

London Borough of Hillingdon

Local Plan

Consultation Statement – Regulation 19

Hillingdon’s Local Plan Part 2

Consultation (April- May 2013)



HILLINGDON
LONDON



INVESTOR IN PEOPLE

www.hillingdon.gov.uk

1. Introduction

- 1.1 This statement sets out how the London Borough of Hillingdon (hereafter referred to as the council) has sought participation from communities and stakeholders during preparation of its Local Plan Part 2, which comprises the Development Management Policies and Site Allocations documents and a Policies Map for the borough. It explains how the Council notified each of the 'specific consultation bodies' and 'general consultation bodies' as to the subject of Local Plan Part 2 and invited representations on what the document should contain.
- 1.2 This statement has been prepared in accordance with Regulations 17 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, which requires a statement setting out:
- (i) which bodies and persons were invited to make representations under Regulation 18;
 - (ii) how these bodies and persons were invited to make representations;
 - (iii) a summary of the main issues raised by those representations; and
 - (iv) how those main issues have been addressed in the DPD.
- 1.3 Those invited to make representations included all bodies and persons who have previously made representations in respect of previous consultation exercises and/ or those who have requested their details to be added to the Planning Database. All of these bodies and persons were contacted individually by letter or email.

2. Background: Plan Preparation

- 2.1 The Hillingdon Local Plan: Part 1 - Strategic Policies was formally adopted by the Council on 8th November 2012 and sets out the Council's overall vision and objectives for future development in the borough. Together with the National Planning Policy Framework (NPPF) and the London Plan, Part 1 provides up-to-date strategic land use planning policies through to 2026.
- 2.2 Once adopted, the Local Plan Part 2 will comprise three main components:
- Development Management Policies: a set of detailed local planning policies;
 - Site Allocations: a series of recommendations for the future development of a number of major sites; and
 - Policies Map: this will be brought forward as an Atlas of Proposed Changes to the existing Hillingdon Unitary Development Plan Proposals Map, adopted by the Council in 1998.

3. Local Plan Part 2 Consultation under Regulation 18

3.1 The consultation was officially set for the six week period from 19 April and 31 May 2013. A consultation paper (attached at Appendix A) was made available for public comment, which summarised the proposed scope and content of the Local Plan Part 2. In addition, there was a 'Call for Sites' where landowners, developers and other interested parties were invited to suggest specific sites for future development.

Bodies invited to make representations

3.2 The Council consulted specific and general consultation bodies which included statutory bodies, residents groups, businesses and local residents by post and/or email. A schedule of those consulted can be found at Appendix B.

3.3 Set out below is a summary of the consultation methods that were used in accordance with the processes set out in the Regulations and in the Council's Statement of Community Involvement (SCI), adopted in November 2006. These included:

- **The Council website:**

- A 'Have your say' article was placed on the Local Plan pages of the Council's website with a quick link from the home page. The article included information to explain the purpose of consultation, how to comment and where to view the documents or get further information.
- Comments were invited from borough residents, local businesses and other stakeholders on what Part 2 of the Local Plan should contain.

- **Press notice:** A statutory press notice was placed in the Hillingdon Leader, the Gazette series and the London Gazette in April 2013 (See Appendix C).

- **Hillingdon People (bi-monthly magazine):** A feature article was placed in the May/June 2013 edition of Hillingdon People (See Appendix D).

- **Press release:** A press release was issued on 23rd April 2014.

- **Twitter:** The consultation was also advertised on the Council's Twitter page on Tuesday 23rd April 2013 and at regular intervals up to the end of the consultation.

- **Horizon (internal staff website):** An article appeared regularly on the 'news' pages during the consultation dates.

- **Mailout:**

- The mail-out list is derived from the identification of key stakeholders, hard-to-reach groups, those identified as likely to have an interest in planning policy development and those who have responded to previous policy consultation exercises, such as in relation to Local Plan Part 1 (previously the Core Strategy).

- Approximately 2,500 letters and e-Mails were sent to a wide range of groups and individuals on the Planning Policy consultation database. This included members of the Local Strategic Partnership (LSP) (35); environmental groups (11); Chambers of Commerce (3); community groups (92); conservation groups (32); conservation panels (7); consultants (146); developers (13); the Planning and Transportation Customer Panel (7); estate agents (14); local agents (5); housing providers (36); health providers (7); other London boroughs (4); post offices (44); GP's (51); schools (60); transport providers (26) and other general groups/ individuals (124). Letters were also sent to 50 randomly selected residents per ward from the electoral register (1,100 residents) and to 197 randomly selected businesses from the 2010 Hillingdon Business Directory.
- All statutory consultees (119), residents associations (115), elected members and local MP's were emailed with a copy of the consultation paper and representation forms.
- **Locations where documents were made available for viewing:** Copies of the Consultation Paper and representation forms were also placed at the Civic Centre (Planning Information Services) and the following borough libraries:
 - Botwell Library
 - Charville Library
 - Eastcote Library
 - Harefield Library
 - Harlington Library and Learning Centre
 - Harefield Library
 - Hayes End Library
 - Ickenham Library
 - Manor Farm Library
 - Northwood Hills Library
 - Northwood Library
 - Oak Farm Library
 - Ruislip Manor Library
 - South Ruislip Library
 - Uxbridge Library and Learning Centre
 - West Drayton Library
 - Yeading Library
 - Yiewsley Library

4. A summary of the main issues raised in the representations

4.1 Responses were received from 89 organisations, statutory bodies and individual members of the public. These raised over 300 individual representations. A schedule of respondents comments and officers responses, including responses to the 'call for site' is attached at Appendix E.

4.2 The key issues raised included the following:

- Any proposed releases of employment land should be clearly identified and criteria set out for assessing proposed changes of use from employment land.
- Employment sites near Heathrow Airport should be retained.
- Part 2 policies should be sufficiently flexible to allow new employment uses to be set up when market demand seeks alternative uses.
- Empty office space should be reused before the Council permits new office development.
- New hotel developments should be steered towards existing town centres rather than around the Heathrow perimeter.
- Policies for retail centres and parades should be flexible to allow quick changes of use to avoid units staying empty for long periods.
- All standards for housing (e.g. car parking provision, floorspace standards, lifetime home requirements) should be applied flexibly on a site by site basis and allow for viability to be considered.
- House conversions should be avoided in conservation areas and minimise the visual clutter which can result.
- More options to provide affordable homes should be considered.
- Social and community facilities generally need to be protected; there is a particular need to provide more places of worship for the different communities now resident in the borough due to its changing demographic character.

4.3 Various site specific proposals were also put forward in response to the Call for sites. A full schedule of sites and Council comments is attached at Appendix E, however, the sites submitted included:

- The Nestles Factory Site, Hayes
- Land to south of Hayes & Harlington Station
- Rainbow and Kirby Industrial Estates and adjacent land, Yiewsley
- Former Arla Foods Site, South Ruislip
- Enterprise House, Blyth Road, Hayes
- Chailey Industrial Estate, Pump Lane, Hayes
- Mount Vernon Hospital

- 24 hectares of Green Belt land at Long Lane Farm, Ickenham near Northolt Airport
- Holloway Lane Quarry, Sipson
- Westland Industrial Estate, Millington Road, Hayes
- Green Lane / Station Approach, Northwood
- Harefield Grove Farm, Harefield
- Fassnidge Memorial Hall, Harefield Road, Uxbridge
- Land at Bath Road between Nobel Drive and Malvern Road
- Frog's Ditch Farm, Shepiston Lane, Harlington
- London Gaelic Athletic Association Sports Ground, West End Road, South Ruislip

5. How representations were taken into account

- 5.1 Following the conclusion of the consultation process the Council undertook a full assessment of all representations received. The outcome of this assessment is contained in the Schedule at Appendix E of this study.
- 5.2 Draft versions of the Site Allocations and Development Management Policies documents were prepared to take account of the comments received and the conclusions of recent evidence base studies. The outcome of the consultation process was reported to Cabinet on 24th October 2013. At this meeting Cabinet approved a recommendation to issue the draft Site Allocations document for public comment in accordance with Regulation 19 of the Town and Country Planning (Local Development) (England) Regulations 2012.
- 5.3 On 13th February 2014, Cabinet approved a recommendation to issue the draft Development Management Policies document for public comment in accordance with Regulation 19 of the Town and Country Planning (Local Development) (England) Regulations 2012.

6. Conclusion

- 6.1 The council considers that it carried out a comprehensive consultation exercise for the Regulation 18 documents, which enabled a variety of consultees to become involved in the preparation of the Local Plan Part 2. The consultation followed the processes set out in the council's adopted Statement of Community Involvement and has been undertaken in accordance with the Town and Country Planning (Local Development) (England) Regulations 2012.

Appendix A: Local Plan Part 2 Consultation Paper

London Borough of Hillingdon

Hillingdon Local Plan: Part 2 Consultation Paper

Introduction - the Hillingdon Local Plan: Part 1 - Strategic Policies were formally adopted by the Council on 8th November 2012 and set out the Council's overall vision and objectives for future development in the borough. Together with the National Planning Policy Framework and London Plan, the Plan provides up-to-date strategic land use planning policies through to 2026.

Part 2 of the Hillingdon Local Plan will comprise three main components:

- Development Management Policies - a set of detailed local planning policies.
- Site Allocations – a series of recommendations for the future development of a number of major sites.
- Policies Map – this will take the form of an atlas of proposed changes to the existing Hillingdon Unitary Development Plan Proposals Map.

This public consultation is a first step in the preparation of Part 2. Its aim is to seek initial views as to what this part of the Plan should contain, gives an opportunity for you to tell us about any alternative policy approaches that you would like us to consider, and also calls for sites for possible inclusion in the Plan.

The new Local Plan (Parts 1 and 2) will fully replace the existing 2007 Saved Unitary Development Plan policies in due course and it will be used by the Council in conjunction with the London Plan to guide development and determine future planning applications and appeals.

Content of the Local Plan: Part 2 - the Council proposes that the detailed planning policies and proposals contained in Part 2 of the Local Plan should be set out under the same five separate principle headings used in Part 1:

- a) The Economy
- b) New Homes
- c) Historic and Built Environment
- d) Environmental Improvement
- e) Transport and Infrastructure.

Proposed Development Management Policies

a) The Economy

These policies will address a range of issues including the supply of employment land, locations for employment growth, retailing and small and medium sized businesses:

- 1. Supply of Employment Land**
Protecting the use of land allocated for employment uses
- 2. Locations for Employment Growth**
Protecting the locations of land allocated for employment uses
- 3. Change of Use within Industrial Development**
Protecting light industrial uses from change of use to heavy industrial uses
- 4. Office Development**
Support for office development in town centres
- 5. Hotel Development**
Support for hotel and similar uses in Uxbridge and other town centres
- 6. Uxbridge**
Support for the development of Uxbridge as a major Metropolitan Centre
- 7. Safeguarding retail uses in Town, District and Neighbourhood Centres**
Protecting retail uses in the Town, District and Neighbourhood Centres
- 8. Restaurants and Hot Food Takeaways**
Protecting retail uses and preventing change of use to restaurants and hot food take aways where appropriate
- 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

b) New Homes

These policies will address house conversions and include specific policies on the provision of affordable housing and on sites for gypsies and travellers:

- 1. Conversion or Subdivision of Dwellings**
Conversion or subdivision of residential dwellings into additional units
- 2. Houses in Multiple Occupation (HMOs)**
Change of use of dwellings to Houses in Multiple Occupancy
- 3. Affordable Housing**
Provision of affordable housing in residential development schemes
- 4. Provision for Gypsy and Travellers**

Criteria governing the location and suitability of sites for Gypsy and Travellers.

c) Historic and Built Environment

These policies will cover a range of issues including historic heritage assets, conservation areas and listed buildings, detailed local planning standards for new housing development and policies on shop front design and advertisements:

- 1. Heritage Assets**
Development having an adverse impact of Heritage Assets and their settings
- 2. Archaeological Remains**
Proposals affecting archaeological sites and the need for detailed site appraisals
- 3. Listed Buildings**
Development affecting listed building and their settings
- 4. Conservation Areas**
Development affecting the character and appearance of Conservation Areas
- 5. Areas of Special Local Character**
Preventing development that is harmful to the character and appearance of Areas of Special Local Character
- 6. Heritage and Climate Change**
Mitigating against the effects of climate change and their impacts on Heritage Assets
- 7. Planning Applications**
Scope of the design content of planning applications
- 8. Public and Private Amenity Space in Residential Developments**
Provision of public and private amenity space in residential development
- 9. Trees and Landscaping**
Protection and provision of trees and landscaping
- 10. Internal Floorspace Standards**
Minimum floorspace requirements in residential dwellings
- 11. Garden Sizes**
Provision of garden areas relative to the size of dwelling
- 12. Garages**
Size standards for garages
- 13. Security in Residential Development**
Designing out crime in residential developments
- 14. Lifetimes Homes**
Adaptability of homes including providing for wheelchair users

- 15. Implementing Building for Life Standards**
Standards in residential development to satisfy Building for Life standards
- 16. Carbon Reduction in Residential and Non Residential Development**
Phased reduction of CO2 emission for all types of development
- 17. Storage for Refuse and Recyclables in Residential Development**
Provision of refuse facilities in residential development
- 18. Noise and Air Quality in Residential Development**
Levels of noise and air quality requirements in residential development
- 19. Car Parking Standards for residential development**
Car parking standards for residential development
- 20. Electric Car Charging Points**
Provision of electric charging points in residential development
- 21. Safeguarding Gardens from Development**
Safeguarding residential gardens from development
- 22. Rear Extensions**
Scale of residential rear extensions
- 23. Side Extensions**
Scale of residential side extensions
- 24. Roof Extensions**
Scale of residential roof extensions
- 25. Over Dominant Extensions**
Overly large residential extensions
- 26. Privacy and Overlooking**
The retention of privacy and amenity for residential dwellings
- 27. Basements**
Design criteria for basement conversions
- 28. Retention of Off-Street Parking**
Retention of car parking for residential dwellings
- 29. Hard Surfacing**
Hard surfacing in residential gardens
- 30. Public Realm in Town, District Centres and in Retail Parades**
Improvements to the public realm
- 31. Design of Shop Fronts**
Design criteria for new shop fronts

- 32. Advertisements on Retail Premises**
Design criteria for advertisements on retail premises
- 33. Hoardings**
Temporary hoardings on vacant sites
- 34. External Lighting**
Design criteria for external lighting
- 35. Telecommunications Aerials and Apparatus**
Location of telecommunications equipment in designated and other areas.

d) Environmental Improvements

These policies will cover climate change, green belt and other open land, flood risk and water management:

- 1. Low Carbon and Renewable Energy Systems in Residential dwellings**
Use of low carbon and renewable energy sources in dwellings
- 2. Decentralised Energy**
Designing major developments to be able to connect to a Decentralised Energy Network (DEN)
- 3. Living Walls and Roof**
Incorporating living roofs into major developments
- 4. Development in the Metropolitan Green Belt or on Metropolitan Open land**

Development affecting the Green Belt and Metropolitan Open Land
- 5. Dwellings in the Green Belt and Metropolitan Open Land**
Alterations and extensions to dwellings in the Green Belt or on Metropolitan Open Land
- 6. Farm Diversification**
Farm diversification for employment related uses
- 7. Tourist, Facilities in the Countryside**
Tourism facilities in the countryside
- 8. Outdoor Advertising in Rural Areas**
Outdoor advertisement displays in the countryside
- 9. Development in Green Edge Locations**
Development in fringe locations to the Blue Ribbon Network and Green Spaces
- 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

11. Critical Drainage Areas

Development affecting Critical Drainage Areas

12. Management of Flood Risk

Development proposed in Flood Risk Zones

13. Sustainable Urban Drainage Systems

Use of sustainable urban drainage systems, the control of surface water run off rates and the use of water efficiency

14. Safeguarding of Biodiversity

Protection and enhancement of biodiversity features

15. Development of Land Affected by Contamination

Restoration of contaminated land

16. Water Quality

Water quality targets for new development

17. Protection of Ground Water resources

Development within a Source Protection Zone, Safeguard Zone or Water Protection Zone

18. Water Efficiency in Homes

Residential development and the Code for Sustainable Homes

19. Water Efficiency in Non Residential Development

Non residential development and BREEAM standards for water efficiency

20. Air

Development to be 'air quality neutral'

21. Noise

Ambient noise level standards

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

e) Transport and Infrastructure

These policies will cover improving access to local destinations, car parking standards for different types of development and community infrastructure provision:

1. Accessibility and Transport Objectives

Improving accessibility and meeting sustainable transport objectives

2. Heathrow Airport

Development at Heathrow Airport; maintaining air transport movements within current limits; improving air quality and reducing levels of congestion

- 3. RAF Northolt**
Civil flights at RAF Northolt
- 4. Car Parking Standards**
Car parking standards for different type of uses, the submission of travel plans and transport assessments and the provision of electric charging points for vehicles
- 5. Safeguarding Recreational, Leisure and Community Facilities**
Safeguarding the use of recreational, leisure and community facilities
- 6. Medical and Health Facilities**
Provision of medical and health facilities within town centres
- 7. Religious Worship and Assembly**
New build and conversion of buildings for religious facilities
- 8. Developer Contributions to the Provision of Local Infrastructure**
Funding of local infrastructure.

Site Allocations

The goal of the Site Specific Allocations is to identify sites to meet the Council development requirements over the plan period, and to identify areas which should be protected from unsuitable development.

A series of draft proposals will be made for the future development of a number of major sites to provide the land needed to deliver the growth targets outlined in Part 1 of the Hillingdon Local Plan. This section of Part 2 will propose allocating sites to meet objectively assessed development needs in the borough including retail development, housing, employment, community uses, site requirements for gypsies and travellers, leisure facilities and transport needs.

Policies Map

This will take the form of an atlas of proposed changes to the existing Hillingdon Unitary Development Plan Proposals Map, setting out the Council's proposed land use allocations on sites across the borough in map form, including proposals such as Green Belt alterations, new conservation areas and local industrial designations.

**Appendix B: Bodies and persons invited to make representations
under Regulation**

External Groups	Numbers	What was sent:
Business Networks	6	Email/ letter
Chambers of Commerce	3	Letters
Local Businesses (Waste)	20	Letters
Local Business Partnerships	2	Letters
Councillors	79	Email with invitation to drop-in session
MP's	3	Email with invitation to drop-in session
Community centres/ societies/ associations, BAME, hard-to reach	92	Letters
Conservation (natural history, archaeological societies)	32	Letters
Conservation Panels	7	Letters
Consultants	146	Letters
Developers	13	Letters
Environmental	11	Letters
Estate agents	14	Letters
General	40	Letters
Local agents	5	Letters
Planning and Transportation Customer Panel	7	Letters
Local Strategic Partners	45	Letters
Health providers	7	Letters
Housing providers	36	Letters
Libraries and One-Stop-Shop	19	Covering letter, poster, hard copies of documents
Other London Boroughs who had previously consulted LBH (Wandsworth, Newham, Waltham Forest and Croydon)	4	Letters
Post Offices	44	Letters with poster
General Practitioners	51	Letters with poster
Schools	60	Letters with poster
Requests to be added/ notified of LDF consultations	84	Letters/ emails
Residents' Associations	115	Letters with invite to meeting and CD
Statutory (national and public bodies, adjoining local authorities, relevant telecom, electricity, gas, sewerage and water undertakers)	119	Letters with CD
Transport providers	26	Letters
50 Randomly selected residents per ward from electoral register (22 wards)	1100	Letters
Randomly selected businesses from 2008 Hillingdon Business Directory	197	Email
Internal Groups		
Heads of Service	18	Emails
Other internal officers	85	Email

Appendix C: Copy of Press Notice (Regulation 25)

PUBLIC NOTICE

PLANNING AND COMPULSORY PURCHASE ACT 2004

TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012

LONDON BOROUGH OF HILLINGDON LOCAL PLAN: PART 2

INITIAL PUBLIC CONSULTATION

Following a comprehensive Examination in Public process, the Hillingdon Local Plan: Part 1 - Strategic Policies were formally adopted by the Council on 8th November 2012 and together with the National Planning Policy Framework and London Plan provide an up-to-date strategic land use planning policy framework through to 2026 with which to determine planning applications and appeals in the borough.

The Council is now preparing Part 2 of the Local Plan. This will comprise:

- Development Management Policies - a set of detailed local planning policies.
- Site Specific Allocations – a series of recommendations for the future designation / development of a number of major sites and areas across the borough.
- Policies Map – this will take the form of an atlas of proposed changes to the existing Hillingdon Unitary Development Plan Proposals Map.

In accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Council hereby gives notice of an initial public consultation on Part 2 of the Hillingdon Local Plan. Its aim is to seek initial views as to what this part of the Plan should contain and to call for sites for consideration for development. You are invited to make representations on the proposed scope of the above documents. The public participation period commences on Friday 19 April, 2013 and runs for a period of six weeks, ending at 5.00 pm on Friday 31 May, 2013.

An outline of the Council's proposals for Part 2 of the Local Plan can be viewed online on the Council's website at: <http://www.hillingdon.gov.uk/article/11414/Local-Development-Framework>.

Copies are available for public inspection at the Planning reception office, Civic Centre, High Street, Uxbridge, UB8 1UW (Mon – Fri, 9am - 5pm), Hayes One Stop Shop, Botwell Green Sports and Leisure Centre, East Avenue, Hayes, UB3 2HW (Mon-Fri, 9am – 5pm) and at all Hillingdon libraries during normal opening hours (details of these are available at: <http://www.hillingdon.gov.uk/article/8911/Library-opening-hours>).

How to submit representations:

Representations should be made using the designated Response Form and / or the Call for Sites Form both of which are available from the venues mentioned above or which can be requested by phoning the Council's Local Development Framework (LDF) Team on 01895 250230 or by e-mailing ldfconsultation@hillingsdon.gov.uk. Representation forms can be sent:

- By e-Mail to: ldfconsultation@hillingsdon.gov.uk
- By post to: LDF Team, Residents Services, London Borough of Hillingdon, 3N/02 Civic Centre, Uxbridge UB8 1UW
- By fax to: 01895 277042 marked for the attention of the LDF Team.

Please note that copies of representations will be made available on request for inspection at the Council offices. They cannot therefore be treated as confidential. **All responses must be received by 5.00 pm on Friday 31 May, 2013.** Comments received after the end of the consultation period do not have the right to be considered.

Jales Tippell

**Head of Transportation, Planning Policy & Community Engagement
on behalf of Hillingdon Council**

Appendix D: Hillingdon People - May/June 2013 edition

Extract from Hillingdon People May/June 2013



year, Armed Forces (24-29 June) is held e public awareness contribution made e who serve or erved in the Armed . As a borough we ery close links with ces and during ar's Armed Forces we signed the gdon Armed Forces nunity Covenant, a itment to support med Forces our community. Monday 24 June will be a special flag g ceremony at the Centre in Uxbridge. rmed Forces Day ill be paraded gh the town centre ve at the Civic

sunset ceremony on the Civic Centre forecourt, performed by the world famous Central Band of the Royal Air Force who are based at RAF Northolt. Music will start at 5pm and finish at approximately 5.45pm. A collection will be held in aid of the RAF Benevolent Fund. Armed Forces and Service Charity information stands will be operating in the Mall Pavilions and Chimes Shopping Centre from 10am to 4pm.

Wednesday 26 June is Wear Your Uniform to Work Day, where members of the Reserve Forces are encouraged to wear their uniforms at work to demonstrate

went to print, residents were sending in their responses to the council's referendum on possible Heathrow expansion. The ballot closed on Thursday 16 May and results were due to be announced on Tuesday 21 May. More information will be in the July/August edition of *Hillingdon People*.

Have your say on development needs

Residents and businesses are being encouraged to have their say on local planning policy, including on planning in the future and which sites in Hillingdon should be considered for development. The consultation will run until 5pm on Friday 31 May. Visit www.hillingdon.gov.uk/haveyoursay and select current consultations and surveys.

Fundraising concert

The RAF Central Band is playing an Anniversary Concert in aid of the RAF Benevolent Fund. The concert is being held at

Person needed

We are looking for someone to be the Independent Person for the council's Standards Committee. This person is responsible for ensuring high standards of conduct from the borough's councillors. You would be required to give your opinion on any complaints against councillors or co-opted members that are considered by the committee. You will also give advice following any investigation.

To be considered for the role, you cannot be related to, or a close friend of, current or former members or officers of the council.

An annual allowance of £1,500 will be payable.

To be considered, please submit an expression of interest of between 150-200 words, detailing your experience and suitability for the role, to ralagh@hillingdon.gov.uk, by 31 May.

Calling carers

Do you care for someone else, or do you know

**Appendix E: Schedule of respondents, comments and officers
proposed responses, including proposals received in the call for
sites. (Regulation 18)**

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.
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	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.

Consultation Statement Regulation 18
Hillingdon's Local Plan Part 2 Regulation 18 Consultation (April- May 2013)

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
		19. Car Parking Standards for residential development		
	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 content of the plans you are about to embark on.	Noted. No change.
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	Employment General	With regard to points 1 and 2 of the potential employment development management policies, it is considered essential that specific reference	Part 2 of the Local Plan will identify areas for the future release of employment land once the findings of the current Employment Land

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	Investments Ltd		(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 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.	Study are available.
	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	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. 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.	Noted – the Council is aware of national planning policy requirements regarding being flexible in the wording and interpretation of planning policies.
26/62	Nathaniel 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 industrial sites to other uses. 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	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 will be included, drawing on the findings of that Study.

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			<p>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>	
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.
46/218	Deloitte Real Estate on behalf of Universities Superannuation Scheme	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.

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50/226	Heathrow Airport Ltd (Planning and Programmes)	<p>a) The Economy</p> <p>1. Supply of Employment Land</p> <p>2. Locations for Employment Growth</p> <p>3. Changes of Use within Industrial Development.</p>	<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>
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		

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		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.	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. The Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.
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 proposed Site Allocations which will be reflected on the associated Proposals Map. 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.	The Council will take into account the potential for new employment created on identified sites and the position regarding transport infrastructure.
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	The Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.

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			are not protected where it is evident that 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 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.	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.
	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.

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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 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>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>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 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 requires Local Planning Authorities to "<i>set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres</i>" (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</p>	<p>Noted - the Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.</p> <p>It 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 and other policy requirements set out in both the Local Plan and London Plan.</p>

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			<p>economically viable to retail within the High Street.</p> <p>Paragraph 28 of the National Planning Policy Framework (NPPF) indicates that <i>“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:</i></p> <ul style="list-style-type: none"> • <i>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.....”</i> <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 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	Safeguarding retail uses in	We suggest that sympathetic parking policies will help in this.	Noted – this comment has been passed to the Council's parking

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	Association	Town, District and Neighbourhood Centres		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). 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 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 depends 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>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 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		

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		take-aways where appropriate.		
51/237	Nathaniel Lichfield on behalf of Intu Properties plc	Restaurants and Hot Food Takeaways: Protecting retail uses and preventing change of use to restaurants and hot food take aways where appropriate	<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. 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. 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 approach will assist in ensuring that Uxbridge position as a major metropolitan centre is maintained and strengthened.</p>	Noted - the Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.
	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			

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	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 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.	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.
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;	Phil Rumsey; Veronica	Conversion of Subdivision of	Conversion or subdivision of residential dwellings into additional units	The Council will consider individual planning applications on their

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ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
31/97	Rumsey	Dwellings	should only be permitted in extreme circumstances and not at all in conservation areas.	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 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 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</p>	Noted - these comments have been passed to the Council's housing service for information and any further action.

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			<p>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 existing Right to Buy/Acquire route.</p>	
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 	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.

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			<p>residential development</p> <ul style="list-style-type: none"> 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) 	
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 Association	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 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.	<p>The Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.</p> <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." It will consider the different ways in which affordable housing can be achieved when new development proposals come forward.</p>
	New Homes	4. Provision for Gypsy and Travellers - Criteria governing the location and suitability of		

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		sites for Gypsy and Travellers.		
26/66	Nathanial Lichfield and Partners on behalf of British Airways Plc	New Homes - Provision for Gypsy and Travellers	<p>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.</p> <p>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 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>	Noted – the Council will be reviewing the need for affordable housing during the preparation of Part 2 of the Local Plan.
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		

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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	<p>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 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</p>	The Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.

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			potential benefits of enabling development also are reflected in the Part 2 heritage policies.	
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 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</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.

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			<p>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. The Proposed Archaeological Priority Area be up graded to an Archaeological Priority Area.</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>
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		

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		Assets		
	Historic and Built Environment	7. Planning Applications - Scope of the design content of planning applications		
50/228	Heathrow Airport Ltd (Planning and Programmes)	c) Historic and Built Environment Planning Applications	HAL considers that the information provided in support of planning applications should be needs-based and informed by pragmatic pre-application discussion.	The Council will follow national planning policy requirements regarding assessments and information required in support of planning 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.
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	Noted.

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			our own borough.	
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 Environment	11. Garden Sizes - Provision of garden areas relative to the size of 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);	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.

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	Transition Heathrow			
	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.		
	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

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				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.		
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 	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.

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			<p>residential developments</p> <ul style="list-style-type: none"> The NPPF states at paragraph 39 that when setting local 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.		
	Historic and Built Environment	21. Safeguarding Gardens from Development - Safeguarding residential gardens from development.		

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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.		
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		

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	Environment	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 one long strip of hard surfacing behind the pavement.	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.
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.

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	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.	<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 "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; 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	32. Advertisements on Retail		

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	Environment	Premises - Design criteria for advertisements 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.	<p>Section 2 of policy BE1 in Part 1 of the Local Plan already requires that all new developments should:</p> <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>
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 enforced.	<p>Section 2 of policy BE1 in Part 1 of the Local Plan already requires that all new developments should:</p> <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>

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				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.
	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 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> <p><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></p>	A proposed policy on telecommunications will be included in the draft Development Management Policies for inclusion in Part 2 of the Local Plan.

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			<p>(ii) <i>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></p> <p>(iii) <i>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></p> <p>(iv) <i>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></p> <p>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."</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		

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ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
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 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</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 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>

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			all development proposals in, or affecting, the 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 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."</p>
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.	<p>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:</p> <p>"Maximise the opportunities for all new homes to contribute to tackling</p>

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				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 Improvement	3. Living Walls and Roof - Incorporating living roofs 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

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				<p>activity..."</p> <p>This policy already allows the Council to negotiate with developers for such measures as "living roofs". It cannot make this a mandatory requirement.</p>
50/230	Heathrow Airport Ltd (Planning and Programmes)	<p>d) Environmental Improvement</p> <p>3. Living Walls and Roofs</p> <p>14. Safeguarding of Biodiversity</p>	<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	<p>4. Development in the Metropolitan Green Belt or on Metropolitan Open land- Development affecting the Green Belt and Metropolitan Open Land.</p>		

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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. 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> <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. 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		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.	
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</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.

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			<p>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>	
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.
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</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.

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			<p>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, 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.</p>	
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.

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41/175; 44/203; 55/262; 57/288	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	4.Development in the Metropolitan Green Belt or on Metropolitan Open land	Open space and agricultural land in the green belt should be protected as such. New development should be mitigated by equal sized habitat creation schemes with an emphasis placed on wild flower meadows for bees and other pollinating insects.	<p>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.</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 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.</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.

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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 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</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.

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			<p>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. 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> <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</p>	

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			<p>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 they need to move to a new site</p>	
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</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.

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			<p>Overstaying Boats in the London Area. 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 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 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.
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	Development in Green Edge	We suggest you add Green Chains to this policy.	Noted – the Council will take this into consideration when drafting any

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	Association	Locations		proposed Development Management Policy.
		<p>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.</p>		
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. • Seek opportunities to link to neighbouring open spaces or create new green spaces, green corridors, buffer zones along rivers. 	Noted.
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</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.

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			<p>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>	
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 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>HAL agrees that sustainable water management policies should be applied to new development and the range of policies headings 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>	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 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.
	Environmental Improvement	11. Critical Drainage Areas - Development affecting Critical Drainage Areas.		
	Environmental Improvement	12. Management of Flood Risk- Development proposed		

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		in Flood Risk Zones.		
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. Incorporation of SuDs(Sustainable Drainage Systems) hierarchy plus links to additional benefits for biodiversity, water quality</p> <ul style="list-style-type: none"> • (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 not be permitted through contaminated and/or within shallow groundwater table due to the risk of mobilising contaminants and polluting controlled waters).	Noted.

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	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>
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	Development applications can provide opportunities to incorporate	Section 7 of policy BE1 in Part 1 of the Local Plan already requires that

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			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. 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> .	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 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.
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 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.	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 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.
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	15. Development of Land		

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	Improvement	Affected by Contamination - Restoration of contaminated land.		
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 to is an appropriate standard."
	Environmental Improvement	17. Protection of Ground Water resources - Development within a Source Protection Zone, Safeguard Zone or Water Protection Zone.		

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25/57	Environment Agency	17 Protection of Ground Water Resources	Good to see groundwater resources mentioned but surface water quality also needs to be protected. 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	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 and BREEAM.	Support welcome.
	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	HAL acknowledges the position in Part 1 of the Local Plan where it seeks under strategic objective SO10 an improvement in air quality,	Clarification noted regarding air quality and comments regarding S106 agreements and / or CIL charges applying to on-airport development.

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			<p>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. 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>	
	Environmental Improvement	21. Noise -Ambient noise level standards.		
50/232	Heathrow Airport Ltd (Planning and Programmes)	d) Environmental Improvement 21. Noise	<p>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 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</p>	The full implications of the proposed zoning of types of development will be considered by the Council during the drafting of Development Management Policies.

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			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.	
	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	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. 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.	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; 57/293	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	Minerals and waste	Provision of bio digestion facilities should be central to waste management strategies and developments that provide this should be favoured.	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.

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	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.
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</p>	<p>Noted.</p> <p>It is for the Council's Local Implementation Plan to set out the measures and mechanisms required.</p>

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			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.	
38/150	Ruislip Residents Association	Accessibility and Transport Objectives	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.	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.
41/181; 44/209; 55/268; 57/294	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	Accessibility and transport	All new residential development should be linked by walking distance to bus or train routes.	Policy T1 in Part 1 of the Local Plan in effect meets this concern. It states: "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."
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)		Aerodrome Safeguarding 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	Noted.

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			<p>the Aerodrome Reference Point (ARP) for Heathrow Airport Ltd. 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. A new building, structure or extension because of its size, shape, 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>	
1/2	Heathrow Airport Ltd		Wind Turbine Developments	Noted.

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	(Safeguarding)		<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>	
26/69	British Airways Plc (Nathanial Lichfield and Partners)	Heathrow Airport	<p>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 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>	<p>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 with the outcome of work by the Davies Commission.</p>

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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 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</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> <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>

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			<p>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 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.</p>	
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 policies 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 submission of travel plans and transport assessments and the provision of electric charging		

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		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. 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. 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 offices where a clear 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.
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,	e) Transport and Infrastructure	<ul style="list-style-type: none"> Car parking standards should reflect the increasing car ownership 	The Council is aware of national planning policy requirements regarding

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	Geoff Armstrong	4. Car Parking Standards 8. Developer Contributions to the Provision of Local Infrastructure	<p>which exists</p> <ul style="list-style-type: none"> • 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 wording and flexible interpretation of planning policies. It will take local car use into account in setting its detailed parking standards in Part 2.
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 this 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 In accordance with London Plan policy 6.9 'Cycling' this policy should</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>

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			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.	
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.
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 the community.</p> <p>A typical policy would state, for example, that the council will protect</p>	The Council will always take the individual merits of a planning application into account when considering proposals submitted to it for planning permission.

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			<p>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	<p>There is a need not only to safeguard existing facilities but also to review and provide for future needs.</p>	<p>Agreed – the Council will keep its plan under review in future to ensure it provides for future needs.</p>
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. 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 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),</p>	<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.</p>

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			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.	
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 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. It will take London Plan policies into account regarding community uses.
	Transport and Infrastructure	6. Medical and Health Facilities -Provision of medical and health facilitates 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	Part 1 of the Local Plan already makes clear the Council's commitment to improve the provision of community facilities throughout the borough.

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			existence of local communities and need to be, not only recognised but provided for 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	<p>To be explored:</p> <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)		<p>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 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</p>	Noted.

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			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.	
9/11	Zoe Taylor on behalf of Drs Garsin, Madhok, Donner & Ramchandani, Belmont Medical Centre	RAF Uxbridge	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. 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.	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.

PROPOSALS RECEIVED IN CALL FOR SITES

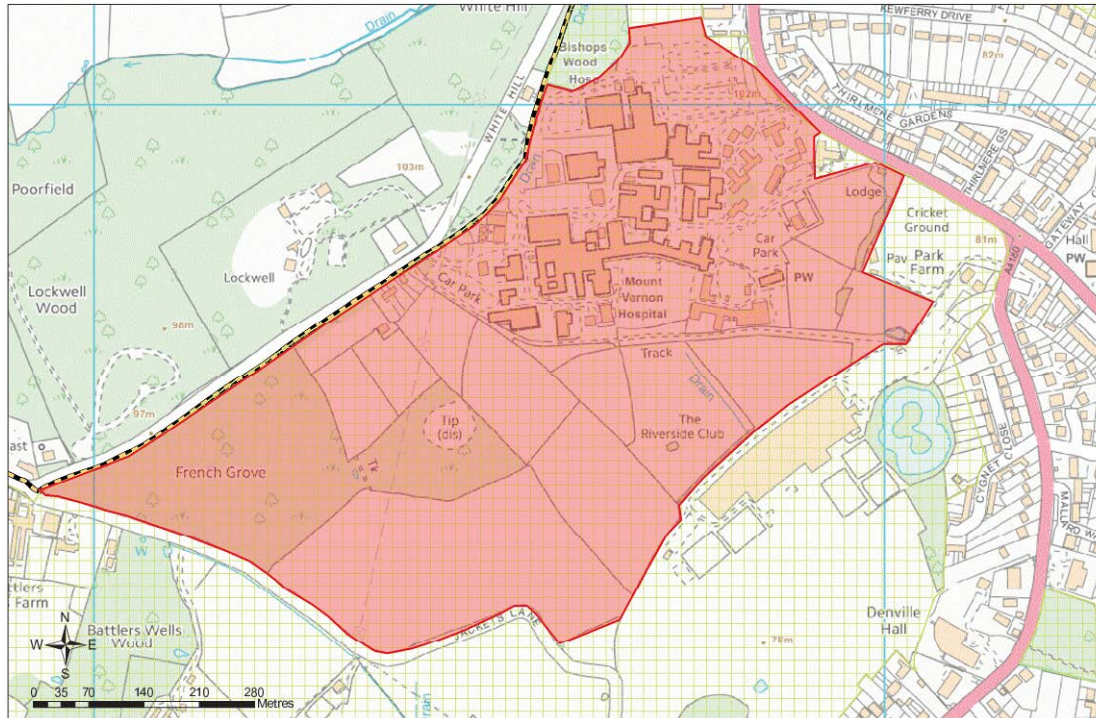
1. Land at Mount Vernon Hospital, Northwood
2. Former Haulage Yard off Uxbridge Road / Springwell Lane / Drayton Ford, Mill End, Rickmansworth
3. Land at Green Lane/Station Approach, Northwood
4. Garden land at rear of 37 – 43 The Drive, Northwood
5. Land to rear of 25-34 Cygnet Close, Northwood
6. Land to north west of Little Bourne Farm, Harefield
7. Land at Harefield Grove Farm to the south of the Harefield to Southall Gas Pipeline and north of Harefield Academy
8. Site of Whitehouse Cottage, Northwood Road, Harefield
9. Haste Hill Farm, Fore Street, Eastcote
10. Land to south of Clovelly Avenue and north of Daltons Farm, Ickenham
11. Land at Long Lane Farm, Ickenham
12. Former Arla Foods Site, Victoria Road, South Ruislip
13. London Gaelic Athletic Association Sports Ground, West End Road, South Ruislip
14. Land adjacent to Gutteridge Farm, Western Avenue
15. Land adjacent to Lynhurst Crescent, Western Avenue
16. Fassnidge Memorial Hall, Harefield Road, Uxbridge
17. Former Chiltern View Pub, 190, Cowley Road, Uxbridge
18. Land to rear of 2 - 36 Oakdene Road and 27 – 67 Clifton Gardens, Hillingdon
19. Former Star Public House, Byron Parade, Uxbridge Road, Hillingdon
20. Garden Land at rear of 541 – 549 and 565 – 581 Uxbridge Road, Hayes
21. Land adjacent to Minet Country Park, off A312
22. Land to rear of 63, Daleham Drive, West Drayton
23. Rainbow and Kirby Industrial Estates and adjacent land, Trout Road, Yiewsley
24. MPS Police Station, Station Road, West Drayton
25. Rigby Lane Waste Transfer Station, Hayes
26. Enterprise House, Blyth Road, Hayes
27. Chailey Industrial Estate, Pump Lane, Hayes
28. Land to South of Hayes & Harlington Station, Hayes
29. Nestles Factory Site, North Hyde Gardens, Hayes
30. Hyde Park Hayes, Millington Road, Hayes
31. Unit 3 Site, Westland Industrial Estate, Millington Road, Hayes
32. Frog's Ditch Farm, Shepiston Lane, Harlington

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33. Duval House and Car Park, Harmondsworth
34. Holloway Lane Quarry, Sipson
35. Former Sipson Garden Centre, Sipson Road, Sipson
36. Land adjacent to Kenwood Close, Sipson
37. Land at rear of 460 – 470 Bath Road, Longford
38. Land at Bath Road, between Nobel Drive and Malvern Road

1. Land at Mount Vernon Hospital, Northwood



Map Notes

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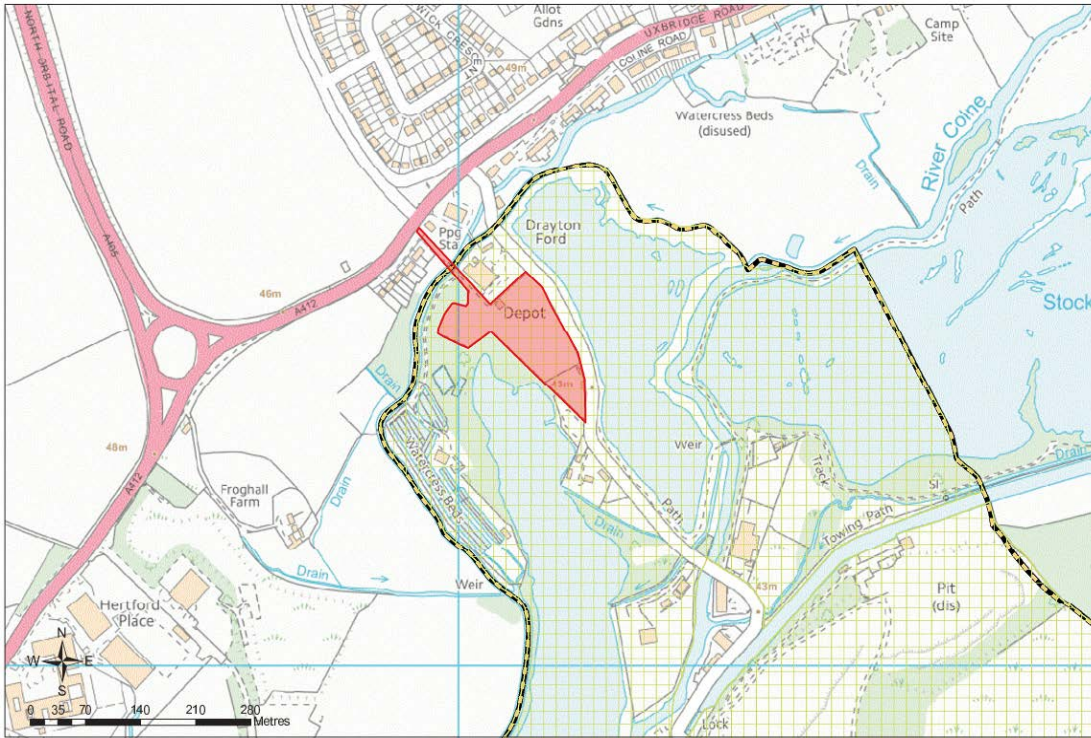
(Light hatching shows Green Belt land)

Ward(s)	Northwood
Location	Site west of Rickmansworth Road / south of Northwood Road
Existing Use	Hospital
Designation	Green Belt
Area (ha/sqm)	Total : 23 ha
PTAL Ratings	PTAL Score 2
Ownership if known	Hillingdon Hospitals NHS Foundation Trust
Call for Sites response received	<p>The Trust is currently involved in a wide ranging review of the 23 ha site with a view to identifying land and buildings there which are surplus to requirements and would be suitable for redevelopment.</p> <p>The Mount Vernon site comprises two distinct areas, the northern part which includes all the existing buildings in a compact zone, and the southern area which is mainly open space and fields.</p> <p>The site is identified on the Hillingdon UDP Proposals Map as being within the Green Belt and most of the southern area is also designated as a Countryside Conservation Area.</p> <p>The Trust considers that redevelopment of the site to provide much needed new housing will make efficient use of a previously developed site in line with the guidance contained within the NPPF. In addition the redevelopment of the site for housing will make an important contribution towards meeting the housing needs of the Borough. They recommend that the northern part of the site should be de-designated as Green Belt land and identified as a housing allocation within Part 2 of the Hillingdon Local Plan.</p>
Officer Response	The Council does not support the de-designation of Green Belt land and is proposing a series of site allocations elsewhere

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	which have identified potential capacity to meet its housing delivery targets up to 2021.
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2. Former Haulage Yard off Uxbridge Road / Springwell Lane / Drayton Ford, Mill End, Rickmansworth



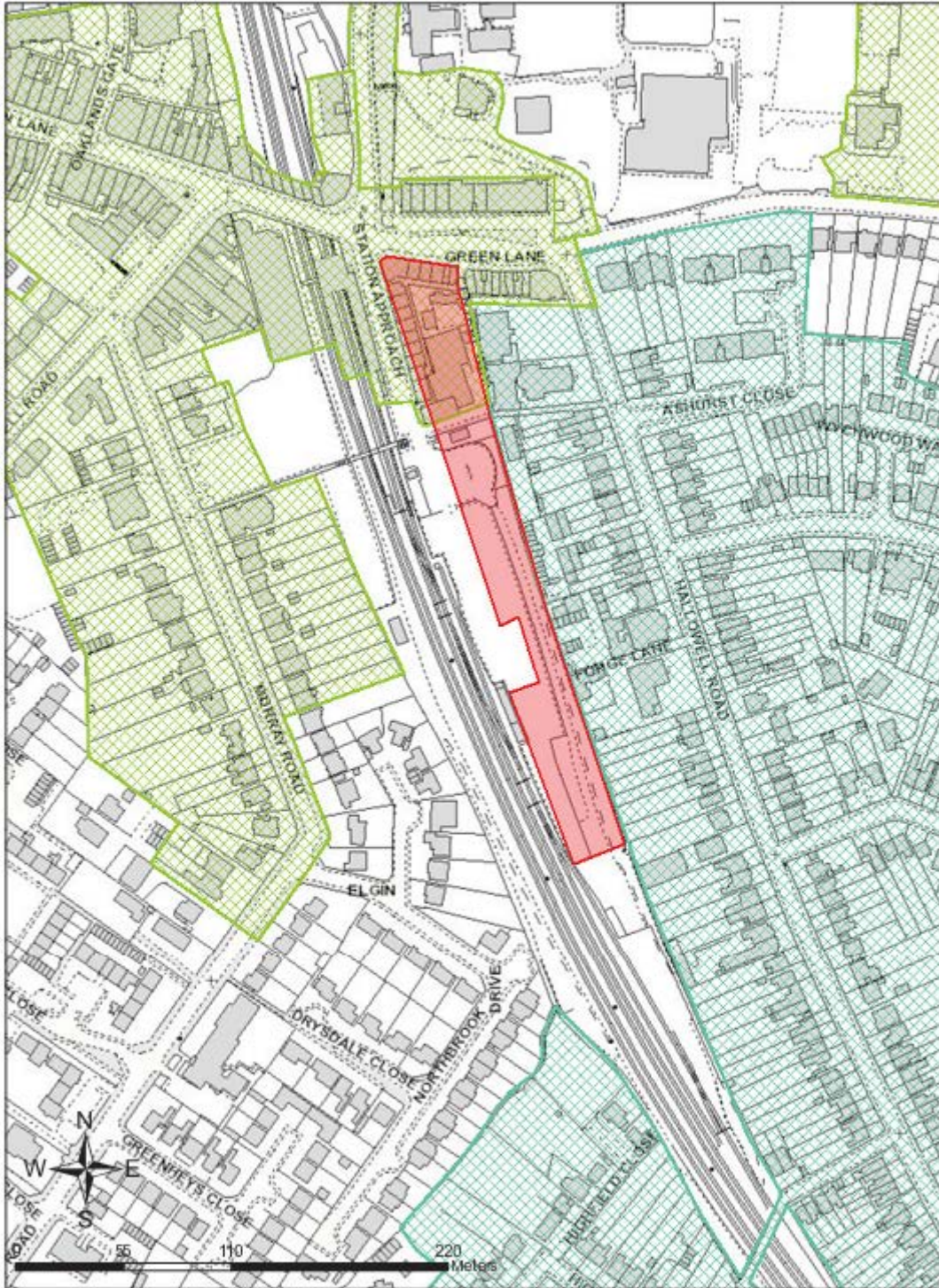
Map Notes

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(Light hatching shows Green Belt land)

Ward(s)	Harefield
Location	Off (A 412) Uxbridge Road, adjacent to Springwell Lane
Existing Use	Vacant – last used in part for vehicle and materials storage
Designation	Green Belt
Area (ha/sqm)	1.8 Ha
PTAL Ratings	PTAL Score 2
Ownership if known	
Call for Sites response received	Former haulier's use ceased approximately six years ago. Housing redevelopment has been allowed 300 ms to the south east at a site on Springwell Lane. Request for de-designation as Green Belt land
Officer Response	The Council does not support the de-designation of Green Belt land and is proposing a series of site allocations elsewhere which have identified potential capacity to meet its housing delivery targets up to 2021.

3. Land at Green Lane / Station Approach, Northwood



Map Notes

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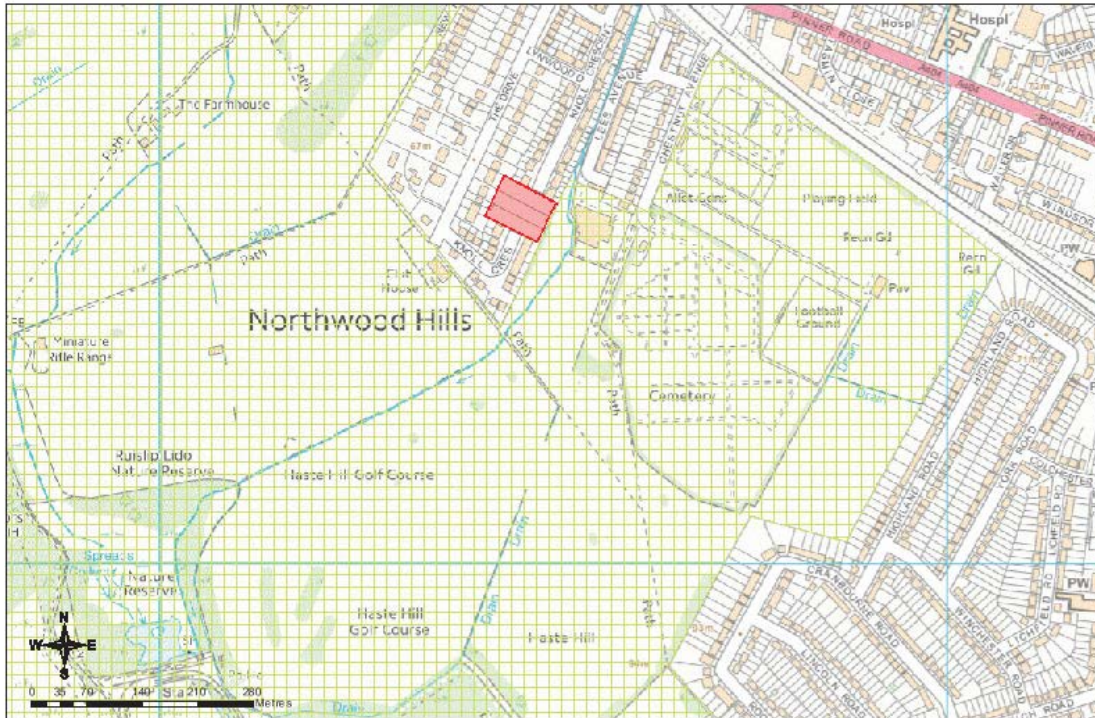
(Light hatching shows Conservation Area; dark hatching = Area of Special Local Character)

Ward(s)	Northwood
Location	Green Lane/Station Approach, Norwood
Existing Use	Existing mix of retail and commercial units with residential flats above
Area (ha/sqm)	1.6 Ha
PTAL Ratings	PTAL Score 2-3

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Hillingdon's Local Plan Part 2 Regulation 18 Consultation (April- May 2013)

Additional Information	Part of site falls within Conservation Area (light green hatching) and area of special local character (dark green hatching)
Ownership if known	Transport for London
Call for Sites response received	Would like to develop site with a supermarket (47,000 sq ft) and 160 residential units
Officer Response	The redevelopment of this site would have major implications for the Northwood Town Centre conservation area and impact upon several existing businesses based there.

4. Garden land at rear of 37- 43 The Drive, Northwood



Map Notes

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hatching shows Green Belt land)

(Light

Ward(s)	Northwood
Location	Rear of 37-43 The Drive, Northwood
Existing Use	Garden land
Designation	Abutting but not within Green Belt
Area (ha/sqm)	0.39 ha
PTAL Ratings	PTAL Score 1b
Ownership if known	4 separate householders
Call for Sites response received	Site could accommodate 8 dwellings
Officer Response	Not supported - the proposed construction of housing on this garden land would be contrary to London Plan policy, and create an intensified area of housing development directly contrary to the character of the surrounding area. The Council is proposing a series of site allocations elsewhere which have identified potential capacity to meet its housing delivery targets up to 2021.

5. Land to rear of 25-34 Cygnet Close, Northwood



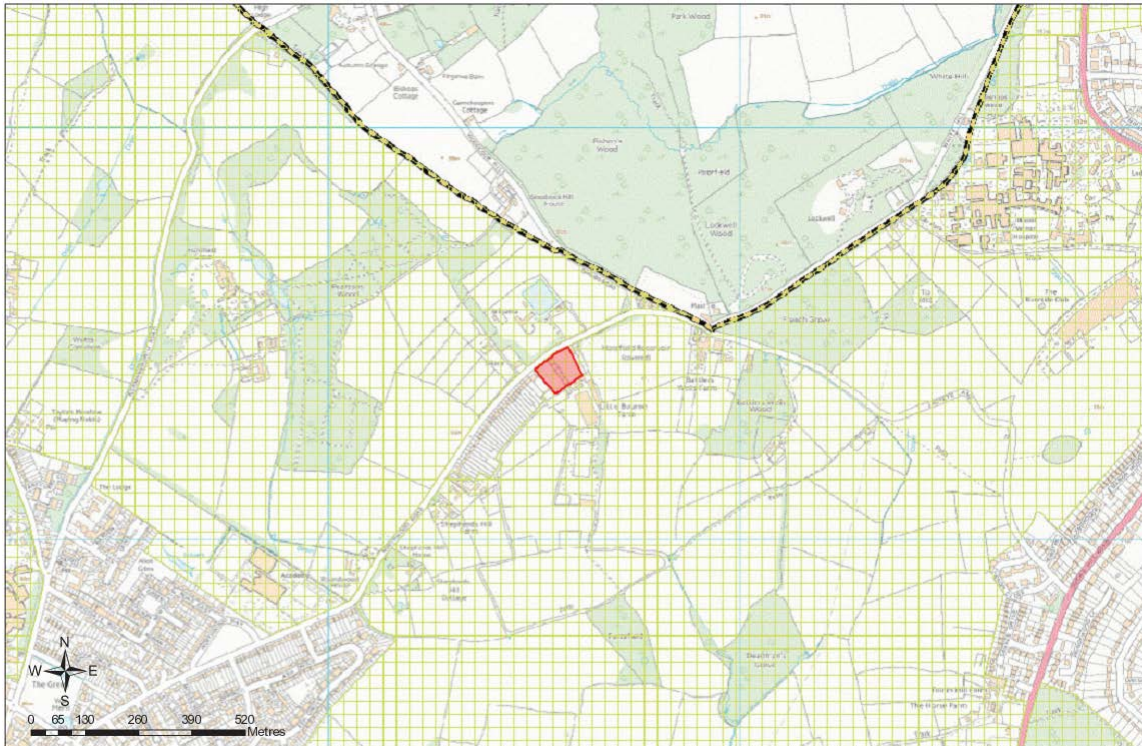
Map Notes

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(Light hatching shows Green Belt land)

Ward(s)	Northwood
Location	Rear of 25-34 Cygnet Close, Northwood, HA6
Existing Use	
Designation	Green Belt
Area (ha/sqm)	0.2 Ha
PTAL Ratings	PTAL Score 1b
Ownership if known	
Call for Sites response received	No proposed use made in representation – might be intended for future residential development
Officer Response	The Council does not support the de-designation of Green Belt land and is proposing a series of site allocations elsewhere which have identified potential capacity to meet its housing delivery targets up to 2021.

Consultation Statement Regulation 18
Hillingdon's Local Plan Part 2 Regulation 18 Consultation (April- May 2013)
6. Land to north west of Little Bourne Farm, Harefield



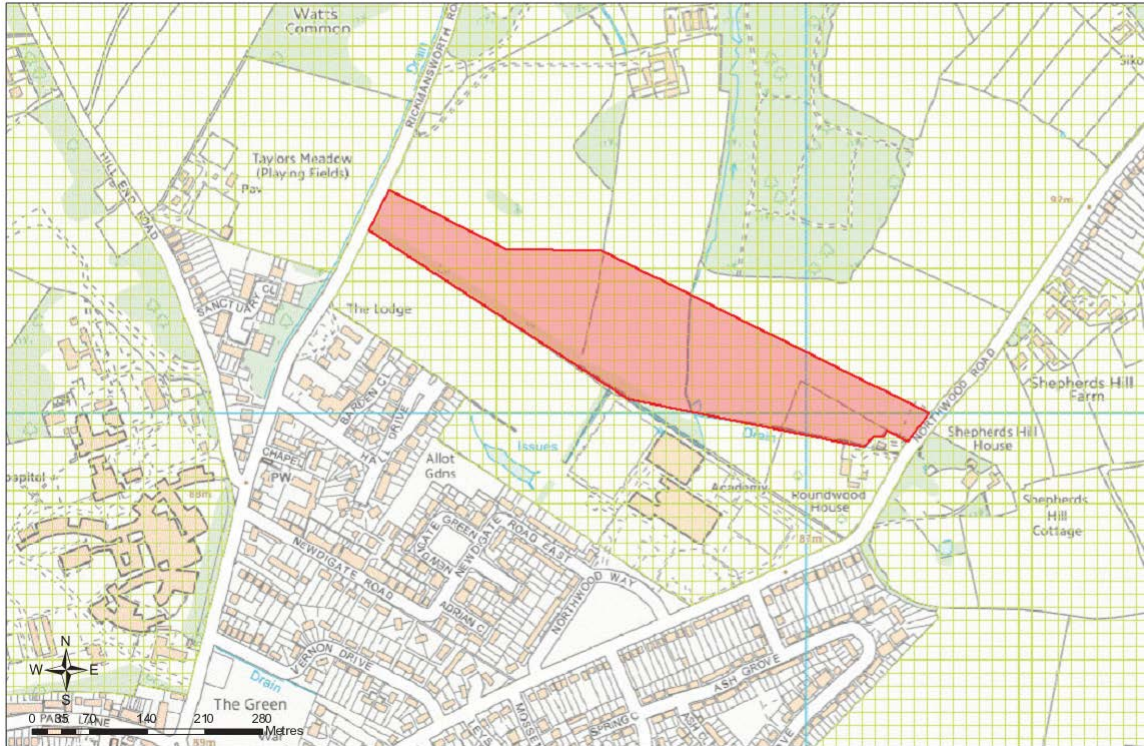
Map Notes

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(Light hatching shows Green Belt land)

Ward(s)	Harefield
Location	Two fields between the Little Bourne Farm and the Northwood Road
Existing Use	Agricultural grazing land – two paddocks
Designation	Green Belt
Area (ha/sqm)	Approximately 0.7 Ha
PTAL Ratings	PTAL Score 1a
Ownership if known	Privately owned by Ms I J Heatly and family
Call for Sites response received	Site is at eastern end of a continuous row of housing on south side of Northwood Road (numbers 202-280)
Officer Response	The Council does not support the de-designation of Green Belt land and is proposing a series of site allocations elsewhere which have identified potential capacity to meet its housing delivery targets up to 2021.

7. Land at Harefield Grove Farm to south of the Harefield to Southall Gas Pipeline and north of Harefield Academy



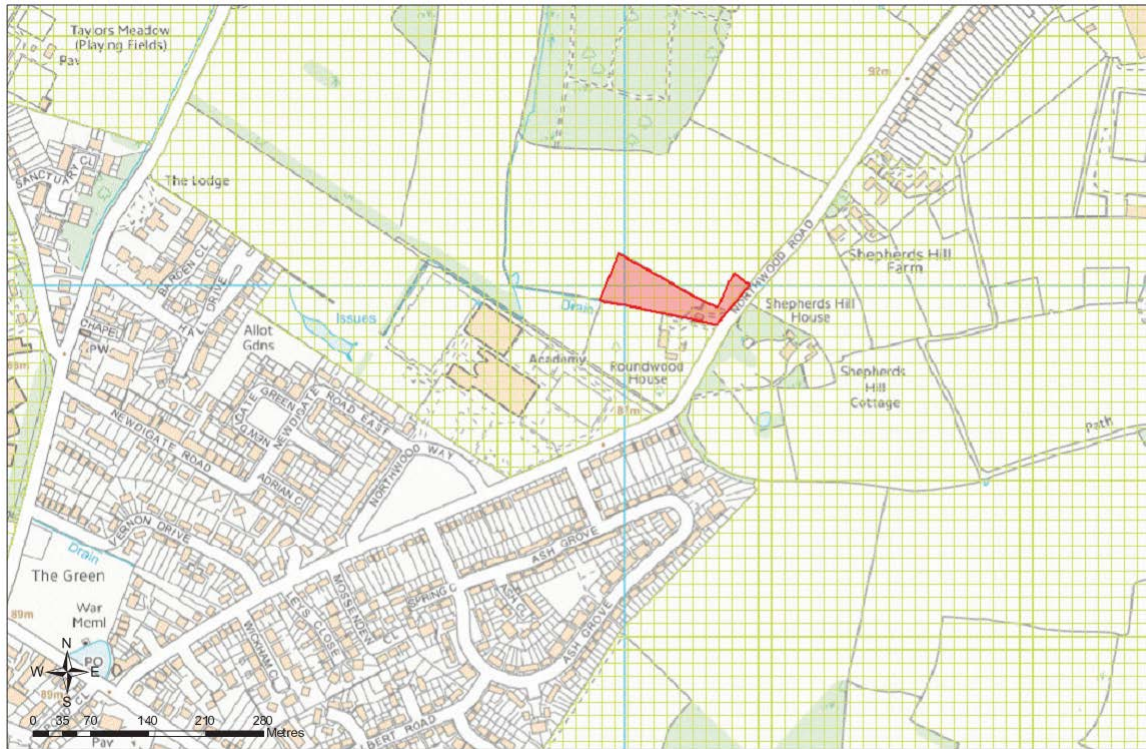
Map Notes

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(Light hatching shows Green Belt land)

Ward(s)	Harefield
Location	Land north of Harefield Academy between Rickmansworth Road and Northwood Road
Existing Use	Agricultural grazing land
Designation	Green Belt
Area (ha/sqm)	Approximately 5.0 Ha
PTAL Ratings	PTAL Score 1a
Ownership if known	Julian Kverndal and family
Call for Sites response received	Eastern part of land was previously used as contractor's compounds. No development would be permitted above or near new gas pipeline which would effectively make a barrier to development. Propose residential development next to Harefield and extra facilities for Harefield Academy
Officer Response	The Council does not support the de-designation of Green Belt land and is proposing a series of site allocations elsewhere which have identified potential capacity to meet its housing delivery targets up to 2021.

Consultation Statement Regulation 18
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8. Site of Whitehouse Cottage, Northwood Road, Harefield



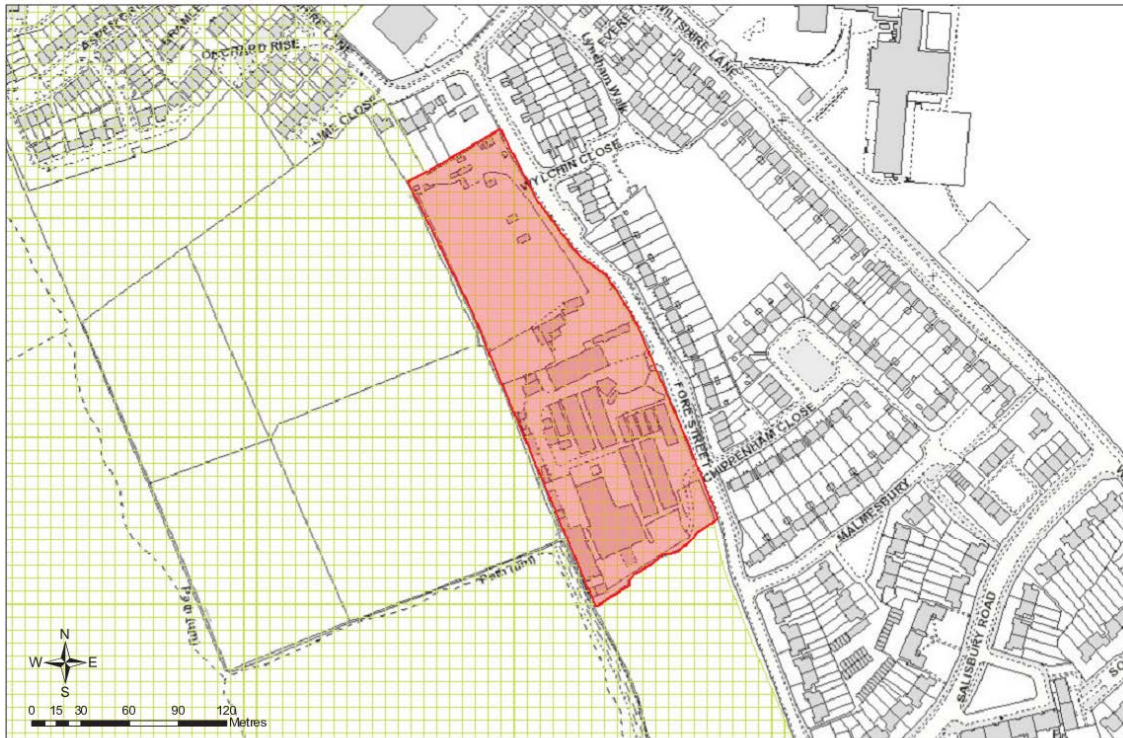
Map Notes

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(Light hatching shows Green Belt land)

Ward(s)	Harefield
Location	Adjacent to Northwood Road, Harefield
Existing Use	Paddock, office, garden, garages, occasional residential use
Designation	Green Belt
Area (ha/sqm)	0.6 ha
PTAL Ratings	PTAL Score 1a
Ownership if known	Mr A Cox
Call for Sites response received	Seeking a sensible sustainable long term use for the site, preferably residential development; alternatively B1
Officer Response	No useful purpose would be served by the redevelopment of the full site in this area of Green Belt. The Council would prefer to see any replacement buildings confined to the original built area of the site to maintain the openness of this area (as per national planning policy). The Council does not support the development of Green Belt land for housing and is proposing a series of site allocations elsewhere which have identified potential capacity to meet its housing delivery targets up to 2021.

9. Haste Hill Farm, Fore Street, Eastcote HA5



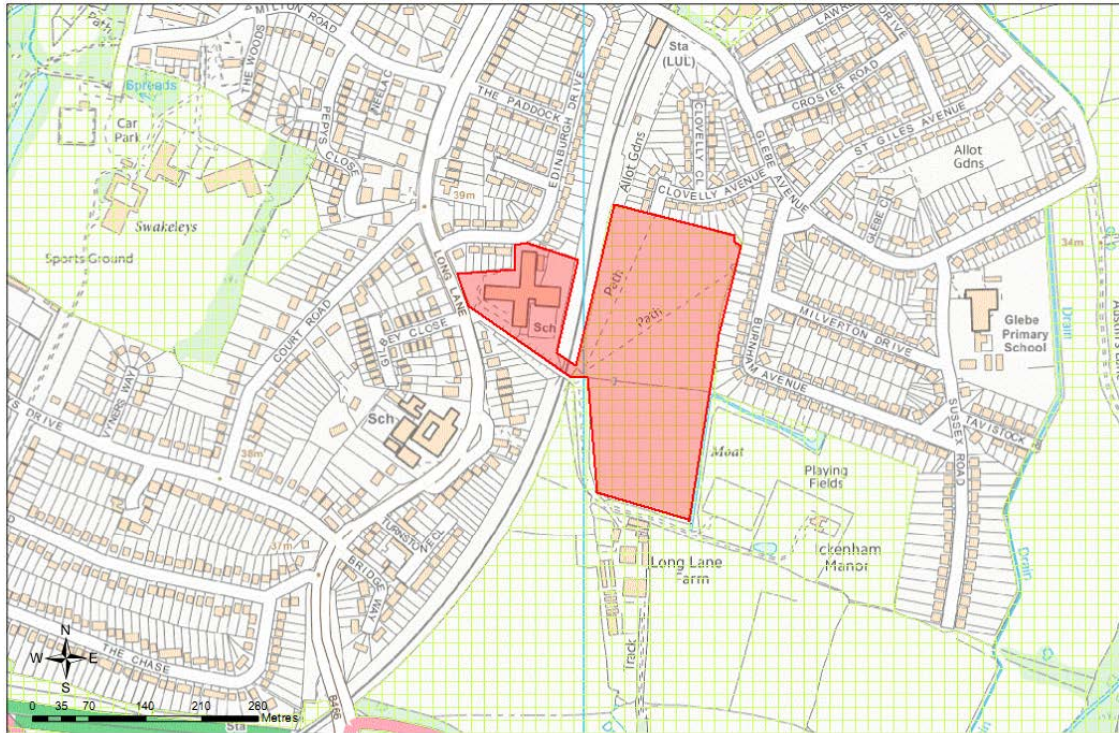
Map Notes

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(Light hatching shows Green Belt land)

Ward(s)	Northwood Hills
Location	West of Fore Street
Existing Use	Livery stables, nursery and storage
Designation	Green Belt
Area (ha/sqm)	Approximately 2.4 Ha
PTAL Ratings	PTAL Score 1a
Additional Information	Western part of site is zoned as Archaeological Priority Area. Adjoins National Nature Reserve and Site of Special Scientific Interest
Ownership if known	Privately owned by Ms S Hatchett and her two siblings
Call for Sites response received	Residential development preferred; alternatives B1 or B2
Officer response	The Council does not support the de-designation of Green Belt land and is proposing a series of site allocations elsewhere which have identified potential capacity to meet its housing delivery targets up to 2021.

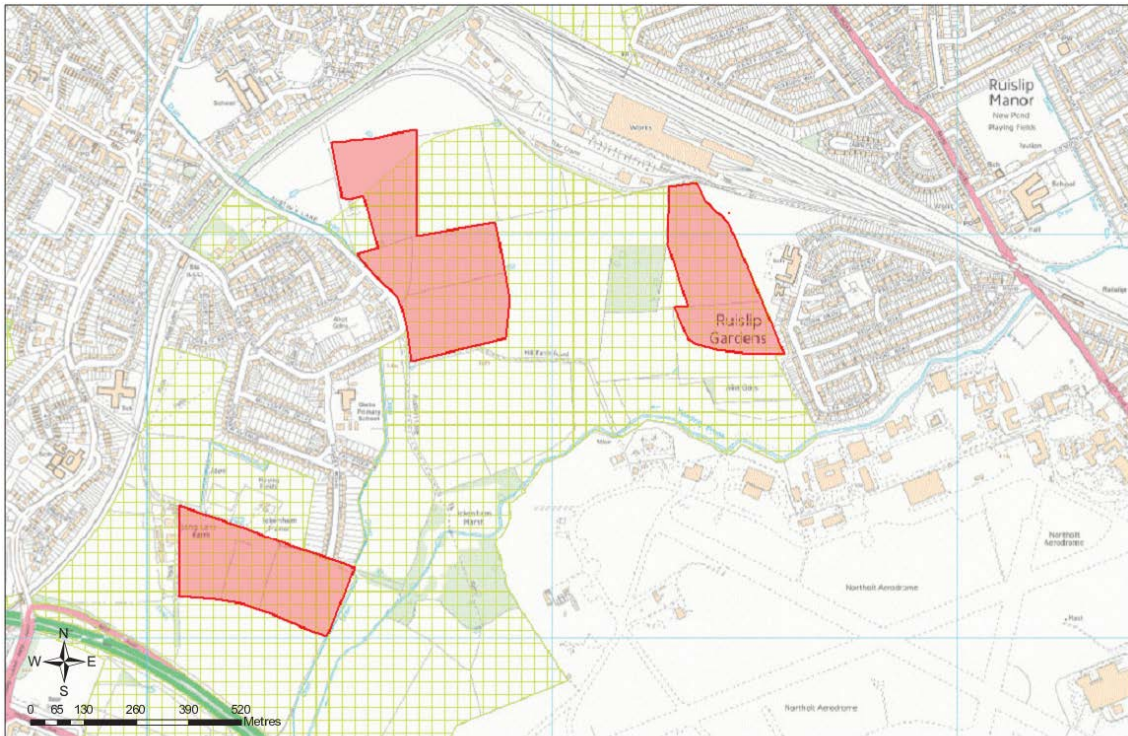
10. Land to south of Clovelly Avenue and north of Daltons Farm, Ickenham



(Light hatching shows Green Belt land)

Ward(s)	Ickenham
Location	South of Clovelly Avenue
Existing Use	School Campus / Agricultural grazing land
Designation	Green Belt
Area (ha/sqm)	2.0 Ha
PTAL Ratings	PTAL Score 2
Ownership if known	
Call for Sites response received	Proposal is that this land should be de-designated as Green Belt land and identified for education use supported by enabling housing development on site and at the Douay Martyrs School campus
Officer Response	Not supported – the Council wish to see the Green Belt fully maintained in this area to prevent the merging of separate built up areas. The Council does not support the de-designation of Green Belt land and is proposing a series of site allocations elsewhere which have identified potential capacity to meet its housing delivery targets up to 2021.

11. Land at Long Lane Farm, Ickenham



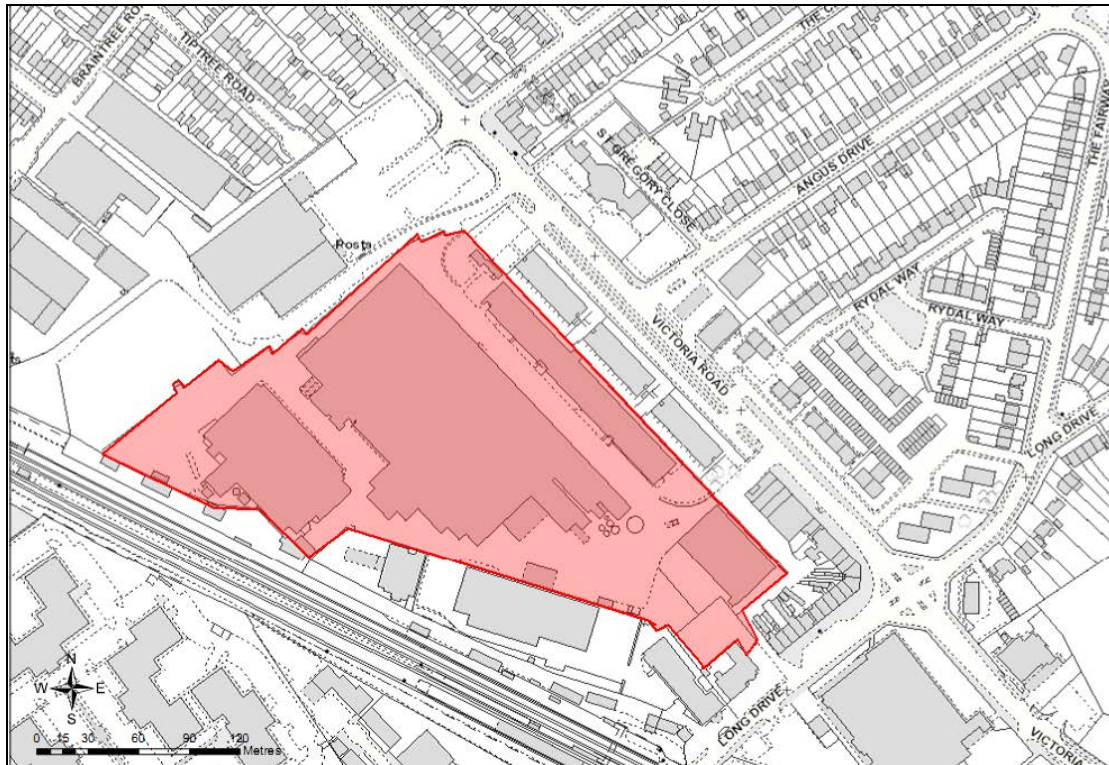
Map Notes

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(Light hatching shows Green Belt land)

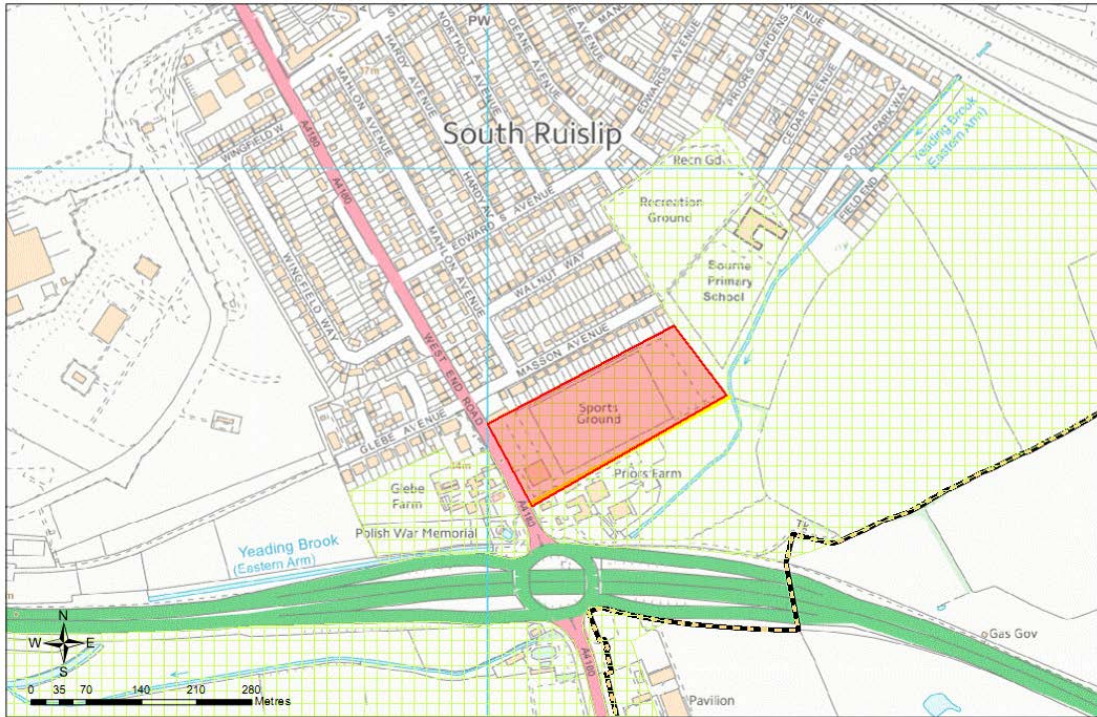
Ward(s)	Ickenham and South Ruislip
Location	Three separate areas of land to the north and west of Northolt Airport
Existing Use	Agriculture
Designation	Green Belt
Area (ha/sqm)	24 Ha
PTAL Ratings	PTAL Score 2
Ownership if known	Legal and General Property Partners (Life Fund) Ltd
Call for Sites response received	Propose de-designation as Green Belt of these areas and their development for affordable housing, forming extensions to existing housing areas in Ickenham and Ruislip
Officer Response	The Council does not support the de-designation of Green Belt land and is proposing a series of site allocations elsewhere which have identified potential capacity to meet its housing delivery targets up to 2021.

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12. Former Arla Foods Site, Victoria Road, South Ruislip



Ward(s)	South Ruislip
Location	Victoria Road, Ruislip
Existing Use	Currently has long standing use for industry; now vacant
Designation	UDP – part of Braintree Road Industrial and Business Area
Area (ha/sqm)	4.7 Ha
PTAL Ratings	PTAL Score 3
Ownership if known	Arla Foods UK
Call for Sites response received	<p>Three separate proposals put forward for this site – one submitted on behalf of the owners for a commercial redevelopment and two from individuals who propose the site should be designated for housing and community uses.</p> <p>RAF Northolt – site lies underneath existing flight path.</p> <p>Existing 'Industrial Business Area' - Hillingdon UDP policy BE25</p>
Officer Response	The Council would support a mixed redevelopment of this site (as per policy SA 17).

13. London Gaelic Athletic Association Sports Ground, West End Road, South Ruislip

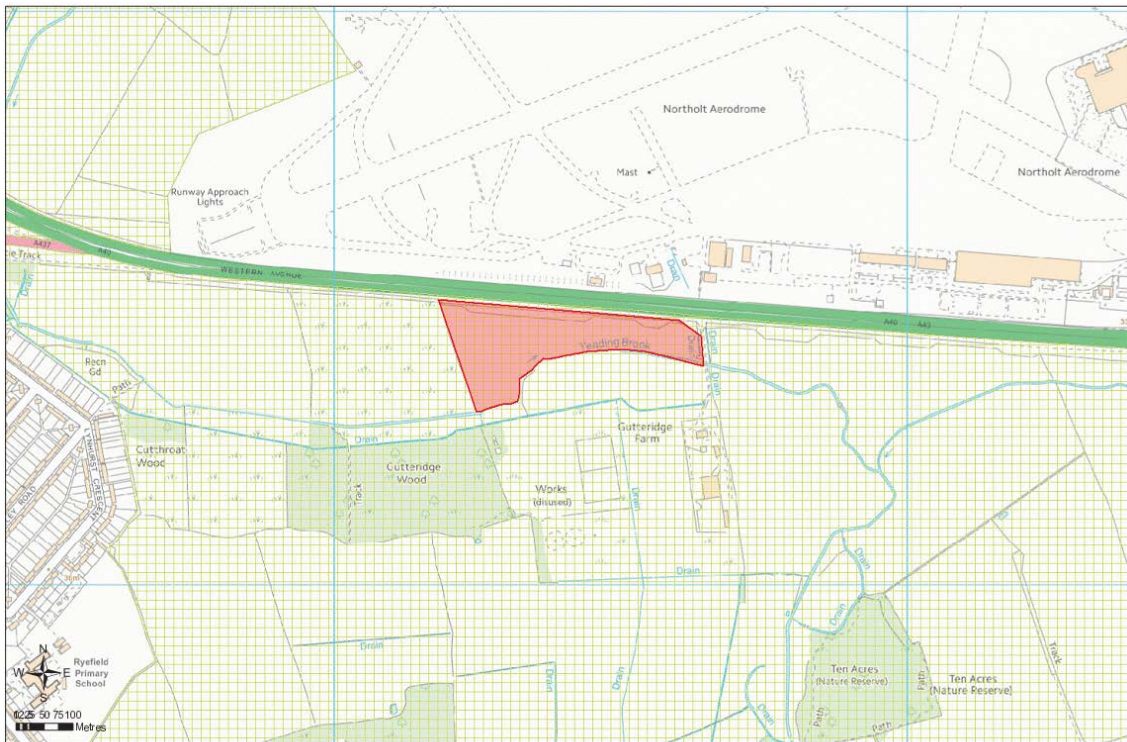


(Light hatching shows Green Belt land)

Ward(s)	South Ruislip
Location	West End Road, South Ruislip
Existing Use	Sports Ground
Designation	Green Belt
Area (ha/sqm)	3.12 ha
PTAL Ratings	PTAL Score 1b
Ownership if known	
Call for Sites response received	The respondents believe that the existing site does not contribute to the function of Green Belt as envisaged in national and London Plan policies and that the site would be better allocated for sports pitches and ancillary uses. Request de-designation as Green Belt land.
Officer Response	The existing use is an appropriate Green Belt use. De-designation is not required for its continued future use.

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14. Land adjacent to Gutteridge Farm, Western Avenue



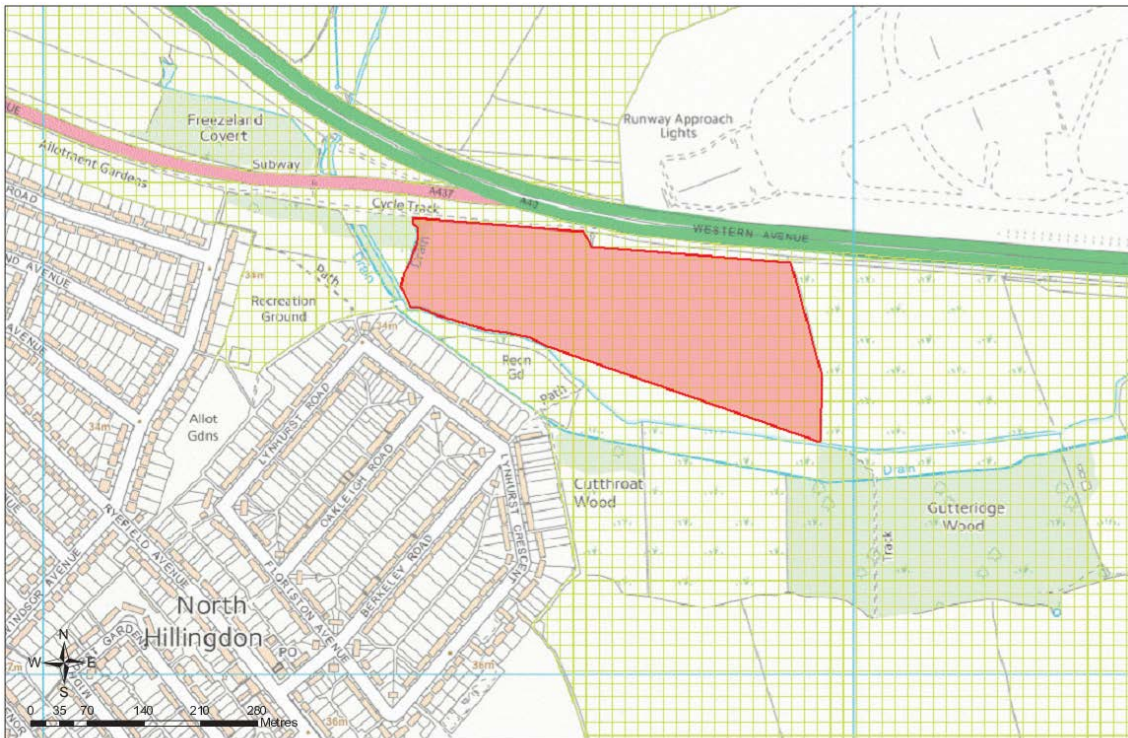
Map Notes

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(Light hatching shows Green Belt land)

Ward(s)	Hillingdon East
Location	Adjacent to Gutteridge Farm, Western Avenue
Existing Use	Vacant
Designation	Green Belt with nature reserve and countryside conservation area
Area (ha/sqm)	4.0 Ha
PTAL Ratings	PTAL Score 0
Ownership if known	Transport for London
Call for Sites response received	Propose developing site with residential scheme
Officer Response	The Council does not support the de-designation of Green Belt land and is proposing a series of site allocations elsewhere which have identified potential capacity to meet its housing delivery targets up to 2021.

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 Hillingdon's Local Plan Part 2 Regulation 18 Consultation (April- May 2013)
15. Land adjacent to Lynhurst Crescent, Western Avenue



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(Light hatching shows Green Belt land)

Ward(s)	Hillingdon East
Location	Adjacent to Lynhurst Crescent, Western Avenue
Existing Use	Vacant
Designation	Green Belt with nature reserve and countryside conservation area
Area (ha/sqm)	6.0 Ha
PTAL Ratings	PTAL Score 1a
Ownership if known	Transport for London
Call for Sites response received	Propose residential development
Officer Response	The Council does not support the de-designation of Green Belt land and is proposing a series of site allocations elsewhere which have identified potential capacity to meet its housing delivery targets up to 2021.

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16. Fassnidge Memorial Hall, Harefield Road, Uxbridge



Map Notes

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(Light hatching shows Conservation Areas; dark hatching shows Area of Special Local Character)

Ward(s)	Uxbridge South
Location	Harefield Road, Uxbridge
Existing Use	D1 Community Use
Designation	
Area (ha/sqm)	0.23 ha
PTAL Ratings	PTAL Score 5
Ownership if known	Fassnidge Memorial Trust
Call for Sites response received	Although the site is just under 0.25 ha threshold, it would be suitable for higher density smaller units and could accommodate 70 apartments
Officer Response	The building is not listed and is located on the boundary of the Uxbridge Conservation Area. In principle a residential-led redevelopment of the site may be acceptable, but any redevelopment would need to take into account the particular environmental constraints affecting this site, e.g. regarding road access at this junction and noise and air pollution levels.

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17. Former Chiltern View Pub, 190 Cowley Road, Uxbridge

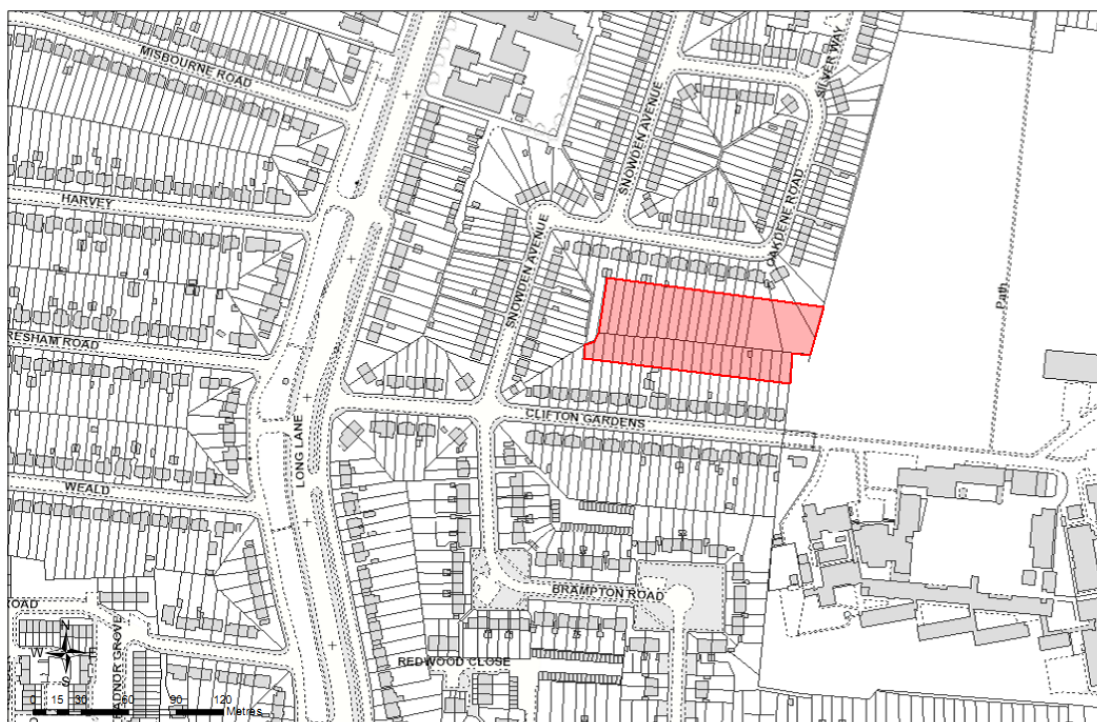


Ward(s)	Uxbridge South
Location	190, Cowley Road, Uxbridge
Existing Use	Vacant public house
Designation	
Area (ha/sqm)	Approximately 600 sq ms
PTAL Ratings	PTAL Score 2
Ownership if known	
Call for Sites response received	Site should be re-used for residential
Officer Response	In this location the Council would support community/residential re-use of the site.

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18. Land to rear of 2 - 36 Oakdene Road and 27- 67 Clifton Gardens, Hillingdon



Ward(s)	Hillingdon East
Location	Rear of 2-36 Oakdene Road and 27-67 Clifton Gardens, Hillingdon
Existing Use	Residential gardens
Designation	
Area (ha/sqm)	0.7 ha
PTAL Ratings	PTAL Score 1b
Ownership if known	Various individual owners
Call for Sites response received	Site has capacity for an estimated 20 homes
Officer Response	Not supported - the proposed construction of housing on this garden land would be contrary to London Plan policy, and create an intensified area of housing development directly contrary to the character of the surrounding area. The Council is proposing a series of site allocations elsewhere which have identified potential capacity to meet its housing delivery targets up to 2021.

19. Former Star Public House, Byron Parade, Uxbridge Road, Hillingdon



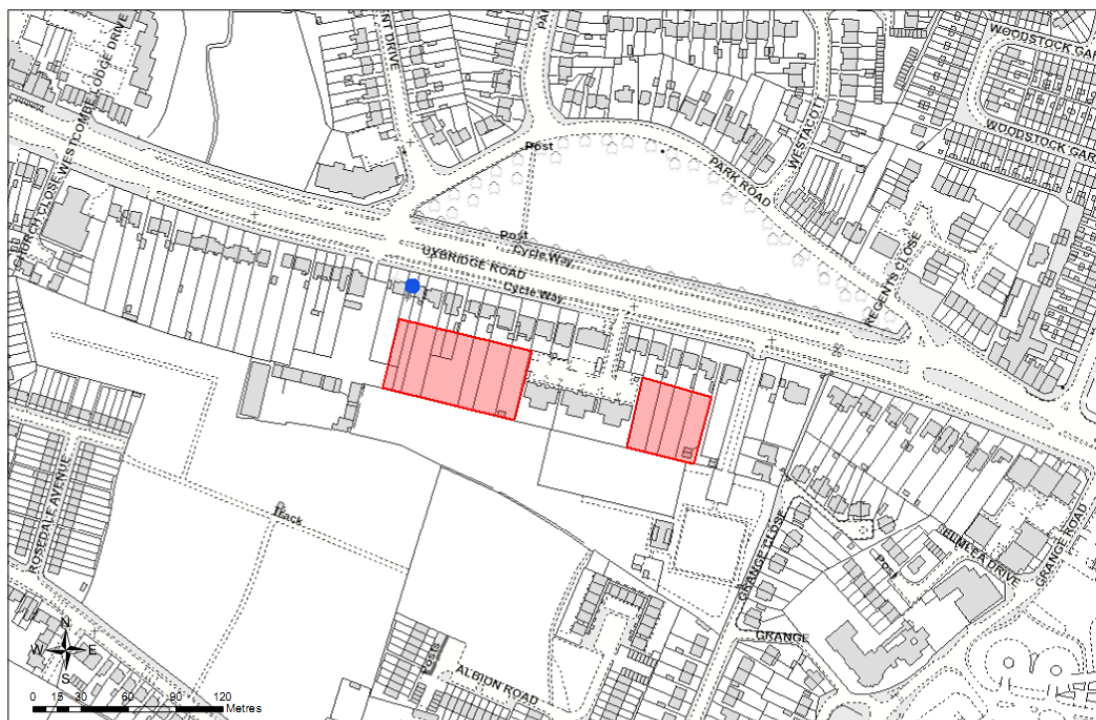
(Light hatching shows Green Belt land)

Ward(s)	Hillingdon East
Location	Byron Parade, Uxbridge Road, Hillingdon
Existing Use	Vacant public house
Designation	
Area (ha/sqm)	Approximately 700 sq ms
PTAL Ratings	PTAL Score 2
Ownership if known	
Call for Sites response received	Site should be used for residential
Officer Response	In this location the Council would support community/residential re-use of the site.

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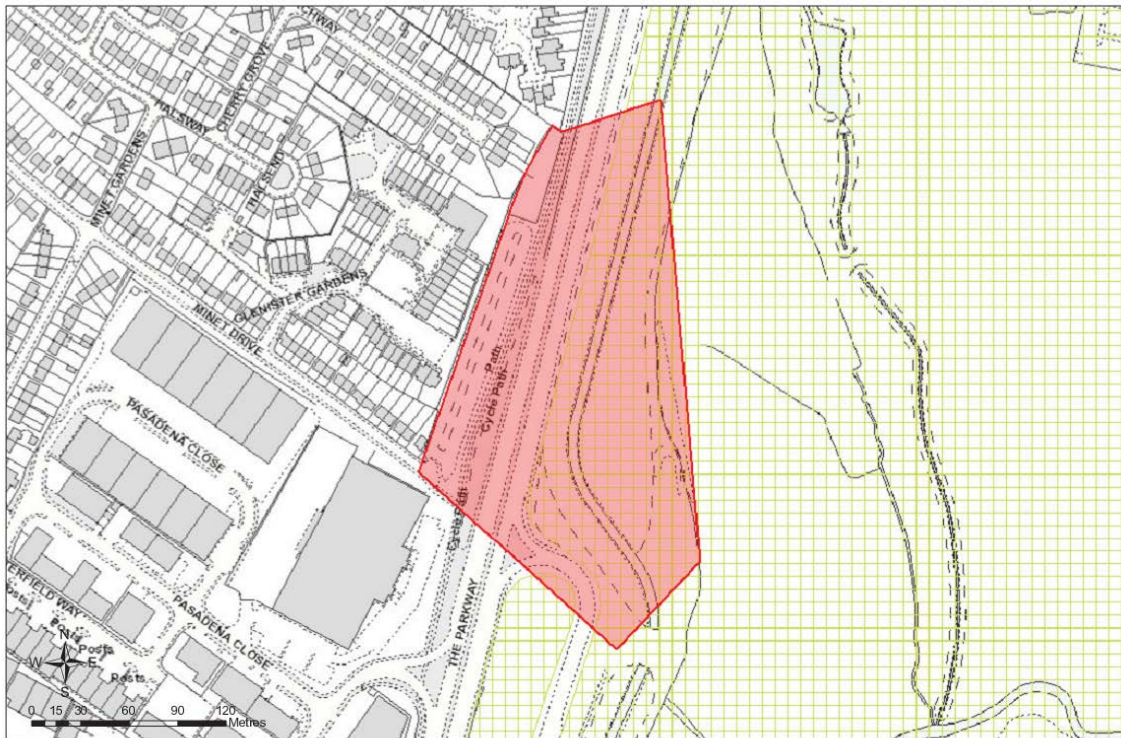
Hillingdon's Local Plan Part 2 Regulation 18 Consultation (April- May 2013)

20. Garden land at rear of 541- 549 and 565 - 581, Uxbridge Road, Hayes



Ward(s)	Botwell
Location	Rear of 541-549 and 565-581 Uxbridge Road, Hayes
Existing Use	Garden land
Designation	
Area (ha/sqm)	3.9 ha
PTAL Ratings	PTAL Score 3
Ownership if known	14 separate householders
Call for Sites response received	Respondents have noted that these sites are "Adjacent to and would take access from recent backland development."
Officer Response	Not supported - the proposed construction of housing on this garden land would be contrary to London Plan policy, and create an intensified area of housing development directly contrary to the character of the surrounding area. The Council is proposing a series of site allocations elsewhere which have identified potential capacity to meet its housing delivery targets up to 2021.

21. Land adjacent to Minet Country Park, off A312



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(Light hatching shows Green Belt land)

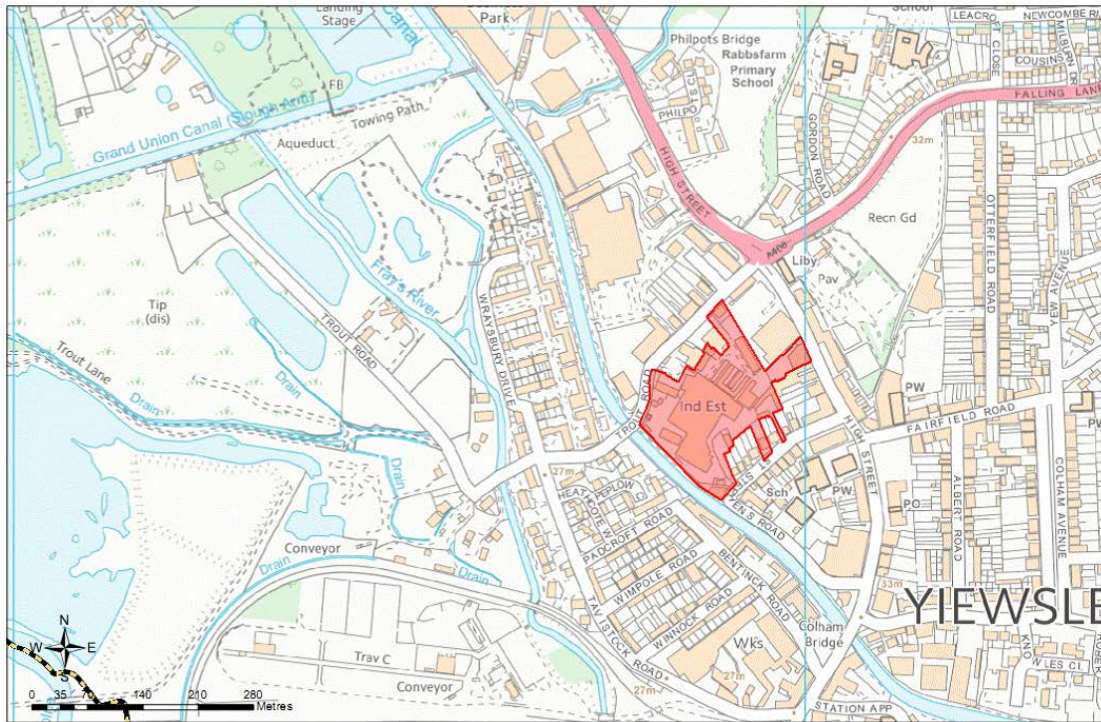
Ward(s)	Townfield
Location	Adjacent to Minet Country Park, off A312
Existing Use	Vacant
Designation	Green Belt with nature conservation site
Area (ha/sqm)	2.0 Ha
PTAL Ratings	PTAL Score 0
Ownership if known	Transport for London
Call for Sites response received	Propose residential development
Officer Response	There are severe environmental constraints for any development on this site - in terms of noise and air quality and visual impact on the adjoining Country Park and nature conservation area. The Council would not support its development for residential housing and is proposing a series of site allocations elsewhere which have identified potential capacity to meet its housing delivery targets up to 2021.

22. Land to rear of 63 Daleham Drive, West Drayton



Ward(s)	Yiewsley
Location	Rear of 63 Daleham Drive, West Drayton
Existing Use	Used as residential garden for 117 West Drayton Road
Designation	Green Belt
Area (ha/sqm)	280 sq ms (0.028 ha)
PTAL Ratings	PTAL Score 2
Ownership if known	Privately owned by Mr.N.Gill
Call for Sites response received	The site is surrounded by development. Request removal from Green Belt designation. Propose residential development.
Officer Response	Supported – the site does not form a significant area of Green Belt and is not significant in other respects – e.g. for nature conservation.

23. Rainbow and Kirby Industrial Estates and adjacent land, Trout Road, Yiewsley



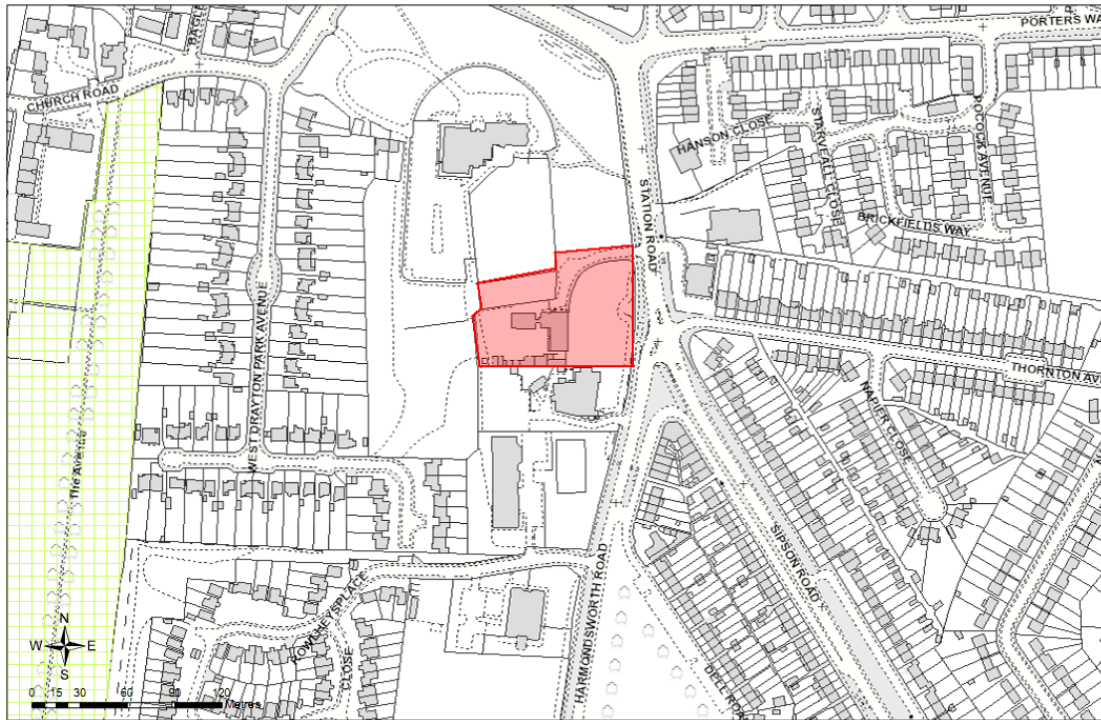
Ward(s)	Yiewsley
Location	Main vehicle access gained from Trout Road, with alternative access points on High Street and St Stephens Road. Extensive frontage to Grand Union Canal.
Existing Use	The site is now largely vacant, due to the demolition of single-storey and two-storey industrial buildings (many of which suffered significant fire damage in March 2011 and were condemned) and the empty three-storey vacant office building, Gemeni House. There is also 1 residential property on St Stephens Road.
Designation	
Area (ha/sqm)	2.31 Ha
PTAL Ratings	PTAL Score 2-3
Ownership if known	Bourne End Investments Ltd
Call for Sites response received	<p>The respondents propose that the Rainbow and Kirby Industrial Estates and adjacent land should be identified for residential development. The allocation should identify the potential for approximately 170-190 dwellings and the Plan should acknowledge the regeneration, economic, social and environmental enhancements the proposals will provide for Yiewsley with the potential to:</p> <ul style="list-style-type: none"> - Provide a mix of unit sizes, in the form of flatted development - Enhance pedestrian links between the High Street and Grand Union Canal - Where viable contribute to affordable housing, possibly in the form of specialist care housing
Officer Response	<p>This site is included in the New Homes section of the Site Allocations – this states that:</p> <p><i>The Council will support residential-led mixed use development proposals that contribute to regeneration in Yiewsley Town Centre. The Council is of the view that the site should be</i></p>

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subject to the following quantum of development:

- *30% of floorspace should relate to leisure and commercial uses to reflect the town centre location and the previous use of the site.*
 - *70% of floorspace should relate to residential uses.*
 - *Particular consideration will need to be given to the proposed access arrangements to the site.*
 - *Proposals should meet the provisions of relevant policies in other parts of the Local Plan.*
 - *The mix of uses is considered important and should capitalise on the proximity of the future Crossrail link at West Drayton Station.*
 - *Development proposals should incorporate canalside improvements to be agreed with the Council.*
-

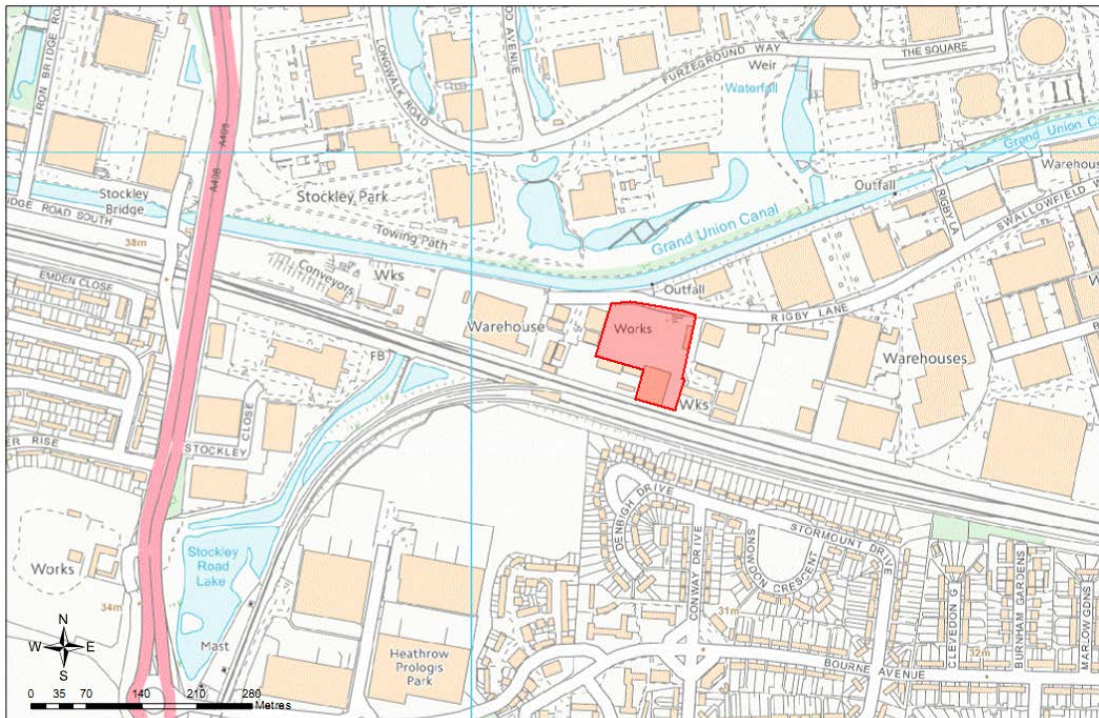
24. MPS Police Station, Station Road, West Drayton



(Light hatching shows Green Belt land)

Ward(s)	West Drayton
Location	Station Road, West Drayton
Existing Use	Still in operational use – replacement facilities being provided nearby. Site will be vacant within 2 years
Designation	
Area (ha/sqm)	0.65 Ha
PTAL Ratings	PTAL Score 2
Ownership if known	Metropolitan Police Service
Call for Sites response received	West Drayton Police is now surplus to Metropolitan Police requirements and replacement policing facilities are being provided in the vicinity. The site offers development potential for a residential-led scheme
Officer Response	In this location the Council would support community/residential re-use of the site

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25. Rigby Lane Waste Transfer Station, Hayes



Ward(s)	Botwell
Location	At western end of Rigby Lane on south side
Existing Use	B2 Waste transfer station
Designation	Industrial and Business Area
Area (ha/sqm)	Approximately 0.88 Ha
PTAL Ratings	PTAL Score 0
Ownership if known	
Call for Sites response received	<p>SITA UK currently operates the Rigby Lane Waste Transfer Station in Hayes. It has been in use as a Waste Transfer Facility following redevelopment in 2010 and has been in use as a waste facility for over 20 years.</p> <p>Section 4 of the Proposed Sites & Policies draft of the West London Waste Plan (published in February 2011) identified Rigby Lane as an existing waste site considered to have the potential for re-development for other waste treatment uses. The company wish to ensure this is recognised in the Local Plan.</p>
Officer Response	Agreed – the site is to be proposed as a waste treatment site in the West London Waste Plan.

26. Enterprise House, Blyth Road, Hayes

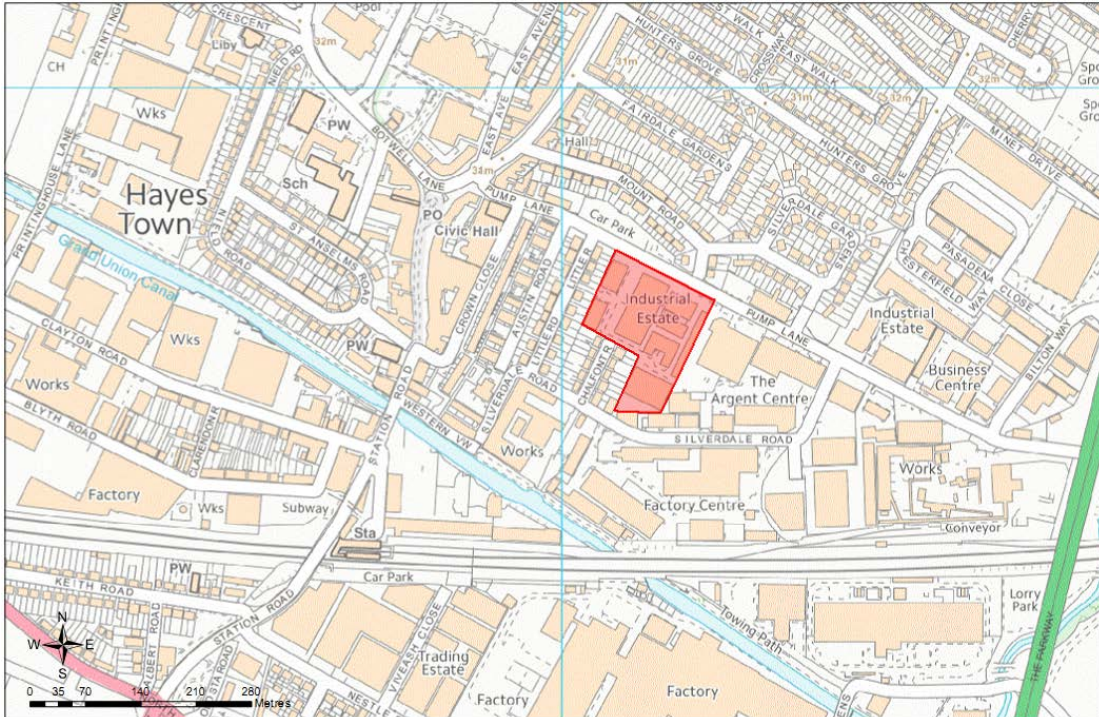


(Light hatching shows Conservation Area)

Ward(s)	Botwell
Location	Blyth Road, Hayes
Existing Use	Currently has long standing use for industry; the building is listed, now largely vacant and in poor condition
Designation	Thorn EMI Botwell Conservation Area
Area (ha/sqm)	0.4 Ha
PTAL Ratings	PTAL Score 3
Ownership if known	Workspace Group plc
Call for Sites response received	Listed building requiring major refurbishment and restoration works. Preference for mixed use development – residential, B1 and small café
Officer Response	The Council view this building as appropriate for a residential-led mixed use development. The site is included in the New Homes section of the Site Allocations at policy SA 1.

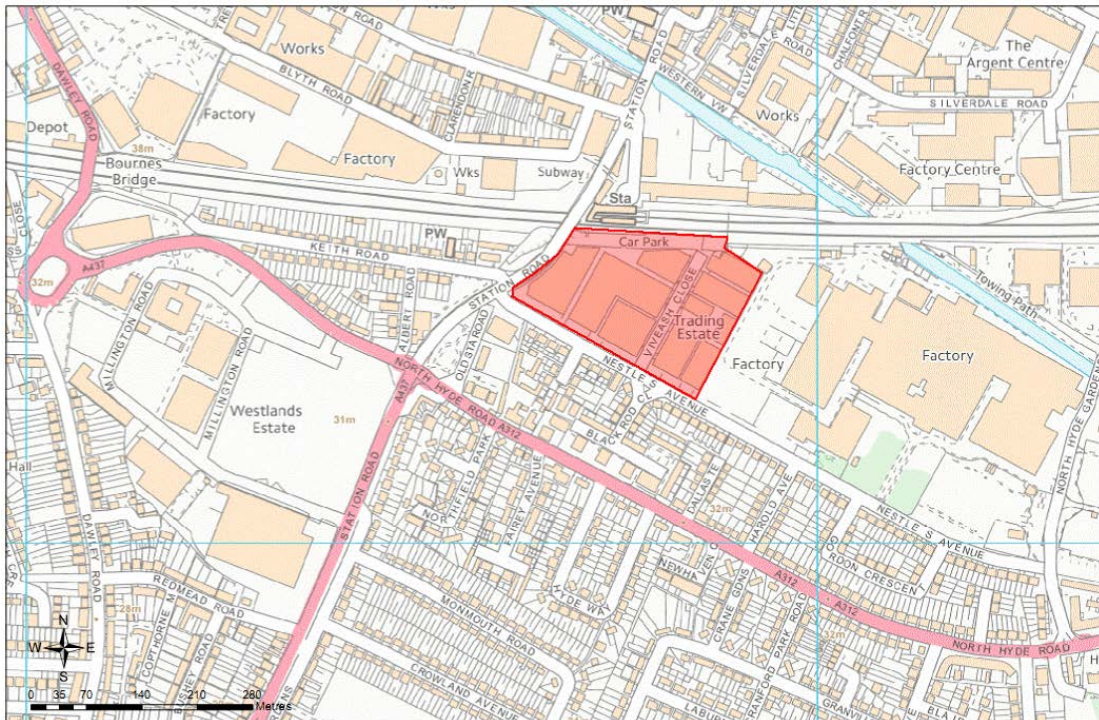
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27. Chailey Industrial Estate, Pump Lane, Hayes



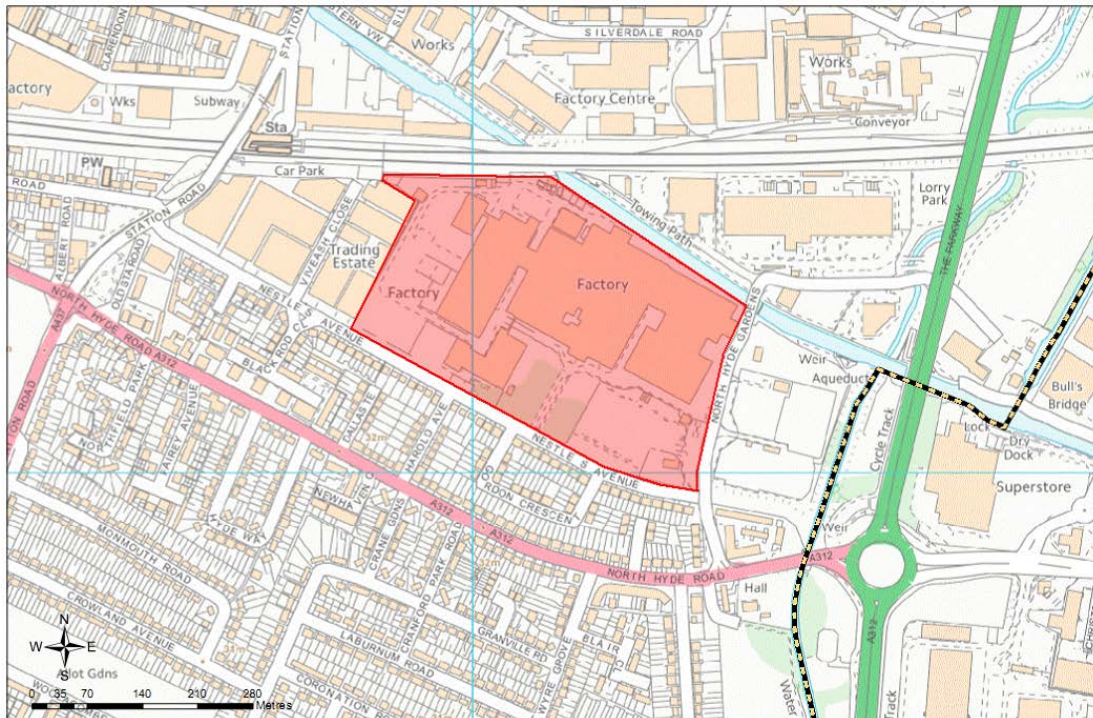
Ward(s)	Townfield
Location	Pump Lane, Hayes
Existing Use	Industrial estate - part vacant
Designation	
Area (ha/sqm)	1.85 ha
PTAL Ratings	PTAL Score 3
Ownership if known	Co-operative Insurance Society
Call for Sites response received	The site comprises an end-of-life industrial estate. A mixed use residential-led scheme is proposed for the site, including retail and community uses
Officer Response	The Council supports the proposed mixed use redevelopment of this site. The site is included in the New Homes section of the Draft Proposed Site Allocations – at policy SA 18.

28. Land to South of Hayes & Harlington Station, Hayes



Ward(s)	Botwell
Location	Land to South of Hayes & Harlington Station - bounded by Station Road, Nestles Avenue, Viveash Close and railway station car park
Existing Use	Mix of uses: light industry, storage, museum, camper van hire and general parking
Designation	London Plan - part of the Hayes Industrial Area Preferred Industrial Location (PIL) UDP – part of Nestle Avenue / Bulls Bridge Industrial and Business Area
Area (ha/sqm)	2.5 Ha
PTAL Ratings	PTAL Score 4
Ownership if known	Part owned by Access Self Storage and part by Network Rail.
Call for Sites response received	The respondents consider that the site is surplus employment land and should be redeveloped to help the regeneration of this “gateway” location to Hayes town centre.
Officer Response	The mixed use redevelopment of this site and the adjoining Nestles Factory Site, North Hyde Gardens is proposed by the Council in its draft Proposed Site Allocations and Designations at policy SA 10.

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29. Nestles Factory Site, North Hyde Gardens, Hayes

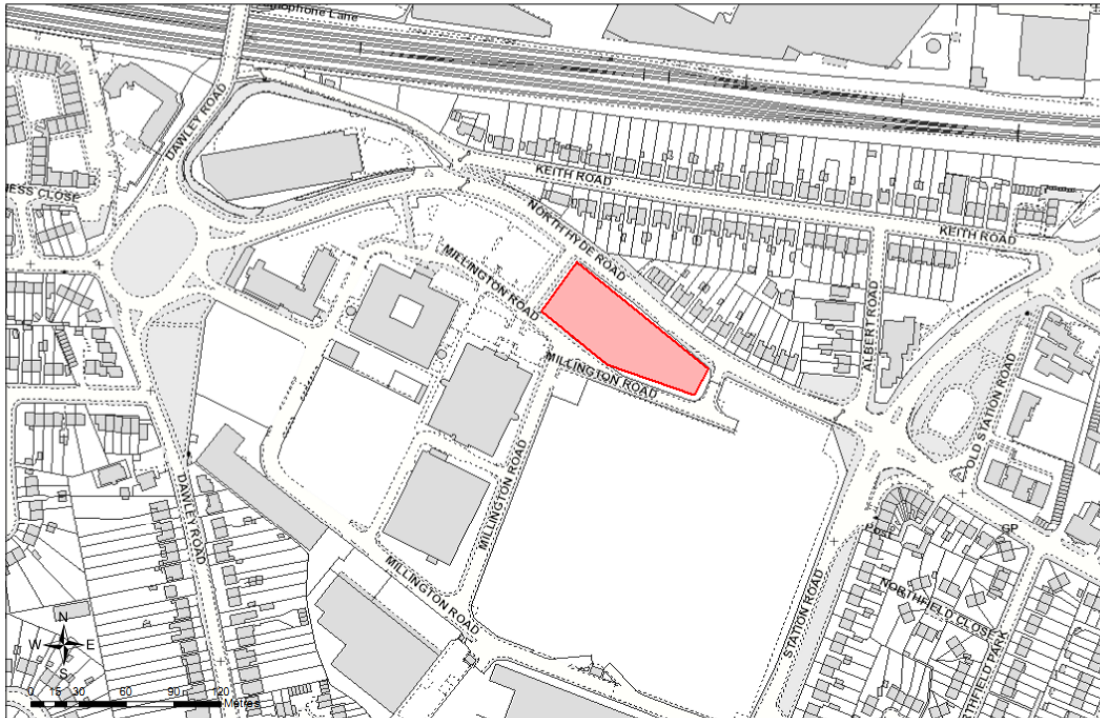


Ward(s)	Botwell
Location	On north side of Nestles Avenue with main entrance in North Hyde Gardens
Existing Use	B2 General Industry
Designation	London Plan - part of the Hayes Industrial Area Preferred Industrial Location (PIL) UDP – part of Nestle Avenue / Bulls Bridge Industrial and Business Area
Area (ha/sqm)	12 Ha
PTAL Ratings	PTAL Score 2
Ownership if known	Nestles UK
Call for Sites response received	<p>The existing factory employs approximately 200 people and is due to close in 2014 and following decommissioning, become available for development in 2015. The owners propose that this could entail a mix of uses and activities which could include:</p> <ul style="list-style-type: none"> • Housing, office and/or hotels at those parts on the site which are in closest proximity to the Crossrail station. These uses could extend along the Grand Union Canal in response to the call in the Part 1 Hillingdon Local Plan for residential-led mixed use redevelopment along the canal corridor in Hayes. • Employment units (likely to be biased towards logistics and distribution) towards the eastern zones of the site in recognition of the need to consolidate the economic role of the Hayes/West Drayton Corridor. <p>The whole of the site was designated as the Botwell Nestles Conservation Area (a heritage asset as defined by PPS5) on 19th June 1988. The basis for the designation was its history and in particular, the quality and interest of its early twentieth century factory buildings. As stated in PPS5, and as required by Council policy BE4, there is a presumption in</p>

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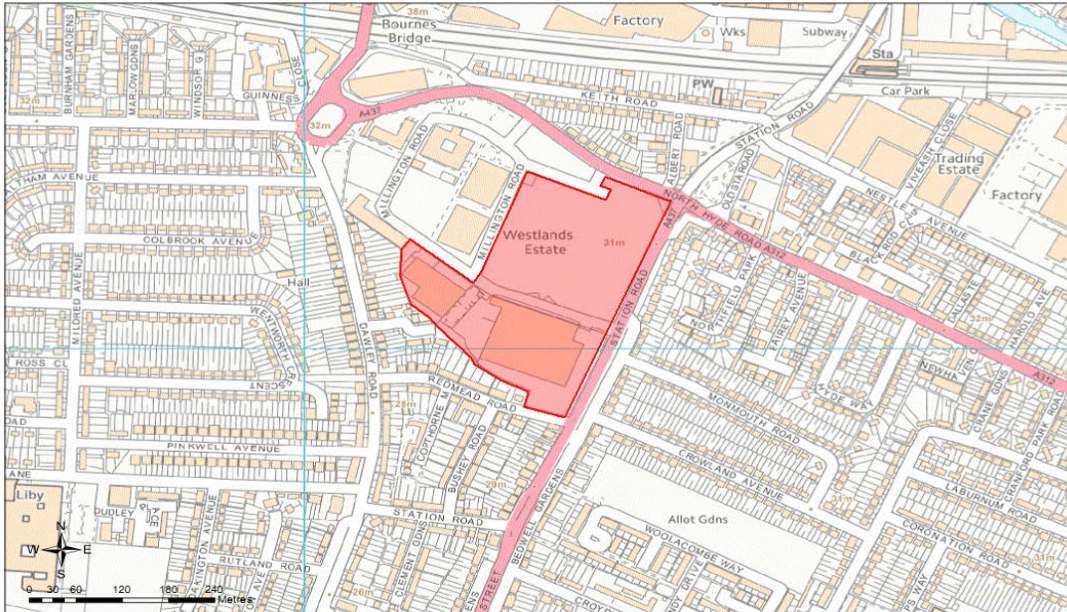
	favour of the conservation of buildings that make a positive contribution to the character or appearance of conservation areas.
Officer Response	The mixed use redevelopment of this site and the adjoining land south of Hayes & Harlington Station is proposed by the Council in its draft Proposed Site Allocations and Designations at policy SA 10.

30. Hyde Park Hayes, Millington Road, Hayes



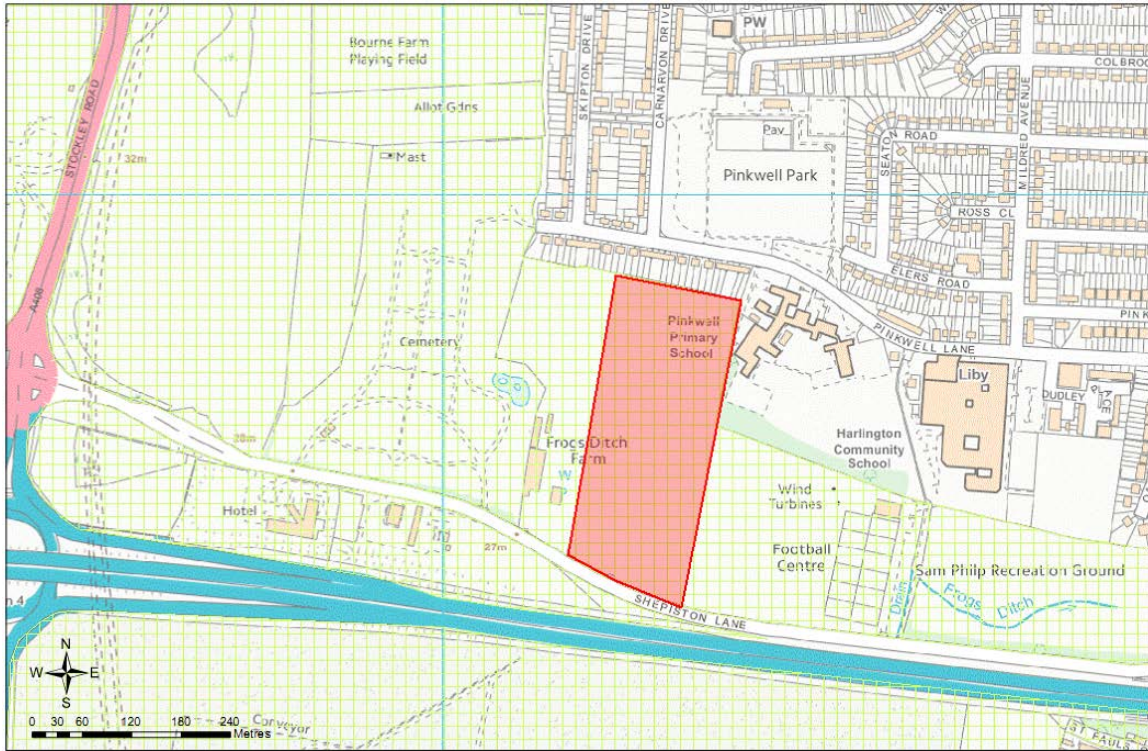
Ward(s)	Pinkwell
Location	Millington Road, Hayes
Existing Use	Vacant site
Area (ha/sqm)	0.4 ha
PTAL Ratings	PTAL Score 4
Ownership if known	HPH A Ltd
Call for Sites response received	Site forms part of an on-going scheme for the Hyde Park Hayes campus. The respondents propose redeveloping the site with B1a office space within two office buildings. The site previously accommodated a pre-war office building, Mercury House. Other possible uses for the site could be 'amenity' or 'service' such as small scale retail, an hotel or a gym. The site should be confirmed as a development site appropriate for employment generating uses (not restricted to B Class uses).
Officer Response	The Council would only support an employment-led redevelopment of the site, appropriate to its current designation as a Locally Significant Employment Site. It would oppose any scheme where other elements – such as retailing – took precedence in a location which remains outside the designated town centre.

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31. Unit 3 Site, Westland Industrial Estate, Millington Road, Hayes



Ward(s)	Pinkwell
Location	Millington Road, Hayes
Existing Use	
Area (ha/sqm)	4.8 Ha
Designation	Strategic Employment Land
PTAL Ratings	PTAL Score 4
Ownership if known	
Call for Sites response received	<p>Given the change in circumstances following the November 2012 appeal decision, it is no longer appropriate to designate the site as strategically employment land important as:</p> <ul style="list-style-type: none"> - It is separated from the main areas of strategically important industrial land in Hayes to the north of the canal and railway. - At 4.8 ha in size it is too small to be considered important strategically. - Its future use is compromised by the proximity of residential and office developments which would affect the range of possible B Class Uses which could locate there.
Officer Response	<p>The Council considers the remainder of 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.</p>

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32. Frog's Ditch Farm, Shepiston Lane, Harlington



Map Notes

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(Light hatching shows Green Belt land)

Ward(s)	Pinkwell
Location	Frog's Ditch Farm, Shepiston Lane, Harlington
Existing Use	Agricultural
Designation	Green Belt
Area (ha/sqm)	5.48 ha
PTAL Ratings	PTAL Score 1b
Ownership if known	Cemex UK Properties
Call for Sites response received	Would be interested in bringing this site to market if the current Green Belt restrictions were removed. Would prefer residential development; alternatively, the site could be used for an extension to Harlington Community School.
Officer Response	The Council does not support the de-designation of Green Belt land and is proposing a series of site allocations elsewhere which have identified potential capacity to meet its housing delivery targets up to 2021.

33. Duval House and Car Park, Harmondsworth



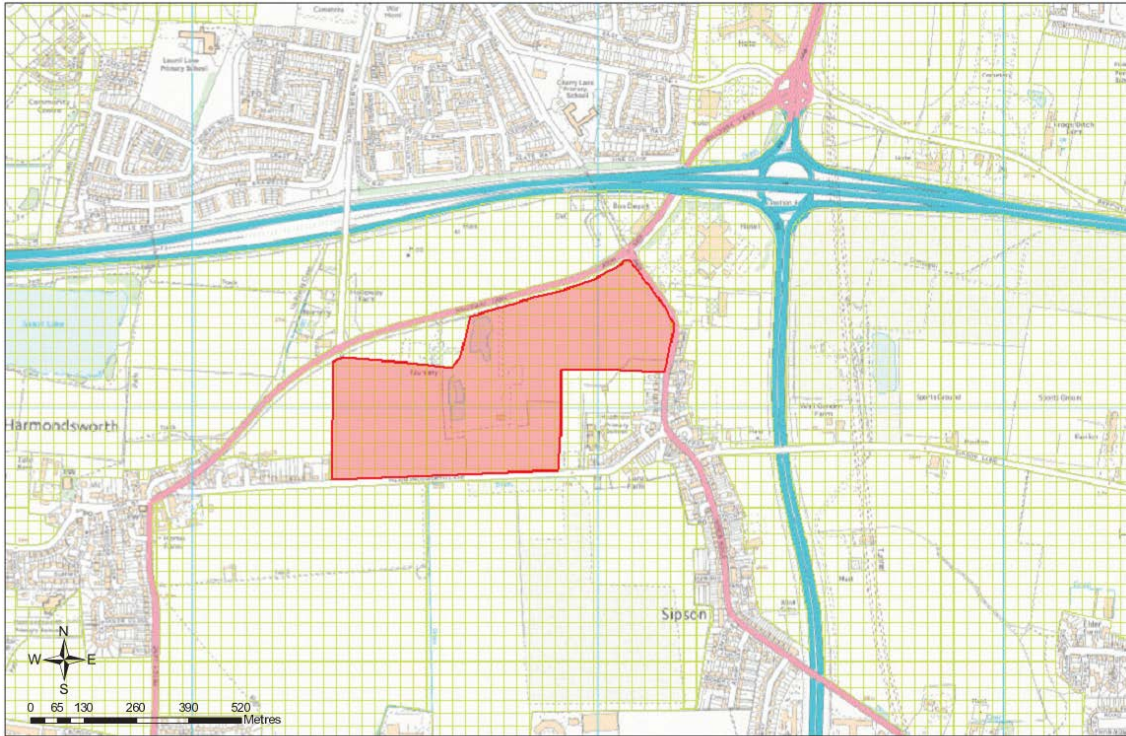
Map Notes

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(Light hatching shows Green Belt land)

Ward(s)	Heathrow Villages
Location	At eastern end of High Street, Harmondsworth on north side at junction with Harmondsworth Lane and Meadowlea Close
Existing Use	Office building with car park to rear
Designation	Green Belt (north part of site)
Area (ha/sqm)	0.2 Ha
PTAL Ratings	PTAL Score 1b
Ownership if known	La Salle Investment Management
Call for Sites response received	<p>The UDP Proposals Map was adopted in 1998, prior to the construction of Duval House. The existing building is not shown and the car park is identified as a field within the Green Belt. As the car park is tarmaced and defined by boundary walling and planting, it is not open in character and is visually distinct from the adjacent Green Belt to the North.</p> <p>The existing lease is set to expire in September 2016; the property is not situated within a recognised office location and the owner's knowledge of the local office market is that it will be very difficult to re-let the building, indeed it is unlikely to be viable to do so.</p>
Officer Response	The Council would support de-designation of the rear car park as Green Belt in order to permit a residential redevelopment of this site. Development of the full site would be fully within the overall built envelope of the village.

34. Holloway Lane Quarry, Sipson



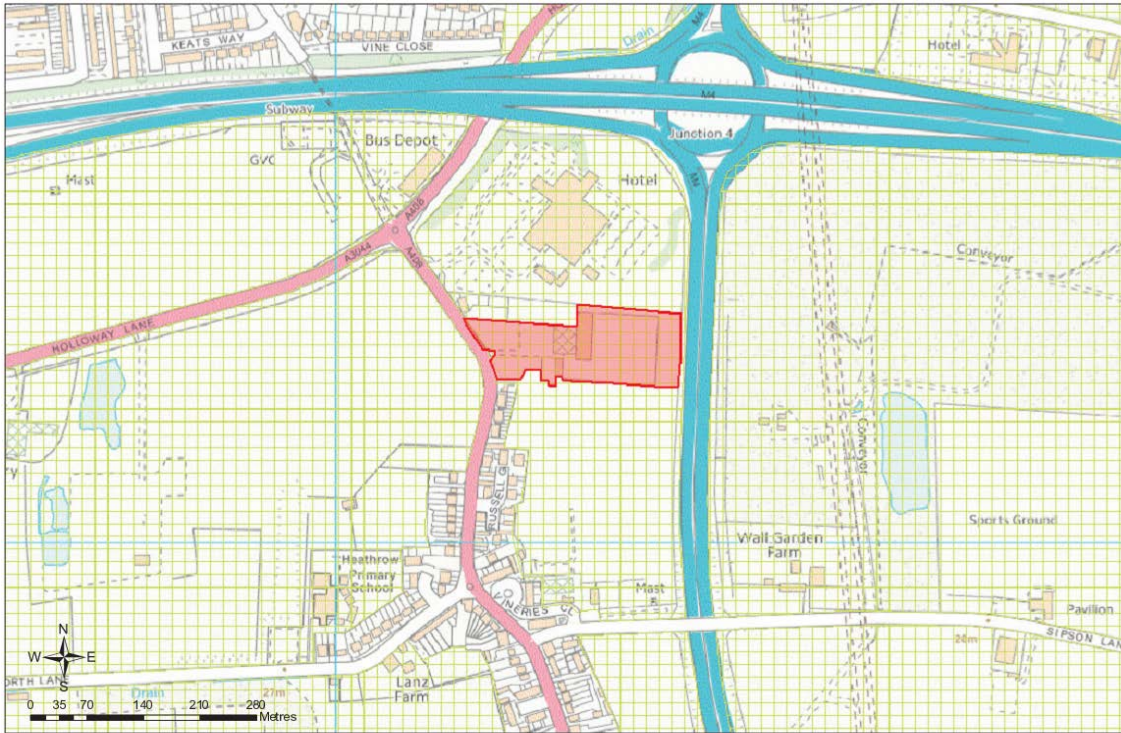
Map Notes

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(Light hatching shows Green Belt land)

Ward(s)	Heathrow Villages
Location	Former mineral extraction site between Holloway Lane (A3044) to the north and Harmondsworth Lane to the south
Existing Use	The site is currently in use as a waste Material Recovery Facility (MRF), operated by Iver Recycling.
Designation	Green Belt
Area (ha/sqm)	
PTAL Ratings	PTAL Score 1b
Ownership if known	SITA UK
Call for Sites response received	The Materials Recovery Facility has been in operation since 2001 when Planning Permission 43155/APP/2000/2598 was granted.
Officer Response	Not accepted – the objective of the original permission was that this site should ultimately be returned to agricultural use.

35. Former Sipson Garden Centre, Sipson Road, Sipson



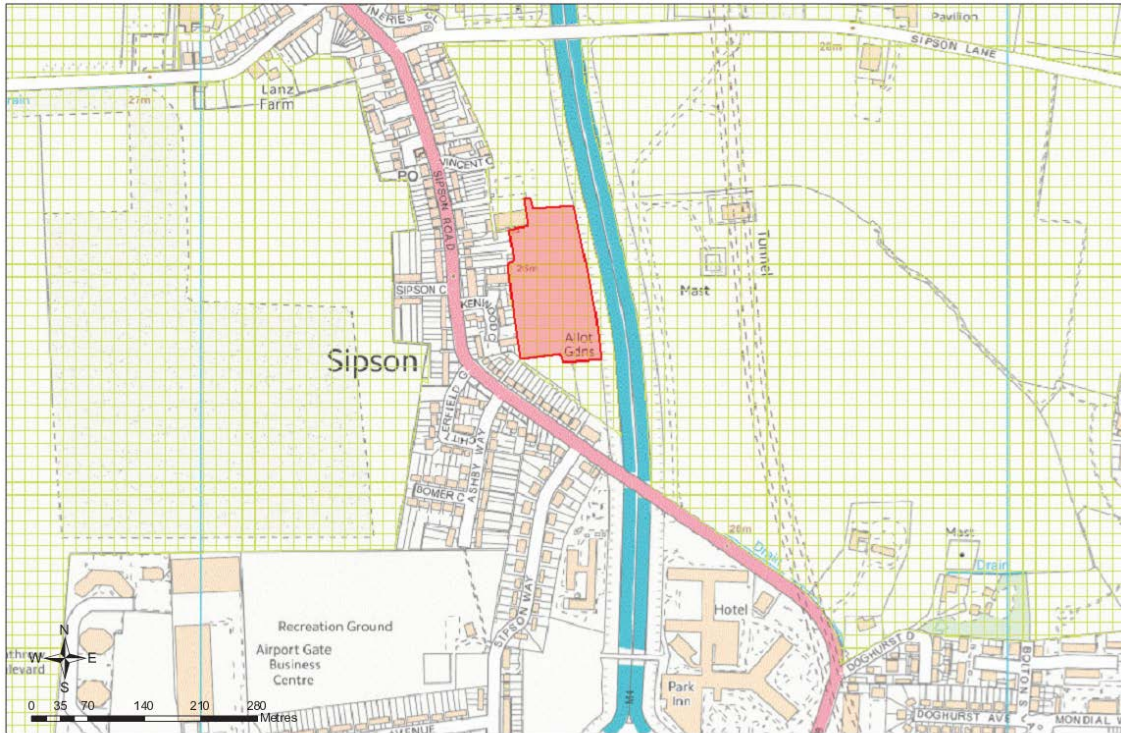
Map Notes

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(Light hatching shows Green Belt land)

Ward(s)	Heathrow Villages
Location	Former Sipson Garden Centre, Sipson Road, Sipson
Existing Use	Vacant – former garden centre
Designation	Green Belt
Area (ha/sqm)	6.88 ha
PTAL Ratings	PTAL Score 1a
Ownership if known	Privately owned by Messrs. Ward and Hungerford
Call for Sites response received	Transition Heathrow propose a market gardening venture with aspirations to purchase the land for community ownership through a land trust.
Officer Response	The Council does not support the de-designation of Green Belt land. It would support the re-use of this site by an activity appropriate to a Green Belt location (as per the advice at paragraphs 89-90 in the National Planning Policy Framework).

36. Land adjacent to Kenwood Close, Sipson



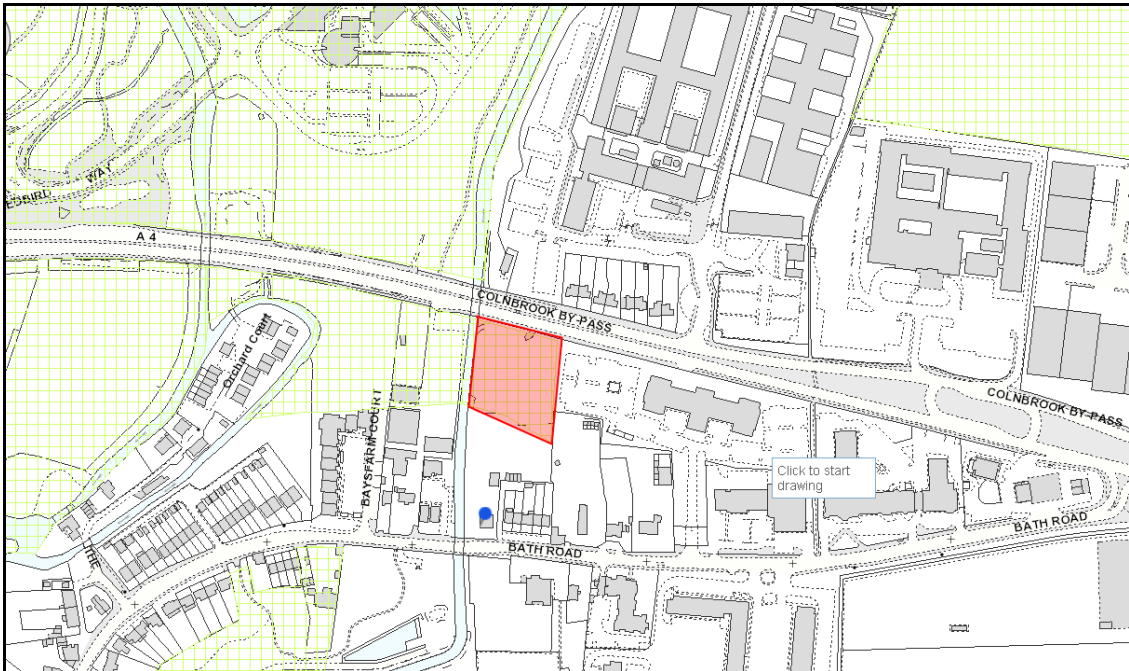
Map Notes

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(Light hatching shows Green Belt land)

Ward(s)	Heathrow Villages
Location	Adjacent to Kenwood Close, Sipson
Existing Use	Agricultural grazing land
Designation	Green Belt
Area (ha/sqm)	1.65 ha
PTAL Ratings	PTAL Score 1b
Ownership if known	Privately owned by Mr. S.Punni
Call for Sites response received	Develop site with Affordable Housing – 33 houses – which would constitute very special circumstances to allow de-designation of Green Belt
Officer Response	Support a continuation of the existing use which is appropriate in the Green Belt. The Council does not support the de-designation of Green Belt land and is proposing a series of site allocations elsewhere which have identified potential capacity to meet its housing delivery targets up to 2021.

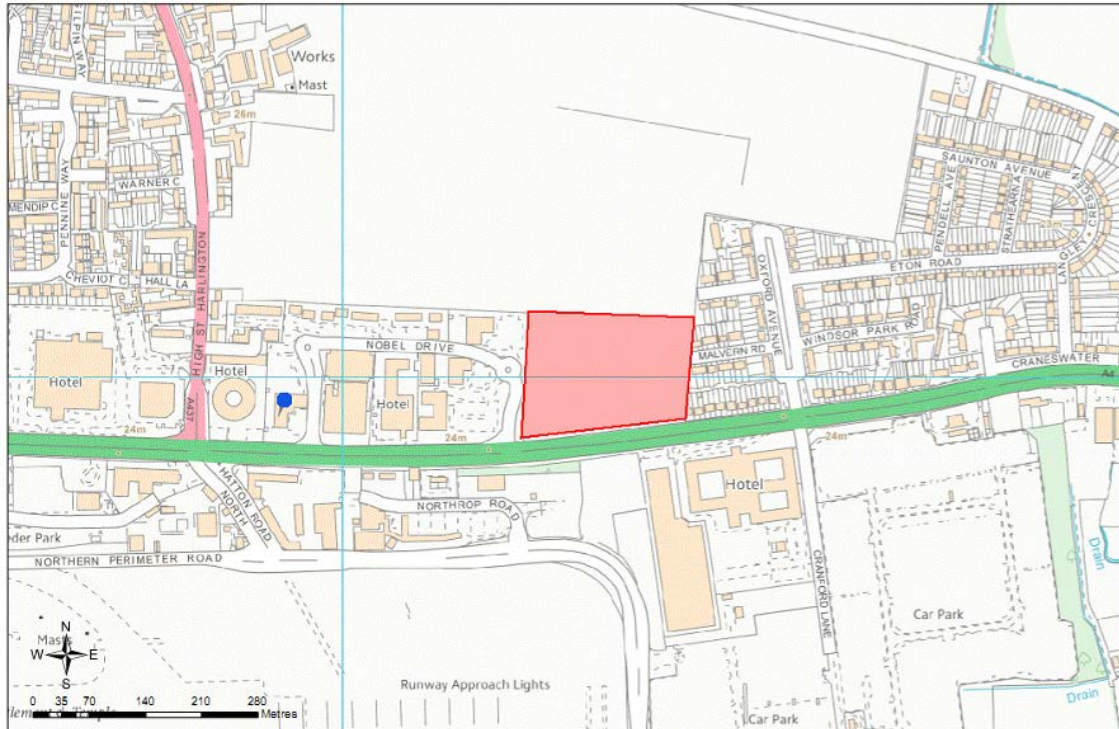
37. Land at rear of 460 - 470 Bath Road, Longford



(Light hatching shows Green Belt land)

Ward(s)	Heathrow Villages
Location	Rear of 460-470 Bath Road, Longford
Existing Use	Vacant site
Designation	Green Belt
Area (ha/sqm)	0.35 ha
PTAL Ratings	PTAL Score 1b
Additional Information	Council is proposing de-designation
Ownership if known	Rokeby Developments (Southern) Ltd & Ilos Holdings Ltd
Call for Sites response received	The respondents consider that as this site adjoins one with outstanding planning permission for a hotel development, it would be logical to permit development here as well to provide additional hotel capacity in an area close to Heathrow Airport.
Officer Response	Support the de-designation as this site is isolated from the main Green Belt area and effectively does not serve an identified Green Belt function. The land is not an existing designated employment site and might be appropriate for a range of uses apart from a hotel, including residential redevelopment. It is included as a proposed Green Belt deletion in the Draft Proposed Site Allocations and Designations.

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38. Land at Bath Road, between Nobel Drive and Malvern Road



Map Notes

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(Light hatching shows Green Belt land)

Ward(s)	Heathrow Villages
Location	Land between Nobel Drive and Malvern Road
Existing Use	Vacant – former mineral working site now restored
Designation	Green Belt
Area (ha/sqm)	Approximately 3.0 ha
PTAL Ratings	PTAL Score 3
Ownership if known	Henry Streeter Automotive Limited
Call for Sites response received	Proposed hotel development
Officer Response	The Council does not support the de-designation of Green Belt land and is opposed to its redevelopment for uses which would be inappropriate in the Green Belt.

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