13	<p>Object to the proposed extension of the existing Site of Nature Conservation Importance (Ref: SINC Extension 13) to include Land at the Mount Vernon hospital site, as identified in table 6.1 and detailed on page 147 of the Local Plan Part 2: Site Allocations and Designations Document.</p> <p>Consider that the proposed SINC extension/ designation is not justified by the evidence, which clearly demonstrates that the land is not of sufficient nature conservation importance and does not meet the requirements for designation of a SINC.</p> <p>Point out that there is an inconsistency between Table 6.1 and the details of the proposed designation set out in on page 147 of the Site Allocations and Designation document. The former refers to the site's proposed designation as a Grade 2 SINC, whereas the latter refers to a Grade 1 designation.</p>	<p><u>Proposed Change</u></p> <p>Rationale for the SINC extension is based on work undertaken by the London Ecology Unit in 2005.</p> <p>A further review of SINC boundaries will be undertaken prior to the examination, in accordance with the recommendation contained in the Cabinet report.</p>
78	6	Nexus Planning on behalf of East	Proposed Extension SINC	Object to the proposed SINC Extension 13 to include Land at the Mount Vernon hospital site,	Rationale for the SINC extension is based on work undertaken by the London Ecology

Appendix 2: Site Allocations and Designations: Schedule of Representations Received and Officer Responses

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ID	Rep No	Individual/Organisation	Para, Policy, Map	Summary of Representation	Council Response
		and North Hertfordshire Trust	Ext 13	<p>as identified in Table 6.1. Consider that there proposed designation is not justified by evidence, does not meet the criteria for SINC designation and should therefore be removed.</p> <p>A separate ecology study has been submitted to demonstrate that the proposed SINC is not justified.</p> <p>Also point out that there is an inconsistency between Table 6.1 and the details of the proposed designation set out on page 147 of the draft document. The former refers to the land's proposed designation as a Grade 2 SINC, whereas the latter refers to a Grade 1 designation.</p>	<p>Unit in 2005.</p> <p>A further review of SINC boundaries will be undertaken prior to the examination, in accordance with the recommendation contained in the Cabinet report.</p> <p><u>No Proposed Change</u></p>
78	7	Nexus Planning on behalf of East and North Hertfordshire Trust	Proposed Extension SINC Ext 13:	Request the removal of land at the Mount Vernon Hospital Site from the Green Belt, deletion of the proposed extension to the Grade I SINC to include land at the Mount Vernon Hospital and the allocation of land at the Mount Vernon Hospital Site, as shown on the plan for housing site.	<p>Rationale for the SINC extension is based on work undertaken by the London Ecology Unit in 2005.</p> <p>In accordance with the recommendations for the Cabinet report a full review of all SINC's in the borough will be undertaken prior to the examination.</p> <p>Sufficient justification has not been provided to remove the site from the Green Belt.</p> <p><u>No Proposed Change</u></p>
22	1	Hillingdon Hospitals	Proposed Extension SINC Ext 13,	<p>The Trust is keen to ensure a supportive policy framework for Hillingdon Hospital and Mount Vernon Hospital.</p> <p>Note that there are no site specific policies with regards to Hillingdon Hospital, which is not</p>	Officers recognise the role of Hillingdon Hospital as a Strategic Partner to the Council and note the development of the masterplan for Hillingdon Hospital. This representation raises two issues:

Appendix 2: Site Allocations and Designations: Schedule of Representations Received and Officer Responses

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ID	Rep No	Individual/ Organisation	Para, Policy, Map	Summary of Representation	Council Response
				<p>acceptable.</p> <p>Are disappointed that the proposed policies would have a detrimental impact on the Trust's proposals for the Mount Vernon Hospital.</p> <p>Consider that site should be excluded from the Green Belt given its built up nature. The proposed SINC extension 13 is wholly inappropriate and undermines the redevelopment proposals that are currently being prepared for the site.</p> <p>A master plan for redevelopment of this site envisages the surplus area to the north to be developed for housing.</p>	<p>1. Green Belt</p> <p>The developed nature of the Mount Vernon site does not necessarily mean that it should be excluded from the Green Belt. Many settlements in the borough are 'washed over' by this designation on the basis that they are not considered appropriate for expansion beyond their existing boundaries.</p> <p>Officers consider that subject to meeting other policy considerations within the plan the Green Belt designation does not necessarily prevent development taking place within the existing developed envelope of the site.</p> <p>However, proposed expansion beyond the existing boundary is not considered appropriate or justified. The eastern boundary of the Green Belt is clearly defined by Rickmansworth Road to the east of the site. As currently defined, this prevents the expansion of the residential uses into open countryside.</p> <p>2. Proposed SINC</p> <p>The proposed SINC to the south of the site was defined by the London Ecology unit in 2005.</p> <p>A further review of SINC boundaries will be undertaken prior to the examination, in accordance with the recommendation contained in the Cabinet report.</p>

Appendix 2: Site Allocations and Designations: Schedule of Representations Received and Officer Responses

February 2015

ID	Rep No	Individual/ Organisation	Para, Policy, Map	Summary of Representation	Council Response
16	1	Matthews and Son LLP on behalf of Henry Streeter Ltd	Proposed New SINC 1 Table 6.2	<p>Suggests withdrawing proposed SINC New 1 Wall Garden Farm Sand Heaps on the grounds that:</p> <ul style="list-style-type: none"> a) the correct protocols in terms of SINC identification and stakeholder engagement have not been used, b) the land is operational and includes a minerals processing plant , c) the permitted restoration is to agriculture, d) it does not have the support of the landowner, e) it will not be accessible to the public f) it is not 'appropriate' in terms expressed in Policy EM7 (line 2). <p>The 2005 GLA evidence document states that at the time sand heaps associated with the mineral extraction supported a breeding colony of sand martins, which are protected by the Wildlife and Countryside Act 1981. These sand heaps no longer exist. Consider that any occupation of quarry workings by sand martins is seasonal and the habitat has changed.</p>	<p>The Council proposes to commission a review of all SINC's in the borough prior to the hearing sessions associated with the examination process.</p> <p>A further review of SINC boundaries will be undertaken prior to the examination, in accordance with the recommendation contained in the Cabinet report.</p> <p><u>No Proposed Change</u></p>
Chapter 6: Key Transport Interchanges					
56	2	Heathrow Airport Ltd	Heathrow Bus Inter-changes	<p>Welcome the addition of the Heathrow Bus Interchange as a designated site, but consider that the boundary should encompass the whole Central Terminal Area recognising the important interchange functions that the terminals and the</p>	<p>The Part 2 documents deliver the detail of the Local Plan Part 1 which identified 5 key public transport interchanges which did not include Terminals 4 and 5.</p>

Appendix 2: Site Allocations and Designations: Schedule of Representations Received and Officer Responses

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ID	Rep No	Individual/ Organisation	Para, Policy, Map	Summary of Representation	Council Response
				central bus station fulfil. Suggest including reference to the Central Terminal Area site as a multimode transport interchange and consider that Terminals 4 and 5 should each be designated as Key Transport Interchanges.	Comments noted for any future review of this document. <u>No Proposed Change</u>
Chapter 7: School Sites					
88	1	Guys Investments Limited on behalf of f451 IP Ltd	General	Considers that the document fails to adequately address the need for schools and suggests that consideration should be given to the expansion of the Douay Martyrs School onto a portion of the Glebe farm site, which is designated Green Belt.	<u>Proposed Change</u> The documents will be updated to reflect the Council's latest position on school provision.
53	10	Cllr Janet Duncan	Page 176: School Sites	Considers that sites should be identified for new secondary schools to ensure essential educational provision to meet identified need of 27 forms of entry.	<u>Proposed Change</u> The plan is to be amended to reflect the Council's latest position on school places.
53	7	Cllr Janet Duncan	Page 178; Lake Farm School	Suggests removing Lake Farm School from the Green Belt in the same way as Ruislip High School is now a developed site and no longer fulfils the Green Belt function.	<u>Proposed Change</u> It is agreed that this area no longer serves the purposes of the Green Belt as defined in the NPPF and should be removed.
Chapter 8: Mineral Safeguarding					
16	6	Matthews and Son LLP on behalf of Henry Streeter Ltd	Section 8 Mineral Safeguarding	The Key Objective of the Local Plan Part 1 of making a proportionate contribution to West London's mineral allocation is not achieved through Mineral Safeguarding as defined in the NPPF/NPPG. Contrary to the statement in this	<u>Proposed Change</u> Railheads in the borough will be safeguarded from development in accordance with the provisions of the

Appendix 2: Site Allocations and Designations: Schedule of Representations Received and Officer Responses

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ID	Rep No	Individual/ Organisation	Para, Policy, Map	Summary of Representation	Council Response
				<p>paragraph the Minerals Technical Background Report (2008) does not conclude that 'there are three sites able to provide the defined aggregates requirement over the plan period for the Borough' and to claim that it does is misleading.</p> <p>Safeguarding these sites will not deliver the defined aggregates requirement over that plan period.</p>	<p>London Plan.</p> <p>The most recent Local Aggregates Assessment June 2014 (Jacobs) concluded the borough has fully satisfied its obligation to make provision for the supply of land won sand and gravel aggregates in line with the London Plan provided that, amongst other things, permitted reserves continue to be monitored and planning permission at the existing extraction sites remain extant.</p> <p><u>No Proposed Change</u></p>
General Comments					
1	1	Hertfordshire County Council	General	<p>Have recently adopted a Waste Site Allocations document, but none of the proposed allocation sites are located near the county boundary. However, safeguarded waste site Maple Lodge Sewage Treatment Works, which is identified in the Council's adopted Waste Core Strategy and Development Management Policies document, is adjacent to the boundary with Hillingdon. Expect the location of the sewage treatment works to be taken into consideration in accordance with the County's policy requirements, should a planning application be submitted adjacent to, or in close proximity to it.</p> <p>Land in Hertfordshire adjoining the boundary with Hillingdon, is situated within the sand and gravel belt identified as a minerals consultation area in the county council's 'Mineral Consultation Areas in Hertfordshire SPD.</p>	<p>Adjacent boroughs and districts will be consulted on planning applications in accordance with Planning Regulations. This does not require a change to the Local Plan documents.</p> <p><u>No Proposed Change</u></p>

Appendix 2: Site Allocations and Designations: Schedule of Representations Received and Officer Responses
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ID	Rep No	Individual/ Organisation	Para, Policy, Map	Summary of Representation	Council Response
				Request to be consulted on any development that does not fall within Section 3: Excluded Development of the SPD. Any planning applications for development close to the county boundary may need to refer to this SPD.	

3) POLICIES MAP - ATLAS OF CHANGES, SUSTAINABILITY APPRAISAL, APPROPRIATE ASSESSMENT AND STRATEGIC FLOOD RISK ASSESSMENT - September 2014

- The following schedule reports on comments received during the consultation on the initial September 2014 Policies Map Atlas of Changes. It provides the representations received together with officer responses

Appendix 3: Policies Map Atlas of Changes: Schedule of Representations Received and Officer Responses
February 2015

ID	Rep No	Individual/ Organisation	Para, Policy, Map	Summary of Representation	Council Response
Background					
No representation submitted					
Chapter 1: Rebalancing Employment Land: Proposed Strategic Industrial Locations					
65	12	Nathaniel Lichfield & Partners on behalf of Purplexed LLP	1.1	Support the removal of Strategic Industrial Land (SIL) designation and the identification for residential-led mixed use redevelopment under Site SA2 (The Old Vinyl Factory).	Support noted and welcomed. <u>No Proposed Change</u>
66	2	Nathaniel Lichfield & Partners on behalf of Workspace Group	1.1	Support the removal of the Strategic Industrial Land (SIL) designation and the identification of Enterprise House for residential-led mixed use redevelopment under policy SA1.	Support noted and welcomed. <u>No Proposed Change</u>
Chapter 2: Proposed Locally Significant Employment Locations					
21	2	The Emerson Group	Map 2.4	Support is given to the identification of the three sites north of the A4 Bath Road as shown on Map 2.4 and the inclusion of these as Locally Important Employment Areas under Policy DME1 (Employment uses in Designated Sites). Concerns expressed that the proposed expansion of Heathrow Airport will increase industrial vacancy rates.	Support noted and welcomed. <u>No Proposed Change</u>

Appendix 3: Policies Map Atlas of Changes: Schedule of Representations Received and Officer Responses
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ID	Rep No	Individual/ Organisation	Para, Policy, Map	Summary of Representation	Council Response
				Policy DME2 (Employment Uses Outside of Designated Sites) is a logical attempt to underpin the broad policies in the Core Strategy to accommodate the required 9,000 jobs over the plan period.	
Chapter 3: Proposed locally Significant Industrial Sites					
53	6	Cllr Janet Duncan	Chapter 3	<p>Supports the removal of the Old Coal Yard site in Tavistock Road, Yiewsley from the IBA designation as detailed work and information have shown that it is not suitable for an industrial designation and high generation of HGVs.</p> <p>The close proximity of the site to a Crossrail station and bus station would encourage mixed use development which minimises the need for car parking and does not generate HGV traffic.</p> <p>Crossrail investment encouraging higher employment uses should be maximised, to support both the local town centres of Yiewsley and West Drayton and the local economy.</p> <p>The removal of this site has made the plan sounder and good development is achievable.</p>	<p>Supported noted and welcomed.</p> <p><u>Proposed Change</u></p> <p>Officers propose to allocate the Old Coal Yard Site for residential led mixed use development. An appropriate scheme for the site will be identified in the revised version of the Site Allocations document, which will be issued for consultation in May of this year.</p>
Chapter 4: Deletion from the Green Belt Boundary					
73	1	Mercer Planning Consultants Ltd on behalf of Mr. R	Chapter 4	Request that 59 Reservoir Road be excluded from the Green Belt as it does not meet the tests outlined in the NPPF. Consider that a	An extensive review of the Green Belt was undertaken in 2013. Officers are of the view that there are no exceptional circumstances

Appendix 3: Policies Map Atlas of Changes: Schedule of Representations Received and Officer Responses
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ID	Rep No	Individual/ Organisation	Para, Policy, Map	Summary of Representation	Council Response
		Mahmud		detailed review of existing Green Belt boundaries should be carried out.	to the justify exclusion of 59 Reservoir Road as required by the NPPF. The site meets two of the purposes for including land in the Green Belt as identified in the NPPF - to prevent unrestricted sprawl of large built-up areas and to assist in safeguarding the countryside from encroachment. The current boundary is based on existing definable physical features whereas the deletion of the site from the Green Belt would result in a Green Belt boundary that was no longer clearly defined. <u>No Proposed Change</u>
26	7	Nexus Planning on behalf of Hillingdon Hospital NHS Foundation Trust	Chapter 4: Deletion from Green Belt	The Trust made separate representations to the Local Plan Part 2 in respect of land at the Mount Vernon Hospital Site. Amongst other things, these representations seek the following: i) The removal of land at the Mount Vernon Hospital Site from the Green Belt. ii) Deletion of the proposed extension to the Grade I SINC to include land at the Mount Vernon Hospital Site (Ref. SINC Ext 13). iii) The allocation of land at the Mount Vernon Hospital Site as a housing site.	The release of Green Belt land is not necessary to meet Hillingdon's current housing target contained in the Local Plan Part 1 or the revised target contained in the Further Alterations to the London Plan. This is reflected in policy EM2 of the Local Plan Part 1, which seeks to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains in Hillingdon. Policy 7.16 of the London Plan states that the Mayor strongly supports the current extent of London's Green Belt. As such, the London-wide Strategic Housing Land Availability Assessment, which formed the basis of Hillingdon's revised Annual Monitoring target for housing provision, did not identify sites in the Green Belt. A further review of SINC boundaries will be undertaken prior to the examination, in

Appendix 3: Policies Map Atlas of Changes: Schedule of Representations Received and Officer Responses
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ID	Rep No	Individual/Organisation	Para, Policy, Map	Summary of Representation	Council Response
					accordance with the recommendation contained in the Cabinet report. <u>No Proposed Change</u>
56	1	Heathrow Airport Ltd	Map 4.2 Proposed removal of Terminal 5 Business Car Park	Support the deletion of Former Perry Oaks Sludge Works Site and consider the A3044 marks a logical boundary. However, a further area of Green Belt requires removal at the site of the T5 Business Car Park. Given the site's isolation from other Green Belt land as a result of the realignment of the Duke of Northumberland's River and the development of this area as car parking, it is not considered that the land designated as Green Belt at Longford Park to the south of the River serves a Green Belt function. Request redefining the Green Belt boundary along the river and the airport boundary so that it corresponds with the Green Belt boundary in this location.	Support noted and welcomed <u>Proposed Change</u> The area of land with planning permission for the Terminal 5 Business Car Park will be removed from the Green Belt.
Chapter 5: Additions to the Green Belt Boundary					
3	1	Kenneth Morgan	Map 5.1	Considers that white area at the rear of the houses in Merle Ave and the Sports Ground has no natural boundary. Asks why is it that particular shape and why is it coloured white? On site it is just part of one large field with only access via a farmyard or public footpath. Suggests including the area into the Green Belt.	<u>Proposed Change</u> The Green Belt boundary will be amended to include the land to the rear of Merle Avenue up to the western boundary of the Sports Ground. This forms a clearly defined boundary for the Green Belt in accordance with the NPPF.

Appendix 3: Policies Map Atlas of Changes: Schedule of Representations Received and Officer Responses
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ID	Rep No	Individual/ Organisation	Para, Policy, Map	Summary of Representation	Council Response
4	1	Anthony Crane	Map 5.1	<p>The sports field for Harefield school and the adjoining land is not included as proposed new Green Belt.</p> <p>Considers that including the sports field into the Green Belt would ensure that the Olympic legacy of sport facilities is up held for local people.</p> <p>Half the adjacent field surrounding the sports field is already in the Green Belt. Considers that it is therefore illogical not to include the whole field.</p>	<p><u>Proposed Change</u></p> <p>The Green Belt boundary will be amended to include the land to the rear of Merle Avenue up to the western boundary of the Sports Ground. This forms a clearly defined boundary for the Green Belt in accordance with the NPPF.</p>
10	1	Harefield Tenants and Residents Association (HTRA) (Paul Stone)	Map 5.1	<p>Requests that a small plot of land adjacent to Merle Avenue should be included within the Green Belt Boundary. Enquires as to why this piece of land has not been included as it meets the same criteria as neighbouring Green Belt land.</p> <p>Requests that the Green Belt boundary be extended to include a neighbouring sports pitch.</p> <p>HTRA are delighted to note extensions to nature conservation sites on the Proposals Map, but are concerned about the potential loss of the land at the rear and the end of Merle Avenue and the Sports Ground (School Playing field). The current Green Belt boundary is illogical and requests the inclusion of a small parcel of land at the rear and the end of Merle Avenue in to the Green Belt to create a definable and logical boundary.</p> <p>HRTA petitions also for the sports ground to</p>	<p>Support for extensions to conservation sites noted.</p> <p><u>Proposed Change</u></p> <p>The Green Belt boundary will be amended to include the land to the rear of Merle Avenue up to the western boundary of the Sports Ground. This forms a clearly defined boundary for the Green Belt in accordance with the NPPF.</p>

Appendix 3: Policies Map Atlas of Changes: Schedule of Representations Received and Officer Responses
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ID	Rep No	Individual/ Organisation	Para, Policy, Map	Summary of Representation	Council Response
				be granted Green Belt status within the Local Plan Part 2 and urge the Council to do all they can to ensure that these excellent facilities are preserved for future generations.	
47	1	Anthony Wilkinson	5.1	Fully supports the addition to the Green Belt in Map 5.1.	Supported noted and welcomed. <u>No Proposed Change</u>
Chapter 6: Proposed Metropolitan Open Land					
13	1	Mark Stirling	6.3 Kings College Playing Fields	<p>Justification is given for classifying the land as Metropolitan Open Land, but no justification is provided for removing this land from the UDP designation 'Areas form links in a Green Chain'. The guidance suggests the two are certainly compatible.</p> <p>Removing the Green Chain classification would reduce the protection afforded to this area and this seems contrary to the Council's stated aims. Moreover, the removal of this status is not highlighted elsewhere (e.g. under the heading 'Green Chain Deletion' in the Site Allocation and Designations document) and might therefore be missed by anybody casually reviewing these documents.</p> <p>The site should be retained as Metropolitan Open Land and Green Chain.</p>	<p>Metropolitan Open Land designation offers more protection to green spaces than a Green Chain designation. The London Plan paragraph 7.56 explicitly states that "open spaces and links within a Green Chain should be designated as MOL due to their London-wide importance". Kings College Playing Fields can be designated as MOL through Policy 7.17 D of the London Plan because it satisfies at least one of the criteria listed - a) and d).</p> <p>Both Site Allocations and Atlas of Change documents refer to replacing a Green Chain designation with a Metropolitan Open Space designation.</p> <p><u>No Proposed Change</u></p>
Chapter 7: Amendments to Areas Forming Links in Green Chains					

Appendix 3: Policies Map Atlas of Changes: Schedule of Representations Received and Officer Responses
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ID	Rep No	Individual/ Organisation	Para, Policy, Map	Summary of Representation	Council Response
23	3	Eastcote Conservation Panel	No specific reference in the chapter	Request the inclusion of the Parkway Open Space linked to Colombia Avenue Open Space by railway embankment as Green Chain. Further request that the status of the Bessingby/Cavendish/Pine Gardens Parks, Warrender Park and Highgrove Woods be upgraded to Metropolitan Open Land. Consider that these meet the criteria for designating MOL.	<p>The Parkway /Columbia Avenue open spaces are already protected from development as open spaces, under the provisions of policy DMCI 3: Public Open Space Provision.</p> <p>The nature conservation value of the areas themselves and the link between them would need to be demonstrated in order to justify the Green Chain designation.</p> <p>Whilst the spaces listed contribute to the value of the local area, it is not considered that they meet the criteria for the designation of Metropolitan Open Land listed in Policy 7.17 of the London Plan.</p> <p><u>No Proposed Change</u></p>
Chapter 8: Proposed Extension to Nature Conservation Sites of Metropolitan or Borough Grade 1 Importance					
71	6	London Wildlife Trust	Chapter 8	The Nature Reserve boundary shown for Frays Island/Mabey's Meadow Nature Reserve on Thorney Mill Road is inaccurate in that it omits the meadow element. Suggest revising the boundary and are happy to provide details.	<p><u>Proposed Change</u></p> <p>Details of the boundary of Frays Island will be amended to include Mabey's Nature Reserve.</p>
71	5	London Wildlife Trust	Chapter 8	The boundary of the Frays Farm Meadows Nature Reserve is omitted from the Plan, as is the boundary of the wider Frays Valley Local Nature Reserve. Suggest adding boundaries and are happy to provide details if they are not readily available.	<p><u>Proposed Change</u></p> <p>Frays Farm Meadows is a proposed Nature Conservation Site of Metropolitan or Borough Grade 1 Importance. This is shown on the composite Policies Map but not in the Atlas of Changes. The Atlas of Changes will be amended accordingly.</p>

Appendix 3: Policies Map Atlas of Changes: Schedule of Representations Received and Officer Responses
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ID	Rep No	Individual/ Organisation	Para, Policy, Map	Summary of Representation	Council Response
83	2	St James Group	SINC Ext 6 - 8.5	Proposed SINC extension 6 (Yeading Brook, Minet Country Park, Hitherbroom Park) is unsound because it 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. The extension to the SINC should be revised to omit the land adjoining Pump Lane.	<u>Proposed Change</u> The Policies Map will be amended to reflect the latest position of the approved alignment of the access road.
68	2	DP9 on behalf of Red & Yellow	8.10	Object to proposed extension SINC Ext 11 (Medipark Harefield). Have carried out ecological survey work demonstrating that the site does not merit its proposed designation.	The rationale for SINC extension is based on work undertaken by the London Ecology Unit in 2005 as it abuts an existing site of Metropolitan importance. The proposed extension is to a site of Metropolitan importance. In accordance with the recommendations contained in the Cabinet report, a full review of all SINC's in the borough will be undertaken prior to the examination <u>No Proposed Change</u>
Chapter 9: Proposed Deletion of a Nature Conservation Sites of Metropolitan or Borough Grade 1 Importance					
No representation submitted					
Chapter 10: Proposed Extensions to Nature Conservation Sites of Borough Grade 2 or Local Importance					

Appendix 3: Policies Map Atlas of Changes: Schedule of Representations Received and Officer Responses
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ID	Rep No	Individual/ Organisation	Para, Policy, Map	Summary of Representation	Council Response
71	4	London Wildlife Trust	Chapter 10	The boundary of the Crane Meadows Nature Reserve is omitted from the Plan. This London Wildlife Trust Nature Reserve lies between the River Crane and the airport perimeter. Its designation and improvement is an important enhancement to the Green Belt and river corridor.	Crane Meadows is identified as a proposed extension to a Nature Conservation Site of Borough Grade 2 Importance. <u>No Proposed Change</u>
Chapter 11: Heathrow Airport Boundary					
No representations submitted					
Chapter 12: Road Safeguarding					
83	1	St James Group	12.1	Map 12.1 in the Policies Map: Atlas of Changes does not reflect or adequately take account of the permitted scheme for Southall Gas Works because: a) the position of the road safeguarding on the plan is not in accordance with the position of the eastern access route approved under the Permitted Scheme 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. Suggest amending map to take account of eastern access, pedestrian and cycle bridges. Furthermore, the road safeguarding	The plan will be amended to take account of the correct alignment of the access. <u>Proposed Change</u> Amend Policies Map to reflect exact position of access road, in accordance with the approved scheme.

Appendix 3: Policies Map Atlas of Changes: Schedule of Representations Received and Officer Responses
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ID	Rep No	Individual/ Organisation	Para, Policy, Map	Summary of Representation	Council Response
				contemplated by Map 12.1 does not appear to have been considered alongside SINC Ext 6: Yeading Brook, Minet Country Park, Hitherbroom Park).	
Chapter 13: Archaeological Priority Areas					
No representations submitted					
Chapter 14: Archaeological Priority Zones					
No representation submitted					
Chapter 15: Change to Centre Boundaries - Town Centres					
No representation submitted					
Chapter 16: Change to Centre Boundaries - Local Centres					
No representation submitted					
Chapter 17: Site allocations - new homes					
72	2	Burnett Planning & Development Ltd on behalf of Deutsche	Chapter 17: Willow Tree Local Centre boundary	Suggest extending the boundary of the centre to include the existing retail units on the south side of Glencoe Road, which function as part of the centre due to excellent pedestrian links.	No justification to extend the boundary of the site. <u>No Proposed Change</u>

Appendix 3: Policies Map Atlas of Changes: Schedule of Representations Received and Officer Responses
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ID	Rep No	Individual/ Organisation	Para, Policy, Map	Summary of Representation	Council Response
		Alternative Asset Management Ltd		As drafted the plan fails to plan positively and promote a competitive town centre environment.	
66	3	Nathaniel Lichfield & Partners on behalf of Workspace Group	Chapter 17: SA1	Consider that the policy is out-of-date and inaccurate and should be updated to reflect the most recent planning history for the Enterprise House.	<u>Proposed Change</u> The provisions of SA1 will be amended to reflect the latest planning history for Enterprise House.
39	1	Solent Planning on behalf of Bourne End Investments Ltd	17.28	Plan 17.28 does not show the full extent of the Trout Road site, which totals 2.31 ha. Request that Map 17.28 be amended in accordance with the submitted red line plan and consider that whilst the allocation is supported, the site could be developed solely for residential development.	<u>Proposed Change</u> The site boundary will be amended to reflect the most recent planning history for the site.
40	2	Carter Jonas on behalf of Buccleuch Property	Map 17.9	There is an existing car park adjacently north of the site, which is owned by Network Rail, which should be included within the site boundary.	Satisfactory parking provision needs to be retained or increased for the station. Any reprovision as part of a wider redevelopment could come forward through the planning application process. <u>No Proposed Change</u>
Chapter 18: Site allocations - safeguarding public transport interchanges					
No representation submitted					
Chapter 19: Site allocations - school sites					

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ID	Rep No	Individual/ Organisation	Para, Policy, Map	Summary of Representation	Council Response
					No representation submitted
					Chapter 20: Site allocations - safeguarding minerals sites
					No representations submitted
					Chapter 21: Scheduled Ancient Monuments
					No representations submitted
					Chapter 22: Conservation Areas
					No representations submitted
					Chapter 23: Areas of Special Local Character
					No representation submitted
					Chapter 24: Sites of Special Scientific Interest
					No representation submitted
					Chapter 25: Public Safety Zones

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ID	Rep No	Individual/ Organisation	Para, Policy, Map	Summary of Representation	Council Response
No representation submitted					
Chapter 26: Registered Parks and Gardens					
No representation submitted					
Chapter 27: Air Quality Management Area					
No representation submitted					

**4) Non specific representations and representations received in relation to the Sustainability Appraisal:
Schedule of Representations Received and Officer Comments (September 2014)**

Appendix 4: Non specific representations and representations received in relation to the Sustainability Appraisal: Schedule of Representations Received and Officer Comments

February 2015

ID	Rep No	Individual/ Organisation	Para, Policy, Map	Summary of Representation	Council Response
General Strategic Issues					
82	1	Deloitte Real Estate on behalf of CEMEX Properties Ltd	<p>Development Management Policies - Paragraphs 1.1 / 1.2 and 4.2</p> <p>Site Allocations and Designations - Paragraphs 3.1 and 4.1/4.2</p>	<p>Two significant material considerations - the demonstrable requirement for additional housing in the borough, and the need to provide a spatial context for the Heathrow Opportunity Area - are not currently being addressed in Hillingdon's plan making process.</p> <p>The Council should begin planning for revised housing figures as set out in the draft FALP, at least by issuing an interim policy supplementing the existing housing targets of the Local Plan Part 1.</p> <p>Also identify a large site in Harlington (Frogs Ditch Farm) that could be brought forward as a contribution to local housing supply.</p> <p>The fact that a spatial planning framework for the Heathrow Opportunity Area has not yet been prepared is a serious omission which should be addressed now through the plan-making process.</p> <p>Request the preparation of an interim housing policy addressing the revised housing requirements for the Borough, as set out in the FALP, consequent changes to Development Management Plan paragraphs 1.1 / 1.2 and 4.2 and Site Allocations and Designations Paragraphs 3.1 and 4.1/4.2 as well as the insertion of a policy regarding a spatial planning framework for the Heathrow Opportunity Area.</p>	<p>The boundary of the Heathrow Opportunity Area will be developed through the joint Opportunity Area Framework with the London Borough of Hounslow.</p> <p>This will be updated as and when the review of the Local Plan Part 1 is undertaken.</p> <p>Following the issue of the Inspectors report the Local Plan Part 2 will be updated to reflect the revised housing target contained in the FALP.</p> <p>The Council does not require any release of Green Belt land to meet its housing target.</p> <p><u>No Proposed Change</u></p>

Appendix 4: Non specific representations and representations received in relation to the Sustainability Appraisal: Schedule of Representations Received and Officer Comments

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ID	Rep No	Individual/ Organisation	Para, Policy, Map	Summary of Representation	Council Response
75	1	GVA on behalf of Brunel University	Numerous	<p>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.</p> <p>The proposed designation of land at Brunel University as a SINC is not underpinned by appropriate evidence.</p> <p>Suggest undertaking an objective assessment of the development needs of the higher education/research sector, including the allocation of Brunel University's Uxbridge Campus for higher education/research use.</p> <p>Propose deletion of Green Belt designation that currently applies to this site.</p> <p>Further request the deletion of the proposed designation of Site 4 of the campus as SINC, or alternatively prepare evidence as justification.</p>	<p>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 included.</p> <p>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.</p> <p>The key issue relating to these proposals is the release of land from the Green Belt to meet development needs.</p> <p>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:</p> <ul style="list-style-type: none"> • There is a need for education development in the borough.

Appendix 4: Non specific representations and representations received in relation to the Sustainability Appraisal: Schedule of Representations Received and Officer Comments

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					<p>In itself, it is not considered that need constitutes very special circumstances.</p> <ul style="list-style-type: none"> • There is a location specific need. <p>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.</p> <ul style="list-style-type: none"> • The loss of sites 1, 2, 3 and 4 would not have a significantly adverse effect on the objectives of the Green Belt. <p>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:</p> <ul style="list-style-type: none"> • To check the unrestricted sprawl of large built up areas and • To assist in safeguarding the countryside from encroachment. <p>Officers have met with the landowner to discuss these proposals and have noted that further information is required to undertake a full assessment of the proposals.</p> <p><u>No Proposed Change</u></p>
33	1	South Bucks District Council		Are concerned that the plan retains the current London Plan target to deliver 425 units per annum. GLA Further Alterations to the London Plan (FALP) proposals which sets out a figure	<p><u>Proposed Change</u></p> <p>Further to the publication of the Inspector's Report for the FALP examination, officers propose to amend the Local Plan Part 2</p>

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				<p>for Hillingdon to 2025 of 559 units per annum.</p> <p>Also note that the Council has not produced an up-to-date Local Development Scheme for the review of Part 1 and therefore question the relevance of Part 1 housing figures for the Local Plan Part 2.</p> <p>Further note that a handful of sites are either bordering or located near to the shared authority boundary and stress that each of these developments should ensure that their infrastructure and service requirements are accounted for and undue pressures are not placed on South Bucks.</p>	<p>documents to incorporate the revised annual monitoring target of 559 units per annum.</p> <p>Sufficient sites will be identified to meet this target.</p>
Representations relating to more than one Local Plan Part 2 Document					
90	2	Hillingdon Canals Partnership	<p>Numerous in Development Management Polices</p> <p>Numerous in Site Allocations & Designations</p>	<p>Broadly welcome the proposals to achieve regeneration and growth in Hayes in particular supports specific proposed Development Management Policies.</p> <p>The following points are put forward as suggested improvements:</p> <p>a) the retention of existing community, sport and education facilities in Policy DMCI1 is supported, although it should specifically mention facilities for young people</p> <p>b) the Plan fails to give sufficient attention or structure to the essential local services that are required to support the anticipated residential growth, in particular health and community</p>	<p>Support noted and welcomed.</p> <p><u>Proposed Change</u></p> <p>The plan will be amended to make specific reference to the additional community infrastructure that is needed to support growth in the borough.</p> <p>Specific detailed plans for the Grand Union Canal and the Hayes area will be identified in the emerging Heathrow Area Action Plan.</p> <p>Consideration will be given to amending the boundaries of the Western Core site.</p> <p>The Chailey site is identified for a residential led mixed use scheme in accordance with the</p>

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				<p>services.</p> <p>a) drawing up a specific planning framework for Hayes Town Centre in order to ensure that essential support facilities and services are in place in order to meet the needs of the increased numbers of people</p> <p>c) reviewing how the frontage of the Grand Union Canal could be used in a creative and coordinated way as a spur to regeneration and in particular examining the possibility of developing the frontage on the southern side of the canal between Station Road and Printing House Lane</p> <p>d) amending the boundaries of the 'Western Core' site</p> <p>e) investigating whether part of the Chailey Industrial Estate could be developed as a site for a purpose-built Mosque</p> <p>f) ensuring the protection of Shackles Dock and the continuation of a public house facility in any development of the Silverdale Road/Western View site</p> <p>g) considering 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</p> <p>g) exploring the provision of a footbridge between the Nestle site and the Hayes Town side of the Grand Union canal.</p>	<p>evidence base for the Plan. The addition of a place of worship on the site would be subject to Policy DCMI 2 and would need to be agreed with the site owner.</p> <p>The inclusion of Shackles Dock in the site boundary will require prior agreement from the site owner and a viability assessment to demonstrate that the site has a realistic prospect of being delivered for residential use. In addition, there are a number of heritage issues that would need to be addressed.</p> <p>However, subject to these issues being addressed officers are of the view that Shackles dock, and in particular Benlow works, should be allocated for residential use in the Site Allocations and Designations document.</p> <p>The provision of a footbridge from the Nestle site will need to be considered in the context of the viability of the overall scheme.</p>

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69	1	English Heritage	Sustainability Appraisal; Development Management Policies DMHB1A(iv), DMHB5 DMHB4 and DMHB6	<p>a) Recommend simplifying the Sustainability Appraisal (SA) Objective relating to ' To conserve and enhance heritage assets and their settings'.</p> <p>b) Note that the condition of Conservation Areas may prove a useful indicator in relation to improving the aesthetics of the borough. Reducing the number of Conservation Areas on the 'Heritage at Risk' Register for positive reasons could be a good target.</p> <p>c) Suggest using the word 'conserve' rather than 'preserve' in policies DMHB1 (A) (iv) (Heritage Assets), DMHB5 (Locally Listed Buildings) and DMHB6 (Conservations Areas). Welcome the reference to the appropriate adaptation of heritage assets for improved environmental performance in DMHB1 (B), but this could be accompanied by justification paragraphs.</p> <p>d) Advise that the phrase "when every option for a viable future use has been exhausted" in Policy DMHB4 (B) (Listed Buildings) runs the risk of being considered non-compliant in terms of the NPPF and suggest that this policy be amended.</p> <p>e) Concerned that the Borough's Site Allocations document does not yet sufficiently reflect their implications for the historic environment.</p>	<p>a) The sustainability objectives have already been used to assess the plan.</p> <p><u>Proposed change</u></p> <p>Further appraisal will be undertaken of any amendments to the Plan documents resulting from the publication process. To ensure a consistent assessment process, the same objectives will be used.</p> <p>b) Comments noted and welcomed.</p> <p><u>No Proposed Change</u></p> <p>c) <u>Proposed Change</u></p> <p>Reword Policies DMHB 1 and DMHB 6 to include "<i>conserve</i>" and to relate to NPPF.</p> <p>d) <u>Proposed Change</u></p> <p>A full assessment will be undertaken to ensure the policy is consistent with the NPPF</p> <p>e) <u>No Proposed Change</u></p> <p>The Site Allocations document provides an overview of whether the principle of residential or other forms of development are likely to be acceptable on a site. Detailed assessments will be undertaken as part of the assessment of a planning application.</p>
N/A	N/A	Officer Comments	Development Management Policies and Site	Officers have proposed a significant number of changes to chapter 5 to ensure the protection of heritage assets in the borough, in accordance	<p><u>Proposed Change</u></p> <p>These comments will be fully reviewed in the context of other proposed changes that have</p>

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			Information Schedules contained in Site Allocations document.	<p>with national planning policy.</p> <p>Specific changes should be made to strengthen heritage designations and ensure that they are in accordance with the 'significance' based approach as defined in the NPPF.</p> <p>Site specific policies and designations that are no longer relevant or do not meet the provisions of national guidance should be deleted.</p>	<p>been received, with a view to the following changes:</p> <p>Policies in Chapter 5 will be strengthened to resist the loss of significant of heritage assets</p> <p>There will be a general presumption in favour of the retention of locally listed buildings</p> <p>Policy DMHB 6 (Conservation Areas) is to be amended to confirm the Council's expectations for new development in Conservation Areas</p> <p>There should be a general presumption in favour of the protection of war memorials.</p> <p>Policy DMHB12: High Buildings and Structures should refer specifically to areas that are suitable for high buildings.</p> <p>DMHB 13 should be amended to refer to the design of New Development.</p> <p>Site Information Schedules contained in the Site Allocations document will be updated to reflect heritage considerations where appropriate.</p> <p>Proposed Deletions:</p> <p>The following policies are not considered to comply with guidance contained in the NPPF and should be deleted:</p> <p>Policy DMHB8: Gatehill Farm Estate and Copse Wood Estate Areas of Special Local Character</p> <p>Policy DMHB 9: Registered Historic Parks,</p>

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					Gardens and Landscapes.
Sustainability Appraisal					
32	3	Natural England	Chapter 4 and 5	Broadly support the 17 sustainability objectives listed in chapter 4 and consider that appropriate plans and programmes have been identified in Chapter 5.	Support noted and welcomed. <u>No Proposed Change</u>
General Comments					
2	1	Marine Management Organisation	NS	MMO has no comments to submit in relation to this consultation.	Comments noted. <u>No Proposed Change</u>
7	1	Dr. Klaus Armstrong-Braun	NS	Local Authorities have to carry out surveillance for European Protected Species for Local Plans/Development Applications etc. purposes as per ART 11 of the EU Habitats Directive.	The Council has carried out a Screening for Appropriate Assessment to meet the requirements of the EU Habitats Directive. The Screening has found that while impacts on European sites are likely, they are not likely to be significant.
24	1	Department of Health		Advise that the consultation responses have been passed to the London Area Team for a response.	Comments noted. <u>No Proposed Change</u>
53	1	Cllr Janet Duncan		Wishes to represent the views of the local community.	Comments Noted. <u>No Proposed Change</u>

5) DEVELOPMENT MANAGEMENT POLICIES October 2015

This schedule shows comments received on the later Revised Proposed Submission draft consultation of October 2015, together with officer responses.

DEVELOPMENT MANAGEMENT POLICIES (October 2015)						
ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
General Comments						
10	3	Harefield Tenants and Residents Association (Paul Stone)	N/A	Support	Support and endorse further changes to Local Plan Part 2 as discussed at a number of open meetings.	Support noted and welcomed.
104	1	Derek McCall	N/A	Comment	Considers himself and his wife too old to comment.	Officers take account of all comments received from residents.
106	5	Thomas NP Crow	N/A	Support	Thinks aims of Plan are good. Interested in maintaining good standards in borough. Reduction of car traffic is essential.	Comments are noted and welcomed.
44	5	Ickenham Residents Association	N/A	Comment	Request that LBH work with the Association to develop a Management Plan for the Ickenham Conservation Area.	Officers will look at progressing a Management Plan outside of the Local Plan process.

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ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
44	11	Ickenham Residents Association	N/A	Support	Support the wider policies on climate change adaptation and mitigation in the Local Plan and 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	Support noted and welcomed. Paragraph 4.18 notes the contribution that front gardens make to local character and the reduction of flood risk. The Council will take account of the conclusions of the Townscape Character Study when assessing proposals that involve the loss of front gardens. The management of flood risk in relation to permeable surfaces is taken account of in policies DMEI 9, DMEI 10 and the Council's Surface Water Management Plan.
58	8	Greater London Authority	N/A	Object	Hillingdon has a Regionally Important Geological Site, identified on Map 7.4 of the London Plan as 'GLA 29 The Gravel Pits, Northwood'. There should be a Local Plan policy	Officers support the proposals to identify RIGs on the Policies Map.

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					for the management and protection of this site in accordance with London Plan Policy 7.20.	
19	10	Rapleys on behalf of La Salle Investment Management	N/A	Object	Consider that the reference to the strategic office locations should be consistent across all Local Plan Part 2 documents.	Consistent references to strategic office locations will be included.
103	1	Runnymede Borough Council	N/A	Comment	Have no comments on the Local Plan documents.	Response noted
64	1	Canal & River Trust	N/A	Object	Previous comments have not been taken into account and are not referred to in Consultation Statement, October 2015. Known as Canal & River Trust, not Canal and River Trust.	Name will be amended in the document. All responses are fully assessed against policies and guidance contained in the national planning guidance, the London Plan and relevant evidence base documents.
102	1	Cobden Close Tenants and Residents' Association	N/A	Support	No comments to add, all issues look realistic.	Support noted and welcomed.
137	1	Conservation Area Panel for south of Borough	N/A	Support	Group generally support Local Plan Part 2 policies and proposals that would concern or affect heritage assets and their settings. Detailed guidance on shopfronts and for	Support noted and welcomed.

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ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
					householder development is welcomed.	
1. Introduction						
109	1	CPRE	N/A	Support	Support the changes to the summary of Chapter 6 on Environmental Protection and Enhancement.	Support noted and welcomed.
2. Economy						
19	1	Rapleys on behalf of La Salle Investment Management	Policy DME 1: Employment Uses in Designated Sites	Support	<p>Policy is supported</p> <p>DME 1 (C) and (F) relating to appropriate uses in designated employment areas and ancillary uses that are acceptable in these areas, but object to DME 1 (D) - the criteria where non B1, B2 and B8 uses will be acceptable. Consider that as drafted, the policy criterion is too restrictive, and does not allow for sufficient flexibility to respond to changing economic circumstances. There is a clear conflict between the objectives of the LSEL designation and the</p>	<p>Support noted and welcomed.</p> <p>The requirement for a 2 year marketing reflects the Mayor of London's Land for Industry and Transport" SPG.</p> <p>To address the consistency between parts C and D of the policy, officers suggest rewording criteria D (i) to read:</p> <p><i>'There is no realistic prospect of the land being used in accordance with Part C.'</i></p>

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					<p>requirement of criterion i.</p> <p>Suggest (a) reducing the marketing period from 2 years to 12 months (b) the inclusion of a wider range of ancillary development and removal of the words 'small scale' in criterion F. Amended policy wording suggested.</p>	<p>The list of ancillary development that will be suitable in designated employment areas listed in criterion F is not definitive. The key determinant will be that the proposed development is ancillary and therefore small scale.</p>
117	2	Simply Planning on behalf of Crown Trading Estate	Policy DME 1: Employment Uses in Designated Sites	Object	<p>Recommend that Policy DME 1 is amended to include a new criterion under iv) to permit alternative uses on designated employment sites where the site is specifically identified within the Local Plan as suitable for future release due to regeneration benefits."</p>	<p>The policy relates to uses that are considered appropriate in designated employment locations. If a site is identified as suitable for future release it will be identified elsewhere in the Local Plan and subject to separate policy criteria.</p>
128	1	Emerson Group on behalf of Orbit Development Ltd	Policy DME 1: Employment Uses in Designated Sites,	Object	<p>Object to Policy DME1 part D's proposed requirement for employment sites to have been vacant and consistently marketed for</p>	<p>The two year marketing period derives from the Mayor of London's Land for Industry and</p>

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ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
			part D		a period of two years. 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.	Transport SPG.
132	2	Barton Willmore on behalf of Segro	Policy DME 1: Employment Uses in Designated Sites	Object	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.	The two year marketing period derives from the Mayor of London's Land for Industry and Transport" SPG.
135	1	Robin Brown	Para 2.10	Object	Proposed deletion of paragraph relating to the retention of employment uses on non-designated sites would be contrary to Local Plan Part 1 strategic objective SO15 and NPPF para 21. The paragraph should be reinstated.	The loss of employment uses on non-designated sites will be subject to the criteria in policy DME 2. It is not considered that the deletion of para 21 conflicts with national policy or strategic objective 15 in the Local Plan Part 1.
124	2	Barton Willmore on behalf of Tokyo Inn	Policy DME 2: Employment Uses	Object	These policies should be reworded to allow sufficient flexibility to ensure	Officers propose to amend the policy to take account of other

DEVELOPMENT MANAGEMENT POLICIES (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
			Outside of Designated Sites; DME 3: Office Development		they are consistent with Policy SEA 2, which encourages hotel and office uses within designated sites. There should not be a requirement for hotel development to demonstrate compliance with these policies. Suggested wording provided.	designations and site specific proposals identified in the Site Allocations and Designations document.
19	2	Rapleys on behalf of La Salle Investment Management	Policy DME 3: Office Development	Object	Support criterion E, but object to criterion F. Suggest the inclusion of LSEs into the criterion into list of locations where offices will generally not be permitted. Amended policy wording suggested.	Officers consider that criterion F of policy DME 3 could be amended to state that proposals for offices in other locations will be required to demonstrate that no other preferable locations are available.
128	2	Emerson Group on behalf of Orbit Development Ltd	Policy DME 3: Office Development, part B	Object	Object to the proposed requirement for a 2 year marketing period. 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. Suggest deleting the requirement to	The Council seeks to accommodate the majority of office growth in identified growth locations, in accordance with the London Plan. The two year marketing period mirrors the marketing period for the protection of B1, B2 and B8 in designated

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					demonstrate that office use in no longer viable.	SILs, LSIS and LSELS.
128	3	Emerson Group on behalf of Orbit Development Ltd	Policy DME 3: Office Development, part F	Object	Considers that offices can be located outside of the specified locations, subject to satisfying the sequential approach to main town centre uses as set out by NPPF paragraph 24. Request that part F be reworded accordingly and provide suggested wording.	The Council will seek to accommodate the majority of office Development in office growth locations and town centres. Officers consider that part F of the policy DME 3 could be amended to note that proposals for offices in other locations will be required to demonstrate that no other suitable locations are available.
56	1	Heathrow Airport Ltd	Policy DME 3: Office Development	Object	Maintain that the policy potentially affects the future development of the airport and is not consistent with the London Plan and the NPPF. Consider that criterion A should explicitly allow for office development in Heathrow Airport and provide suggested wording.	Heathrow Airport is not identified in the Local Plan Part 1 as an Office Growth Location.
69	1	Historic England	Para 2.24	Support	Repairs and provision of public access	Officers propose to include

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					to Harmondsworth Great Barn (listed grade I) justifies a reference to it in bullet point 6.	Harmondsworth Great Barn in the list of visitor destinations within the borough.
23	1	Eastcote Conservation Panel	Policies DME 4: Visitor Attractions; DMH 6: Garden and Backland Development; DMEI 5: Development in Green Chains	Object	Disappointed that Warrender Park/Highgrove Woods and Bessingby/Cavendish/Pine Gardens Parks have not been upgraded to MOL as proposed. The document "Metropolitan Open Lands and Green Chain Assessment" should be available to the public.	These parks were not identified in the Council's evidence base documents relating to Metropolitan Open Land. The Council's evidence base document is available on the Local Plan Part 2 webpage.
124	3	Barton Willmore on behalf of Tokyo Inn	Policy DME 5: Hotels and Visitor Accommodation	Support	Policy is supported as there is an identified need for visitor accommodation in the borough.	Support noted and welcomed.
19	3	Rapleys on behalf of La Salle Investment Management	Policy DME 5: Hotels and Visitor Accommodation, para 2.26	Support	Support policy.	Support noted and welcomed.
56	2	Heathrow Airport Ltd	Policy DME 5: Hotels and Visitor Accommodation,	Object	Policy E2 of Local Plan Part 1 refers to hotel development being accommodated in 'other sustainable	The policy seeks to direct the majority of hotel growth to the locations specified in the Local

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			paras 2.26 and 2.27		locations'. Heathrow Airport has excellent public transport accessibility. Paragraph 2.27 requiring airport related development to remain within airport boundary is inconsistent with the London Plan and NPPF and should be removed.	Plan Part 1.
3. Town Centres						
19	4	Rapleys on behalf of La Salle Investment Management	Policy DMTC 1: Town Centre Development	Object	Consider that the demonstration of adequate width and depth of floorspace is an unnecessary and onerous requirement and request that criterion i) is removed	The criterion seeks to resist a provision of inappropriately sized retail units, which could lead to the fragmentation of the town centre.
89	1	Nathaniel Lichfield on behalf of Intu Properties plc	Policy DMTC 2: Primary and Secondary Shopping Areas	Object	Intu supports the protection of Primary Shopping Area ground floor for retail uses, but objects to requirements (a) that a minimum of 70% of the frontage is retained in Use Class A1 and (b) the proposed use will not result a separation of more than 12 metres between A1 retail uses. The requirements would be supported if separate restaurant hub	The policy seeks to promote and protect the provision of A1 retail uses in town centres. At present, there are no specific concentrations of restaurant uses that could be defined hubs.

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					areas are allocated and excluded from the tight restrictions. Wording suggested.	
123	1	Nathaniel Lichfield on behalf of Inland Homes Plc	Policy DMTC 2: Primary and Secondary Shopping Areas	Object	The policy tests placed on proposals in secondary shopping areas are inconsistent with the NPPF and the London Plan and should reflect the differing roles of each area, in addition to the changing nature of town centres. Suggest amended wording and deletion of criteria i and iii.	Officers will continue to review the policy to ensure it is in accordance with the NPPF and the provisions of the London Plan.
113	4	Planning Potential on behalf of Paddy Power	Policy DMTC 2: Primary and Secondary Shopping Areas	Object	The policy does not provide an explanation of why the A1 threshold figures have been set, why A5 uses should be limited to a maximum of 15% and why a separation distance of 12 metres between A1 units is appropriate. The policy should be re-worded, or as a minimum, significantly loosened to allow healthy competition between betting shops whilst also removing the	The policy seeks to avoid an overconcentration of uses that can cause detrimental cumulative impacts and to protect town centres for retail use. The proposed thresholds take account of all considerations and indicators of potential over concentration.

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					unnecessary grouping of a variety of uses which are not intertwined.	Officers will continue to review the policy to ensure it is in accordance with the NPPF and the provisions of the London Plan.
79	1	SSA Planning on behalf of KFC	Policies DMTC 2 Primary and Secondary Shopping Areas; DMTC 3: Maintaining the Viability of Local Centres and Local Parades; DMTC 4: Amenity and Town Centre Uses	Object	Welcome deletion of Part B in DMTC 4 and the clarification of 'unacceptable concentrations', but object to amendments to DMTC 3 and DMTC 2. Are concerned that these amendments focus only on A5 uses, which is inconsistent with DMTC 4. There is an error in DMTC3 A (i) as it sets alternative criteria of one-in-three or 70% of class A1 shops.	Support noted and welcomed. Criterion A i) should read "ensuring the retention of at least 70% of Class A1 shops". Officers will continue to review the policy to ensure it is in accordance with the NPPF and the provisions of the London Plan.
128	3	Emerson Group on behalf of Orbit Development Ltd	Policy DMTC 3: Maintaining the Viability of Local Centres and Local Parades; Table 3.2	Object	Object to the absence of the designation of Sovereign Court, Sipson Road as a Local Parade in Table 3.2 of Policy DMTC 3. Consider that the parade provides valuable amenities for the benefit of the local businesses, residents and visitors to	Sovereign Court contains limited A1 floorspace. This does not justify its designation as a Local Parade.

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					the airport. The parade should be recognised as such in Table 3.2 and be allocated on the Proposals Map.	
113	5	Planning Potential on behalf of Paddy Power	Policy DMTC 3: Maintaining the Viability of Local Centres and Local Parades	Object	<p>The policy does not provide an explanation why the A1 threshold figures have been set, why A5 uses should be limited to a maximum of 15% and why a separation distance of 12 metres between A1 units is appropriate. The policy should be 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.</p>	<p>The policy seeks to avoid an over-concentration of uses that can cause detrimental cumulative impacts and to protect town centres for retail uses.</p> <p>The proposed thresholds take account of all considerations and indicators of potential over concentration.</p> <p>Officers will continue to review the policy to ensure it is in accordance with the NPPF and the provisions of the London Plan.</p>
113	1	Planning Potential on behalf of Paddy Power	Para 3.20	Object	Do not consider that betting shops, hot food takeaways, night clubs, casinos, amusement centres and 'similar uses' should be grouped	The London Plan notes that over-concentrations of betting

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ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
					<p>together. No explanation is provided how the 15% threshold has been arrived at, and how this figure constitutes an over-concentration. The text should 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.</p>	<p>shops and hot food takeaways can give rise to particular concerns.</p> <p>The policy seeks to avoid an over-concentration of uses such as those described in para 3.20 that can lead to antisocial behaviour in local parades and town centres.</p> <p>The proposed thresholds take account of the considerations and indicators of potential over-concentration.</p>
113	2	Planning Potential on behalf of Paddy Power	Para 3.21	Object	<p>Suggest updating the document to reflect that the London Plan Town Centres SPG is now adopted. The para is factually incorrect as betting shops now fall under the 'Sui Generis' use, not A2, following the release of new legislation in April 2015.</p> <p>The text should be removed and the paragraph re-worded, or as a</p>	<p>Officers will ensure that the provisions of the Mayor's Town Centres SPG are reflected in the Local Plan. Any factual inaccuracies will be amended as part of the examination process.</p> <p>Officers will continue to review the policy to ensure it is in</p>

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ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
					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.	accordance with the NPPF and the provisions of the London Plan.
113	3	Planning Potential on behalf of Paddy Power	Para 3.22	Object	<p>Suggest updating document to reflect that the London Plan Town Centres SPG is now adopted. The para is factually incorrect as betting shops now fall under the 'Sui Generis' use, not A2, following the release of new legislation in April 2015.</p> <p>The paragraph should be 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.</p>	<p>Officers will ensure that the provisions of the Mayor's Town Centres SPG are reflected in the Local Plan. Any factual inaccuracies will be amended as part of the examination process.</p> <p>Officers will continue to review the policy to ensure it is in accordance with the NPPF and the provisions of the London Plan.</p>
113	6	Planning Potential on behalf of Paddy Power	Policy DMTC 4: Amenity and Town Centre Uses	Object	Consider that Policy DMTC 4 should have more regard to the London Plan Town Centres SPG.	Officers will ensure that the provisions of the Mayor's Town Centres SPG are

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ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
					The policy should be 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.	reflected in the Local Plan. Officers will continue to review the policy to ensure it is in accordance with the NPPF and the provisions of the London Plan.
135	2	Robin Brown	Policy DMTC 4: Amenity and Town Centre Uses, part B.	Object	Proposed deletion of resisting various uses in proximity to schools or sensitive community uses does not comply with the NPPF core principle of promoting healthy communities. Text supporting London Plan Policy 4.8 notes concerns with over concentration of betting shops and hot food takeaways. Request deleted text be reinstated.	The policy continues to reflect the provisions of the London Plan, which note that over-concentrations of betting shops and hot food takeaways can give rise to particular concerns.

4. New Homes

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ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
57	3	Savills	Policy DMH 2: Housing Mix	Object	Suggest that the policy is revised in order to make reference to housing mix being subject to market requirements.	The policy notes that the Council will require a mix of housing units of different sizes in schemes for residential development to reflect the Council's latest information on housing need. Current needs information indicates that across the borough there is a significant need for family housing. Developers will be required to provide site specific justification if this need cannot be met.
123	2	Nathaniel Lichfield on behalf of Inland Home Plc	Policy DMH 2: Housing Mix	Object	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. Suggest amended wording.	The policy notes that the Council will require a mix of housing units of different sizes in schemes for residential development to reflect the Council's latest information on housing need. Current needs information indicates that across the borough there is a significant need for family

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ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
						housing. Developers will be required to provide site specific justification if this need cannot be met.
122	2	Savills on behalf of Hurlington Ltd	Policy DMH 2: Housing Mix	Object	If the current policy is applied this would result in the delivery of low density housing development and an under provision of housing on development sites which would be contrary to the NPPF. Suggest the inclusion of a reference to the provision of a balanced mix of housing and the deletion table 4.1: Housing Requirement by Type and Size.	Table 4.1 reflects the Council's latest evidence of housing need and is included to assist the application of the policy. The policy notes that the Council will require a mix of housing units of different sizes in schemes for residential development to reflect the Council's latest information on housing need. This indicates that across the borough there is a significant need for family housing. Developers will be required to provide site specific justification if this need cannot be met.
132	3	Barton Willmore on behalf	Policy DMH 2:	Object	Reference should be made that the mix will be applied on a site by site	The policy notes that the Council will require a mix of

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ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
		of Segro	Housing Mix		basis and the character and nature of the site and scheme will be taken into account.	housing units of different sizes in schemes for residential development to reflect the Council's latest information on housing need. This indicates that across the borough there is a significant need for family housing. Developers will be required to provide site specific justification if this need cannot be met.
69	6	Historic England	Para 5.15	Object	Suggested wording to end of paragraph: "where these are available and other relevant assessments including the Hillingdon Townscape Character Assessment".	The Council will be undertaking discussions with Historic England, with a view to addressing their comments prior to the commencement of the examination process.
125	1	Robin Brethwick Associates on behalf of Leigh Brothers	Para DMH 6: Garden and Backland Development	Object	The presumption against loss of back gardens is unreasonable and conflicts with Local Plan Part 1 Policy BE1, which refers to 'inappropriate development of gardens' which is less restrictive. Wording confuses back	Policy DMH 6 notes the contribution that back gardens make to local character. This reflects the conclusions of the Council's Townscape Character study and is in line with NPPF,

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ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
					garden development with backland development. Small plots are the lifeblood of smaller builder-developers and are important for the regeneration of suburban areas. The development of these plots should not be constrained.	para 53.
44	4	Ickenham Residents Association	Policy DMH 7: Provision of Affordable Housing	Support	Support the application of policy DMH 7 in relation to Site Allocations and Designations Policy SA14 and across the Borough and are keen to see that all residential developments over 10 units provide 35% affordable housing provision, in accordance with policy H2 of Local Plan Part 1. Consider that an open-book viability assessment policy would help the Association work with LBH to deliver policy.	Support noted and welcomed. In accordance with other policies in the Plan, the Council will seek the provision of 35% affordable housing, subject to viability and if appropriate in all other circumstances.
57	5	Savills	Policy DMH 7: Provision of Affordable Housing	Support	Support policy DMH 7: Provision of Affordable Housing, due to the fact that the policy refers to viability tests.	Support noted and welcomed. Officers consider that the policy provides sufficient flexibility regarding the

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ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
						quantum and tenure of affordable housing.
132	4	Barton Willmore on behalf of Segro	Policy DMH 7: Provision of Affordable Housing	Object	The flexibility to adjust quantum and tenure to reflect site circumstances (site location and scheme characteristics as well as viability) is essential and policy wording should be changed accordingly.	Officers consider that the policy provides sufficient flexibility regarding the quantum and tenure of affordable housing.
5. Historic and Built Environment						
69	3	Historic England	Para 5.1	Comment	Suggest words "or enhanced" are added to end of opening sentence in line with NPPF.	Officers are agree with the proposed minor addition. The Council will be undertaking discussions with Historic England, with a view to addressing their comments prior to the commencement of the examination process.
61	1	Ruislip, Northwood & Eastcote Local History Society (Mrs Susan Toms)	Paras 5.3, 5.5, 5.8, 5.11	Object	Para 5.3 - original paragraph should be reinstated. Para 5.5 - retain first sentence of original paragraph.	Representors seek to reinstate some of the text which is proposed to be deleted. Much of this was proposed for removal on the basis that it

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ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
					5.11 Reinstate “The Council will also have regard to the protection of its settings when considering proposals on neighbouring sites”.	repeats the content of national planning guidance. Officers propose to include a glossary to define key terminology used in the document, including terms such as Heritage Assets and Locally Listed buildings. All proposed changes will be identified on the Statement of Proposed Modifications, to be submitted with the Local Plan Part 2 documents for public examination.
69	4	Historic England	Para 5.4	Object	Townscape Character Study should be referred to in para 5.4 and made accessible within Local Plan pages of the Council's website	The Townscape Study is already referred to in the document but additional references will be included as appropriate. The Council will be undertaking discussions with Historic England, with a view

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ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
						<p>to addressing their comments prior to the commencement of the examination process.</p> <p>The Townscape Character Study is available as part of the Local Plan Part 2 evidence base.</p>
69	5	Historic England	Policy DMHB 1: Heritage Assets	Support	<p>Recommend addition of an overarching sentence stating that the Council will expect development proposals to avoid harm to the historic environment in line with paras 126 and 15(8) of NPPF.</p> <p>Strongly support part C) and suggest this is taken further through proposed heritage strategy.</p>	<p>Support noted and welcomed.</p> <p>Supporting text to Policy DMHB 1 states that proposals affecting heritage assets will be determined in accordance with the NPPF. Officers do not consider that further policy guidance is required.</p> <p>The Council will be undertaking discussions with Historic England, with a view to addressing their comments prior to the commencement of the examination process.</p>

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ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
60	1	Ruislip Village Conservation Panel (Mrs Eileen Bowlt)	Policies DMHB 1: Heritage Assets; DMHB 2: Listed Buildings, DMHB 3: Locally Listed Buildings; DMHB 5: Areas of Special Local Character	Object	<p>Para 5.3 Original paragraph is more informative. Please reinstate.</p> <p>Para 5.5 Reference to NPPF is important, please reinstate.</p> <p>Para 5.8 Reference to Historic England should be retained.</p> <p>Para 5.11 Please reinstate “The Council will also have regard to the protection of the setting when considering proposals on neighbouring sites”</p> <p>DMHB 2 - A - please reinstate “do not detract from its special architectural or historic interest”</p> <p>DMHB 2 C - please reinstate “as a condition of demolition”</p> <p>Para 5.21 This important statement should be retained.</p>	<p>Representors seek to reinstate some of the text which is proposed to be deleted. Much of this was proposed for removal on the basis that it repeats the content of national planning guidance. Officers propose to include a glossary to define key terminology used in the document, including terms such as Heritage Assets and Locally Listed buildings. All proposed changes will be identified on the Statement of Proposed Modifications, to be submitted with the Local Plan Part 2 documents for public examination.</p>

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ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
					DMHB 5 - A - please reinstate the important first paragraph	
61	2	Ruislip, Northwood & Eastcote Local History Society (Mrs Susan Toms)	Policies DMHB 2: Listed Buildings; DMHB 3: Locally Listed Buildings; paras 5.21, 5.22 - 26, paras 5.9 - 10, deleted DMHB 7 - scheduled ancient monuments	Object	<p>DMHB 2 - A - reinstate "do not detract from its special architectural or historic interest".</p> <p>DHMB 2 - C - reinstate "as a condition of demolition".</p> <p>DMHB 3 - reinstate first paragraph.</p> <p>Para 5.21 - reinstate original paragraph</p> <p>Paras 5.22 - 26 reinstate all paragraphs</p> <p>Para 5.22 - should add the Cursus and Gruben houses at Harmondsworth</p> <p>Para 5.9 - 10 - reinstate these paragraphs and the deleted policy DMHB 7 Scheduled Ancient Monuments.</p>	Representors seek to reinstate some of the text which is proposed to be deleted. Much of this was proposed for removal on the basis that it repeats the content of national planning guidance. Officers propose to include a glossary to define key terminology used in the document, including terms such as Heritage Assets and Locally Listed buildings. All proposed changes will be identified on the Statement of Proposed Modifications, to be submitted with the Local Plan Part 2 documents for public examination.
132	5	Barton Willmore on behalf	Policy DMHB 3:	Object	The policy should reflect that a	The demolition of Locally

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ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
		of Segro	Locally Listed Buildings		Locally Listed Building can be demolished where tests set out in Paragraph 133 of the NPPF can be met.	Listed buildings will be discouraged. The policy notes that replacement will only be considered where it can be demonstrated that the community benefits of such proposals outweigh those of retaining the Locally Listed building.
60	2	Ruislip Village Conservation Panel (Mrs Eileen Bowlt)	Conservation Areas (page 54)	Support	Generally excellent but query removal of paras 5.22 - 5.26 as they are informative.	Support noted and welcomed. Deleted paragraphs relate to the definition of Conservation Areas. It is considered that this information could be included in a glossary.
132	6	Barton Willmore on behalf of Segro	Policy DMHB 4: Conservation Areas	Object	As is the case for draft policy DMHB 5, the policy should reflect Paragraph 133 of the NPPF to provide more flexibility when considering comprehensive redevelopment, such as that proposed at the former Nestle site.	The policy sets out general provisions relating to development in Conservation Areas. The policy is considered to be in general conformity with the NPPF.
135	3	Robin Brown	Policy DMHB 4:	Object	Policy does not apply para 5.15	Paragraph 5.15 is supporting

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ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
			Conservation Areas		requirement for Heritage Statements and does not fulfil NPPF para 128. Request requirement for Heritage Statement be added.	text to policy DMHB 4 and sets a requirement for Heritage Statements to be submitted with planning applications for development in Conservation Areas. The requirements of the policy are considered to be broadly consistent with the NPPF.
137	2	Conservation Area Panel for south of Borough	Policy DMHB 4: Conservation Areas	Comment	Panel requests a requirement for Heritage Statements to accompany planning statements be included. Request 'signposting' at various places throughout relevant parts of chapter for Conservation Areas, ASLCs and Appraisals/Management Plans etc such as the 'signpost' or link for more information on Locally Listed Buildings (para 5.13). This would improve functionality and usefulness of the Plan.	Para 5.15 is supporting text to policy DMHB 4 and sets a requirement for Heritage Statements to be submitted with planning applications for development in Conservation Areas. The requirements of the policy are broadly consistent with the NPPF.
60	3	Ruislip Village Conservation	Scheduled Ancient Monuments (page	Object	Further justification required for the	The paragraphs provide contextual information on

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ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
		Panel (Mrs Eileen Bowlt)	58)		removal of paragraphs 5.9 - 5.10	Scheduled Ancient Monuments. It is considered that this information could be provided in a glossary to the document.
123	3	Nathaniel Lichfield on behalf of Inland Home Plc	Policy DMHB 18: Private Outdoor Amenity Space	Object	Consider that the wording is unduly restrictive and risks prejudging the acceptability or otherwise of potential development schemes. The policy should be 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. Suggest amended wording.	Officers will continue to review the policy to ensure it is in accordance with the NPPF and the provisions of the London Plan.
19	5	Rapleys on behalf of La Salle Investment Management	Policy DMHB 10: High Buildings and Structures, para 5.32	Object	The definition of high buildings is restrictive and ambiguous. It is unclear how Council will identify appropriate areas for high buildings.	The Council's Townscape Character Study provides evidence for locating high buildings in Uxbridge and Hayes. Much of the borough has height restrictions which

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						are critical to the safe operation of flights into and out of Heathrow Airport and RAF Northolt. In areas not constrained by airport operations, applications for high buildings will be assessed on a case by case basis, taking into account the mostly low rise suburban nature of the borough, where tall buildings are generally inappropriate, the Townscape Character Study and the London Plan.
69	8	Historic England	Para 5.33	Comment	For clarity, recommend that final sentence 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".	The Council will be undertaking discussions with Historic England, with a view to addressing their comments prior to the commencement of the examination process.
69	9	Historic England	Policy DMHB 10:	Object	Consider some changes to Policy	The Council will be

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ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
			High Buildings and Structures		<p>DMHB 10 are not justified. Recommend:</p> <ul style="list-style-type: none"> - opening sentence omit "dominant" to avoid interpretations that override consideration of setting of a vulnerable heritage asset - in part i) omit "or an area identified by the Borough" as this creates uncertainty and departs from background evidence - retain previous parts iv (contribution to skyline) and v (heritage assets and views) as these are justified in relation to background evidence. 	undertaking discussions with Historic England, with a view to addressing their comments prior to the commencement of the examination process.
135	4	Robin Brown	Policy DMBH 10: High Buildings and Structures	Object	Proposed deletion of original clause ix) would not adequately ensure the contribution and enhancement of the natural and local environment, as required by NPPF para 109. The proposed deletion is contrary to Council's biodiversity statutory duty. Watercourses and water bodies are	The deleted clause states that high buildings should not adversely impact on bio-diversity or open spaces, including watercourses. This provision is covered by other policies in the plan and is

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ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
					not referred to in Policy DMBH 11. Request clause is reinstated.	therefore not required.
14	1	Chris Thomas Ltd on behalf of British Sign & Graphic Association	Policy DMHB 13: Shopfronts, parts (E) & (F)		<p>Interrelationship between DMBH 13 Shopfronts, DMBH 12 Streets and Public Realm and design guidance in Appendix B remains confusing and self- contradictory. All advice on shopfronts and advertisements should be contained within a single section or shopfronts and advertisements should be completely separated and contained within two totally separate sections.</p> <p>No evidential support for Policy DMHB 13 (E) and (F). Shop signs do not need to be restricted in number or to certain areas of shopfront - each proposal must be considered on its individual merit. Policy DMHB 12 (C) is correct in this regard. Advice contradicts that in Appendix B's description of the "signable area". Restricting shop sign content is</p>	<p>The Council's policies have been drafted to protect the particular character of town centres and Conservation Areas in the borough.</p> <p>The issue of advertisements cuts across a number of policy areas including the public realm, heritage and shopfronts. The Council's general policy on advertisements has been prepared to protect visual amenity and to maintain the quality of the public realm. Policy requirements and guidance are geared towards meeting this objective.</p> <p>Officers will undertake a further review of the advice</p>

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					<p>contrary to regulations.</p> <p>Agree with Policy DMHB 13 (F) regarding illumination but this does not justify the proposed ban on flashing and internally illuminated "box lights".</p> <p>Para 5.53 does not advise Appendix B also involves advertisements. There are too many places to look for relevant advice.</p> <p>Para 5.48 - list is unnecessary as all are considered 'advertisements' within the statutory definition. Restrictive policy is not justified.</p> <p>Accept para 5.52 should draw attention to "clutter" but no justification for picking out particular forms of advertisement.</p>	<p>and guidance provided on advertisements and other detailed design matters, prior to the submission of the Local Plan documents for public examination.</p>
109	2	CPRE	Policy DMHB 14: Trees and Landscaping	Support	Support the inclusion of the trees and landscaping policy.	Support noted and welcomed.

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ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
132	7	Barton Willmore on behalf of Segro	Policy DMHB 16: Housing Standards	Object	This policy must be flexible to take into account changes in national standards.	Officers are of the view that policies should be amended to reflect the need to comply with recent revisions to national housing standards. Appropriate revisions will be put forward in the Schedule of Proposed Modifications, to be submitted with the Local Plan documents.
132	8	Barton Willmore on behalf of Segro	Policy DMHB 17: Residential Density	Object	The column referring to different locations should be removed. There is no justification for a deviation from the London Plan density matrix (Table 3.2). Policy DMHB 20 should therefore refer to the density matrix as set out in the London Plan.	The proposed density guidelines in Table 5.3 (Residential Density Matrix) are broadly consistent with those contained in the London Plan.
57	5	Greater London Authority	Policy DMHB 10: Housing Standards	Object	The policy should refer to the national housing standards and the supporting text should note that this standard will be conditioned to ensure its application and	Officers are of the view that policies should be amended to reflect the need to comply with recent revisions to national housing standards.

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					enforcement through the Building Regulations (Part G)	Appropriate revisions will be put forward in the Schedule of Proposed Modifications to be submitted with the Local Plan Part 2 documents.
65	2	Nathaniel Lichfield on behalf of Purplexed LLP	Policy DMHB 17: Residential Density	Object	The density content of this policy is unjustified by any evidence base and should be deleted as being unsound	The proposed density guidelines in Table 5.3 (Residential Density Matrix) are broadly consistent with those contained in the London Plan.
132	9	Barton Willmore on behalf of Segro	Policy DMHB 18: Private Outdoor Amenity Space	Object	The proposed standards significantly exceed the Mayoral Housing SPG. There are no LB Hillingdon special circumstances that warrant different standards. Policy should be amended to reflect the London Plan.	The Council considers higher standards of private amenity space are especially valued by residents and an important element of the residential character and quality of the borough. Officers will continue to review the policy to ensure it is in accordance with the NPPF and the provisions of the London

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						Plan.
64	2	Canal & River Trust	Para 5.81, 5.82	Object	<p>Para 5.81 - Using a description of 'moorings' does not cover all the different types of mooring use.</p> <p>Para 5.82 - Request amendments to reflect the wording provided.</p>	Officers will undertake further investigations to assess the proposed definition of moorings.
64	3	Canal & River Trust	Policy DMHB 20: Moorings, parts i) ii) iii) v) and vi)	Object	<p>i) This criterion is too restrictive, presumptuous and general. The mooring of boats on waterways is part of their character and there should not be a blanket negative response to proposed moorings in rural areas which is not adequately defined. Furthermore, the policy would only relate to permanent moorings and therefore would not necessarily solve the issues it is trying</p>	<p>Officers will assess the proposed changes in the context of the NPPF, the London Plan and other relevant planning guidance. Further discussions with the Canal & River Trust will be undertaken as appropriate.</p> <p>Any proposed changes to the policy will be set out in the</p>

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					<p>to address. Amended wording suggested.</p> <p>Criterion ii) This criterion is too restrictive and misses one of the key purposes of the canal. Furthermore, it must be recognised that moorings need access to the towpath for ingress and egress. Criterion iii) is too vague. It uses the word 'barrier' in an unclear manner.</p> <p>Criterion v) is not effective as it does not adequately identify what is meant by services. Boats are generally self sufficient providing they have access to suitable facilities on the network. Amended wording suggested.</p> <p>Criterion vi) change required to the wording to reflect the title of the publication referenced.</p>	Schedule of Proposed Modifications, to be submitted for examination with the Local Plan Part 2 documents.
6. Environmental Protection and Enhancement						
106	1	Thomas NP Crow	N/A	Object	In North Hillingdon air quality is	Comments regarding air

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					appalling, worst in the borough apart from Heathrow. Doctor has confirmed poor air quality is making nose run continually. Do not experience this elsewhere.	quality in the borough are noted. North Hillingdon falls within the Council's Air Quality Management Area. Policy DMEI 14 seeks to address air quality issues in relation to new development.
135	5	Robin Brown	Para 6.6	Object	Proposed new wording omits reference to living walls as well as living roofs. To ensure consistency and clarity add phrase "and walls" to para 6.6.	Officers propose to amend paragraph 6.6 so that it refers to both living walls and roofs.
57	1	Greater London Authority	Policy DMEI 1: Living Walls, Roofs and Onsite Vegetation	Support	Welcome reference to the London Plan carbon dioxide emissions targets. 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.	Support noted and welcomed.
109	3	CPRE	Policy DMEI 1: Living Walls, Roofs and Onsite	Support	Support the emphasis on encouraging all major developments to incorporate living roofs and/or walls.	Support noted and welcomed.

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			Vegetation		However, the council should clarify what constitutes "suitable justification" for a developer to <i>not</i> incorporate living roofs and/or walls.	
32	3	Natural England	DMEI 1: Living Walls, Roofs and Onsite Vegetation	Support	Support for the inclusion of Green Roofs and Walls policy.	Support noted and welcomed.
135	6	Robin Brown	DMEI 1: Living Walls, Roofs and Onsite Vegetation	Object	Proposed deletion of Sustainable Design Standards would not fulfil Local Plan Part 1 Policy BE1 clause 10. Request reinstatement of Sustainable Design Standards to policy title and generalised requirement for sustainable design and construction.	Since the publication of the Local Plan Part 1 requirements for sustainable design have been standardised and integrated into the Building Regulations. Relevant policy criteria are therefore proposed for deletion.
56	3	Heathrow Airport Ltd	DMEI 1: Living Walls, Roofs and Onsite Vegetation	Support	Support revised wording of 1 i) as it enables flexibility in application of the policy. It may not be necessary for all developments in AQMAs to contribute to green infrastructure	Support noted and welcomed.

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					improvements to improve air quality.	
44	12	Ickenham Residents Association	DMEI 2: Reducing Carbon Emissions	Object	Consider that the policy is out-of-date and should be updated to reflect the latest position, as outlined on p.45 of the Government's recent Productivity Plan	Officers will continue to review the policy to ensure it is in accordance with the NPPF, NPPG and the provisions of the London Plan.
57	2	Greater London Authority	DMEI 2: Reducing Carbon Emissions	Support	Suggested that emphasis is placed on developments that genuinely cannot meet the targets on site 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.	<p>Broadly agree and support suggested change with a slight addition as set out below:</p> <p>"Proposals that fail to take reasonable steps to achieve the required savings will be resisted. However, <i>where it is clearly demonstrated that the targets for carbon emissions cannot be reasonably 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</i></p>

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						<p>contribution to make up for the shortfall. "</p> <p>The addition of the word "reasonably" to the GLA's suggested changes allows for a greater emphasis on non technical matters for justifying why the target cannot be reached. For example, it may be technically possible to meet the target but financially prohibitive.</p>
57	3	Greater London Authority	Footnote 8, page 103	Comment	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.	The footnote will be revised accordingly through the examination process.
57	4	Greater London Authority	Policy DMEI 3: Decentralised Energy	Comment	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	The policy seeks to ensure developments located near existing and future decentralised energy networks will be able to connect to those networks.

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					Manual.	The Council will be undertaking discussions with the GLA, with a view to addressing their comments prior to the commencement of the examination process.
109	4	CPRE	Policy DMEI 4: Development in the Green Belt or on Metropolitan Open Land	Support	Supports this policy which seeks to prevent inappropriate development in the Green Belt and MOL. Look forward to seeing this being given due weight in planning decisions.	Support noted and welcomed.
44	3	Ickenham Residents Association	Policy DMEI 4: Development in the Green Belt or on Metropolitan Open Land	Object	Do not feel that the exceptional circumstances tests laid out in policy DMEI 4 to justify development in the Green Belt could conceivably be met at this time.	The exceptional circumstances test will be applied in accordance with national planning policy guidance and appropriate case law.
44	10	Ickenham Residents Association	Policy DMEI 4: Development in the Green Belt or on Metropolitan Open Land	Object	Would welcome clarity on the difference between 'very special' and 'exceptional' circumstances.	The reference to special circumstances will be omitted to ensure consistency with the wording used in the NPPF.
30	1	Ruislip Residents'	Policy DMEI 5: Development in	Object	Reiterate the need to retain parts of current UDP Policy EM2 as the	Strategic Policy EM2 is set out in the Local Plan Part 1 and

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ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
		Association	Green Chains		proposed policy weakens existing protection of Green Chains. Recent development in Green Belt has not been done sensitively.	provides strategic direction to the proposed development management Policy DMEI 5 relating to development in the Green Belt. Once adopted, Policy DMEI 5 will replace saved UDP Policy OL11. The policies set out in the Local Plan Part 1 will be retained.
31	1	Friends of Pinn Meadows	Policy DMEI 5: Development in Green Chains	Object	UDP Green Chain Policy EM2 should be retained as proposed policy is weaker.	Strategic Policy EM2 is set out in the Local Plan Part 1 and provides strategic direction to the proposed development management policy DMEI 5 relating to development in the Green Belt. Once adopted, policy DMEI 5 will replace saved UDP policy OL11. The policies set out in the Local Plan Part 1 will be retained.
135	7	Robin Brown	Policy DMEI 5: Development in Green Chains	Object	Proposed new section B is not clear as criteria in opening sentence of section A, which relates to	Criterion A sets out the specific circumstances in which development in Green

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					development in Green Chains and not to development in areas deficient in Green Chains. Para 6.23 is supported. Request rewording of clause B.	Chains would be acceptable. Criterion B builds on this and requires all acceptable development to make a positive contribution to the nature conservation value and visual amenity of the Green Chain. It is not considered that the policy requires clarification.
98	1	Environment Agency	Policy DMEI 5: Development in Green Chains	Support	Pleased to note inclusion of requirement for developments to provide new areas of green infrastructure where Green Chains are currently deficient.	Support noted and welcomed.
135	8	Robin Brown	Para 6.27	Object	Proposed change of wording to 'aspire to include enhancement measures' would not comply with NPPF para 109 and the Council's statutory duty on biodiversity. Request deletion of proposed word changes to the paragraph.	It is not considered that the proposed wording results in conflicts with the NPPF.
105	1	Herts and Middx Wildlife	Policy DMEI 7:	Object	The Policy should require all	Officers propose to amend the

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		Trust	Biodiversity Protection and Enhancement		development to achieve no net loss. This should be assessed against the Biodiversity Impact Calculator. The Policy should also be prescriptive of the standard for ecology assessments. The policy should have more emphasis on certain types of improvement. Suggest amended wording to include in policy and paragraphs 6.26-6.29	<p>policy to clearly state the aim of new development is 'no net loss'; this would be consistent with the NPPF. The definition of no net loss could refer to the Biodiversity Impact Calculator but not prescribe its use. This could be too prescriptive for some developments and not always necessary.</p> <p>The other suggested changes are broadly captured by the current wordings and are therefore not necessary.</p>
69	2	Historic England	Policy DMEI 7: Biodiversity Protection and Enhancement	Object	Impacts of renewable energy installations should be highlighted within the policy. Suggest part iv) includes "the significance of heritage assets" after "nature conservation value".	The Council will be undertaking discussions with Historic England, with a view to addressing their comments prior to the commencement of the examination process.
64	5	Canal & River Trust	Para 6.39	Object	Wording is not consistent with para 89 of the NPPF - most waterside	The paragraph refers specifically to residential

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					facilities will support outdoor recreation and are therefore appropriate in Green Belt.	moorings, which constitute residential uses and will not be supported in the Green Belt. It is recognised that outdoor recreation facilities would be considered as appropriate development in accordance with the tests set out in the NPPF.
132	10	Barton Willmore on behalf of Segro	Policy DMEI 8: Waterside Development	Object	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.	Comments noted and welcomed.
64	4	Canal & River Trust	Policy DMEI 8: Waterside Development, parts A ii) and F	Object	Criterion A ii) - concerns are raised over the maintenance of a 5m buffer along the side of watercourses (including the canal).	The requirement for a buffer was introduced in response to comments from the Environment Agency. The policy contains a caveat 'or an

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					The Canal & River Trust has suggested changes to criteria F of the policy to allow improvements to encompass more than just biodiversity.	appropriate width as may be agreed by the Council'. This would address the concerns of the Trust that some development could be flush with the side of the canal. Officers agree with the changes proposed for clause F.
98	2	Environment Agency	Policy DMEI 8: Waterside Development	Support	Pleased to note inclusion of a number of the previous recommendations in this policy, particularly requirement for 8 and 5 metre buffers on main and ordinary watercourses. Policy could be stronger in section F - requiring contributions to biodiversity and improvement for canal-side developments to be extended to all types of watercourse, building on Policy EM3 of Local Plan Part 1.	Support noted and welcomed.
98	3	Environment Agency	Policy DMEI 9: Management of Flood Risk	Support	Pleased to note some positive changes. Still have some outstanding issues regarding sequential test, sequential approach, climate change	The Council will be undertaking discussions with the Environment Agency, with a view to addressing their

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					<p>and flood defences.</p> <p>Policy EM6 sets out a sequential approach in line with national policy. Recommend this is carried through into Part 2, with sites required to pass sequential test before undertaking a Flood Risk Assessment. Addendum to Sustainability Appraisal 2015 (pages 75 and 90) also highlights this and recommends inclusion of sequential and exception tests. Also recommend that where sites are in Flood Zones 2, 3a or 3b and have passed the Sequential Test, the policy requires planned development to use a sequential approach within the site boundary so that more vulnerable developments are placed in areas at lowest risk of flooding. This would mean policy is in line with the SFRA in which windfall sites not included in Site Allocations should be sequentially tested to ensure they are</p>	<p>comments prior to the commencement of the examination process.</p>

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					directed towards areas at lower risk of flooding.	
98	4	Environment Agency	Policy DMEI 9: Management of Flood Risk	Object	<p>Policy fails to mention explicitly climate change adaption and mitigation. The Sustainability Appraisal Addendum shows that the policy does not have any impact on climate change. Development proposals must be designed to reduce vulnerability to climate change, with finished floor levels 300mm above the predicted flood level for the 1 in 100 chance in any year flood event and providing appropriate means of escape to a higher level within the building or safe evacuation. The Environment Agency is publishing updated climate change levels in near future.</p> <p>Policy fails to state explicitly that any development at risk of flooding protected by a defence asset must be commensurate with the lifetime of</p>	The Council will be undertaking discussions with the Environment Agency, with a view to addressing their comments prior to the commencement of the examination process.

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					<p>the development. Strongly recommend policy ensures that any works are designed to maintain integrity of any flood defence assets on site and do not prevent upgrading of defence assets to meet increased risk of flooding.</p> <p>Wording to incorporate above suggested.</p>	
54	2	Savills on behalf of Thames Water	Para 6.53	Support	<p>Support para, however feel that the sentence stating “The Site Allocations document identifies sites that might have capacity issues and notes this as a constraint” should be removed as it infers all other sites in the document do not have capacity constraints, which could change if scale and phasing of a site changes.</p>	<p>Support noted and welcomed.</p> <p>Officers do not agree that the deletion of this sentence is necessary. It is acknowledged that changes in the scale of development may result in further infrastructure capacity issues. These matters will be addressed on a site by site basis.</p>
54	1	Savills on behalf of Thames	Policy DMEI 10:	Support	Support Policy DMEI 10 and	Support noted and welcomed.

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ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
		Water	Water Management, Efficiency and Quality		specifically bullet point J. Feel this could be clarified and strengthened by adding the following sentence: "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".	The Council will be undertaking discussions with Thames Water, with a view to addressing their comments prior to the commencement of the examination process.
135	9	Robin Brown	Policy DMEI 10: Water Management, Efficiency and Quality	Object	Proposed deletion of original Policy DMEI 12 has not been remedied by Policy DMEI 10 in addressing water quality. Does not comply with Local Plan Part 1 Policy EM8 or NPPF para 109. Request that Local Plan Part 1 para 8.128 should be added to policy DMEI 10.	Officers are content that the reworded Policy DMEI 10 addresses key provisions regarding water quality.
98	7	Environment Agency	Policy DMEI 10: Water Management, Efficiency and	Support	Pleased to note removal of Policy DMEI 12 and strengthening of Policy DMEI 10 to include robust SuDS and focus on improving surface water quality. Agree with comment 14 of	The Council will be undertaking discussions with the Environment Agency, with a view to addressing their comments prior to the

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ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
			Quality		Sustainability Appraisal Addendum (Oct 2015) to include a more explicit link to benefits of SuDS. Maintain suggestion to include text to address misconnections in sewer network and role they play in phosphate pollution. Para 6.47 highlights issue of phosphates in certain rivers but policy does not include any measures for developments to address this. Wording suggested for either policy or supporting text reference to Water Framework Directive.	commencement of the examination process.
98	8	Environment Agency	Policy DMEI 12: Development of Land Affected by Contamination	Support	Welcome inclusion of context in this policy. Policy should go further to encourage development on brownfield land in order to ensure remediation of contaminated sites were possible. This should be reflected both in policy and supporting text.	Support noted and welcomed. National planning policy (paragraph 111) sets out a presumption in favour of brownfield sites. It is not considered necessary to repeat the provisions of national policy.
16	3	Matthews and Son LLP	Para 6.58	Object	Policies 5.18 and 5.20 of the London Plan are not recognised.	Officers will continue to review the policy to ensure it is in

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ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
		(Henry Streeter Ltd)			Encouragement of recycling of Construction, Demolition and Excavation materials should be enshrined in policy.	accordance with the NPPF and the provisions of the London Plan.
44	2	Ickenham Residents Association	Policy DMEI 14: Air Quality	Comment	Would welcome clarification on how unacceptable risk in clause ii) of the policy is determined? Are concerned that the LBH Supplementary Planning Guidance on Air Quality and the LBH Air Quality Action Plan are both out-of-date.	The Council proposes to update its Air Quality Supplementary Planning Document. Further guidance on terminology within the policy will be defined in this document.
56	4	Heathrow Airport Ltd	DMEI 14: Air Quality	Object	Pleased that final paragraph of policy has been deleted but feel policy is still confusing and contradictory. Amended wording suggested.	The policy is line with national guidance and the London Plan. Officers will continue to review the policy to ensure it is in accordance with the NPPF and the provisions of the London Plan.
57	7	Greater London Authority	Policy DMEI 14: Air Quality	Support	Welcome the retention of the requirement to be at least 'Air Quality Neutral' in the draft document. To facilitate the implementation of this policy, reference to the Mayor's	Support noted and welcomed. Reference to the Mayor's Sustainable Design and Construction SPG will be included as appropriate.

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					Sustainable Design and Construction SPG should be included.	
16	1	Matthews and Son LLP (Henry Streeter Ltd)	Policies MIN 1: Safeguarding Areas for Minerals and Aggregates, MIN 2: Prior Extraction.	Object	<p>Policy MIN 1 only partially recognises NPPF para 143 and NPPG. Continued confusion between requirement to identify new sites for mineral extraction and to define Minerals Safeguarding Areas (MSAs). Development Management Policies document also fails to define Minerals Consultation Areas or show any on a plan.</p> <p>Consider the following specific sites should be identified: Land South of Harmondsworth Quarry and North of A4; Land at Bedfont Court.</p> <p>Two of the sites listed in MIN 1 could be considered as Preferred Areas: Land west of Harmondsworth Quarry; Land north of Harmondsworth Quarry.</p>	Officers will continue to review the policy to ensure it is in accordance with the NPPF and the provisions of the London Plan.
56	7	Heathrow Airport Ltd	Policy MIN 2: Prior Extraction	Object	Caveat of where prior extraction of minerals would not be required	Officers will continue to review the policy to ensure it is in

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					should be reinstated or "overriding need" caveat that includes surface developments that are in the national interest should be added to new part iii) to be more in line with NPPF para 143, which states that minerals safeguarding should not create a presumption that resources will be worked and that prior extraction should only occur where practicable and environmentally feasible.	accordance with the NPPF and the provisions of the London Plan.
16	4	Matthews and Son LLP (Henry Streeter Ltd)	Deleted para 6.65	Object	Suggests deleting first line of paragraph.	Representor is referring to para 6.65 of previous proposed submission document. The entire paragraph is proposed for deletion.
16	2	Matthews and Son LLP (Henry Streeter Ltd)	Policy MIN 4: Re-use and Recycling of Aggregates	Object	Basis for Policy MIN 4 is not clear and not consistent with NPPF Para 143 bullet 6, cumulative effects of multiple impact from individual sites. Should add justification for MIN 4 or delete. Evidence for choice of 165 ha	Officers will continue to review the policy to ensure it is in accordance with the NPPF and the provisions of the London Plan.

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					should be provided together with special factors that exempt the sites in MIN 1.	
126	1	Surrey County Council	Policy MIN 4: Re-use and Recycling of Aggregates	Support	Intentions of Policy MIN 1 fully supported. Only certain elements of CD&E waste stream are suitable for recycling as aggregates. Clause B (ii) should be reworded. Suggest renaming final paragraph as clause "C".	Support noted and welcomed. Officers will continue to review the policy to ensure it is in accordance with the NPPF and the provisions of the London Plan.
135	10	Robin Brown	MIN 4: Re-use and Recycling of Aggregates	Object	Clause B predetermines the planning process and is inconsistent with para 6.67, which explains that flat topography and lack of screening makes workings highly intrusive. As sites are in Green Belt this presumption in favour of permission would be contrary to national policy as the very special circumstances have not been set out. Request deletion of first sentence of clause B.	Officers will continue to review the policy to ensure it is in accordance with the NPPF and the provisions of the London Plan.

7. Community Infrastructure

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106	2	Thomas NP Crow	N/A	Object	Questions whether or not community infrastructure is deficient.	The Council's Strategic Infrastructure Plan (SIP) provides an overview of the main areas of infrastructure that are required to support planned growth in the borough.
136	1	NHS Property Services Ltd	Para 7.5	Object	<p>Proposed amendment replacing applicant "may" need to demonstrate" with "will" should be reversed to provide flexibility and enable assessment on a site by site basis. Alternative approach would be to add text reflecting the London Plan.</p> <p>Similarly in sentence "Where this is the case, marketing 'should' be submitted", replacement of 'may' with 'should' is not supported as not always appropriate to provide marketing evidence. This requirement should be flexibly</p>	The supporting text and policy reflect the strategic direction for the retention of community infrastructure facilities, set out in the London Plan policy 3.16. Any proposal involving the loss of an existing community facility will be considered on a case by case basis against the policies in the development plan.

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					applied and not conflict with paragraph 3.87A of the London Plan (FALP 2015).	
53	1	Councillor Janet Duncan on behalf of LB Hillingdon Labour Group	Policy DMCI 1: Retention of Existing Community, Sport and Education Facilities	Object	More protection needs to be given to existing community facilities and their incorporation into any future redevelopment proposals.	The Council seeks to protect existing community facilities through policy DMCI 1: Retention of Existing Community Infrastructure and is working with partners to ensure the delivery of infrastructure necessary to support growth. Developer contributions towards strategic and site specific infrastructure are sought through the CIL and Section 106 system.
91	3	Garden City Estate residents Association	Policy DMCI 1: Existing Community, Sport and Education Facilities	Support	Considers policy sound and prepared in accordance with the duty to cooperate, legal and procedural requirements.	Support noted and welcomed.
112	1	Theatres Trust	Policy DMCI 1:	Support	Agrees with the proposed policy, but	Support noted and welcomed.

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			Existing Community, Sport and Education Facilities		recommends that all references to social infrastructure/ community infrastructure are consistently referred to as community facilities. Also suggest including a definition of community facilities.	Officers will ensure consistent terminology is used across the document.
28	1	Sport England	Policy DMCI 1: Existing Community, Sport and Education Facilities	Object	<p>Welcomes removal of 'Sport' from the policy (but needs removing from contents page). Part C (ii) is unclear and confusing and should be deleted. Part C (iii) should be changed to "...the redevelopment of the site would secure an over-riding <u>sporting</u> benefit".</p> <p>Remaining policies not sufficient to meet requirements set out in paras 73 and 74 of NPPF. Policies should seek to protect existing indoor and outdoor sports facilities from development.</p>	The Council will be undertaking discussions with Sport England, with a view to addressing their concerns prior to the commencement of the examination process.
111	1	Councillor Sweeting	Policy DMCI 1: Existing	Object	There should be no loss of community facilities in areas of significant	Policies in the plan relating to community infrastructure seek

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			Community, Sport and Education Facilities		housing development. Any existing sites currently used for community activities and those with a covenant restricting it to community use should be protected. Council should identify new sites for community use in areas experiencing significant population increase through allocated housing sites. Alternative wording suggested.	to resist the loss of existing facilities and encourage new provision, subject to a number of criteria. The Council's Strategic Infrastructure Plan (SIP) provides an overview of the main areas of infrastructure that are required to support planned growth in the borough. The SIP notes that additional school places will be required over the Plan period. The Plan will be updated to reflect the latest position with school place planning, as it progresses through the examination process. In addition, the Council is working with the Clinical Commissioning Group to ensure that the latest position with regard to new healthcare facilities is reflected in the Plan.

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135	11	Robin Brown	Paras 7.12 & 7.13	Object	Does not meet objectively assessed requirements and is contrary to NPPF para 182 tests of soundness. Request that requirements (needs) be objectively assessed and set out how they would be met in order to achieve sustainable development.	The Council's Strategic Infrastructure Plan (SIP) provides an overview of the main areas of infrastructure that are required to support planned growth in the borough. The SIP notes that additional school places will be required over the Plan period. The Plan will be updated to reflect the latest position with school place planning, as it progresses through the examination process.
32	2	Natural England	Page 145	Object	No mention is made of Ruislip Woods Site of Special Scientific Interest as previously requested. Para 7.27 of the previous submission version which mentions the National Nature Reserve at the same site has been deleted and has not been mentioned elsewhere. Recognition of nationally designated sites and their protection in policy is required to make the plan	Paragraphs 7.26-7.28 of the Development Management Policies have been deleted as they provide unnecessary contextual information that adds little to the policy. SSSIs are already protected by national planning policy and policies in the London Plan. However, it is agreed that

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					justified and consistent with National Policy.	specific reference to Ruislip Woods SSSI should be included.
32	4	Natural England	Para 7.27	Support	Welcome the mention of applying Accessible Natural Green Space Standards for new development.	Support noted and welcomed.
132	11	Barton Willmore on behalf of Segro	Policy DMCI 5: Children's Play Areas	Object	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 and new residential developments should meet the playspace requirements for the new development alone and not the existing deficit.	The policy already refers to the London Plan SPG: Providing for Children's and Young Persons Play Space. This issue of yield figures will be discussed further with the GLA.
28	2	Sport England	Policy DCMI 6: Indoor Sports and Leisure Facilities	Object	No reference is made to outdoor sports facilities; this needs to be included in the policy.	The Council has recently commenced a Playing Pitch Needs Assessment in accordance with advice from Sport England. The Council will be undertaking discussions

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						with Sport England, with a view to addressing their concerns prior to the commencement of the examination process.
127	3	Transport for London	Para 7.35	Comment	Suggest inclusion of the date of the Mayor's CIL Charging Schedule for the avoidance of doubt, should rates change in the future.	Officers support the proposed inclusion of these changes.
127	4	Transport for London	Policy DMCI 7: Planning Obligations and Community Infrastructure	Object	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 that which can be collected from the borough CIL. Therefore strongly caution against over-reliance on CIL funding to deliver the majority of the borough's infrastructure requirements, and would suggest this wording be	It is recognised that the CIL will not address all of the identified infrastructure requirements in the borough. However, this funding route will contribute towards some transportation improvements over the period of the Plan.

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					removed from the policy.	
135	12	Robin Brown	Deleted para 7.42	Object	Proposed deletion diminishes clarity and intent from Plan reducing its effectiveness and does not address the meaningful proportion of CIL that national regulations require for the local community. Request reinstatement of appropriately worded para 7.42.	Paragraph 7.42 is proposed to be deleted because it repeats the provisions of the Regulation 123 list and the Planning Obligations SPD. A reference to the relevant documents will be included in the supporting text for policy DMCI 1.
8. Transport and Aviation						
127	5	Transport for London	Policy DMT 1: Managing Transport Impacts, and Table 8.1	Object	Request that a transport statement may be submitted for developments if deemed it is required to assess highway and transport impacts of the proposal. Also requests that the threshold for travel plan is updated to reflect the current TfL guidance where the threshold for Use Class D1 for places of worship and schools should be based on the number of members or staff/ pupils respectively.	The Council will be undertaking discussions with TfL, with a view to addressing their concerns prior to the commencement of the examination process.
127	7	Transport for London	Policy DMT 5:	Object	Requests that Policy DMT 5 promote	The policy will be amended to

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			Pedestrians and Cyclists		the Legible London walking scheme as an initiative to assist in providing well signposted pedestrian and cycle routes.	make reference to the Legible London Walking Scheme.
127	6	Transport for London	DMT 5: Pedestrians and Cyclists; Appendix A table 1	Object	Cycle parking standards for multiple land uses including retail, residential units and office, 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 Council will be undertaking discussions with TfL, with a view to addressing their concerns prior to the commencement of the examination process.
127	8	Transport for London	Policies DMT 5: Pedestrians and Cyclists; DMT 6: Vehicle Parking; Appendix A, Table 1	Object	Requests that the Hillingdon's parking standards in relation to electric vehicle charging points, residential cycle and car parking and B1 office cycle and car parking should be revised to reflect and comply with the London Plan requirements. In relation to office parking, consider that cycle parking standards in town centres that have high public transport accessibility, such as Uxbridge, should	The Council will be undertaking discussions with TfL, with a view to addressing their concerns prior to the commencement of the examination process.

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					have cycle parking standards that match inner/central London. Policy DMT 6 should clearly state that development in areas of high PTAL should aim for significantly less than 1 space per unit.	
127	10	Transport for London	Para 8.30	Object	Do not currently accept that Uxbridge should enjoy a more generous office car parking standard as justifiable circumstances because it failed to provide evidence to demonstrate that such an approach would not cause significant adverse impacts to congestion or air quality, considering that the local highway network is often congested at peak hours; additionally, Uxbridge Town Centre is currently well served by public transport.	The Council will be undertaking discussions with TfL, with a view to addressing their concerns prior to the commencement of the examination process.
127	9	Transport for London	Policy DMT 6: Vehicle Parking and Appendix A Table 1	Object	Consider the current approach adopted by Hillingdon to apply the relaxed standards for office parking across the entire borough is not	The Council will be undertaking discussions with TfL, with a view to addressing their concerns prior to the

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					acceptable. Whilst it is recognised that the London Plan allows for flexibility in setting office parking standards provided this can be justified, any flexibility should be site specific with a more detailed justification to allow TfL to assess the impact and consider the extent of conformity with London Plan policy.	commencement of the examination process.
127	11	Transport for London	Policy DMT 6: Vehicle Parking and Appendix A Table 1	Object	Acknowledge 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 parking provision for visitors may only be allowed with sites of a very low PTAL rating.	The Council will be undertaking discussions with TfL, with a view to addressing their concerns prior to the commencement of the examination process.
132	12	Barton Willmore on behalf of Segro	Policy DMT 6: Vehicle Parking	Object	The standards exceed those set out in the London Plan. When applying car parking standards to a scheme, a range of matters should be	The Council will be undertaking discussions with TfL, with a view to addressing these comments prior to the

DEVELOPMENT MANAGEMENT POLICIES (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
					considered including local circumstances and the character and nature of the site and scheme. Parking standards should reflect PTAL and be expressed as maximums.	commencement of the examination process.
65	3	Nathaniel Lichfield on behalf of Purplexed LLP	Policy DMT 6: Vehicle Parking	Object	Welcome that the parking standard has been modified to reflect the requirement for higher levels of additional B1 parking in the borough to serve Outer London business needs; but 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.	The Council will be undertaking discussions with TfL, with a view to addressing these comments prior to the commencement of the examination process.
106	4	Thomas NP Crow	Para 8.53	Object	Pavements in many parts of North Hillingdon are deplorable eg Hercies Road, Sweetcroft Lane, junction of Hercies Road and Long Lane, North	This issue will be addressed outside of the Local Plan process.

DEVELOPMENT MANAGEMENT POLICIES (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
					Side and outside SMC car showrooms.	
106	3	Thomas NP Crow	Para 8.53	Object	Reference to commercial movements being restricted to quieter aircraft is not true. Some are louder than they used to be. Oak Farm Estate is very noisy due these aircraft, which are to be increased in flight frequency. Need less commercial flights, not more.	Paragraph 8.53 reflects the latest agreements that are in place at RAF Northolt. Any necessary updates will be made during the course of the examination process.
135	12	Robin Brown	Policy DMAV 1: Safe Operation of Airports	Object	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.	It is considered that the provisions of clause iii) are already covered by other policy criteria and supporting text.
56	5	Heathrow Airport Ltd	Policy DMAV 1: Safe Operations of Airports	Object	Land uses and air noises - policy should specify where planning permission would be refused for sensitive uses within specific noise contours. Council should refer to paras 3.20 and 3.23 of the Government's Aviation Policy	The policies and provisions comply with the NPPF and the London Plan. Para 8.35 will be amended to reflect the correct number of operational terminals at

DEVELOPMENT MANAGEMENT POLICIES (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
					<p>Framework.</p> <p>Aviation Safety - no justification has been given for deletion of iii) which provided necessary safeguards for protecting airport operations.</p> <p>Terminals - para 8.35 Heathrow currently operates four terminals; Terminal 1 was closed in June 2015 so original text was correct.</p>	Heathrow Airport.
56	6	Heathrow Airport Ltd	Policy DMAV 2: Heathrow Airport; paras 8.46,8.47,8.51	Object	<p>Airport related uses - ask for part B to be deleted as restricting airport uses to within the airport boundary will not prevent those uses from happening and runs counter to aspirations for economic development.</p> <p>Pressure on Green Belt and congestion - Green Belt already has a high level of protection to protect against encroachment. Heathrow Airport has greater public transport accessibility than suggested locations for office and hotel accommodation.</p>	<p>Heathrow is a crucial influence in attracting new investment to the area. The Council seeks to ensure that land within the airport boundary continues to be protected for activity directly related to the airport. Outside the boundary there is a requirement to balance demand for hotel and employment uses in order to manage economic growth.</p> <p>Para 8.47 will be amended to refer to Heathrow Airport</p>

DEVELOPMENT MANAGEMENT POLICIES (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
					Para 8.46 should be deleted. Other matters - Final sentence of para 8.47 should refer to Heathrow Airport Limited, not BAA.	Limited.
Appendix A: Householder Development Policies						
54	3	Savills on behalf of Thames Water	Policy DMHD 3: Basement Development	Support	Supports the policy but recommends the addition of a paragraph on the need to fit basements with a positive pumped device or equivalent to ensure basements are protected from sewer flooding caused by backflow and ensure policy complies with NPPF para 103.	Support noted and welcomed. Officers are happy for specific references to the inclusion of a pumping device to be added to the supporting text for Policy DMHD 3.
120	1	Jonathan Marx	Policy DMHD 3: Basement Development	Object	Concerns regarding the impacts and assessment of structural surveys to support applications for basement development. Suitable expertise should be present at Planning Committee to improve the quality of guidance being offered to decision-makers.	This issue will be taken forward outside of the Local Plan process.
44	1	Cllr Hensley	N/A	Comment	Request that the condition 'external	Further discussions will be

DEVELOPMENT MANAGEMENT POLICIES (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
					surfaces to match' is revisited. This only applies to the property in question and adjacent properties. Reference that all external surfaces should match adjacent properties.	undertaken with Cllr Hensley to ensure these proposals are incorporated into the Plan.
44	9	Ickenham Residents Association	Appendix A	Support	Support the 'No Hip to Gable' development management policy and urge LB Hillingdon 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.	Support noted and welcomed.
Appendix B: Design Guidance for Shopfronts						
14	2	Chris Thomas Ltd on behalf of British Sign & Graphic Association	Para B1.11	Object	In many cases, corporate signs may not require adjusting. Suggest inserting "where necessary to preserve and/or enhance the character and appearance of the building and area" after "applicants will be expected to adapt their	The Council's policies have been drafted to protect the particular character of town centres and Conservation Areas in the borough. The issue of advertisements

DEVELOPMENT MANAGEMENT POLICIES (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
					<p>corporate signage". "effecting" in para B1.11 should be "affecting".</p>	<p>cuts across a number of policy areas including the public realm, heritage and shopfronts. The Council's general policy on advertisements has been prepared to protect visual amenity and to maintain the quality of the public realm. Policy requirements and guidance are geared towards meeting this objective.</p> <p>Officers will undertake a further review of the advice and guidance provided on advertisements and other detailed design matters, prior to the submission of the Local Plan documents for public examination.</p>
14	3	Chris Thomas Ltd on behalf of British Sign & Graphic Association	Para B1.12	Object	<p>Most of the advice is overly restrictive and some is contrary to regulations. Consider whole paragraph should be</p>	<p>See the above response to all comments received from Chris Thomas Ltd on behalf of</p>

DEVELOPMENT MANAGEMENT POLICIES (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
					deleted.	British Sign & Graphic Association.
14	4	Chris Thomas Ltd on behalf of British Sign & Graphic Association	Para B1.14	Object	Too many assumptions and generalisations. Many conservation areas which often include listed buildings are thriving commercial areas where the full range of advertising is to be expected and welcomed providing it does not detract from amenity. Consider second sentence of para B1.14 should be deleted.	See the above response to all comments received from Chris Thomas Ltd on behalf of British Sign & Graphic Association.
Appendix C: Parking Standards						
Appendix D: Town Centre Maps						
44	8	Ickenham Residents' Association	Ickenham Local Centre map	Comment	Seek clarification for the rationale for the designation of a Primary Shopping Area within the Ickenham shopping area.	The Primary Shopping Area has been carried forward from the Unitary Development Plan.

6) SITE ALLOCATIONS AND DESIGNATIONS - October 2015

This schedule shows comments received on the later draft consultation of October 2015, together with officer responses.

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)						
ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
General Comments						
137	3	Conservation Area Advisory Panel for south of the Borough	N/A	Support	Panel supports bringing forward a number of nature conservation area upgrades and new or extended areas, particularly for Cranford, Harmondsworth, West Drayton and Longford.	Support noted and welcomed.
1. The Hillingdon Local Plan						
62	1	f451 on behalf of Douay Marty's Academy, RC Diocese of Westminster & Guys Investment Trust Ltd	Paras 1.10, 1.11 - 1.16	Object	Paras 1.11 - 1.16 all come to the same conclusion that Hillingdon has not sufficiently accommodated for education capacity for 4 years when the Local Plan should provide for 10 years as demanded by NPPF.	Officers are progressing proposals to increase the number of school places available at three primary schools for permanent expansion. In addition, temporary classroom units at 2 primary schools have been

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
						approved for bulge classes to meet the demand for additional primary school places from September 2016. Options to expand three further secondary schools are being considered. The latest position with regards to school place provision will be reflected in the Statement of Modifications to be submitted with the Local Plan Part 2 documents for public examination.
2. Growth in Hillingdon						
121	1	Barton Willmore on behalf of Countess Goda Estates	N/A	Comment	There is a need to review the Site Allocations and Designations document in advance of 2021.	It is likely that the Site Allocations and Designations Document will be reviewed well in advance of the plan end date.
3. New Homes						
57	2	Savills on behalf of London Diocesan Fund	N/A	Object	Suggest that land at Ladygate Lane, Ruislip for inclusion as housing allocation.	The site has been submitted at a late stage in the process of plan preparation. The scope for

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
						inclusion of additional sites will be considered as part of the examination process.
58	8	Greater London Authority	N/A	Support	Welcome the reference to the borough's new higher minimum housing target of 5,593 and the identification of new development sites, but do not agree with the methodology applied 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	Support noted and welcomed. Officers will be undertaking further discussions with the Greater London Authority, with a view to addressing their comments prior to the commencement of the examination process.

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					borough will need to continue to bring forward additional housing development capacity. 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.	
115	1	Marion Turner	N/A	Support	Welcome the proposals for the redesignation of industrial sites for housing and mixed use development, but is unclear what the proportion of affordable housing will be provided on these sites	Support noted and welcomed. The Council seeks 35 % affordable housing on sites of 10 units or more. This is subject to viability considerations.
17	1	Highways England (Highways Agency)	Policies SA 1 - SA 41	Object	From 1 st April 2015, the Highways Agency became known as Highways England.	Officers are seeking approval from Cabinet to complete a cumulative assessment of

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					The Local Plan should not rely on future transport assessments accompanying planning applications. Highways England expects Hillingdon to produce a transport assessment covering the cumulative impacts of all allocated sites, including evidence that any required mitigation is affordable from identified funding sources.	transport impacts.
109	5	CPRE	N/A	Support	Support the proposed removal of Policy SA 7 to the rear of 119-137 Charville Lane, Hayes.	Support noted and welcomed.
101	1	Hayes Town Partnership	Policy SA 3: Eastern End of Blyth Road, Hayes	Object	The revised proposals have not included Trident House which has recently received consent for conversion to residential use. Reiterate need for outline planning framework or area	Site B in the Site Information refers to Trident House. More specific planning guidance for Hayes will be included in the Heathrow Opportunity Area Planning Framework, which is identified in the Council's Local

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					plan to show how support facilities will be provided for increased number of people living in Hayes.	Development Scheme.
101	3	Hayes Town Partnership	Policy SA 4: Fairview Business Centre	Object	Recommend the addition of Crown Trading Estate as a specific proposal with development aligned to the adjoining Fairview Business Centre.	Support noted and welcomed. The release of this site is broadly consistent with the provisions of the Local Plan Part 1, which seeks to maximise the potential of the Grand Union Canal in Hayes. Further discussions are required to assess the impact of the loss of the SIL designation and the redevelopment potential of this site.
101	4	Hayes Town Partnership	N/A	Object	Recommend safeguarding public access along the entire stretch of canal from Station Road Bridge to the Printing House Lane bridge.	Public access to the canal will be protected through the development management process.
64	12	Canal & River Trust	Policy SA4: Fairview Business Centre	Object	Site is not identified in Site Allocations and Designations document but the Canal &	Support noted and welcomed. Discussions with the landowner in relation to the future use of

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					River Trust would support its release for residential led mixed use redevelopment as a better neighbour to the canal. Understand the owners are keen for this to happen. Request that any redevelopment maximises potential of canal frontage.	the site are ongoing. The London Plan 2011 advises that development proposals should enhance the use of the Blue Ribbon Network. Policy EM3 in the Local Plan Part 1 seeks to enhance local character, visual amenity, ecology, transportation, leisure opportunities and sustainable access to rivers and canals. Redevelopment of the site would be required to meet the provisions of this policy and other relevant policies.
119	2	WYG on behalf of the London Meat Company	N/A	Object	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 are inadequately provided for. Suggest adding	Proposed site allocations for residential development are based on the evidence base document, including Mayor of London's Strategic Housing Land Availability Assessment (SHLAA). The Council's Local Plan Part 1 Strategic Policies identifies the Hayes and West Drayton

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					SA42 The Elms, Harlington as residential allocations to be delivered 2021 - 2026.	corridor as broad location for growth up to 2026 and the location of proposed site allocations correspond to the strategic direction set out in the Local Plan Part 1.
100	1	Heine Planning	Paras 3.18 and 4.26	Object	<p>Policy needs to be reconsidered based on an up-to-date proper needs assessment; regard to policy requirement in NPPF/PPTS; realistic approach to addressing need; comments made by Travellers and those representing them.</p> <p>Proposed extension of Colne Park will not address existing need. Policy not compliant with H3 of Local Plan Part 1 Gypsy and Traveller Pitch provision.</p> <p>Fails to have regard to outcome of recent appeal decisions for Gypsy-</p>	<p>The Council's Gypsy and Traveller Accommodation Assessment was undertaken in September 2014. Since this time, government guidance relating to pitch provision has been updated. The revised version of the guidance contains a new definition of how gypsies and travellers should be defined for the purposes of planning policy. Officers will assess the implications of these changes for pitch provision targets identified in the Local Plan Part 2, in advance of the examination process.</p>

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					Travellers.	
114	1	Sally Barter	Paras 3.18/4.26	Object	Considers that (a) there has been a failure to fully consult with all groups of Gypsies, Travellers, Showmen and Roma living within Hillingdon, (b) the Traveller Needs Assessment was not publicised amongst the Traveller Community, does not record local traveller views and is not factually correct, overwhelmingly focuses on consultation with the Irish Traveller community and was completed at a time when the majority of the community were away at Fairs or working to earn a living.	Interviews on authorised and unauthorised sites have captured the views of the existing traveller population in Hillingdon and informed the assessment. In addition, Hillingdon Traveller Forum has been engaged in its preparation and the assessment is publically available on the Council's website.
65	4	Nathaniel Lichfield on behalf of Purplexed LLP	Policy SA 2: The Old Vinyl Factory and Gatefold Building, Hayes	Object	Suggest amending policy text to refer to the amended outline planning permission (ref 59872/APP/2013/3775 –	The planning history of the site will be updated as part of the examination process and the site allocation policy will reflect the

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					<p>approved 31 July 2014). Given that separate planning permissions have amended the outline planning permission, 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. 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</p>	<p>consented schemes that are likely to be delivered on the site.</p>

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					theory.	
5	1	Amec Foster Wheeler on behalf of National Grid	Policy SA 2: The Old Vinyl Factory and Gatefold Building, Hayes; Policy SA 5: Land South of the Railway, Hayes; Policy SA 14: Master Brewer and Hillingdon Circus, Hillingdon	Comment	Identify the following sites as being crossed by or within close proximity to underground cables and/or gas pipelines: Master Brewer and Hillingdon Circus, Land to the south of the Railway, including Nestle Site, The Old Vinyl Factory and Gatefold Building.	The presence of underground cables and/or gas pipelines will be taken into account when assessing the development potential of these site allocations.
76	1	CBRE	Policy SA 4: Fairview Business Centre	Support	The proposed allocation of Fairview Business Centre under Policy SA 4 and the removal of the site from the SIL designation is supported, but it is considered that it can accommodate greater residential of residential units. The policy should allow for 100% residential in addition to residential-led development. Point out the	The proposed number of residential units is broadly consistent with the London Plan density matrix. Officers would prefer to see some small scale commercial uses to be incorporated into development proposals on this site to support future residential development and the regeneration of Hayes

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					factual inaccuracy in relation to site address and anticipate that Site B will also come forward in the short term.	Town Centre. The inaccuracy in relation to the site address will be corrected and anticipated delivery brought in line with landowner intention.
117	1	Simply Planning on behalf of Crown Trading Estate	Policy SA 4: Fairview Business Centre	Object	Object to the boundaries of Policy SA4 and recommended that policy SA4 is amended to include the adjacent Crown Trading Centre as part of the allocation. If it is not accepted that the Crown Trading Centre is allocated for mixed use residential development then 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 that the quality of industrial	The release of this site is broadly consistent with the provisions of Local Plan Part 1 which seek to maximise the potential of the Grand Union Canal in Hayes. Further discussions are required to assess the impact of the loss of the SIL designation and the redevelopment potential of this site.

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					buildings on site is partially low. Owner petition submitted.	
101	2	Hayes Town Partnership	Policy SA 4: Fairview Business Centre	Support	Support residential and small scale commercial uses on this site.	Support noted and welcomed.
64	6	Canal & River Trust	Policy SA 4: Fairview Business Centre	Support	SA 4 Fairview Business Centre - support but request additional wording to ensure ground floor canalside use maximises the potential of canal and animate this edge as it is isolated and not overlooked.	Support noted and welcomed. The policy requires canalside improvements and higher densities along the canal frontage.
69	10	Historic England	Policy SA 4: Fairview Business Centre; Policy SA 5: Land South of the Railway, Hayes	Object	The Grand Union Canal is an undesignated heritage asset. Significance of the canal should be respected and the corridor enhanced. Provisions for higher densities on these sites should be balanced by the need to avoid harm to the	Officers will be undertaking discussions with Historic England, with a view to addressing their concerns prior to the commencement of the examination process.

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					enjoyment of the canal. Recommend that policies should refer to the assessment of appropriate density, taking account of the heritage, recreational and townscape value of canal, reflecting Paras 58, 60 and 61 of NPPF and Policy 7.30 of the London Plan.	
64	7	Canal & River Trust	Policy SA 5: Land South of the Railway, Hayes	Support	Land to south of the railway including Nestle - canalside frontage should be maximised for active uses on ground floor. Considers site is in an appropriate location for community water sports club and permanent residential moorings. Support better linkages to Hayes Town Centre, a new footbridge and improvements to existing vehicular bridge at North	Support noted and welcomed. The proposed allocation requires development to integrate the canal and maximise the canal frontage. Discussions with landowners in relation to this site are ongoing and it is anticipated that the allocation will change as part of the examination process.

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					Hyde Gardens for pedestrians and cyclists.	
80	1	CgMs on behalf of Elite Group	Policy SA 5: Land South of the Railway, Hayes	Object	Object to proposed residential capacity on Site B and consider that flexibility should be maintained. Recommend the policy is reworded to state that employment floorspace is maintained and the amount of floorspace is re-provided in any redevelopment of the site. Welcome the inclusion of the phrase 'as a preference' as this provides flexibility for developers, but consider that the site is not suitable for large quantities of family housing and therefore reference to the Council's housing need evidence should be omitted.	Discussions with the landowners of the site are ongoing and it is anticipated that the proposed policy will change as part of the examination process. All proposals for housing development will be expected to justify proposed types of housing with reference to the Council's latest housing needs evidence.
50	3	John McDonnell MP	Policy SA 5: Land	Object	The policy has not been	The Council is keen to ensure the

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
			South of the Railway, Hayes		positively prepared, the balance between the loss of employment land and residential development, as well as community infrastructure has not been fully considered. The proposed changes are not sound.	delivery of a significant proportion of employment generating uses and community infrastructure as part of the proposed scheme for this key site. Discussions are progressing with the site owners to agree the overall quantum of uses. The latest position will be reflected when the Local Plan Part 2 is submitted to the Secretary of State for public examination.
116	2	Network Rail	Policy SA 5: Land South of the Railway, Hayes	Object	It unreasonable to expect a developer to delay development until all 3 sites can be planned for comprehensively. Suggest the requirement for 50% of the site being used for employment be replaced with an alternative more flexible approach seeking employment uplift. The indicative dwelling	This is an important strategic site for Hayes town and the borough as a whole and officers are keen to ensure a comprehensive approach to each of the parcels. The supporting text to the policy provides flexibility by stating that the overall quantum of uses will be determined through discussions with key stakeholders and the development of a sustainable

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					requirement for Site C should be increased to reflect London Plan guidance.	masterplan.
135	13	Robin Brown	Policy SA 5: Land South of the Railway, Hayes	Object	Quantum of development set out in this policy would preempt the proper determination of this important site, which lies within a Conservation Area	Discussions are progressing with the site owners to agree the overall quantum of uses. The latest position will be reflected when the Local Plan Part 2 is submitted to the Secretary of State for public examination. The location of the site in the Conservation Area is recognised in the Site Information Table and development proposals will be considered against the conservation policies in the Development Management Policies document.
134	1	Winckworth Sherwood LLP on behalf of Barratt London	Policy SA 5: Land South of the Railway, Hayes	Support	Supports site for mixed use residential and employment uses. The number of residential units should not be restricted. Evolving	Support noted and welcomed. Discussions are progressing with the site owners to agree the overall quantum of uses. The latest position will be reflected when the Local Plan Part 2 is

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					<p>masterplan demonstrates considerably more units can be delivered - between 1000 - 1200. Policy should be reworded to provide more flexibly.</p> <p>Different ownership of sites A, B and C mean that comprehensive redevelopment is unlikely and should not be a requirement, even though it is a good aspiration. Supporting text should just reference the Council's desire for all three sites to come forward at same time.</p> <p>Policy should reflect changes in delivering affordable housing and changes to housing tenure in London, such as the inclusion of starter homes and be worded more flexibly to allow</p>	<p>submitted to the Secretary of State for public examination.</p> <p>The supporting text to the policy notes the Council's objective to bring forward a comprehensive development scheme. Officers will seek to achieve this through discussions with key stakeholders.</p>

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					development to come forward.	
131	1	Carter Jonas on behalf of Access Self Storage	Policy SA 5: Land South of the Railway, Hayes	Support	<p>The allocation of the site is supported but it is considered that (a) Network Rail's land should be included in the allocation, (b) the percentage of employment generating uses is too high at 50% and should be replaced with a qualitative target, (c) the residential capacity on Site C should be increased and a consistent approach to density should be stated in the Policy, (d). Clarification is required as to how a comprehensive scheme can be realised and what is meant by sustainable master plan and (e) delivery should be brought forward to 2016-2021.</p>	<p>Officers will work with each of the landowners and other key stakeholders to ensure the delivery of a comprehensive scheme for this site. Supporting text notes that the overall quantum of uses will be determined through discussions with key stakeholders and the development of a sustainable masterplan.</p>

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
137	5	Conservation Area Advisory Panel for south of the Borough	Policy SA 5: Land South of the Railway, Hayes	Object	Concerns regarding the proposed amount of development on this site, which would be prejudicial to Conservation Area. No evidence that the Conservation Area designation has informed the scale and content of the proposals.	Discussions are progressing with the site owners to agree the overall quantum of uses. The latest position will be reflected when the Local Plan Part 2 is submitted to the Secretary of State for public examination. The Conservation Area, as part of Site A and B of the proposed allocation, is acknowledged in the Site Information Table and the proposed policy criteria include requirements for the development to sustain and enhance the significance of heritage assets. In addition, any proposal would be expected to be consistent with policies DMHB 4 and HE1.
132	1	Barton Willmore on behalf of Segro	Policy SA 5: Land South of the Railway, Hayes	Object	The proposed division between Sites A and B is inaccurate and the Plan should reflect the land interest. Comprehensive	Any factual inaccuracies will be identified on the Schedule of Proposed Modifications. The supporting text to the policy notes the Council's objective to

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					development should not be a policy requirement as this would delay delivery and more flexibility in terms of residential capacity should be included. Question the definition and evidenced need of the sports pitch requirement. Reference to the education use should be deleted.	bring forward a comprehensive development scheme. Officers will seek to achieve this through discussions with key stakeholders. Supporting text notes that the overall quantum of uses will be determined through discussions with key stakeholders and the development of a sustainable masterplan.
101	5	Hayes Town Partnership	Nestle Site SA 5: Land South of the Railway, Hayes	Support	Support all requirements for this site. Site provides an ideal location for water sports centre. Recommend improved connectivity with the town centre by a pedestrian bridge across canal.	Support noted and welcomed. Discussions with the landowner in relation to the future use of the site are ongoing.
101	6	Hayes Town Partnership	Policy SA 6: Western Core (Deleted))	Object	Concerned that the deletion of the site leaves this key area of Hayes in limbo. Unlocking and developing site would regenerate the	The Local Plan Part 2 Proposed Submission Version September 2014 document sought to carry

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					core of Hayes Town Centre. Would welcome dialogue with Council to explore issue.	forward from the saved UDP policies the Western Core site allocation for mixed use development, including 60 units. The site is proposed to be deleted on the basis that multiple land ownership may compromise delivery. No further evidence has been put forward that would support the re-introduction of the site.
64	8	Canal & River Trust	Policy SA 7: Union House, Hayes	Object	Access through site to the approved moorings on the canalside would be supported.	The site has been subject to the Prior Approval process and the proposed allocation reflects the approved scheme. Whilst the Council's strategic policy EM3 blue Ribbon Network seeks to enhance access to the canal, there is no scope for the Council to require canalside improvements through the Prior Approval process.
130	1	Home Group	Policy SA 10: Field End Road,	Object	Feasibility studies indicate that the site can	The residential capacity of this site has been calculated on the

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ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
			Eastcote		accommodate at least 30-35 units. Request that the policy is reworded.	basis of public transport accessibility levels, in accordance with national and London Plan policy.
109	6	CPRE	Policy SA 12: Former Allotments and Melrose Close Car Park, Burns Close	Object	This green space appears to be well used by the local community and the council should be seeking to bring this site back into full use, as allotments.	The allotments site has been vacant for a number of years and the principle of residential development was established in 2011, when planning permission was granted for 79 units.
115	2	Marion Turner	Policy SA 14: Master Brewer and Hillingdon Circus	Comment	Seeks clarification whether mixed use development involves retail at ground floor level or creative uses. Suggests the inclusion of wheelchair accessible units.	As a preference, retail uses should be located at ground floor level. Officers would like to see a mix of uses on this site, including retail at ground floor level as well as leisure, social and community facilities.
129	1	GL Hearn on behalf of Meyer Bergman	Policy SA 14: Master brewer and Hillingdon Circus	Support	Supports updated proposed site allocation and revised objectives but feel some aspects should be reviewed. Relevant planning history is incomplete. The site could	Support noted and welcomed. The planning history, including likely residential capacity of the site, is evolving and will be updated as part of the examination process. In

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ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					<p>deliver a higher number of residential units and request increase of net completions anticipated for site from 125 units to 341 units.</p> <p>Support designation of part of site as nature conservation site of Metropolitan or Borough Grade 1 importance, however there is inconsistency across documents - supplementary information is not provided in Chapter 5 or as part of Atlas of Changes. Request clarification for avoidance of doubt.</p> <p>Request removal of criterion "Form a comprehensive development scheme across the whole site" as the site is in multiple ownership and is unlikely to be delivered at same time or as part of one</p>	<p>addition, inconsistency across the Local Plan Part 2 documents in relation to the nature conservation site will be addressed. Whilst it is recognised that sites A and B are unlikely to be developed at the same time, officers would not wish to see either site developed on a piecemeal basis.</p>

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ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					masterplan.	
44	1	Ickenham Residents Association	Policy SA 14: Master Brewer and Hillingdon Circus	Support	Continue to support the principle of development at Hillingdon Circus/Master Brewer, but prefer mixed-use rather than residential led mixed use on this site. Suggest that the site boundary is moved westward to ensure that no Green Belt is within SA 14.	Support noted and welcomed. The latest position will be reflected when the Local Plan Part 2 is submitted for public examination. The inclusion of the Green Belt within the site serves to ensure that the development will enhance the quality, management and access to Freezeland Covert. The extent of the site area has been carried forward from the existing UDP designation unaltered and all development proposals on this site will have to take account of the Council's Green Belt policies DMEI 4 and EM1.
109	7	CPRE	Policy SA 14: Master Brewer and Hillingdon Circus, Hillingdon	Object	The Council should clarify the status of planning applications at this site and state clearly that there will be no 'inappropriate development' within the	The latest position on this site will be reflected when the Local Plan is submitted for public examination. Any development on the site will be required to take account of the Council's

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ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					Green Belt.	Green Belt policies DMEI 4 and EM1.
42	1	GVA on behalf of Transport for London	Policy SA 16: Northwood Station, Green Lane	Support	Welcome the inclusion of SA 16 and support proposed wording of criteria, subject to minor amendments allowing for the re-provision of retail uses and commuter car parking.	Support noted and welcomed.
69	12	Historic England	Policy SA 16: Northwood Station, Green Lane	Object	The site encompasses part of the Northwood Town Centre and Green Lane Conservation Area and the Frithwood Conservation Area - consequently recommend bullet point 8 is amended to omit the word "adjacent".	Officers will be undertaking discussions with Historic England, with a view to addressing their concerns prior to the commencement of the examination process.
19	7	Rapleys on behalf of LaSalle Investment	Policy SA 21: Eagle House, The Runway	Object	Object to Policy SA21 and request that the allocation is amended to provide a positive framework to secure the delivery of appropriate	The site is subject to Prior Approval for residential development and the allocation has been drafted to reflect the approved scheme.

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ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					and viable development for the site. The allocation should be flexible and it is requested that the site is allocated as a 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.	
57	1	Savills on behalf of London Diocesan Fund	Policy SA 22: Chailey Industrial Estate, Pump Lane	Object	Object to the exclusion of the Matalan Site from site allocation SA 22.	The Local Plan Part 2 Site Allocations and Designations Proposed Submission Version September 2014 identified the Matalan site as part of site allocation SA22. This portion of the site was removed following representations from the site owners, which indicated that it was unlikely to come forward for development.

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ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
						The site is now in the ownership of the London Diocesan Fund, which has requested that it is added back into the Site Allocations and Designations document and allocated for a mixed use residential and retail scheme. Officers are content to support the proposed allocation, subject to the agreement of a suitable quantum of development on the site.
101	7	Hayes Town Partnership	Policy SA 22: Chailey Industrial Estate	Object	Revised proposal is for residential only, not mixed use. Hayes Town Partnership previously recommended that the site should include a purpose built mosque to replace facility in nearby former Civic Hall. Recommend this should be included in proposals for this site.	The previous proposal of mixed-use development was based on the Matalan site being included. Due to recent changes in landownership the Matalan element is likely to be included again into the site allocation. The policy criteria requiring the provision of community infrastructure on site will be retained. Specific proposals will be assessed against all relevant

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ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
						development management policies.
94	1	Gerald Eve LLP on behalf of Royal London Limited	Policy SA 22: Chailey Industrial Estate, Pump Lane		Are supportive of the policy generally, but consider that the site itself has the potential to offer a significantly greater density at 170 units per hectare. Suggest amended policy wording and to amend proposed number of units and net completions within the site information table.	Support welcomed. The proposed density on this site is consistent with the density range set out in table 3.2 of the London Plan.
50	5	John McDonnell MP	Policy SA22: Chailey Industrial Estate, Pump Lane	Object	Considers that the policy has not been positively prepared and is therefore not sound.	Officers continue to work with partners to ensure that the necessary infrastructure is in place through the CIL and Section 106 mechanisms.
50	4	John McDonnell MP	Policy SA 23: Silverdale Road/Western View	Object	Considers that the policy has not been positively prepared and is therefore not sound.	Officers continue to work with partners to ensure that the necessary infrastructure is in place through the CIL and Section 106 mechanisms.
122	1	Savills on behalf of	Policy SA 23:	Object	Consider that the site is	Proposed density is consistent

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ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
		Hurlington Ltd	Silverdale Road/Western View		ideally placed for the delivery of higher density development Request that the reference comprehensive development is removed and the indicative phasing should be reinstated as per the original draft allocation at 2016-2021. Further 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. Amended wording provided.	with the London Plan density ranges. The site is key to the regeneration of the town centre and it is considered it would benefit from comprehensive development.
101	8	Hayes Town Partnership	Policy SA 23: Silverdale Road, Western View.	Support	Strongly support revised proposal to include retail. Recommend a specific requirement to retain and enhance the historically significant Shackles Dock. Ask that discrepancy in	Support noted and welcomed. The inclusion of Shackles Dock in the site boundary will require prior agreement from the site owner and a viability assessment to demonstrate that the site has a realistic prospect of being

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ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					numbers of residential units be amended.	delivered for residential use. In addition, there are a number of heritage issues that would need to be addressed.
64	9	Canal & River Trust	Policy SA 23: Silverdale Road/ Western View	Support	Proposals should maximise canalside frontage. Dock is privately owned and should be retained and retention highlighted within Policy SA 23. Canalside improvements should be agreed with the Trust.	The London Plan 2011 advises that development proposals should enhance the use of the Blue Ribbon Network and Local Plan Part 1 policy EM3 seeks to enhance the local character, visual amenity, ecology, transportation, leisure opportunities and sustainable access to rivers and canals. The inclusion of Shackles Dock in the site boundary will require prior agreement from the site owner and there are a number of heritage issues that would need to be addressed. The Canal & River Trust is a statutory consultee and the Council is required to formally consult the Trust on any planning

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ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
						application for development likely to affect the canal.
69	11	Historic England	Policy SA 23: Silverdale Road/Western View	Object	<p>The second bullet point of lacks clarity on the Council's expectations. The Old Crown Public House is a pivotal building within the Victorian landscape, a locally listed building and policy should specify that the building is retained in any new development.</p> <p>Concerned that maximising canal frontage might be through maximising densities and believe policy should include a further criterion to ensure the quality and scale of development is appropriate to the local context, avoiding a potentially enclosed and alien environment.</p>	Officers will be undertaking discussions with Historic England, with a view to addressing their concerns prior to the commencement of the examination process.
50	1	John McDonnell MP	Policy SA 24:	Object	The balance of the loss of	Benlow Works is currently

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ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
			Benlow Works, Silverdale Road		<p>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.</p>	<p>largely vacant and the proposed allocation seeks to bring this important building forward for mixed use development, including employment generating uses.</p> <p>Policies in the plan relating to community infrastructure seek to resist the loss of existing facilities and encourage new provision, subject to a number of criteria. The Council's Strategic Infrastructure Plan (SIP) provides an overview of the main areas of infrastructure that are required to support planned growth in the borough.</p> <p>The SIP notes that additional school places will be required over the plan period. The Plan will be updated to reflect the latest position with regards to school place planning, as it progresses through the</p>

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ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
						examination process. In addition, officers are working with the Clinical Commissioning Group to ensure that the latest position with regard to new healthcare facilities is reflected in the Plan.
137	4	Conservation Area Advisory Panel for south of the Borough	Policy SA 24: Benlow Works, Silverdale Road	Support	Support proposals to secure a future for this at risk listed building	Support noted and welcomed.
76	2	CBRE	Policy SA 24: Benlow Works, Silverdale Road	Object	Consider that the current proposal to allocate Benlow Works in isolation with substantial areas of land within CBRE's ownership cannot be supported as this would compromise the operation of the Silverdale Factory Centre. The wider Silverdale Factory Centre should be allocated as a comprehensive residential-led redevelopment.	The allocation is justified on the basis that the development of the site will ensure the necessary repairs and bring back into use the Grade 2 Listed Building. The specific circumstances and heritage value of the site are such that it is considered suitable for allocation in the Local Plan. The release of the wider Silverdale Road area has not been justified.

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ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
101	9	Hayes Town Partnership	Policy SA 24: Benlow Works	Support	Support proposal for mixed use development	Support noted and welcomed.
64	10	Canal & River Trust	Policy SA 29: Cape Boards Site, Iver Lane, Cowley	Support	The proposal is supported. Canalside improvements should be agreed with the trust and development should make a contribution to towpath and environmental enhancements.	Support noted and welcomed. The Canal & River Trust is a statutory consultee and the Council is required to formally consult the Trust on any planning application for development likely to affect the canal.
69	13	Historic England	Policy SA 30: Grand Union Park, Packet Boat	Object	It is noted that a change of use is permitted through prior approval. Canal and its bridges to south west are particularly attractive features. In case of future planning applications, it may be suitable to refer to these assets and potential opportunities for enhancement.	Officers will be undertaking discussions with Historic England, with a view to addressing their concerns prior to the commencement of the Examination process.
50	6	John McDonnell MP	Policy SA 35: Former Vehicle	Object	Considers that the policy has not been positively prepared	Officers continue to work with partners to ensure that the

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ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
			Testing Station, Cygnet Way		and is therefore not sound.	necessary infrastructure is in place through the CIL and Section 106 mechanisms.
50	7	John McDonnell MP	Policy SA 36: Hayes Bridge, Uxbridge Road	Object	Considers that the policy has not been positively prepared and is therefore not sound.	Officers continue to work with partners to ensure that the necessary infrastructure is in place through the CIL and Section 106 mechanisms.
64	11	Canal & River Trust	Policy SA 36: Hayes Bridge, Uxbridge Road	Support	Allocation of the site is supported. Residential moorings should be a feature of the redevelopment proposals.	The Council already encourages residential moorings along the urban stretch of the canal through policy DMHB20.
139	1	Mrs Frances Burton	Policy SA 37: Former Coal Depot	Support	Supports the designation of the site	Support noted and welcomed.
140	1	Mrs Catherin Levell	Policy SA 37: Former Coal Depot	Support	Supports the designation of the site	Support noted and welcomed.
141	1	Mr John Bishop	Policy SA 37: Former Coal Depot	Support	Supports the designation of the site	Support noted and welcomed.

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ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
142	1	Mr Mohammed Islam	Policy SA 37: Former Coal Depot	Support	Supports the designation of the site	Support noted and welcomed.
143	1	Mr Mark Decent	Policy SA 37: Former Coal Depot	Support	Supports the designation of the site	Support noted and welcomed.
144	1	Mrs Melanie Auckland	Policy SA 37: Former Coal Depot	Support	Supports the designation of the site	Support noted and welcomed.
145	1	Mr Balal Akram	Policy SA 37: Former Coal Depot	Support	Supports the designation of the site	Support noted and welcomed.
146	1	Mr Mark Auckland	Policy SA 37: Former Coal Depot	Support	Supports the designation of the site	Support noted and welcomed.
147	1	Mrs Margaret Atkinson	Policy SA 37: Former Coal Depot	Support	Supports the designation of the site	Support noted and welcomed..
148	1	Mrs Sarah Atkinson	Policy SA 37: Former Coal Depot	Support	Supports the designation of the site	Support noted and welcomed.
149	1	Mr Daryll Atkinson	Policy SA 37:	Support	Supports the designation of	Support noted and welcomed.

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ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
			Former Coal Depot		the site	
150	1	Mr William Cummings	Policy SA 37: Former Coal Depot	Support	Supports the designation of the site	Support noted and welcomed.
152	1	Miss Emily Auckland	Policy SA 37: Former Coal Depot	Support	Supports the designation of the site	Support noted and welcomed.
153	1	Mr Peter Decent	Policy SA 37: Former Coal Depot	Support	Supports the designation of the site	Support noted and welcomed.
154	1	Mrs Frances Decent	Policy SA 37: Former Coal Depot	Support	Supports the designation of the site	Support noted and welcomed.
155	1	Mr Matthew Crane	Policy SA 37: Former Coal Depot	Support	Supports the designation of the site	Support noted and welcomed.
156	1	Mr Thomas Cathcart	Policy SA 37: Former Coal Depot	Support	Supports the designation of the site	Support noted and welcomed.
157	1	Mr Alan Atkinson	Policy SA 37: Former Coal	Support	Supports the designation of the site	Support noted and welcomed.

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ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
			Depot			
158	1	Mr Jack Cathcart	Policy SA 37: Former Coal Depot	Support	Supports the designation of the site	Support noted and welcomed.
159	1	Mrs Sarah Cranie	Policy SA 37: Former Coal Depot	Support	Supports the designation of the site	Support noted and welcomed.
160	1	Mr Harry Cathcart	Policy SA 37: Former Coal Depot	Support	Supports the designation of the site	Support noted and welcomed.
46	2	Cllr Edwards	Policy SA 37: Former Coal Depot	Support	The Community welcomes the re-designation of the Former Coal Depot. The local community. Its location does not make it suitable for industrial use and its re-designation to will permit the enhancement of the area to the benefit of nearby residents as well as to the wider community. Consideration should be given to inclusion of a	Support noted and welcomed.

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ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					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 for open air storage of vehicles amongst other commercial uses.	
110	1	Yiewsley & West Drayton Town Centre Action Group	Policy SA 37: Former Coal Depot	Support	Support the proposal for mixed use development on this site and feel that it will enhance the area in general.	Support noted and welcomed.
116	1	Network Rail	Policy SA 37: Former Coal Depot		Consider that the Coal Yard is ideally positioned to accommodate future growth in freight business and do not support the loss of the existing employment designation.	Officers maintain the view that it should be allocated for mixed use residential development to come forward in the latter stages of the plan period.

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ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
91	2	Garden City Estate Residents Association	Policy SA 37: Former Coal Depot	Support	Strongly support the proposed release from employment designation and allocation for mixed use development.	Support noted and welcomed.
111	3	Councillor Sweeting	Policy SA 37: Former Coal Depot	Support	Fully support Council's re-designation of site for mixed use development with a proportion for community use.	Support noted and welcomed.
53	4	Councillor Janet Duncan on behalf of LB Hillingdon Labour Group	Policy SA 37: Former Coal Depot	Support	Welcome removal of IBA designation and designation for mixed use development. Would be helpful to include health facilities.	Support noted and welcomed.
85	1	Barton Willmore on behalf of Powerday PLC	Policy SA 37: Former Coal Depot	Object	Powerday submitted planning application for development of Materials and Recovery Facility on site in December 2015 following refusal of a similar application made in July 2013. Not aware of any	Officers maintain the view that the site should be allocated for mixed use residential development to come forward in the latter stages of the plan period.

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ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					<p>developer promoter interest in the site for residential development and Powerday does not intend to bring it forward for housing. Strongly oppose its de-allocation from an Industrial and Business Area. Site is not a suitable location or viable for residential development for many reasons, including contamination. Hillingdon should be protecting the site for industrial use if borough is to remain a key industrial location. There is no rationale for including site within proposed Archaeological Priority Zone and Powerday objects to this designation which should be deleted.</p>	
161	1	Preston Bennett on behalf	Policy SA 39: Trout Road	Object	Onslow Mills Site was previously part of SA 39 and	Officers support the re-introduction of this portion of

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ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
		of Onslow Mills	Yiewsley		was removed from the allocation without notification of the site owner. Request that the site be reconsidered as part of Site Allocation SA 39 to help achieve a comprehensive regeneration masterplan for the entire site.	the site.
4. Rebalancing Employment Land						
58	11	Greater London Authority	Policy SEA 2: Hotel and Office Growth Locations	Support	Welcomes the designations to support hotel and / or office growth.	Support noted and welcomed.
64	14	Canal & River Trust	N/A	Support	Trust would support the release of industrial canalside sites to help enhance canalside and the delivery of sustainable communities.	The Council has released a significant proportion of designated employment land to other uses. Further releases would need to be supported by appropriate evidence. EM3 seeks to ensure that any development proposals contribute to the enhancement of the canal corridor.

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ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
58	9	Greater London Authority	Policy SEA 1: Strategic Industrial Locations	Support	Support the policy and the defined boundaries in line with London Plan policy 2.17, as well as the continued consolidation and designation of SIL and LSIL. It would be useful to compare the total area of land released with the release benchmark set out in the Land for Industry and Transport SPG and to outline how the release of surplus industrial land close to public transport/town centres is prioritised to maximise opportunities for higher density housing in line with London Plan policies 3.3 and 4.4.	Support noted and welcomed. There is scope to include the suggested comparison of total land released with the Mayor's release benchmark as part of the examination process. Officers will be undertaking further discussions with the Greater London Authority, with a view to addressing their concerns prior to the commencement of the examination process.
57	6	London Diocesan Fund	Map B: Hayes Industrial Area, Page 124	Object	Proposes changes to map B showing the Hayes Industrial Area to reflect exclusion of Matalan site from the existing employment	The Local Plan Part 2 Site Allocations and Designations Proposed Submission Version September 2014 identified the Matalan site as part of site

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ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					designation.	<p>allocation SA 22. This portion of the site was removed following representations from the site owners, which indicated that it was unlikely to come forward for development.</p> <p>The site is now in the ownership of the London Diocesan Fund, who has requested that it is added back into the Site Allocations and Designations document and allocated for a mixed use residential and retail scheme. Officers are content to support the proposed allocation, subject to the agreement of a suitable quantum of development on the site.</p>
58	10	Greater London Authority	Para 4.14	Object	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 paragraph refers to areas of SIL that are proposed to be released from residential-led mixed use development. No further releases are proposed

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ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					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.	over and above those that have already been identified. It is agreed that the policy should be amended to clarify this.
138	1	Montagu Evans on behalf of Townend Development	Para 4.27	Object	Suggest including Stockley Farm as a Locally Significant Industrial Site.	No specific evidence is available to support the proposed LSEL designation. LSIS are proposed in line with the strategic direction provided by policy E1 set out in the Local Plan Part 1. Any additional employment designation would need to be considered through the examination process.
64	15	Canal & River Trust	Para 4.29	Support	Summerhouse Lane - support the release of canalside land for residential development.	Support noted and welcomed.
128	4	The Emerson Group on behalf of Orbit Developments Ltd	Para 4.33	Support	Support the designation of Heathrow Boulevard, 282 Bath Road, within the Bath Road, Hayes Locally	Support noted and welcomed.

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ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					Significant Employment.	
19	9	Rapleys on behalf of LaSalle Investment	Para 4.34, Map J, Odyssey Business Park	Object	Consider that the revised text is factually incorrect and that it is inappropriate to designate the site as a LSEL as there is no evidence to suggest that the site would provide a range of employment activities, other than the existing Class B1 offices.	The designation is proposed on the basis that the site is an existing modern office park of significant size and responds to the direction provided in strategic policy E1 and the supporting text in paragraph 5.8 set out in the Local Plan Part 1. The proposed designation reflects recommendation 7 of the Council's Employment Land Study Update 2014.
19	8	Rapleys on behalf of LaSalle Investment	Policy SEA 2: Hotel and Office Growth Locations, para 4.44	Object	Object to paragraph 4.44 and suggest that the paragraph is amended to make 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 locations are identified as preferred locations for hotel growth in Hillingdon. Other types of development will be appropriate in these locations, subject to meeting the policies in the development plan.

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ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
128	5	The Emerson Group on behalf of Orbit Developments Ltd	Policy SEA 2: Hotel and Office Growth Locations	Support	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.	Support noted and welcomed.
124	1	Barton Willmore on behalf of Tokyo Inn	Policy SEA 2: Hotel and Office Growth Locations, Map O, para 4.48	Support	Support the emerging hotel growth locations and release of employment land for other uses. However, note that there is an error at Paragraph 4.48, which refers to 'Map N', when in fact it should refer to 'Map O'.	Support noted and welcomed. The map reference will be corrected.
56	8	Heathrow Airport Ltd	Policy SEA 2: Hotel and Office Growth Locations, Map O	Object	Heathrow Airport should be included under point i) - with reference to its definition in map 13.1 (Policies Map/Atlas of Change). Question the suitability of some of the locations for growth identified in Map O as they present little	The Council does not consider the Airport as a preferred location for hotel and office growth. Hotels and office growth locations have been identified on the basis of relevant evidence studies and the strategic direction provided by policies E1 and E2, as set out

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ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					opportunity for further growth. Greater flexibility to allow office and hotel uses in sustainable locations needs to be written into relevant policies.	in the Local Plan Part 1.
5. Green Belt; Metropolitan Open Space; Green Chains; Nature Conservation Sites						
44	6	Ickenham Residents Association	N/A	Support	Welcome the adjustments to the list of Sites of Importance for Nature Conservation (SINC).	Support noted and welcomed.
109	11	CPRE	Page 154, Table 5.1, net Change in Green Belt	Support	Support the increase of almost 70ha of land designated as Metropolitan Open Land, but 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. Given that this represents a	Support noted and welcomed. The Council seeks to resist the loss of green space in line with the relevant strategic and development management policies in the development plan. Proposed deletions of Green Belt reflect the conclusions of the Council's Green Belt Study.

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ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					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.	
109	8	CPRE	Page 155, 470 Bath Road, Longford	Object	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. , As the site is located directly adjacent to the River it should instead be designated as Metropolitan Open Land.	The site clearly forms a logical and definable Green Belt boundary in Longford and it is considered that it does not merit its current Green Belt designation. Justification for the proposed deletion is provided on page 41 of the Green Belt Assessment Update September 2013.
109	9	CPRE	Page 158, Land at Stockley Road adjoining the	Object	Object to the removal of protection on the land at Stockley Road. The Green	The site is proposed on page 180 of the Plan as a Green Chain designation on the basis that it

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
			Grand Union Canal, Hayes		Belt Review states that this site continues to fulfil its function as part of the wildlife corridor. 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.	supports the creation of a wildlife corridor along the Grand Union Canal. It is not considered that a dual designation would increase the overall protection of the site.
109	10	CPRE	Page 159, Lake Farm School, Hayes	Object	Object to the removal of playing fields from the Green Belt. The boundary should be changed so that it aligns more closely with the built up area of the school.	The Green Belt boundary has been revised to reflect the site boundary of the approved scheme.
133	1	Barton Willmore on behalf of Imperial College London	Page 250, Land at Sipson Lane	Object	Object to the designation of the site and requests that it is deleted from the Green Belt.	The site is allocated as a Minerals Safeguarding Area in response to requirements set out in policy 5.20 of the London Plan. Paragraph 90 of the NPPF makes it clear that minerals extraction is not inappropriate in Green Belt provided the openness of the

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
						Green Belt is preserved and the proposed use does not conflict with the purposes of including land in Green Belt.
57	6	Savills on behalf the London Diocesan Fund	N/A	Object	Seeks a Green Belt deletion of Glovers Grove for another site under LDF ownership for a land use swap with Ladygate Lane.	The site has not been identified as suitable for release from its existing designation in the Green Belt Assessment Update September 2013.
73	1	Mercer Planning on behalf of Rayan Mahmud	Page 153, Green Belt deletions	Object	Considers that land at 59 Reservoir Road in Ruislip should be included in the list of Green Belt deletions. The land does not meet any of tests for Green Belt designation.	This site meets at least one of the purposes of including land in the Green Belt, as identified in the NPPF. The current boundary is based on existing definable physical features and is not recommended for change.
135	14	Robin Brown	Page 156, Longford Green and Page 159, Lake Farm School Hayes	Object	These sites still perform Green Belt functions and should be retained to comply with national policy.	Lake Farm school has been fully developed and Longford Green is now occupied by the Heathrow Business Class Car Park. Justification for the proposed deletion has been provided.

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
137	5	Conservation Area Advisory Panel for south of the Borough	Page 156 Longford Green and Page 159, Lake Farm School Hayes	Object	Green Belt deletions not supported as these sites still function to prevent urban sprawl and their release would serve as an unacceptable precedent.	Lake Farm school has been fully developed and Longford Green is now occupied by the Heathrow Business Class Car Park. Justification for the proposed deletion has been provided. As such, these sites no longer meet the purposes of including land in the Green Belt.
119	1	WYG on behalf of the London Meat Company	Para 5.12	Object	Assert that land at 'The Elms and land immediately to the north of The Elms complex should be excluded from the Green Belt due to its intensively developed character and interrelationship with the existing built form comprising the setting of Harlington.	The Elms is located on the eastern edge of Harlington Village and the designated Green Belt prevents coalescence with nearby Cranford. The Council will continue to resist the loss of designated Green Belt land in Hillingdon.
71	2	London Wildlife Trust (Hillingdon Group)	Para 5.12	Support	Support Council's retention of full Green Belt protection for Hayes Park.	Support noted and welcomed.

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
50	2	John McDonnell MP	Para 5.12, page 159	Object	The paragraph is not in line with national policy.	It is not considered that the removal of the Lake Farm site conflicts with national Green Belt Policy. As the site has recently been developed as a school it no longer serves the purpose of including land in the Green Belt, as set out in the NPPF.
31	2	Friends of Pinn Meadows	Page 153, Areas Forming Links in the Green Chain	Object	Kings College Playing Fields should keep its Green Chain designation along with MoL designation.	Officers are of the view that a dual designation will not provide additional protection and could result in a lack of clarity regarding the designation that applies to these sites.
109	11	CPRE	Page 153, Green Belt Extensions.	Support	Supports extensions to areas of Green Belt, but considers that Ruislip Depot, Austins Lane, Ickenham and Windsor Avenue Allotments, North Hillingdon should be included.	Support noted and welcomed. Proposed changes to Green Belts are identified in the Council's Green Belt Study.
32	1	Natural England	Page 154, Table 5.1: Net Change	Object	Net decrease in Green Belt is not made up for by net	The Council seeks to resist further loss of Green Belt in line

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
			in Green Belt.		increase in MoL.	with strategic policies EM2 and emerging development management policy DMEI 4. Proposed additions and deletions are based on the conclusions of supporting evidence base documents.
138	2	Montagu Evans on behalf of Townend Development	Page 155, Green Belt deletions	Object	Recommend that Stockley Farm is deleted from the Green Belt designation.	The site has not been identified as suitable for release its existing designation in the Green Belt Assessment Update September 2013.
30	2	Ruislip Residents' Association	Page 169 - 10 Pg 170 - 11 Pg 171 - 12 Pg 173 - 14 Pg 175 - 16 Pg 177 - 17 NB representor has referred to numbering in previous	Object	Welcome upgrade of many Green Chain sites to MoL status, but sites should be given dual status to ensure maximum protection. Dual designation should be given to the following sites: 10 - Haydon Hall Park 11 - Kings College Playing Fields - subject of inappropriate development	Proposed designations are based on the Council's evidence base on Green Chains and MoL. Officers are of the view that a dual designation will not provide additional protection and could result in a lack of clarity regarding the designation that applies to these sites. Any factual inaccuracies will be

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
			<p>submission document - numbers here refer to those in proposed changes doc to avoid confusion</p>		<p>proposals</p> <p>12 - Manor Farm and Winston Churchill Hall - site should be extended to include adjacent Great Barn, Cow Byre and Manor Farmhouse building</p> <p>14 - Field End Recreation Ground - is in Cavendish Ward not Ruislip Manor. Site adjacent to Roxbourne Park and Yeading Brook in LB Harrow and forms area of valuable open space.</p> <p>16 - New Pond Playing Fields, Sidmouth Drive Recreation Grounds and West End Road Open Space.</p> <p>17 - Ruislip Green Chain Link - welcomes upgrade to Green Chain designation but should have joint MoL designation.</p> <p>Grosvenor Vale Sports</p>	<p>corrected as part of the examination process.</p>

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					<p>Ground - rumours that this site might be redeveloped. It therefore requires maximum protection.</p> <p>Other sites to add to list of New Green Chains:</p> <p>Bessingby Playing Fields, Bessingby Road, Ruislip Manor and Cavendish Sports Ground - important recreational land that should have equal status to other local open spaces.</p> <p>Park Way Green - should have same protection as Kings College Fields. Site abuts railway corridor adjacent to small open space at Columbia Avenue and together they form a Green Chain.</p> <p>BWI School - playing field is within Ruislip Conservation</p>	

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					<p>Area, abuts River Pinn Green Chain and Nature Conservation Area, and therefore is a natural extension to the Green Chain.</p> <p>Warrender Park - adjacent to Highgrove Nature Conservation Site and Bishop Ramsey School playing fields creating a natural wildlife corridor and a break in urban environment.</p> <p>All the above proposals were rejected by the Council.</p> <p>Believe exclusion of Park Way Green, TfL railway line and Columbia Avenue open space from Green Chain status is unreasonable as it is similar to the designation proposed in corridor between Shenley Park, Ruislip Manor and Ruislip</p>	

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					Rugby Club open space. Exclusion of other sites is also inconsistent.	
138	3	Montagu Evans on behalf of Townend Development	Page 182	Object	Recommend that Stockley Farm is deleted as a SINC.	Stockley Park Lakes and Meadows is identified as a new SINC on the basis of a diverse range of habitats, with semi-improved grassland and scrub habitats along the Grand Union Canal, and a series of ponds/lakes supporting marginal habitats with grassland and scattered trees adjacent. Table.3.1 in the evidence base document provides justification.
67	1	Vincent and Gorbing on behalf of Mrs Diane Frank, Catherine Bechade and Belikat PTY Ltd	SINC Ext 5: Yeading Brook and Minet Country Park	Object	Consider the extension on to our land at Springfield Road is entirely unjustified. The Site is not of sufficient ecological value, does not meet relevant criteria to support the designation, has not been subject to detailed ecological survey work and is	Changes to identified SINCs are based on the conclusions of the Review of the Sites of Importance for Nature Conservation, undertaken in 2015.

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					not open to public access. Request deletion of proposed extension.	
83	2	St James Group Ltd	SINC Ext 5: Yeading Brook and Minet Country Park	Object	The extension 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.	Amendments to SINC's are proposed on the basis of the conclusions of the Review of the Sites of Importance for Nature Conservation, undertaken in 2015.
75	1	Bilfinger GVA on behalf of Brunel	SINC Ext 8: River Pinn and Manor Farm Pastures	Object	Object to the proposed designation as SINC on the basis of that the development needs of the higher education sector have not been informed by an objective needs assessment.	Officers are undertaking a full review of the evidence provided by the University to support this position.

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
62	2	f451 on behalf of Douay Marty's Academy, RC Diocese of Westminster & Guys Investment Trust Ltd	N/A	Object	Request that part of Glebe Farm be removed from Green Belt to enable the creation of a single site Douay Martyrs Academy plus potential expansion to meet future school needs in the borough. Remaining green belt land will increase amenity for local community by enhancing access and respecting adjacent scheduled ancient monument.	<p>The Council's policy with regards to the release of Green Belt land is set out in policy E2 of the Local Plan Part 1 and Policy DMEI4 of the Local Plan Part 2 Development Management Policies document</p> <p>The Council's Strategic Infrastructure Plan (SIP) notes that additional school places will be required over the period of the Local Plan. The plan will be updated to reflect the latest position with school places as part of the examination process.</p>
71	1	London Wildlife Trust (Hillingdon Group)	Page 205, Table 5.4	Support	Welcome and support the new SINC's which have been added to the Plan.	Support noted and welcomed.
6. Key Transport Interchanges						
127	1	Transport for London	Chapter 6	Support	Welcomes the safeguarding of future public transport interchanges. Requests that Hillingdon considers	Land for strategic transport schemes has been safeguarded in chapter 4 of the Site Allocations and Designations

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					safeguarding sites, land and route alignments required for any future strategic schemes, such as High Speed Rail 2.	document. The Council remains firmly opposed to HS2 and does not consider it appropriate to safeguard land for this purpose.
69	14	Historic England	Page 93, Uxbridge Town Centre	Support	Welcomes the additional references to highlight the listed status of Uxbridge Station and the Conservation Area.	Support noted and welcomed.
7. Community Infrastructure Sites						
44	7	Ickenham Residents Association	N/A	Comment	Asks that the Association is kept updated on negotiations about possible expansion of the two secondary schools in the village.	Ickenham residents will be updated on this issue through the Residents Planning Forum.
108	1	Dave Robbins	N/A	Object	Considers that population growth in West Drayton has not been accompanied by necessary infrastructure improvements and hopes this will be addressed as part of	Policies in the plan relating to community infrastructure seek to resist the loss of existing facilities and encourage new provision, subject to a number of

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					the development of the Coal Yard site.	<p>criteria. The Council's Strategic Infrastructure Plan (SIP) provides an overview of the main areas of infrastructure that are required to support planned growth in the borough.</p> <p>The SIP notes that additional school places will be required over the Plan period. The plan will be updated to reflect the latest position with school place planning, as it progresses through the examination process. In addition, officers are working with the Clinical Commissioning Group to ensure that the latest position with regard to new healthcare facilities is reflected in the Plan.</p>
127	2	Transport for London	N/A	Comment	Good public transport links and accessibility should be a key selection criterion in the allocation of new sites for schools. Would expect to be	TfL is a key stakeholder and will be consulted on any proposals with the potential to have an impact on the transport network.

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					consulted in the due course on the school site identification study.	
46	1	Cllr Edwards	Para 7.8	Object	Considers that 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 Council's Strategic Infrastructure Plan (SIP) notes that additional school places will be required over the period of the Local Plan. The Plan will be updated to reflect the latest position with regard to school place planning as part of the examination process.
111	2	Councillor Sweeting	Paras 7.8 - 7.11;	Object	Suggest new wording: "The Council will undertake a search for a site for a new secondary school for Yiewsley West Drayton to meet the area's growing pupil population". Information incorrect regarding land adjacent to Laurel Lane School. The school is three form entry,	The Council's Strategic Infrastructure Plan notes that additional school places will be required over the Plan period. The plan will be updated to reflect the latest position with school place planning, as it progresses through the examination process.

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					not five form entry, even though planning permission was for a five form entry junior school.	
53	2	Councillor Janet Duncan on behalf of LB Hillingdon Labour Group	Para 7.16	Object	A health hub for West Drayton must be identified and agreed.	Officers are working with the Clinical Commissioning Group to ensure that the latest position with regards to new healthcare facilities is reflected in the Plan.
111	4	Councillor Sweeting	Paras 7.14 - 7.17	Object	<p>Council needs to identify a new site for healthcare hub in light of long wait times for current G.Ps and proposed increased population.</p> <p>Suggest new wording: "The Council will seek to identify a site for a new healthcare hub in Yiewsley/West Drayton. The Council will develop the old swimming pool site, Yiewsley for Community Uses".</p>	<p>Any factual inaccuracies will be corrected through the examination process.</p> <p>Officers are working with the Clinical Commissioning Group to ensure that the latest position with regards to new healthcare facilities is reflected in the Plan.</p>

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
147	2	Mrs Margaret Atkinson	Para 7.16 (page 245)	Object	Council needs to identify site for health hub in Yiewsley/West Drayton as population is booming with no adequate health care. Council has a duty to keep citizens healthy. Swimming pool site should be kept for community use.	Officers are working with the Clinical Commissioning Group to ensure that the latest position with regard to new healthcare facilities is reflected in the Plan.
91	1	Garden City Residents Association	Para 7.16	Object	There is an under provision of GPs and related primary care services in Yiewsley/West Drayton. Asserts that there is a need for a site to be identified for health hub.	Officers are working with the Clinical Commissioning Group to ensure that the latest position with regard to new healthcare facilities is reflected in the Plan.
151	1	Mr Alan Atkinson	Para 7.16 (page 245)	Object	The Council needs to identify a site for the health hub in West Drayton especially in light of the swimming pool site in Yiewsley not being developed as a health centre. The site needs to be protected for community	Officers are working with the Clinical Commissioning Group to ensure that the latest position with regard to new healthcare facilities is reflected in the Plan.

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
					use.	
53	3	Councillor Janet Duncan on behalf of LB Hillingdon Labour Group	Para 7.11	Object	Paragraph should include the need for a new secondary school in the south of the borough in the West Drayton area.	The Council's Strategic Infrastructure Plan notes that additional school places will be required over the Plan period. The Plan will be updated to reflect the latest position with school place planning, as it progresses through the examination process.
8. Minerals and Railheads Safeguarding						

SITE ALLOCATIONS AND DESIGNATIONS (October 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support /Object	Summary of Representation Received	Officer Response
16	5	Matthews and Son LLP (Henry Streeter Ltd)	Paras 8.1, 8.4		Para 8.4 is misleading and the section should be rewritten because the Minerals Technical Background Report (2008) does not conclude that there are three sites able to provide required aggregates over the Plan period. Report concludes the Sites in MIN 1 should be identified as Preferred Areas.	It is not considered that the report concludes on page 16 that sites should be identified as Preferred Areas. Sites are identified as Safeguarding Areas in response to requirements set out in policy 5.20 of the London Plan.

7) POLICIES MAP - ATLAS OF CHANGES, SUSTAINABILITY APPRAISAL, APPROPRIATE ASSESSMENT AND STRATEGIC FLOOD RISK ASSESSMENT - October 2015

POLICIES MAP - ATLAS OF CHANGES, SUSTAINABILITY APPRAISAL, APPROPRIATE ASSESSMENT AND STRATEGIC FLOOD RISK ASSESSMENT (Oct 2015)						
ID	Rep no	Individual/Organisation	Para/Policy/Map	Support/Object	Summary of Representation Received	Officer Response
47	1	Anthony Wilkinson	N/A	Object	Advises that the property at 8 Woodfield, Harefield is incorrectly mapped. No 8 should be shown as larger than No 7 and does not include the existing outbuilding and a swimming pool located to the south of the property. Considers that the green belt boundary should be located to the south of the swimming pool.	Officers will assess this issue and identify any necessary changes in the Statement of Proposed Modifications, to be submitted for Examination with the Local Plan Part 2 documents.
58	6	Greater London Authority	N/A	Object	The Gravel Pits Northwood should be identified as Regionally Significant Geological Site on the Polices Map	Officers support the proposals to identify the Regionally Important Geological Sites on the Policies Map. Identification of these sites will take place through the public examination process.
71	3	London Wildlife Trust	N/A	Object	Note some nature reserve	Extent of existing nature

POLICIES MAP - ATLAS OF CHANGES, SUSTAINABILITY APPRAISAL, APPROPRIATE ASSESSMENT AND STRATEGIC FLOOD RISK ASSESSMENT (Oct 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support/Object	Summary of Representation Received	Officer Response
		(Hillingdon Group)			boundaries omitted from Policies Map as pointed out in first consultation: - Full extent of Frays Island - Mabey's Meadow Nature Reserve (West Drayton) - Frays Farm Meadows and the wider Frays Valley LNR (Ickenham) - Crane Meadows (Heathrow East).	reserves is shown on the Composite Policies Maps. Officers will be undertaking further discussions with the London Wildlife Trust to confirm the full extent of these sites, prior to the commencement of the examination process.
128	6	The Emerson Group on behalf Orbit Developments	Map 2.4, Map 4.2, Map 6.1 & Map 6.5	Support	Support the designation of Heathrow Boulevard, 282 Bath Road within the Bath Road, Hayes Locally Significant Employment Site (Map 2.4) and Office Growth Location (Map 4.2). 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	Support noted and welcomed.

POLICIES MAP - ATLAS OF CHANGES, SUSTAINABILITY APPRAISAL, APPROPRIATE ASSESSMENT AND STRATEGIC FLOOD RISK ASSESSMENT (Oct 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support/Object	Summary of Representation Received	Officer Response
					Location, Cluster 5 (Map 6.1 & 6.5).	
107	1	Anthony Crane	Map 8.1	Support	Support the changes to Map 8.1 (Land West of Merle Avenue, Harefield)	Support noted and welcomed.
83	3	St James Group Ltd	Map 11.5 - SINC Ext 5	Object	The extension 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.	Officers will assess this issue and identify any necessary changes in the Statement of Proposed Modifications, to be submitted for Examination with the Local Plan Part 2 documents
56	9	Heathrow Airport Ltd	Map 13.1 Atlas of Change (i) (ii)	Object	Airport boundary shows a number of errors and should be amended to include the following land parcels: - pod parking	Officers will assess this issue and identify any necessary changes in the Statement of Proposed Modifications, to be submitted for Examination with the Local Plan Part 2

POLICIES MAP - ATLAS OF CHANGES, SUSTAINABILITY APPRAISAL, APPROPRIATE ASSESSMENT AND STRATEGIC FLOOD RISK ASSESSMENT (Oct 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support/Object	Summary of Representation Received	Officer Response
					<ul style="list-style-type: none"> - The gap shown to the south east of the Longford Roundabout - Spout Land 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. <p>Can provide airport boundary.</p>	documents.
83	1	St James Group Ltd	Map 14.1	Object	Map 14.1 does not reflect or adequately take account of the permitted scheme 54814/APP/2009/430 in respect of the position of the western access route and the location of the two further permitted pedestrian and cycle routes bridging the canal.	Officers will assess this issue and identify any necessary changes in the Statement of Proposed Modifications, to be submitted for Examination with the Local Plan Part 2 documents
117	3	Simply Planning on behalf of the Crown Trading Estate	Page 131, Map 19.4: Fairview	Object	Consider that the Crown Trading Estate should be	The release of this site is broadly consistent with the

POLICIES MAP - ATLAS OF CHANGES, SUSTAINABILITY APPRAISAL, APPROPRIATE ASSESSMENT AND STRATEGIC FLOOD RISK ASSESSMENT (Oct 2015)

ID	Rep no	Individual/Organisation	Para/Policy/Map	Support/Object	Summary of Representation Received	Officer Response
			Business Centre		released from employment and allocated for mixed-use development, or alternatively re-allocated as a Locally Significant Industrial Site.	provisions of the Local Plan Part 1, which seeks to maximise the potential of the Grand Union Canal in Hayes. Further discussions are required to assess the impact of the loss of the SIL designation and the redevelopment potential of this site.
56	10	Heathrow Airport Ltd	Page 176, Map 20.5 PTR5 Heathrow Bus Interchange	Object	Title should be changed to "Heathrow CTA Public Transport Interchange" as it links to other forms of public transport	The title of the interchange will be amended. Suggest CTA is written in full: Central Terminal Area.

8) Schedule of late representations

The Council received some representations after the closure of consultation on 8 December 2015. These representations were not 'duly' made in accordance with Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and they do not have to be considered in the Examination of the plans. The Council has responded to these below, however it will be for the Inspector to determine whether such representations should be taken into account through the Examination process.

Date received	Name of representor	Comments (in full)	Summary of Response	Council Comments	Actions
2 February 2017	Richard and Sue Farmery	<p>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.</p> <p>Legal Compliance</p> <p>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</p>	<p><u>Legal Compliance</u></p> <p>Query whether or not the Hillingdon Submission Draft Part 2 is in conformity with the 2016 London Plan.</p>	<p>A 'Statement of Conformity' was received from the GLA during 2016.</p> <p>The political composition of the GLA is not a planning matter. Local authorities must be able to show conformity with the adopted London Plan, as defined by Regulation 24 of the 2012 Regulations. Moreover, the statement under 'legal compliance' is factually incorrect, given that the first draft London Plan prepared under Sadiq Khan's leadership was not published until November 2017. There is no legal requirement to be in 'general conformity' with a draft plan.</p>	<p>None.</p> <p>None.</p>

		<p>administration. The aims of these opposing political parties are very different and have resulted in changes to the Plan.</p> <p>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.</p> <p>Soundness</p> <p>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.</p> <p>The Spinney already has the following protections:</p> <ul style="list-style-type: none"> · It is within the Harefield Conservation area, CA-1, · It is a Grade II site of Nature Conservation, SINIC 12, · Is subject to an Article 4 direction under the Town and Country Planning (Permitted Development) Order 1995, and 	<p><u>Soundness</u></p> <p>As the site owners, the respondents object to the Dairy Farm and Spinney site being designated as Green Belt.</p>	<p>Regarding the Dairy Farm and Spinney, the Schedule of Proposed Modifications sets out that <i>“officers propose to amend the extension to exclude land to the west of Dairy Farm Lane that has been developed for residential use. Referring to the site as the ‘Dairy Farm’ is misleading and the site will therefore be renamed “Cricket Ground and Spinney, Harefield”</i> .</p>	<p>As set out in the ‘Council comments’ column to the left</p>
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		<ul style="list-style-type: none"> Has two wide ranging tree preservation orders, TPO 3 and TPO 237. <p>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-20th century show it mainly as lawn, with paths through flower beds and only a few specimen trees.</p> <p>We have read the reasons for recommending the extension of the Green Belt on page 78 of the Green Belt assessment document.</p> <p>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.'</p> <p>With regard to the proposed extension shown in this document, it not only includes area within the</p>			
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		<p>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'.</p> <p>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.</p> <p>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</p>			
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		<p>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.</p> <p>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.</p> <p>We would therefore suggest that as there has been a material change from the initial assessment, both in development and location; this area</p>			
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		<p>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”.</p> <p>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.</p> <p>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</p>			
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		inclusion within the green belt.			
18 May 2016	Savills, on behalf of London Diocese Fund	<p>Object to proposed extension to the existing SINC designation at West Ruislip Golf Course and Old Priory Meadows.</p> <p>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 (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”.</p> <p>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</p>	<p>The landowner (London Diocese Fund) objects to a proposed extension to the existing SINC designation at West Ruislip Golf Course and Old Priory Meadows.</p> <p>They question the accuracy of the survey data underpinning the proposed designation and extension of the SINC. This does not appear to relate to the main reason for the “SINC Ext 11” designation – which is preserving wetland habitat. The site should be removed from the designation as it does not serve a purpose.</p> <p>This is an unsound policy change and does not accord with the NPPF tests of</p>	<p>The Council does not agree.</p> <p>The change was consulted on within the revised proposed submission stage – consultation took place for the statutory six week period . It is considered that this is procedurally compliant, in line with planning requirements under the 2004 Planning and Compulsory Purchase Act, and that the change would be both effective and justified under the NPPF.</p>	None.

		<p>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).</p> <p>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.</p> <p>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.</p>	<p>soundness in either being 'justified' or 'effective' local policy.</p>		
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