



HILLINGDON
LONDON



Council

To all Members of the Council

Date: THURSDAY, 8 SEPTEMBER
2011

Time: 7.30 PM

Venue: COUNCIL CHAMBER -
CIVIC CENTRE, HIGH
STREET, UXBRIDGE UB8
1UW

**Meeting
Details:** Members of the Public and
Press are welcome to attend
this meeting

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Agenda

Prayers

To be said by Father Philip Blandford

- 1 Apologies for Absence
- 2 Minutes 1 - 10
To receive the minutes of the meeting held on 7 July 2011 (*attached*)
- 3 Declarations of Interest
To note any declarations of interest in any matter before the Council
- 4 Mayor's Announcements
- 5 Report of the Head of Democratic Services 11 - 12
- 6 Hillingdon Local Development Framework: Pre-Submission Draft Core Strategy 13 - 574
To consider a recommendation from Cabinet for submission of the draft Core Strategy to the Secretary of State.
- 7 Hillingdon Children and Families Trust Plan 2011-14 575 - 598
To consider a recommendation from Cabinet for the adoption of the Plan (*attached*)
- 8 Members' Questions 599 - 600
To take questions submitted by Members in accordance with Council Procedure Rule 11
- 9 Motions 601 - 602
To consider Motions submitted by Members in accordance with Council Procedure Rule 12

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Agenda Item 2



HILLINGDON
LONDON

Minutes

COUNCIL

7 July 2011

Meeting held at Council Chamber - Civic Centre, High Street, Uxbridge UB8 1UW

Councillor Mary O'Connor (Mayor)
Councillor Michael Markham (Deputy Mayor)

	<p>MEMBERS PRESENT:</p> <p>Councillors: David Allam Janet Duncan Richard Lewis Lynne Allen Beulah East John Major Bruce Baker Neil Fye Carol Melvin Tim Barker Janet Gardner Douglas Mills Richard Barnes Sid Garg (in part) Richard Mills Josephine Barrett Roshan Ghei John Morgan David Benson (in part) Dominic Gilham June Nelson Jonathan Bianco Raymond Graham Susan O'Brien Lindsay Bliss Paul Harmsworth David Payne Sukhpal Brar (in part) Shirley Harper-O'Neill Ray Puddifoot Wayne Bridges John Hensley Andrew Retter Mike Bull Henry Higgins John Riley Keith Burrows Patricia Jackson David Routledge Paul Buttivant Phoday Jarjussey Avtar Sandhu George Cooper Alan Kauffman Scott Seaman-Digby Judith Cooper Judy Kelly David Simmonds Philip Corthorne Peter Kemp Brian Stead Brian Crowe Mo Khursheed Michael White Peter Curling Kuldeep Lakhmana David Yarrow Catherine Dann Eddie Lavery</p>
	<p>OFFICERS PRESENT: Hugh Dunnachie, Fran Beasley, Jean Palmer, Neil Stubbings, Raj Alagh, Lloyd White, Mark Braddock and Nikki Stubbs</p>
14.	<p>APOLOGIES FOR ABSENCE (<i>Agenda Item 1</i>)</p> <p>Apologies for absence were received from Councillors Dhillon, Jenkins, MacDonald and Sansarpuri.</p>
15.	<p>MINUTES (<i>Agenda Item 2</i>)</p> <p>RESOLVED: That the minutes of the meetings held on 24 February 2011 and 12 May 2011 be agreed as correct records.</p>
16.	<p>DECLARATIONS OF INTEREST (<i>Agenda Item 3</i>)</p> <p>Those present were advised that, with regard to the petition being debated at the Council meeting (Agenda Item 5), Planning Committee Members would not need to declare an interest on the item as it was not a planning matter. However, should the discussion expand to include planning issues, these Members would need to have regard to the issue of pre-determination. Councillor Duncan indicated that, as she was a Member of the Central and South Planning Committee, she would leave the</p>

	<p>room during the consideration of this item.</p> <p>Councillor D Mills declared a personal and prejudicial interest in Agenda Item 9.5 – Motion from Councillor Riley, as the proposed HS2 route was in close proximity to his property, and left the room during the consideration thereof.</p> <p>Councillor R Mills declared a personal and prejudicial interest in Agenda Item 9.5 – Motion from Councillor Riley, as he had an interest in a property that would be affected by the proposed HS2 route, and left the room during the consideration thereof.</p> <p>Councillor Jarjussey declared a personal interest in Agenda Item 9.4 – Motion from Councillor Major, as he was on the CNWL Board, and stayed in the room during the consideration thereof.</p>
17.	<p>MAYOR'S ANNOUNCEMENTS (<i>Agenda Item 4</i>)</p> <p>It was with sadness that the Mayor advised those present that Mr Michael Craxton had passed away. Mr Craxton was a former Mayor and had been a Ward Councillor in Belmore Ward between 1971 and 1978 and in Charville Ward from 1986 to 2002. Former Councillor, Mr Bernie Franklin, had also passed away. Mr Franklin had been a Ward Councillor in Yeading from 1986 to 1990. Those present stood for a minute's silence.</p> <p>The Mayor announced that, since the last Council meeting on 12 May 2011, she and her representatives had attended 164 events, the majority of which had been in the Borough.</p> <p>It was noted that the Mayor's charities had recently been launched. The Mayor thanked those who had attended and supported the event which contributed to an increased awareness of the importance of mental health.</p>
18.	<p>PETITION REQUIRING COUNCIL DEBATE (<i>Agenda Item 5</i>)</p> <p>The petition organiser, Mr Dhillon, had submitted a petition with more than 2,500 signatories for Council debate. He spoke in support of the petition which was in relation to the future of the former Hayes Library site. It was noted that a further petition on this matter had been considered by Councillor Bianco, Cabinet Member for Finance, Property and Business Services at a Petition Hearing on 6 July 2011.</p> <p>Councillor Puddifoot moved the motion which was tabled at the meeting. This was seconded by Councillor Bianco. Following debate (Councillors Allen, Jarjussey and Khursheed), the motion was put to the vote and agreed.</p> <p>RESOLVED: That this Council notes that Cabinet will request, in writing, the individual views of the Ward Councillors for Botwell and Townfield Wards, together with the views of the MP for Hayes and Harlington on:</p> <ol style="list-style-type: none"> 1. Whether they feel that the former Golden Crescent Library would be suitable by nature of the building and its location for use by a religious group. 2. Whether they support the petitioners' request that the building be sold to the Ramgarhia Sikh Association Hayes. 3. Whether the building should be placed on the open market to allow other interested parties to bid.

	<p>4. Whether they feel that in this case, the need for use by a religious group should take precedence over the need for local housing, private or supported.</p> <p>Responses are requested within one month of today's date.</p> <p>Subject to receiving, in the opinion of the Leader of the Council and the Cabinet Member for Finance, Property and Business Services, reasoned individual responses, Cabinet will reconsider this matter.</p> <p>If all responses are not received or are inadequate or incomplete, the Cabinet decision of 14 April 2011 will stand.</p>
19.	<p>AUDIT COMMITTEE ANNUAL REPORT (<i>Agenda Item 6</i>)</p> <p>It was noted that there was a typographical error in paragraph 7.4 – the Head of Audit had assumed responsibility for the Housing Benefit Fraud Team in October 2010. Councillor G Cooper moved the recommendation as set out on the Order of Business. This was seconded by Councillor Bianco. The motion was put to the vote and agreed.</p> <p>RESOLVED: That the annual report be noted.</p>
20.	<p>REPORT OF THE HEAD OF DEMOCRATIC SERVICES (<i>Agenda Item 7</i>)</p> <p>i) MEMBERSHIP OF COUNCIL COMMITTEES 2011/12</p> <p>Councillor G Cooper moved the recommendations as set out on the Order of Business. This was seconded by Councillor White.</p> <p>RESOLVED: That:</p> <ol style="list-style-type: none"> 1. Councillor Morgan be appointed to the External Services Scrutiny Committee as a replacement for Councillor R Mills; and 2. Councillor Fyfe be appointed to the Central and South Planning Committee as a replacement for Councillor Buttivant. <p>(ii) MEMBERSHIP OF OUTSIDE BODIES</p> <p>Councillor G Cooper moved the recommendation as set out below. This was seconded by Councillor White.</p> <p>RESOLVED: That Councillors Melvin and Riley be appointed to the Corporate Parenting Group as a replacement for Councillor Kelly and to an additional post.</p>
21.	<p>MEMBERS' QUESTIONS (<i>Agenda Item 8</i>)</p> <p>8.1 QUESTION SUBMITTED BY COUNCILLOR RETTER TO THE CABINET MEMBER FOR EDUCATION AND CHILDRENS' SERVICES – COUNCILLOR SIMMONDS</p> <p>"Does the Cabinet Member responsible for education matters share my appreciation of those teaching staff who chose to work on 30 June, rather than striking, despite</p>

ongoing negotiations with government over the future arrangements for the Teachers' Pension Scheme?"

Councillor Simmonds responded that it was a shame that a small number of unions had chosen to go on strike when negotiations around teachers' pensions were ongoing with the Government. Only a small number of schools across the Borough had closed during the strike and Councillor Simmonds was appreciative for those staff that chose to work and for the support that parents had provided in some areas to ensure that the majority of schools remained open. He stated that this illustrated the Council's commitment to putting its residents first.

Councillor Retter, by way of a supplementary question, asked what future arrangements could be put in place to enable parents to keep schools open if this situation were to reoccur.

Councillor Simmonds responded that there were already many volunteers that were involved with schools and that, subject to adhering to the rules, he would support the suggestion for more parents to get involved.

8.2 QUESTION SUBMITTED BY COUNCILLOR DHILLON TO THE CABINET MEMBER FOR PLANNING, TRANSPORTATION AND RECYCLING – COUNCILLOR BURROWS

"Can the Cabinet Member for Planning, Transportation and Recycling tell us what the position is regarding Stockley and Uxbridge Golf Courses in respect of filling, overfilling and remedial works?"

As Councillor Dhillon was unable to attend the meeting, Councillor Khursheed posed the question on his behalf. Councillor Burrows responded that, when considering the two golf courses, it must be borne in mind that Uxbridge Golf Course formed part of the Colne Valley and the Green Belt and had a natural landscape form. Whereas, Stockley Park Golf Course was a former landfill site which had a landform created by soil being deposited on the site when the golf course was created approximately 20 years ago.

The Council had sought, in accordance with its adopted planning policies, to protect the amenity offered by Uxbridge Golf Course from what it had considered to be harmful remodelling operations which, if approved, would have involved extensive tipping operations. This had resulted in one dismissed appeal and another appeal which was yet to be decided.

Councillor Burrows advised that the gas line re-instatement works that had occurred this year at Uxbridge Golf Course had not involved anything other than very limited top soil being brought to the site which was required as part of the re-instatement works.

With regard to Stockley Park Golf course, it was well known that a former operator had obtained planning permission for remodelling works. This planning permission had then been breached and immediate enforcement action taken which had stopped unauthorised tipping. However, the golf course operator then went out of business and the new golf course operator had indicated a willingness to work with the Council to address the previous operators tipping issues. The new operator was advised by Council officers that, given the artificial nature of both the old and new landforms at the golf course, a landscape led approach of new tree planting should be adopted.

The key planning issue that needed to be addressed at the Stockley Park Golf Course was the lack of tree planting over the area subject to filling works. This approach was supported in discussions that Council officers had with the Environment Agency (EA). Officers had been advised that there was no benefit in moving newly deposited earth material around the golf course and that the EA was happy that the deposited material was not adversely affecting watercourses. It was noted that, due to the way the club was run by the new operator, Stockley Park Golf Course had seen a large increase in membership in recent months.

A planning application was lodged at the start of this year but had not yet been considered by the Planning Committee as the Environment Agency had asked that leachate issues be fully investigated before the Council determined the planning application (*leachate is any liquid that, in passing through matter, extracts solutes, suspended solids or any other component of the material through which it has passed*). There had always been leachate issues at the golf course and Council officers had extensive experience of these issues at the golf course. The course had been subject to leachate monitoring since it opened, hence officers knew that this was not a problem. Nonetheless, until relevant technical reports were signed off by the Environment Agency, the planning application would not be considered by the Planning Committee.

Councillor Khursheed, by way of a supplementary question, asked what the financial cost would be to local Council Tax payers.

Councillor Burrows advised that he would forward a response to this supplementary question to Councillors Khursheed and Dhillon and ensure that it was appended to the minutes of the meeting.

WRITTEN RESPONSE TO THE SUPPLEMENTARY QUESTION FROM COUNCILLOR BURROWS:

Councillor Burrows advised that National Grid's pipeline works affected 4 golf holes at Uxbridge Golf Course and that National Grid had paid money to Mack Trading to restore the golf course. At Stockley Park Golf Course, the new operator had submitted a planning application for restoration works to the Golf Course. It was the new operator's (Cube/Picasso) intention to carry out the proposed works at its own expense.

Following the deposition of material by the previous operator at the Golf Course, Councillor Burrows stated that the Council had subsequently engaged external consultants to both survey the changes to the Golf Course and to undertake detailed soil analysis testing (the soil testing was comprehensive and it had not identified any hazardous material that would require removal from the Golf Course). The total cost of all work completed by the consultants was approximately £15k including VAT.

22. **MOTIONS** (Agenda Item 9)

9.5 MOTION FROM COUNCILLOR RILEY

Councillor Riley moved the following motion:

“That this Council welcomes the Mayor of London's support for our argument that the proposed HS2 route through this Borough will cause significant environmental and

social disadvantages and that Hillingdon residents gain no benefit from HS2.

Furthermore, Council asks Cabinet, in its formal reply to the Department of Transport consultation on HS2, to highlight the weakness of the current business case for HS2 and the fact that the cost will, as a minimum, be equal to £51m for each constituency.

Council therefore reaffirms its full opposition to HS2 and its strong support of the creation of "Hillingdon Against HS2" by local residents and the formation of the 51M group of local authorities."

The motion was seconded by Councillor Crowe. Following debate (Councillor Simmonds), Councillor Harmsworth moved an amendment as follows:

2nd paragraph: to delete everything after "...on HS2, to highlight..." and add:

"the alternative provision of following the existing track into Euston before going underground and coming up at Waterloo which would allow trains from all over Southern England to pass through London directly to the North whilst massively increasing the capacity of both stations. The problems of existing plans to have HS2 loop into W. London is then resolved by having an interchange between Crossrail One at Tottenham Court Road for Heathrow with the trains running between Euston and Waterloo. This will have the additional benefits of an extra 25 trains per hour and none of the disruption to communities along the length of the existing proposals."

3rd paragraph: to add the words "as currently proposed" after "...its full opposition to HS2..." so that it read:

"Council therefore reaffirms its full opposition to HS2 as currently proposed and its strong support of the creation of "Hillingdon Against HS2" by local residents and the formation of the 51M group of local authorities."

The amended motion was seconded by Councillor Curling. Following debate (Councillors Barnes, Crowe and Puddifoot), the amendment was put to the vote and lost. Following further debate (Burrows, Kauffman, O'Brien and Puddifoot), the original motion was put to the vote and unanimously agreed.

RESOLVED: That this Council welcomes the Mayor of London's support for our argument that the proposed HS2 route through this Borough will cause significant environmental and social disadvantages and that Hillingdon residents gain no benefit from HS2.

Furthermore, Council asks Cabinet, in its formal reply to the Department of Transport consultation on HS2, to highlight the weakness of the current business case for HS2 and the fact that the cost will, as a minimum, be equal to £51m for each constituency.

Council therefore reaffirms its full opposition to HS2 and its strong support of the creation of "Hillingdon Against HS2" by local residents and the formation of the 51M group of local authorities.

9.1 MOTION FROM COUNCILLOR DUNCAN

Councillor Duncan moved the following motion:

“That this Council is committed to preserving Hillingdon’s Green Belt and open spaces and upgrading them wherever possible. It is with concern therefore that we note paragraph 9.45 of the Pre-Submission Core Strategy stating:

“The Council recognises that the capacity of existing school sites is becoming increasingly limited and that these exceptional circumstances may necessitate the release of greenfield sites through the production of the Site Allocations DPD.”

Should it become accepted policy to allow school development on greenfield sites it will start the erosion of the Borough’s green areas.

There is a large amount of land proposed for release from industrial and commercial use and other land within the developed area available for development. Cabinet is urged to particularly examine this paragraph with a view to identifying school sites within the developed area as soon as possible in order to give confidence that there will be sufficient school places for Hillingdon children and that this will not be done at the expense of our greenfield heritage.”

The motion was seconded by Councillor East. Following debate (Councillors D Mills, Puddifoot, Simmonds and Yarrow) the motion was put to the vote and lost.

9.3 MOTION FROM COUNCILLOR PUDDIFOOT

Councillor Puddifoot moved the following motion:

“That this Council notes the contents of the Localism Bill concerning the abolition of the current ethical regime and the opportunity afforded to local Councils to adopt their own Members’ Code of Conduct. Council confirms its commitment to maintaining and upholding the highest standards of moral and ethical behaviour amongst elected Members.

Council recognises the important role that political parties have to play in ensuring these standards are maintained but acknowledges that the primary responsibility in respect of their public office lies with the Council of which they are a member, as political parties may not be able to act expeditiously when an issue arises.

Council notes the work currently being undertaken by the Standards Committee in this regard and expresses its desire to ensure that, when a new local Code is proposed for adoption by the Committee, anomalies in the current Code are rectified, such as ensuring the Code may apply to Members when they are acting in their private capacity and that behaviour which results in an official police caution (as opposed to a criminal conviction) may be considered as a potential breach of the Code.”

The motion was seconded by Councillor Khursheed. Following debate (Councillors Corthorne and Harmsworth), the motion was put to a recorded vote.

Those voting for: The Mayor (Councillor O’Connor), the Deputy Mayor (Councillor Markham), Councillors Allam, Allen, Baker, Barker, Barnes, Barrett, Benson, Bianco, Bliss, Brar, Bridges, Bull, Burrows, Buttivant, G Cooper, J Cooper, Corthorne, Crowe, Curling, Dann, Duncan, East, Fyfe, Gardner, Ghei, Gilham, Graham, Harmsworth, Harper-O’Neill, Hensley, Higgins, Jackson, Jarjussey, Kauffman, Kelly, Kemp, Khursheed, Lakhmana, Lavery, Lewis, Major, Melvin, D Mills, R Mills, Morgan, Nelson, O’Brien, Payne, Puddifoot, Retter, Riley, Routledge, Sandhu, Seaman-Digby, Simmonds, Stead, White and Yarrow.

Those voting against: None.

Those abstaining: None.

RESOLVED: That this Council notes the contents of the Localism Bill concerning the abolition of the current ethical regime and the opportunity afforded to local Councils to adopt their own Members' Code of Conduct. Council confirms its commitment to maintaining and upholding the highest standards of moral and ethical behaviour amongst elected Members.

Council recognises the important role that political parties have to play in ensuring these standards are maintained but acknowledges that the primary responsibility in respect of their public office lies with the Council of which they are a member, as political parties may not be able to act expeditiously when an issue arises.

Council notes the work currently being undertaken by the Standards Committee in this regard and expresses its desire to ensure that, when a new local Code is proposed for adoption by the Committee, anomalies in the current Code are rectified, such as ensuring the Code may apply to Members when they are acting in their private capacity and that behaviour which results in an official police caution (as opposed to a criminal conviction) may be considered as a potential breach of the Code.

9.2 MOTION FROM COUNCILLOR CURLING

Councillor Curling moved the following motion:

"That this Council notes the recent guidelines from the Government regarding Local Councils' being encouraged not to use tax payers money to produce newspapers and similar publications.

Council therefore requests that Cabinet review the Council's corporate communications strategy and shows its commitment to put residents first by ceasing the publication of "Hillingdon People" and the in-house staff publication "Team Hillingdon".

The motion was seconded by Councillor Khursheed. Councillor Seaman-Digby moved the following amendment:

2nd paragraph: delete and replace with:

'That this Council notes the recent Cabinet decision on this matter and congratulates officers on the efficiencies made to the Communications service, saving in excess of £550k from staff restructuring, realigning the service to better meet corporate objectives and reducing the volumes of printed material across the Council. Furthermore, the recent residents' survey results showed that 70% of residents feel well informed by the Council and gave the award winning Hillingdon People as their preferred choice of media for finding out about Council services.'

The amended motion was seconded by Councillor R Mills. Following debate (Councillors Barnes, Curling and Harmsworth), the amendment was put to the vote and agreed. The substantive motion was then put to the vote and agreed.

RESOLVED: That this Council notes the recent guidelines from the Government regarding Local Councils' being encouraged not to use tax payers money to produce newspapers and similar publications.

The Council also notes the recent Cabinet decision on this matter and congratulates officers on the efficiencies made to the Communications service, saving in excess of £550k from staff restructuring, realigning the service to better meet corporate objectives and reducing the volumes of printed material across the Council. Furthermore, the recent residents' survey results showed that 70% of residents feel well informed by the Council and gave the award winning Hillingdon People as their preferred choice of media for finding out about Council services.

9.4 MOTION FROM COUNCILLOR MAJOR

Councillor Major moved the following motion:

"That this Council notes that Central and North West London NHS Foundation Trust (CNWL) recently arbitrarily imposed an upper limit of 4 continence pads per patient per day, despite the fact that service users had been assessed as needing 5 or more. This was done without consultation with users or carers or without discussions with statutory partner organisations, such as the Council.

Letters were sent without prior warning to 1,970 users and caused considerable dismay amongst carers, many of whom survive at little above crisis level on a day to day basis. Arbitrary actions such as this can cause families whose plight is constantly at a critical level to go into crisis and in such a way to impact on other agencies such as the Council.

We therefore ask officers of the Council to enter into discussion with officers of CNWL to formulate protocols so that such decisions are never again taken in isolation or without consultation. These protocols should include referring such instances to the Council's External Services Scrutiny Committee."

The motion was seconded by Councillor Lakhmana. Following debate (Councillors Allen, Baker, Corthorne and Jarjussey), the motion was put to a recorded vote.

Those voting for: Councillors Allam, Allen, Bliss, Curling, Duncan, East, Gardner, Ghei, Harmsworth, Jarjussey, Khursheed, Lakhmana, Major, Nelson and Sandhu.

Those voting against: The Mayor (Councillor O'Connor), the Deputy Mayor (Councillor Markham), Councillors Baker, Barker, Barnes, Barrett, Benson, Bianco, Brar, Bridges, Bull, Burrows, Buttivant, G Cooper, J Cooper, Corthorne, Crowe, Dann, Fyfe, Gilham, Graham, Harper-O'Neill, Hensley, Higgins, Jackson, Kauffman, Kelly, Kemp, Lavery, Lewis, Melvin, D Mills, R Mills, Morgan, O'Brien, Payne, Puddifoot, Retter, Riley, Routledge, Seaman-Digby, Simmonds, Stead, White and Yarrow.

Those abstaining: None.

The motion was lost.

The meeting, which commenced at 7.30 pm, closed at 9.58 pm.

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REPORT OF THE HEAD OF DEMOCRATIC SERVICES

(i) URGENT IMPLEMENTATION OF DECISIONS

RECOMMENDATION: That the Urgency decisions detailed below be noted.

Information

1. The Constitution allows a Cabinet or Cabinet Member decision to be implemented before the expiry of the 5 day call-in provided there is agreement from the Chairman of the Executive Scrutiny Committee to waive this. All such decisions are to be reported for information only to the full Council.
2. Recently the following decisions have been made using urgency procedures:
 - Decisions by the Cabinet on 20 January 2011 in respect of Parking Fees and Charges and the Primary School Capital Programme;
 - Decisions by the Cabinet on 18 February on proposals to change the first tier management structure of the Council;
 - A decision by the Cabinet Member for Social Services, Health and Housing on 31 March 2011 regarding a single tender for the Direct Payment Support Service;
 - Decisions by the Cabinet on 26 May 2011 in relation to the Primary School Capital Programme;
 - A joint decision by the Leader of the Council and Cabinet Member for Finance, Property and Business Services on 27 May 2011 on the award of a contract for the building of Ruislip High School 6th Form Extension.
 - Decisions by the Cabinet on 28 July 2011 in relation to Hillingdon's response to the Government consultation on High Speed Rail and Extra Care Housing; contract award for the provision of personal care.
 - A decision by the Leader of the Council and Cabinet Members for Finance, Property and Business Services and Co-ordination and Central Services (decision taken on behalf of the above by the Leader of the Council) on 16 August 2011 to accept the tender for procurement of refuse collection vehicles and associated capital releases.

BACKGROUND PAPERS :none

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HILLINGDON LOCAL DEVELOPMENT FRAMEWORK: PRE-SUBMISSION DRAFT CORE STRATEGY

Reporting Officer: Head of Democratic Services

SUMMARY

This report presents the Local Development Framework Pre-Submission Draft as a policy framework document and seeks approval to proceed with arrangements to submit the Draft Core Strategy to the Secretary of State for an Examination in Public, following Cabinet endorsement on 28 July 2011. Submitting the documents to the Secretary of State will enable the Council to make meaningful progress on the Local Development Framework Core Strategy in order to meet targets approved by the Mayor of London in the Council's Local Development Scheme.

The Core Strategy will in due course replace the Unitary Development Plan Saved Policies, 2007. Strategic policies in the Core Strategy are intended to provide a more up-to-date framework to determine planning applications forming a material consideration alongside the Unitary Development Plan and the London Plan, Consolidated with Alterations 2008, and the Replacement London Plan 2009.

The Core Strategy has been drafted to reflect the provisions of the emerging Replacement London Plan on key issues such as housing, employment growth and nature conservation. The version approved by Cabinet in July was prepared soon after publication of the London Plan Examination in Public Panel report in May. It took account of the Panel's recommendations to include:

- 1) an aspirational target for 50% of all new housing in London to be provided as affordable housing; and also
- 2) to include sub regional targets for gypsy and traveller pitch provision across London.

The London Plan was subsequently adopted and published on 22 July 2011. The Mayor chose not to accept these recommendations. Instead the adopted London Plan encourages boroughs to seek to maximise affordable housing provision and sets an overall annual target for London of 13,200 new affordable homes. With regards to gypsy and traveller pitch provision the Mayor expects boroughs to assess the needs of these groups and make appropriate provision in consultation with local communities.

Policies H2 (Affordable Housing) and H3 (Gypsy and Traveller Pitch Provision) in the Core Strategy will need to be further amended in order to reflect the wording that is now contained in the adopted London Plan on these particular issues. Officers intend to propose further amendments in this regard at the Core Strategy Examination in Public. Members should note that if any further amendments are required to the Core Strategy in order to adhere to the terms of the July 2011 London Plan, such amendments will also be put forward by officers at the Examination in Public.

Appendix 3 – the Pre-Submission Draft Core Strategy has been circulated to all Members as part of this agenda.

Appendix 1 (Consultation report), Appendix 2 (schedule of proposed changes) and Appendix 4 (Sustainability Appraisal) are all available as reference copies in Group Offices and available for public inspection and also on the Council's website.

RECOMMENDATION: That the:

- **Local Development Framework Pre-Submission Draft Core Strategy**
- **Schedule of Proposed Changes**
- **Report of Consultations on the Pre-Submission Draft Core Strategy**
- **Consultation Statement for the Consultation Draft Core Strategy and**
- **Final Sustainability Appraisal Report**

be submitted to the Secretary of State for formal examination and that the Deputy Chief Executive, Corporate Director of Planning, Environment, Education & Community Services, in consultation with the Cabinet Member for Planning, Transportation and Recycling, be authorised to make any further minor amendments required during the examination stage.

INFORMATION

The Local Development Framework Core Strategy - Background

1. The Core Strategy is a spatial plan, providing the strategic vision and direction for new development through to 2026. It aligns closely with the Sustainable Community Strategy and conforms to the Mayor of London's London Plan.
2. The drafting of the Core Strategy has taken into account relevant planning legislation, national planning policy statements; on-going advice from the Government Office for London and the Planning Inspectorate, and also from lessons learnt from professional planning bodies and agencies, in particular the Planning Advisory Service (PAS). In summary the Core Strategy has evolved from the following documents:
 - Issues and Options (Spring 2005)
 - Preferred Options (Autumn 2005)
 - Revised Preferred Options (Spring 2007)
 - Consultation Draft (June 2010)
 - Pre-Submission Draft (February 2011)

The Consultation on the Pre Submission Core Strategy

3. At a meeting on 18 November 2010, the Cabinet agreed to approve the Pre-Submission Draft Core Strategy for public consultation and requested that the results of the consultation be reported to a future meeting, which was on 28 July 2011.
4. The detailed arrangements made to involve the public and key stakeholders in consultations on the Draft Core Strategy have followed the approach set out in the Council's Statement of Community Involvement (SCI) adopted in November 2006. The SCI sets out a minimum of six weeks for public consultations for each of the stages in the plan making process. Consultations on the Draft Core Strategy were carried out over a six-week period between 9 February and 25 March, 2011.
5. During this period:
 - Press notices were published in the Hillingdon Leader, Gazette series (all Hillingdon editions) and in the London Gazette on the 9 February.

- Consultation documents were available for viewing and comment at all borough public libraries, the Hayes One Stop Shop, and the Planning Information Services section at the Uxbridge Civic Centre.
 - Public information displays on the Draft Core Strategy were exhibited at Uxbridge Library and at Planning Information Services, Civic Centre, Uxbridge.
 - Six information drop in sessions were held at Ruislip Manor, Uxbridge and Botwell libraries.
 - An article was placed in Hillingdon People in the January 2011 edition and an audio advertisement was placed in Hillingdon talking Newspaper for the visually impaired.
 - The consultation was also advertised on the Council's Website from 9 February.
6. A number of local events and meetings were also attended by officers to raise awareness and encourage discussion about the draft Core Strategy. These included the:
- Youth Council (10 January)
 - West Drayton Town Partnership (12 January)
 - Hillingdon Motorists Forum (12 January)
 - Older Peoples Steering Group (12 January)
 - Cleaner Greener Group (25 January)
 - Hayes Town Partnership (7 February)
 - Local Strategic Partnership - Executive Meeting (8 February)
 - Hillingdon Force - Older People's Steering Group (18 February)
 - Yiewsley Community Fair (26 February)
 - Yiewsley & West Drayton Town Centre Partnership (2 March)
 - Hillingdon Interfaith Network (2 March)
 - Access and Mobility Forum (7 March)
7. Approximately 3,000 letters and emails were sent to various groups and individuals, inviting comments on the consultation documents. The letters included a brief summary about the draft Core Strategy, where to view it and how to provide comments. Relevant groups were also provided with a CD Rom. Responses were invited on-line, by email, by completing a Consultation Response Form, by letter or fax.
8. All elected Members and local MPs were posted a letter explaining the consultation process and an invitation to a drop-in session, with a hard copy of the Consultation Draft Core Strategy delivered to the group offices, with additional hard copies delivered upon request. A letter and CD-Rom was sent to all statutory consultees (119). Residents Associations (115) were also sent a letter and CD-Rom.
9. Letters were also sent to 50 randomly selected residents per ward from the electoral register (1100) and to 197 randomly selected businesses from the 2008 Hillingdon Business Directory.
10. Two drop-in information sessions for Council Members were held at the Civic Centre during the evening on 16 February and 1 March.

11. Over 570 responses from 128 organisations and individuals were received on the various chapters, policies and proposals. A full set of responses received is attached at Appendix 1 to this report together with a list of people and organisations making representations. The main areas of concern which arose are summarised below:
- a. **Green Belt designations:** some objectors from commercial organisations consider it anomalous that the Green Belt designation continues to cover the Terminal 5 site at Heathrow. Some objectors also consider that designations in the north of the borough no longer fulfil a true Green Belt function and sites should be released for housing or other uses. The officer response is that various detailed Green Belt designations will be reviewed along with a series of other site designations as part of work for the forthcoming Site Allocations development plan document. The Core Strategy simply shows the broad extent of the Green Belt in the borough.
 - b. **Heathrow:** one major airline has requested that the Core Strategy should:
 - recognise that land should be reserved to enable future consideration of the need for Runway Three – it should not be released for other uses which would jeopardise future development of a third runway;
 - permit airport-related hotel and employment development in line with anticipated demand;
 - allow for more intensive use of the runways; and
 - remove the Council's opposition to supporting greater numbers of flights.

The officer response is that it would not be reasonable to effectively safeguard land originally required for the Runway 3 proposal in case the Government reconsiders the case for it at some future date. Officers have also re-iterated the Council's position that land at the Airport is finite and should be primarily used for operational purposes and that it remains opposed to more intensive use of the runways or greater numbers of flights.
 - c. **Employment Land:** some commercial organisations believe the borough's population growth projections require more employment land to be released than that identified in the Core Strategy. The officer response is that the current housing trajectory data does not require further land releases in the light of work on the Strategic Housing Land Availability Assessment. Future work on a Site Allocations Development Plan Document may also identify further sites available for housing development which are not on existing employment land.
 - d. **Retailing:** several major supermarket operators consider the borough should have a more updated retail study, e.g. in view of recent housing development and that planned in the borough. In response, officers have noted the recent comparison retail study position statement and suggest that a further major retail study could be undertaken relatively early following adoption of the Core Strategy. Preparation of a Site Allocations Development Plan Document may also bring forward sites which offer further retail development potential in the borough.

- e. **Heathrow Opportunity Area Boundary:** some local organisations have asked that the Opportunity Area boundary should be clearly set out in the Core Strategy. The officer response is that the Opportunity Area is a proposal in the London Plan and that it remains for the Mayor of London to issue details of the intended Opportunity Area boundary.
- f. **Mayor of London – London Plan conformity:** the Mayor has raised two issues of general conformity with the London Plan and has asked the borough to amend the Core Strategy to address these issues. As there will be three Crossrail stations in the borough at Heathrow, West Drayton and Hayes, he requests that the Core Strategy makes reference to Crossrail specifically as a strategic infrastructure project; and that it highlights the relevant London Plan Policies and Supplementary Planning Guidance under which Section 106 funding will be sought from office and retail development through Planning Obligations and the proposed Mayor’s CIL. Officers intend including these references within the Core Strategy as required by the Mayor.

The Mayor has also requested that Policy EM11 on Sustainable Waste Management should clearly set out the waste apportionment target for Hillingdon from the London Plan - which is 382 thousand tonnes per annum by 2026 – and that the commitment to safeguard all waste sites needs to be within the Core Strategy policy as well as in the supporting text at paragraph 8.159. Officers propose to amend the Core Strategy as requested by the Mayor.

2009 Replacement London Plan - Panel Report

- 12. Following the borough’s consultations on the Pre-Submission Draft Core Strategy, Members should note that a Panel Report for the Examination in Public on the Draft Replacement London Plan was published on 3rd May. As a result, there are some amendments required to the Core Strategy. Overall, the Panel found the Replacement London Plan to be sound. Their key recommendations were as follows:

Policy 3.5: Quality of Design and Housing Developments. The ‘presumption against’ development on back gardens is to be removed from part A of the policy. It is to be replaced with new provisions allowing local authorities to introduce ‘policies to control’ such development. In Hillingdon such policies would be proposed in the forthcoming Development Management Development Plan Document.

Policy 3.5: Quality of Design and Housing Development: Table 3.3 (Minimum Space Standards) is to be amended to incorporate indicative space standards for 1-bed flats / studios of 37 square metres. Again, in Hillingdon detailed local policies could be proposed in the forthcoming Development Management Development Plan Document.

Policy 3.9: Gypsies and Travellers: Table 3.4 which set out borough-wide pitch provision targets is to be replaced with sub regional targets for the Homes and Communities Agency London sub regions. Hillingdon is in the North West London sub region which is expected to provide 40 – 43 additional pitches between 2007 and 2017.

Policy 3.12: Affordable Housing Targets: Part A of the policy is to be changed so that boroughs “..should aspire towards securing 50% of all new housing as affordable.”.

13. To reflect the provisions of the London Plan and the associated Panel Report, the wording of policy H2 in the draft Core Strategy will be amended to state that Hillingdon will seek to maximise affordable housing provision. The supporting text will refer to the conclusions of Hillingdon's economic viability assessment and the recently published London Plan Panel Report.

Schedule of Proposed Changes to the Pre-Submission Draft Core Strategy

14. Appendix 2 of this report contains a Schedule of Proposed Changes to the Pre-Submission Draft Core Strategy. Officers propose that this Schedule together with the Pre-Submission Draft will form the principal Submission documents for the Secretary of State.
15. The majority of changes represent minor editing of the text of the Core Strategy for clarification or to update particular wording or statistics - e.g. to reflect the findings of the Panel Report for the Examination in Public on the Draft Replacement London Plan. The main changes proposed in the Schedule are summarised below:
 - a. A reference to the borough's aspiration that the Central Line should be extended to Uxbridge is to be included in the Major Infrastructure Projects section of the Core Strategy as a new paragraph 3.10.
 - b. Following a request by the Planning Inspectorate, a further section is to be added to the Core Strategy listing those policies from the Unitary Development Plan Saved Policies, 2007 which will be superseded. (This is shown as "Appendix 5" in the revised text of the Core Strategy - attached for Members' information as Appendix 3 to this report.)
 - c. To meet the statutory requirement to be in general conformity with the London Plan: (i) additional wording is to be included at chapter 3 on the section covering strategic infrastructure, noting how Section 106 planning obligations and Mayoral Community Infrastructure Levy are to be implemented on Crossrail; (ii) policy EM6 will seek the use of Sustainable Urban Drainage Systems in new developments; (iii) policy EM8 will seek the incorporation of water efficiency measures in all new development; (iv) policy EM11 on Sustainable Waste Management is to be amended to include the waste apportionment target for the borough in 2026 and to note that existing waste sites are to be safeguarded for future waste management use.
 - d. Paragraph 5.20 is to be amended to note that the Bath Road area at Heathrow is identified in the Hillingdon Tourism Study as potentially suitable for hotel growth, alongside Hayes and Uxbridge.
 - e. Reference to the development of a night time economy in the borough's Hayes to West Drayton Corridor is to be added to the text of Table 5.3 to match a similar policy intention specifically for Uxbridge already included at paragraph 5.27 in the Core Strategy.
16. For Members' information, Appendix 3 attached to this report comprises a copy of the whole text of the draft Core Strategy incorporating the alterations proposed in the Schedule of Proposed Changes to the Pre-Submission Draft. These are highlighted in underlined text.

Submission Documents

17. Members should note that the following documents are to be submitted to the Secretary of State:
- Local Development Framework Pre-Submission Draft Core Strategy
 - Schedule of Proposed Changes (attached as Appendix 2 to this report)
 - Report of Consultations on the Pre-Submission Draft Core Strategy
 - Consultation Statement for the Consultation Draft Core Strategy (previously reported to Cabinet at its meeting on 18th November 2010)
 - Final Sustainability Appraisal Report (Appendix 4 to this report)

These documents have to be submitted together under the requirements of Regulation 30 of the Town and Country Planning (Local Development) (England) Regulations 2004.

Next Steps

18. The remaining timetable for production of the Core Strategy is outlined below:-
- (a) Officers to undertake further evidence base research and preparation of supporting topic papers prior to submission of the draft Core Strategy to the Secretary of State.
 - (b) A Programme Officer to be appointed by September to facilitate the organisation and running of the Examination in Public.
 - (c) Officers to seek full Council approval at the meeting on 8th September for the submission of the draft Strategy to the Secretary of State.
 - (d) Subject to any final editing, to advertise and submit the draft Core Strategy and accompanying documents to the Secretary of State by the end of September for subsequent Examination in Public before an independent Inspector.
 - (e) To agree the appointment of an Inspector for the Examination in Public with the Planning Inspectorate and arrange office accommodation and supporting facilities for the Inspector and Programme Officer at Uxbridge Civic Centre for the period in the run-up to, and for a further period following the Examination in Public.
 - (f) To arrange and advertise any Pre-Examination Meeting required by the Inspector. This would normally be expected to be held within eight weeks of submission, i.e. by the end of November.
 - (g) To arrange and advertise final arrangements for the Examination in Public, which can be expected to be held during January 2012.
19. The length of the Examination in Public will not be known until after the Pre-Examination Meeting when a final timetable and details of issues to be examined will be produced by the Inspector. Experience from other Core Strategy Examinations in Public held to date suggests that it is unlikely to extend beyond five days. The inspector will then produce a report whose findings will be binding on the Council. Publication of this is anticipated by April 2012. Providing the Inspector finds the Core Strategy sound, the Council should then be in a position to move forward to formally adopt the Strategy during May / June 2012.

Financial Implications

The cost of preparing and taking forward the draft Local Development Framework Core Strategy to an Examination in Public is estimated to be £75,000 and will be met from the existing planning budget.

Comments of the Residents' and Environmental Services Policy Overview Committee

The Residents' and Environmental Services Policy Overview Committee has been involved over the years in the development of the LDF, providing input as part of the process.

Financial Implications

Corporate Finance has reviewed this report and its recommendations and is satisfied, that the cost of preparing and taking forward the Local Development Framework Core Strategy to an Examination in Public, will be contained within the existing planning budget.

Legal

Section 15 of the Planning & Compulsory Purchase Act 2004 places a statutory duty on the Council to prepare and maintain a Local Development Scheme ("the Scheme"). The Scheme will specify those documents that are Development Plan Documents. Regulation 7 of the Town and Country Planning (Local Development) (England) Regulations 2004 states that the Core Strategy will be a Development Plan Document.

When preparing the Core Strategy, the Local Planning Authority must comply with the consultation requirements found both in the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended) and the revised Planning Policy Statement 12 (Local Spatial Planning) which sets out government policy on Local Development Frameworks. This includes a duty to consult with specific and general consultation bodies, requirement to place an advertisement in a newspaper and general duty to comply with the Council's Statement of Community Involvement.

The Town and Country Planning (Local Development) (England) Regulations 2004 require that any representations received must be fully considered and conscientiously taken into account by the decision maker, including those which do not accord with the proposals.

The Local Authorities (Functions and Responsibilities) (England) Regulations 2000 (as amended) sets out specific functions that cannot be the sole responsibility of the Executive. These functions include and relating to the Development Plan Documents "the approval, for the purposes of its submission to the Secretary of State for his approval of any plan or strategy" (Regulation 4(3)(c)). Accordingly, once approved by the Cabinet, this report will also need approval by the Council.

Corporate Landlord comments

Strategic Policies apply generally to all land and property in the borough regardless of ownership. The Strategy, including the Infrastructure Plan, has been prepared within the context of the council's asset management plan. In general terms the Plan aims to safeguard property assets in public service or community use. It also helps to identify opportunities where services need to expand, for example to respond to demographic changes. However in circumstances where community services need to be rationalised, the

effect of planning policy may tend towards the retention of community facilities, which may at times restrict sales of surplus Council assets for residential development.

BACKGROUND PAPERS:

- Cabinet Report 18 November 2010 - Hillingdon Local Development Framework Pre-Submission Draft Core Strategy
- Cabinet Report 27 May 2010 - Hillingdon's Local Development Framework Consultation Draft Core Strategy
- Cabinet Report 18 December 2008 - Hillingdon's Local Development Framework Revised Local Development Scheme.
- Statement of Community Involvement, November 2006
- Cabinet report 28 July - Hillingdon Local Development Framework Pre-Submission Draft Core Strategy

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Appendix 1: Report of Consultations

List of Representors on the Pre-Submission Draft Core Strategy

Representor Number:	Consultee	Company / Organisation	Representation Numbers:
001	Mr Cedric Hoptroff	London Green Belt Council	2-5
002	Mr David Payne	Mineral Products Association	6-13
003	Mr Trevor Walker	Individual	15-16
004	Mr Richard Williams	Individual	18
005	Ms Helen Cornforth	London Borough of Richmond	19
006	Mr Steve Lamb (Tarmac Ltd)	Quarryplan (GB) Limited on behalf of Tarmac Ltd	20-22
007	Miss Carmelle Bell	Thames Water Utilities Ltd	23
008	Mr Steve Staines	Traveller Law Reform Project	24
009	Mr Ivor Williams	Individual	25
010	Miss Claire McAlister	British Waterways	26-38, 40-49
011	Mr Leslie Gillot	Individual	50-53
012	Dr Justine Bayley	Hayes Conservation Area Advisory Panel	54
013	Ms A Jaffer	Individual	55, 57, 59 and SA1
014	Mr John McDonnell MP	(Representations on behalf of self)	56, 58, 60-65, 67-71
015	Mary Turvey	Individual	66
016	J Naughton	Hillingdon Primary Care Trust	72-78
017	Ms Allison Ingham	Planning Inspectorate	79
018	R Bust	Coal Authority	80
019	Michael Saxby	Fulmer Parish Council - South Bucks	81
020	Mr and Mrs D Hunnisett	Individuals	82
021	Mr Colin Darby (VSM Estates)	GVA Grimley Ltd on behalf of VSM Estates	83
022	Orbit Developments (Southern) Ltd	The Emerson Group on behalf of Orbit Developments (Southern) Ltd	84-87
023	Ms Isabel Assaly	Natural England London Region	88-90
024	Tony Ellis	Northwood Residents Association	91-103
025	Mr Carl Neilson	Yiewsley and West Drayton Town Centre Action Group	104
026	Mr Richard James	Individual	105
027	Ms Lara Evans	Lafarge Aggregates Ltd	106-109
028	M D Homes	Howard J Green on behalf of MD Homes	110
029	Mr David Mackie	Individual	111
030	Buccluech Property	Drivers Jonas Deloitte on behalf of Buccluech Property	112-115
031	Ms Anna Parr	Environment Agency	116-124
32	Mr John Walls	Gleeson Developments Ltd on behalf of John Walls	125-130
033	Hillingdon Hospital NHS Trust	Broadway Malyan on behalf of Hillingdon Hospital NHS Trust	131-133
034	Unspecified client	Quod Planning on behalf of unspecified client	134
035	Sainsbury's Supermarkets Ltd	Turley Associates on behalf of Sainsbury's Supermarkets Ltd	135-136
036	Duncan Struthers	Hillingdon Inter Faith Network	137-147

Representor Number:	Consultee	Company / Organisation	Representation Numbers:
037	WM Morrison Supermarkets Plc	Peacock and Smith Ltd on behalf of WM Morrison Supermarkets Plc	148
038	Thorney Farm Developments	Boyer Planning on behalf of Thorney Farm Developments	149-151
039	Mrs Veronica Rumsey	Individual	152-156
040	Mr Philip Rumsey	Individual	157-161
041	Workspace Group	Ransome and Company Ltd on behalf of Workspace Group	162-170
042	BS Pension Fund Trustee Ltd	CGMS Consulting on behalf of BS Pension Fund Trustee Ltd	171-172
043	Waitrose Ltd	Barton Willmore on behalf of Waitrose Ltd	173-176
044	Universities Superannuation Scheme Ltd	Drivers Jonas Deloitte on behalf of Universities Superannuation Scheme Ltd	177-182
045	Mr J Watson (ACS International Schools)	Preston Bennett Holdings Ltd on behalf of ACS International Schools	183-184
046	Mr Steve Barnes	Lichfield Planning on behalf of British Airways plc	185-195
047	Mr John Turner	The Ballymore Group	196-202
048	Mr Richard Oakley	Heathrow Airport Ltd	203-226
049	Ms Liz Segal	Hillingdon Alliance of Residents Associations	227-228
050	McCarthy & Stone Retirement Lifestyle Ltd	The Planning Bureau on behalf of McCarthy & Stone Retirement Lifestyle Ltd	229-230
051	Mrs Janet Campbell	Individual	231
052	Mrs Janet Haywood	Individual	232
053	Mr Christopher Haywood	Individual	233
054	Mr Roy Mann	Individual	234
055	Mr John Rout	Individual	235
056	Mr Bernard John Fagan	Individual	236-238
057	Mr Robert Case	Individual	239
058	Mrs Barbara Case	Individual	240
059	Mr Carl Neilson	Yiewsley and West Drayton Town Centre Action Group	241-249
060	Co-operative Insurance Society (managed by AXA REIM)	Gerald Eve on behalf of Co-operative Insurance Society (managed by AXA REIM)	250
061	Mr Tim James (Threadneedle Property Investments)	Indigo Planning on behalf of Threadneedle Property Investments	251-252
062	Mr Cliff Dixon	English Democrats (Hillingdon)	253-254
063	Mr Ahmet Moustafa	Warren Park Residents Association	255-257
064	Mr Tim Farlam (IKEA)	RPS on behalf of IKEA	258-261
065	Cathedral Group	Nathaniel Lichfield & Partners on behalf of Cathedral Group	262-269
066	Ms Rose Freeman	The Theatres Trust	270
067	Mr David Wellavise	Individual	271
068	Ms Eilish Stone	Individual	272
069	Mr James Ahearne	RPS on behalf of Lidl (UK) GmbH	273-274
070	Her Majesty's Court Service	DPP on behalf of Her Majesty's Court Service	275
071	Legal & General Property Partners (Life Fund) Ltd	Drivers Jonas Deloitte on behalf of Legal & General Property Partners (Life	276- 283

Representor Number:	Consultee	Company / Organisation	Representation Numbers:
		Fund) Ltd	
072	Mr John Echlin	HFCA	284
073	Mrs Janet Sweeting	Garden City Estate Residents' Associaton	285-303
074	PRUPIM	CB Richard Ellis on behalf of PRUPIM	304-315
075	Ms Sandra Lawrence	Individual	316
076	Mr Christopher Geake	Individual	317
077	Katharine Harrison	Surrey County Council	318-323
078	Henry Streeter (Sand and Ballast) Ltd	Consultant Planning Group on behalf of Henry Streeter (Sand and Ballast) Ltd	324-325
079	CEMEX	Driver Jonas Delloite on behalf of CEMEX	326-327
080	Mr Patrick Blake	Highways Agency	328
081	Mr Laurie Baker	London Geodiversity Partnership	329-332
082	Southstream Holdings Ltd	Montagu Evans on behalf of Southstream Holdings Ltd	333-334
083	Kerville Associates	Montagu Evans on behalf of Kerville Associates	335-337
084	Ms Tracey Holliday	Individual	338-351
085	Ms Emma Smyth	SITA UK	352-353
086	Mr David Brough	Hayes Town Partnership	354-363
087	Mr Shaun Holliday	Bell Farm Christian Centre	364-375
088	Mrs Diane Faichney	Bell Farm Christian Centre	376
089	Mr James Chadwick	Planning Perspectives LLP	377-380
090	Mr Philip Allard	Planning Perspectives LLP	381-384
091	Royal Brompton & Harefield NHS Foundation Trust	CGMS Consulting on behalf of Royal Brompton & Harefield NHS Foundation Trust	385-390
092	Dr Ute Navidi	Hillingdon Play Association	391
093	Mr Richard Walker	Hillingdon Motorist Forum	392-397 and SA3
094	Brunel University	VRG Planning Ltd on behalf of Brunel University	398-406
095	CES Properties (Ickenham) Ltd	DP9 on behalf of CES Properties (Ickenham) Ltd	407-408
096	SEGRO Plc	Nathaniel Lichfield & Partners on behalf of SEGRO Plc	409-410
097	Kuldeep Lakhmana	Heathrow Airport Ltd	411
098	Greater Manchester Pension Fund	Capita Symonds on behalf of Greater Manchester Pension Fund	412-415
099	Mr Calvin Beckford	Individual	416
100	Mrs Patricia Gibbs	Skylark CA	417
101	PRUPIM	Maddox & Associates on behalf of PRUPIM	418-421
102	Mr Tony Pilkington	Individual	422
103	Mr Steve Akeju	GL Hearn on behalf of Tesco Stores Ltd	423-425
104	National Grid	Entec on behalf of National Grid	426
105	Mrs Pauline Bonman	Individual	427
106	Mr Jazz Dhillon	Individual	428-430
107	Mrs June Nelson	Imperial College NHS Trust	431-434
108	Mrs Patricia Harper	Individual	435
109	Royal Brompton & Harefield NHS Foundation	DP9 on behalf of Royal Brompton & Harefield NHS Foundation Trust	436-441

Representer Number:	Consultee	Company / Organisation	Representation Numbers:
	Trust		
110	Henry Streeter Automotive Ltd	CGMS Ltd on behalf of Henry Streeter Automotive Ltd	442-451
111	Mr Robin Brown	Hayes and Harlington Community Development Forum	452-461
112	Mayor of London	Greater London Authority	462-486
113	Mr John McDonnell MP	(Representations on behalf of LocalCommunity)	487-501
114	Councillor Robin Sansarpuri	LBH Councillor	502
115	Councillor Lynne Joy Allen	LBH Councillor	503
116	Mrs June Nelson	Imperial College NHS Trust	504
117	Councillor Peter Curling	LBH Councillor	505
118	Councillor Phoday Jarjussey	LBH Councillor	506
119	Councillor Roshin Ghei	LBH Councillor	507
120	Councillor Paul Harmsworth	LBH Councillor	508-509
121	Councillor Anita Macdonald	LBH Councillor	510
122	Councillor John Major	LBH Councillor	511
123	Councillor Janet Duncan	LBH Councillor	512-530
124	Arla Foods UK Plc	BNP Paribas Real Estate on behalf of Arla Foods UK Plc	531-541
125	Mr Matthew Thomas	Bride Hall Developments Ltd (Late submission)	542-544
126	Mr Graham Saunders	English Heritage (Late submission)	545-558 and SA2
127	Mrs Frances Seeds	Individual (Late submission)	559-575
128	Mr Tim Jurdon	Arora Management Services Ltd	577

Note: Representation Nos. 1, 14, 17, 39 and 576 were not used.

Appendix 1: Responses received to the Pre-Submission Draft Core Strategy

ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
77	General Comment	Hillingdon Primary Care Trust		The LDF refers to green initiatives such as cycling and car sharing. How are public sector organisations going to be brought together to support and develop these plans. i.e Hillingdon PCT, Brunel University and Hillingdon Hospital generate substantial vehicle and personnel movements daily.	The Council will liaise with its major public sector partner bodies on sustainable transport initiatives - and develop these through other Council strategies such as the Local Implementation Plan. No proposed change.
78	General Comment	Hillingdon Primary Care Trust		Should the LDF make a statement about how it is going to draw together public and private sector organisations to support sustainability initiatives.	Disagree - the Council will continue to work with its partner organisations to achieve the objectives of the Sustainable Community Strategy. These arrangements do not need to be detailed in the Core Strategy. No proposed change.
80	General Comment	Coal Authority		We have no specific comments to make on this document at this stage.	Noted. No proposed change.
89	General Comment	Planning Inspectorate		Unable to find any superseded policies in your DPD (a list of these will be needed when you submit), or a HRA/letter from Natural England saying it is not required.	<p>Agree, a list of superseded UDP Saved Policies will be provided in the Submission Draft of the Core Strategy.</p> <p>A Habitats Regulation Assessment Verdict letter from Natural England confirming that stage two and three of the Habitats Regulation Assessment, requiring a full Appropriate Assessment, would not be required. This letter was placed on the Council's website in February 2011 under the section 'Evidence Base' documents.</p>
81	General Comment	Fulmer Parish Council - South Bucks		Impressive response to the consultation. Fulmer Parish has nothing to add.	Support welcomed.
91	General Comment	Northwood Residents Association		As a general comment, it would appear that not enough emphasis has been put on the needs of the elderly.	No proposed change. Hillingdon's aging population is acknowledged in the population section of A Portrait for Hillingdon and in relation to housing in paragraph 6.29. Paragraph 9.43 notes that in relation to social infrastructure, DPDs will need to make provision for the facilities required by the aging population.

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Appendix 1: Responses received to the Pre-Submission Draft Core Strategy

ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
92	General Comment	Northwood Residents Association		The report also makes far too many assumptions where there is a lack of concrete fact.	The Council has prepared the Core Strategy in accordance with national planning guidance and its policies are supported by a substantial evidence base. No proposed change.
228	General Comment	Hillingdon Alliance of Residents Associations		Regeneration is needed in the south of the borough - but with this should be with the agreement of the local community and respecting Green Belt land. The closure of the swimming pool at Yiewsley and its planned replacement by a health centre is inappropriate. There is an alternative location for the health centre and the site should continue to provide local sports and leisure facilities for the large young population in the area.	<p>The Council will continue to consult the local community in accordance with the approved Statement of Community Involvement as further detailed work progresses on regeneration proposals for the south of the borough. These can be expected to come forward as part of work on the Site Allocations, Proposals Map and Heathrow Area Development Plan Documents.</p> <p>The detailed issue of the closure of the swimming pool at Yiewsley is not a matter for the Core Strategy.</p> <p>No proposed change.</p>
283	General Comment	Northwood Residents Association		The report ignores the existence of the development of the old Southall Gas Works development and the impact it will have on Hillingdon.	The Council has not ignored the Southall Gas Works scheme. It sees the potential development there as supporting its own regeneration proposals within the Hayes - West Drayton corridor. No proposed change.
94	General Comment	Northwood Residents Association		No mention is made of golf courses, their effect on the green belt and the water table.	The Council is aware of the issues of water use which can arise with proposals for golf courses and other commercial uses. This is a detailed development consideration which can be addressed by the Council in a Development Management Development Plan Document to be produced as a later part of the Local Development Framework. No proposed change.
111	General Comment	Individual		<p>1) There has been a lack of consultation with people in the borough.</p> <p>2) Most sections of the Strategy have loose wording and loopholes. Various policies need strengthening from stating the Council "will seek" to it "will" - e.g. maintain the current extent of the</p>	<p>1) Disagree, involvement of the public and key stakeholders in preparing the Core Strategy Pre-Submission Draft has followed the approach set out in the Council's Statement of Community Involvement (SCI) adopted in November 2006. Various publicity methods were used with the aim of raising awareness of the LDF and informing as</p>

Appendix 1: Responses received to the Pre-Submission Draft Core Strategy

ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				<p>Green Belt / identify and protect quiet areas / safeguard and improve water quality / encourage or require sustainable techniques to land redemption or require the installation of renewable energy.</p> <p>3) The Strategy does not adequately address the problems of new development having been allowed in the wrong locations, traffic congestion on local roads (e.g. at Hillingdon Hospital) with its impact on public transport, pollution and loss of Green Belt land.</p> <p>4) There should be no further expansion at either Heathrow or Northolt Airports.</p> <p>5) There is nothing explicit on the protection of green space.</p> <p>6) Employment areas should be spread more across the borough.</p> <p>7) Retail shops should not be lost to fast food outlets.</p>	<p>many people as possible. These have included information being made available on the Council's website, at all borough libraries and One-stop-shop in Hayes, 6 public drop-in sessions, 6 press notices, an article in Hillingdon People magazine, poster displays at Post Offices, GP surgeries and schools, public exhibitions at Uxbridge Library and Civic Centre, audio advertisement in the Hillingdon Talking Newspaper for the visually impaired, attendance at representative group meetings. Approximately 3,123 letters/ emails were sent to a wide range of groups and individuals on the LDF consultation database including 50 randomly selected residents per ward from the electoral register (1100) and to 173 randomly selected businesses from the 2008 Hillingdon Business Directory. No proposed change.</p> <p>2) Disagree, the Council considers that the wording is appropriate for a Core Strategy as implementation of some policies depend on the contribution from other agencies. No proposed change.</p> <p>3) Disagree, Table 3.1 sets out the main challenges facing the borough and acknowledges pressure for inappropriate developments. The Core Strategy seeks to direct development to the most sustainable locations whilst minimising their impact on the environment. No proposed change.</p> <p>4) Paras 3.5 and 3.6 set out the Council's position on the expansion of Heathrow Airport. There are no known expansion plans for Northolt Airport. No proposed change.</p> <p>5) Disagree, Policy EM2 seeks to protect green belt, metropolitan open land and green chains, Policy EM4 seeks to protect open space and</p>

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					<p>informal recreation areas and Policy BE1 seeks to protect the development of gardens from inappropriate development and improve the quality of the public realm. No proposed change.</p> <p>6) The location of the main employment areas across the borough is set out at Map 5.1 in the Core Strategy. There are many other individual employment locations in Hillingdon and together with the local network of town centres the Council considers that there is already a wide range of employment opportunities available across its area. No proposed change.</p> <p>7) Changes of use will be dealt with in the Development Management DPD. No proposed change.</p>
37	General Comment	Hillingdon Inter Faith Network		<p>The main submission is that-</p> <ol style="list-style-type: none"> 1.the current proposals do not (always) address needs in a holistic way for the benefit of residents 2.there is a lack of appreciation of the community cohesion and strength brought about by the faith communities 3.there is a lack of engagement with the need for community regeneration of the Heathrow villages and of the need to acknowledge the demographic changes with the intrinsic need for community space. 4.the proposals are not flexible enough to meet all of the changing communities within the given timescale. <p>In our submission, we have recognised the importance of basing our comments on</p>	<p>The Vision statement looks towards Hillingdon taking full advantage of its distinctive strengths with regard to its various communities and seeks to improve the quality of life by improving accessibility to local facilities. Strategic Objective SO6 in the Core Strategy also highlights the importance the Council attaches to the issue of social inclusion. The main policy in the Strategy on Community Infrastructure provision derives from the Vision and this objective and partly looks towards the retention of existing community facilities and the provision of new ones to meet the needs of new communities within the local population. In this way the Core Strategy sets out the broad strategic approach it will take to such issues as the provision on places of worship or new community meeting places.</p> <p>Detailed proposals for further local provision of community space or other facilities can be expected to come forward as part of other Local Development Framework documents - such as</p>

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				<p>perceived sound evidence, providing some examples.</p> <p>We also noted that the council does need to be consistent with national policy. This now focuses on being localised, both by and for the locality. The strategic objectives mentioned are those which relate specifically to the points raised.</p>	<p>the Site Allocations or Heathrow Area Development Plan Documents.</p> <p>No proposed change.</p>
202	General Comment	The Ballymore Group		<p>Reference should be made to how S106, CIL and the Mayoral CIL will be implemented. The cumulative burden of this charge on developers should be taken into account and should not be set at a level where developments become unviable.</p>	<p>The following text will be inserted as supporting text to policy C11 following paragraph 9.38:</p> <p>The Council currently secures developer contributions towards infrastructure by way of planning obligations, with the support of Hillingdon's adopted Planning Obligations Supplementary Planning Document. In November 2010, the government confirmed that this mechanism of funding infrastructure will be replaced with the Community Infrastructure Levy (CIL). Unlike S106, CIL payments would apply to the majority of new development in the borough. The Council has undertaken to prepare a CIL Charging Schedule and will be consulting on this in accordance with Government Guidance.</p> <p>The Mayoral CIL is a GLA proposal that is currently out for consultation. First and foremost, it should be progressed by the Mayor as part of the Replacement London Plan. The matter will be progressed by Hillingdon following the completion of the consultation process and the independent examination of the proposals.</p>
231	General Comment	Individual		<p>Less housing growth should be proposed and more off-road parking provided for residents - to free up the current congested local roads for public transport. Heathrow Airport should not be allowed to expand further.</p>	<p>The council has to meet the level of housing provision required of it in the London Plan - to help meet London's overall housing needs.</p> <p>Detailed car parking standards will be proposed in a later part of the Local Development Framework - the Development Management Development</p>

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					<p>Plan Document.</p> <p>An overall aim of the Council is to encourage more use of sustainable forms of transport - e.g. a part of that approach entails encouraging the location of major developments at locations with good public transport access.</p> <p>The Council's policy approach to Heathrow Airport is to protect the current airport boundary and allow only airport-related development within that boundary. The Council does not wish to see further expansion of the airport beyond that boundary.</p> <p>No proposed change.</p>
34	General Comment	Individual		There is no guarantee that the policies in the Strategy will be put into practice. The Council must prevent the loss of the Green Belt and save it for future generations.	<p>The Core Strategy represents an important vehicle through which the Council will seek to achieve its corporate objectives in the Hillingdon Sustainable Community Strategy. As such, the Council will be firmly committed to putting the policies in the Strategy into effect.</p> <p>The Council agrees that loss of Green Belt is to be resisted - and its policy EM2 is a robust expression of its approach.</p> <p>No proposed change.</p>
272	General Comment	Individual		The Heathrow villages are blighted by the Runway Three decision. BAA is retaining properties for several years there pending the Government's aviation policy review. The further environmental and health impacts that would follow from increased passenger numbers at Heathrow. Threat to the Villages from High Speed 2 and the possibility of a Heathrow Station. The unacceptable impact on the area caused by the uncontrolled increase in the numbers of hotels. The unacceptable impact of	<p>The Core Strategy cannot consider land ownership matters.</p> <p>The Council is aware of concerns over environmental and health issues regarding the expansion of Heathrow Airport. Its broad policy approach regarding environmental issues is set out at section 8 of the Core Strategy (e.g. at policy EM8).</p> <p>The details of the High Speed 2 project are yet to</p>

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				<p>the preferred Mineral Safeguarding Area, i.e. land west of Harmondsworth quarry and north of the village of Harmondsworth. The lack of consideration given to the resulting increased traffic flow, noise and air pollution and damage to roads and pavements. The lack of recycling facilities in the south of the borough and inadequate provision for the Heathrow Villages.</p>	<p>be determined by the Government and cannot be addressed at this stage in the Core Strategy.</p> <p>The Council is required to meet the mineral apportionment requirements of the London Plan. As Hillingdon is one of the few London Boroughs with commercial aggregate resources it has to provide some measure of safeguarding for those reserves located in the south of the borough.</p> <p>The lack of local recycling facilities for residents in the south of the borough is recognised by the Council and it is committed to identifying and allocating suitable new sites for waste management at policy EM11.</p> <p>No proposed change.</p>
323	General Comment	Legal and General Property Partners (Life Fund) Ltd	Drivers Jonas Deloitte on behalf of Legal & General Property Partners (Life Fund) Ltd	<p>The Core Strategy should make clear that all diagrams are illustrative. Detailed designations will be subject to future consultations.</p>	<p>Paragraph 1.1 makes clear that the Core Strategy: "...does not set out guidelines for decisions about planning applications (this will be done through the Development Management document) and nor does it allocate specific sites (this will be done through the Site Allocations document and Proposals Map)". This paragraph also makes clear the broad, strategic nature of the Core Strategy.</p> <p>All Development Plan Documents are also to be subject to consultations - as specified in the Council's approved Statement of Community Involvement.</p> <p>No proposed change.</p>
323	General Comment	Surrey County Council		<p>As the Core Strategy includes development management policies covering the London Borough which will be used to determine planning applications for major development, the lack of any policy reference requiring developers to prepare SWMPs renders the Core Strategy to</p>	<p>The policy on sustainable waste management (EM 11) is a broad strategic policy. The Council is preparing a joint West London Waste Plan Development Plan Document in conjunction with five other west London partner boroughs. It will investigate whether this proposed policy</p>

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				be unsound and not effective as it is not consistent with either the London Plan or national policy. In order to address this issue, the London Borough should propose a minor amendment to the Core Strategy to include an appropriate policy reference requiring developers to prepare and submit a SWMP in support of their application.	reference should be included in the Waste Plan or in a Development Management Development Plan Document. No proposed change.
373	General Comment	Bell Farm Christian Centre		<p>Consultation Statement:</p> <p>In failing to invite consultation from any of the 50 or more active churches in the borough the consultation process is flawed and discriminates against those of the Christian Faith who have not been properly consulted on the Core Strategy. The consultation period should be extended to include consultative feedback from Churches which are significant and active stakeholders in the local community. Several organisations which have been disbanded for some years have still been consulted - they should be removed from the consultation statement - and how many other non-existent organisations have been included in the consultation?</p>	The Core Strategy was consulted on in accordance with government guidance and the Council's Statement of Community Involvement. Hillingdon's Inter-Faith Network was specifically consulted as an organisation that represents faith groups in the borough. No proposed change.
490	General Comment	Mr John McDonnell MP		The Core Strategy is extremely weak and needs to be strengthened to ensure it produces concrete policies and actions to reflect the priorities of the community.	The Core Strategy has been prepared in accordance with the adopted Statement of Community Involvement. This has ensured extensive public involvement in the Strategy's preparation and the resultant policies do reflect the priorities of the borough's population - as regards meeting local housing needs, protecting and enhancing the built and natural environment, etc. No proposed change.
541	General Comment	Arla Foods UK Plc	BNP Paribas Real Estate	Policy wording in the Strategy needs to be more flexible - particularly where this could impact on development viability when bringing forward brownfield land (with its additional costs) for	The Council is aware of the requirements of national planning policy guidance regarding the need to word and apply policies with a degree of flexibility. The policies in the draft Core Strategy

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				development.	are sufficiently flexible in their approach for the purposes of a broad strategic policy document. No proposed change.
426	General Comment	National Grid	Entec on behalf of National Grid	National Grid owns and operates North Hyde substation which is located within an area identified as a Strategic Employment Site in the Pre-submission Core Strategy Document. While National Grid does not object to future redevelopment in this area, we would like to take this opportunity to highlight that substations are vital to the efficient operation of our electricity transmission network for switching circuits or transforming voltage. North Hyde substation is an essential part of the transmission network and has an important role to play in maintaining the supply of electricity to the local distribution network operator and therefore ultimately to homes and businesses throughout Hillingdon and the wider area. The site is therefore "Operational Land" and, for the reasons outlined above, there may need to be further essential utility development at the site in the future.	Noted - no proposed change.
427	General Comment	Individual		The further growth envisaged in the Strategy should be considered against the need to preserve the environment and wildlife; to consider whether empty office blocks and vacant MoD buildings in West Drayton & Uxbridge could be used for some of the new housing growth; and the risk of not having sufficient school places available.	The Core Strategy already contains robust policies aimed at protecting the borough's natural environment and biodiversity. Detailed allocations for housing and other development will be made through the Site Allocations and Proposals Map Development Plan Documents. The Core Strategy includes an infrastructure schedule which will be kept under review with respect to school provision as development proceeds during the plan period. No proposed change.
452	General Comment	Hayes and Harlington Community Development Forum		C.S is not concise, focused, nor has engaged the community. It has avoided dealing with critical issues, e.g. Heathrow Opportunity Planning Framework & London Plan targets; reconciling growth and air	The Council would submit that there has been extensive public involvement in the drafting of the Core Strategy and that the result has been a concise and focussed document. The Heathrow Opportunity Area is a London Plan

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				<p>quality/ climate change/ environmental impacts.</p> <p>It has not acknowledged the implications of HS2 and links to Heathrow.</p> <p>The Infrastructure Schedule is simply a list and does not set out a delivery plan.</p> <p>Integration with plans of adjoining authorities is not clear and their proposals are not apparently addressed.</p> <p>As for evidence, many LBH documents are apparently not in the public domain presently.</p> <p>Sustainability Appraisal (Feb 2011) recommendations have not apparently resulted in amended policies being put forward.</p> <p>Emerging national policy and the Neighbourhood Plans approach has not been signposted in the Core Strategy.</p> <p>Emerging regional policy – the draft Replacement London Plan which has been subjected to EiP and a Panel report (yet to be published by the Mayor) – has progressed to such an advanced stage, with a considerable evidential base, that it should be reflected in the C.S.</p> <p>There is a need for a fundamental and systematic rewriting of the Pre Submission Core Strategy to take on board the above comments.</p>	<p>proposal and it remains for the Mayor of London to designate the precise area to be included.</p> <p>The Core Strategy does contain both policies aimed at meeting London Plan growth expectations and at addressing environmental concerns which that growth may give rise to.</p> <p>The Government has yet to determine the route of High Speed 2 and whether there will be a link to Heathrow Airport - it would be premature to refer to these proposals in the Core Strategy.</p> <p>Indicative phasing details - where known - have been included in the Infrastructure Schedule of the Strategy.</p> <p>Evidence for the Core Strategy will continue to be compiled up to Submission and the Sustainability Appraisal recommendations will be included as proposed changes to the Strategy.</p> <p>The Localism Bill proposals have yet to be enacted and are still subject to change. It would again be premature to refer to these in the Core Strategy.</p> <p>Relevant policy recommendations from the Panel Report will be taken into account in Proposed Changes to the Core Strategy.</p> <p>No proposed change.</p>
502	General Comment	Councillor R Sansarpuri		Not specified (Blank).	Representor will be advised on the date for the EiP. No proposed change.
507	General Comment	Cllr R Ghei		The employment strategy in the Plan should aim to create the maximum number of jobs for Hillingdon residents.	The Core Strategy policies (at section 5) do look towards providing significant job growth in the borough over the plan period. They provide a

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					<p>detailed policy framework to maintain a range of jobs across the borough by encouraging further office-based employment, protecting industrial sites and employment locations (policy E1), providing a strategy for future growth at Uxbridge and in the Heathrow Opportunity Area (policies E2-E4), undertaking to accommodate additional retail growth in the borough's town and local centres (policy E5), and looking to raise skill levels in the local workforce (policy E7).</p> <p>No proposed change.</p>
18	1.4	Individual		<p>It is important the Council keeps all the green belt within its boundary as a legacy for the future population of the borough. Changes to the green belt laws will also place excess pressure on local community services that are currently stretched to meet the requirements of the borough.</p>	<p>Policy EM2 in the Core Strategy states the Council's clear intention to maintain the current extent, hierarchy and strategic functions of the Green Belt. No proposed change.</p>
236	1.7	Individual		<p>No genuine effort was made to involve the citizens of Hayes in the consultation. Concerned at the lack of printed copies available to local residents. Copies should have been available to loan from local libraries, printed copies should have been made to post to interested residents and an audio cassette more readily available. The Council has a poor consultation record on this and several other documents.</p>	<p>The detailed arrangements made to involve the public and key stakeholders in consultations on the Core Strategy have followed the approach set out in the Council's Statement of Community Involvement (SCI) adopted in November 2006. The SCI sets out a minimum of six weeks for public consultations for each of the stages in the plan making process. Consultations on the Pre-Submission Core Strategy were carried out over a six-week period between 9th February and 25th March.</p> <p>During this six-week period:</p> <p>a. Press notices were published in the Hillingdon Leader, Gazette series (all Hillingdon editions) and in the London Gazette on the 9th February.</p> <p>b. Consultation documents were available for viewing and comment at all borough public libraries, the Hayes One Stop Shop, and the</p>

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					<p>Planning Information Services section at the Uxbridge Civic Centre.</p> <p>c. Public information displays were exhibited at Uxbridge Library and at Planning Information Services, Civic Centre, Uxbridge.</p> <p>d. Six information drop in sessions were held at Ruislip Manor, Uxbridge and Botwell libraries.</p> <p>A number of local events and meetings were also attended by officers to raise awareness and encourage discussion about the Pre-Submission Core Strategy. These included the:</p> <ul style="list-style-type: none"> • Youth Council (5pm, 10 January) • West Drayton Town Partnership (7pm, 12 January) • Hillingdon Motorists Forum (7pm, 12 January) • Older Peoples Steering Group exhibition (12 January) • Cleaner Greener Group (25 January) • Hayes Town Partnership (7 February) • Local Strategic Partnership - Executive Meeting (8 February) • Hillingdon Force - Older People's Steering Group (18 February) • Yiewsley Community Fair (26 February) • Yiewsley & West Drayton Town Centre Partnership (2 March)

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					<ul style="list-style-type: none"> • Hillingdon Interfaith Network (2 March) • Access and Mobility Forum (7 March) <p>17. Approximately 3,000 letters and emails were sent to various groups and individuals, inviting comments on the consultation documents. The letters included a brief summary about the Core Strategy, where to view it and how to provide comments. Relevant groups were also provided with a CD Rom. Responses were invited on-line, by email, by completing a Consultation Response Form, by letter or fax.</p> <p>The recent consultations were held in accordance with the approved Statement of Community Involvement and electronic responses were requested as the most cost-effective means of dealing with responses. Responses made by letter were also accepted as the Council would agree that not all consultees are able to use computers to respond to consultations. Drop-in information sessions were staged at libraries in the north, centre and south of the borough to give local residents and businesses the opportunity to discuss the Core Strategy with planning officers.</p> <p>No proposed change.</p>
392	2	Hillingdon Motorist Forum		<p>A modern Borough such as Hillingdon should be planning a road network that will be able to support the current as well as the predicted level of road traffic. It is clear from the comments throughout the document referring to traffic congestion that the current road network cannot support the current level of traffic let alone the predicted traffic levels. There are no plans to upgrade the road network to a sufficient standard.</p>	<p>Improvements to the road network are primarily dealt with in the borough's Local Implementation Plan and are only one facet of reducing traffic congestion. The transport policies in the Strategy aim to steer development to the most accessible locations (to facilitate access by all modes of transport), to improve public transport interchanges in local centres (to make use of public transport a more attractive option) and to improve north-south public transport links across the borough (to reduce pressure for private car</p>

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					use). Taken together these measures should help reduce road congestion within the existing road network. No proposed change.
491	2	Mr John McDonnell MP		Greater emphasis should be given to the issue of environmental inequality.	The Vision statement has to cover a number of major themes which the Core Strategy addresses in its objectives and policies. The environment theme is noted in the Vision with respect to both Hillingdon taking full advantage of its distinctive strengths and to seeking an improved environment and infrastructure. Whilst environmental issues then are dealt with throughout the Strategy they are given prominence in section 7 dealing with the historic and built environment and in section 8 dealing with environmental improvement. No proposed change.
56	2.2	Mr John McDonnell MP		The vision for Hillingdon does not recognise adequately the social, economic and environmental pressures that areas of the borough are facing and sidesteps the issue of the inequality within the borough, failing to address the particular issue of the inequality between the south and north of the borough and the need to tackle inequality within our area. There needs to be particular reference in the vision for the future of the borough which recognises the pressures that certain areas face and a commitment to address inequality between the south and north of the borough in order to achieve greater equality.	The summary of the Vision statement in the Core Strategy at paragraph 2.2 notes the intention that economic growth is to be concentrated in those parts of the borough with the greatest socio-economic need, notably the Hayes / West Drayton corridor. The inequality between the north and south of the borough is also clearly highlighted in section 3 - e.g. see paragraph 3.2 which notes the areas of deprivation to the south of the A 40. Section 4 then sets out the Vision for the borough and includes a range of strategic objectives to deliver the Vision. These again aim to address the deprivation in the south parts of the borough - e.g. by accommodating new job growth at Uxbridge and in the general area around Heathrow. No proposed change.
58	2.2	Mr John McDonnell MP		The vision fails to address the issue of the lack of community identity of in the borough, the	The Vision in the Core Strategy looks to take full advantage of the distinctive strengths of the

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				isolation of many communities and individuals, and the ever changing transient population of the area. The Vision should include recognition of the issue of lack of identity and population change by setting a goal of increasing community engagement and overcoming isolation, promoting community cohesion and celebrating the multi cultural nature of our community.	borough - its range of places, communities and heritage - e.g. see first bullet point in the Vision statement at paragraph 4.1. As with other outer London Boroughs Hillingdon has always had a partly transient population - acting as a place to which people move to from inner parts of London, perhaps to take advantage of the wider range of housing and green spaces here, and also as a first place to live in the capital for people from outside, attracted by lower housing prices compared to more central parts of the city. What the Core Strategy is attempting to do is to set out how the Council will seek to make the borough an attractive location to live, building on the existing strengths highlighted in the Vision statement. No proposed change.
04	2.2	PRUPIM	CB Richard Ellis on behalf of PRUPIM	The vision should be strengthened such that it recognises the strategic role of Heathrow airport, for example, the last bullet point could be reworded as follows: "Heathrow airport will continue to play a strategic role in the growth of the national and local economy".	The Core Strategy already highlights the economic importance of Heathrow Airport to the borough in several places - e.g. in the Vision Statement at paragraph 4.1, at Strategic Objectives SO23 - SO25 and in the section of Table 5.3 on Heathrow Airport. It is not considered necessary to further emphasise the role of the Airport in the Vision statement as suggested. No proposed change.
320	3	Surrey County Council		In relation to the Spatial Portrait, the County Council therefore welcomes the acknowledgement on page 10 of the Core Strategy that Hillingdon is a major producer of minerals compared to other London Boroughs. The reference on page 15 to the need to meet the London Plan mineral apportionment figures as being one of the main planning challenges facing the Borough is also supported, together with the Vision on page 18 which recognises that Hillingdon continues to retain viable mineral	Noted. No proposed change.

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				resources within the Opportunity Area.	
193		British Airways plc	Lichfield Planning	<p>Comments on accuracy:</p> <p>In section 3. Portrait of Hillingdon under 'Transport':</p> <p>It should note that only Crossrail is actually committed;</p> <p>T5 should be listed as a major rail/underground station in its own right.</p> <p>Under 'Economy' (page 9): the document states "Each year Heathrow accommodates 480,000 flights and approximately 67m passengers". But paragraph 4.14 states that "...the airport receives 63 mppa". For consistency the same figure should appear in both sections, and BA regard 67mppa as a closer approximation of the current number.</p>	<p>Accepted - sub-section on transport following paragraph 3.3 to be amended to note that Crossrail scheme is under construction; and reference to be added regarding the status of the T5 station.</p> <p>Paragraph 4.14 to be amended to refer to 67 mppa.</p>
203		Heathrow Airport Ltd		<p>The third bullet of the Key Facts: Economy box refers to current and predicted passenger numbers at Heathrow. These need to be brought up to date. Passenger throughput for 2010 stands at 67 million passengers. The Draft Core Strategy refers to passenger numbers reaching 85 mppa by 2015. The decline in air traffic as a result of the economic recession means passenger numbers have not increased in line with previous forecasts. Our 2010 Capital Investment Plan illustrates that passenger numbers for 2015 are more likely to be in the range of 75-77mppa.</p>	<p>Accepted - change third bullet point in sub-section on Economy to refer to 75-77 mppa passenger numbers by 2015 - and similarly change figure quoted at paragraph 4.14.</p>
204		Heathrow Airport Ltd		<p>The Core Strategy, describes Heathrow as a key gateway for the UK. HAL suggest that the document makes clear the role of Heathrow as the UK's only hub airport. This should be explicitly recognised.</p>	<p>Accepted - amend wording of first sentence at first bullet point in sub-section on Transport following paragraph 3.3 to note that: "The borough is home to Heathrow Airport, a key gateway for the UK, the UK's only hub airport and</p>

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					one of the busiest airports in the world."
72	3.3	Hillingdon Primary Care Trust		Page 11 - correct text to say PCT manages 20 health care facilities.	Agreed - amend fourth bullet point at sub-section on Community Facilities to read: "Hillingdon Primary Care Trust owns and manages 20 health care facilities."
284	3.3	HFCA		The input & facilities of the borough's many community associations is not acknowledged in the Core Strategy. More emphasis is needed on improving their role.	Whilst the role of community associations is beyond the remit of the Core Strategy, the Vision statement does look to focus community activities in town and neighbourhood centres by encouraging a diversity of uses there and the policies in the Strategy aim to achieve this, e.g. via Strategic Objective 18 and policy CI 1. No proposed change.
305	Table 3.1	PRUPIM	CB Richard Ellis on behalf of PRUPIM	The issues section, as drafted, fails to recognise the wider definition of economic development in PPS4 which also includes main town centre uses such as hotels and retail uses. It therefore fails to recognise such uses as critical contributors to the supply of local employment opportunities. This section should include a key challenge as "delivering employment opportunities for the local population".	Table 3.1 is simply a summary of the main planning issues facing the borough - which includes local pressure on designated employment land from other uses - e.g. housing or retailing. The summary given does not mean that the Council fails to recognise the national guidance set out in PPS4. No proposed change.
442	Table 3.1	Henry Streeter Automotive Ltd	CGMS Ltd on behalf of Henry Streeter Automotive Ltd	Support for delivering hotel growth as required by London Plan	Noted. No proposed change.
464	Table 3.1	Mayor of London	Greater London Authority	On the economy section of the main challenges for Hillingdon it states that the London Plan requirement is to accommodate a proportion of 9-11,000 new jobs in Heathrow Opportunity Area. The Draft Replacement London Plan (2009) states that the employment capacity for Heathrow is 12,000 with 9,000 new homes...the table should reflect the new figures. It is recognised that detailed policies for Heathrow will be set out in the Heathrow Area DPD and the GLA looks forward to collaborative	Accepted - amend Table 3.1 to include the revised figures of 12,000 new jobs with 9,000 new homes as stated in the draft Replacement London Plan.

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				working with Hillingdon and Hounslow Councils on an Opportunity Area Planning Framework/DPD for the area.	
130	3.5		Gleeson Developments Ltd	Supports policy.	Noted. No proposed change.
185	3.5	British Airways plc	Lichfield Planning	Change paragraphs 3.5, 3.6 and 3.8 to recognise that land should be reserved for later consideration of Runway Three; there should be more intensive use of the runways; and remove the Council's opposition to supporting greater flight numbers.	The Core Strategy is intended to cover a fifteen year period and the inclusion of the detailed information suggested would risk becoming quickly out of date. The existing wording is considered to state clearly the current position on a third runway, and the Council's position regarding the Airport's future operation. No proposed change.
205	3.5	Heathrow Airport Ltd		<p>HAL object to the inclusion of paragraphs 3.5 to 3.6 of the Draft Core Strategy regarding "Heathrow Expansion". The Government's policy position on airports needs to be updated. As such, we suggest deletion of paragraphs 3.5 to 3.6 as drafted and replacement with appropriate wording acknowledging the position of the Government not to support a third runway but also the importance of improving existing airports to enhance reliability and passenger experience in line with the Government's objectives of "better not bigger". Given the relevance of this policy to the Government's decision to end the Cranford Agreement, this should also be drawn out in the document. We suggest the replacement of these paragraphs with wording which reflects the following:</p> <p>"Heathrow Airport</p> <p>The scale of the Heathrow Airport operation and the mitigation of its associated environmental impacts are defined by the conditions set out by</p>	The Core Strategy is intended to cover a fifteen year period and the inclusion of the detailed information suggested would risk becoming quickly out of date. The existing wording is considered to state clearly the current position on a third runway, and the Council's position regarding the Airport's future operation. No proposed change.

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				<p>the Secretaries of State in the decision to permit Terminal 5. In particular, the airport continues to be limited to a maximum of 480,000 Air Traffic Movements (ATMs), 42,000 car parking spaces and the area affected by aircraft noise must not exceed 145 sq km based on the 57 dB(A) Leq 16 hr contour. The growth of the airport within the permitted limits of 480,000ATMs with a potential passenger capacity of some 90 – 95 mppa, and with the runways operating in segregated mode, has therefore already been thoroughly considered, reviewed and appropriate mitigation secured.</p> <p>In January 2009 the Government confirmed its policy support for a third runway at Heathrow. In April 2009 a legal challenge to this decision was submitted by Hillingdon and nine other claimants. In March 2010 the judge ruled that the Secretary of State must reconsider the case for a third runway and the associated evidence base through the process of formulating its future Airport Policy. At the time it was envisaged this would be through an Airports National Policy Statement (NPS). Following the election in May 2010 the new Government announced cancellation of the third runway in their coalition agreement. In that context, BAA have announced that they are not progressing a planning application for a third runway.</p> <p>In the context of constrained airport capacity in the South East and the Government's decision to</p> <p>oppose expansion at Heathrow, Gatwick and Stansted, Transport Secretary Philip Hammond has set up a South East Airports Taskforce. The objectives of the Taskforce are to investigate the options "to make best use of the existing airport</p>	

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				<p>infrastructure” to ensure “improving efficiency and reliability and reducing delay” (source: South East Airports Taskforce, Draft Terms of Reference and Membership, 15 June 2010). Working together with key partners within the aviation community, this group will look at how to secure the successful future of aviation in the South East and Heathrow's hub status within the constraints of the existing runways The first meeting of the Taskforce was held in July 2010 and the findings are due to be reported in July 2011.</p> <p>The Government have also announced that the planned Airports NPS is to instead be progressed in the form of a “sustainable framework for UK aviation”. The Department for Transport (DfT) anticipate scoping this document during 2011, consulting on it in 2012 and adoption in 2013.”</p> <p>It is also relevant to report that, a ministerial statement was issued on 7th September 2010, by The Minister of State for Transport (Theresa Villiers), as follows:</p> <p>‘The previous Government's decisions in 2009 also included a commitment to end the Cranford agreement. This decision was based on the desire to distribute noise more fairly around the airport and extend the benefits of runway alternation to communities under the flight paths during periods of easterly winds. We support that objective and do not intend to re-open the decision. A number of infrastructure and operational changes by BAA and NATS are needed to implement this decision. The airport operator, BAA, is currently developing proposals for ending the Cranford agreement with a view to confirming the necessary works by the end of</p>	

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				<p>this year. I will look to BAA to ensure that proper consideration is given to appropriate mitigation and compensation measures for those likely to be affected by the proposals.”</p> <p>In the context of this, HAL would encourage policy support for the programme of renewal at Heathrow to deliver the objectives of improving passenger experience and improving reliability in line with the stated objectives of the new Government.</p>	
432	3.6	Imperial College NHS Trust		It is not clear in the Strategy how the Council will secure improvements for the local communities.	Through the use of its development control powers the Council will look to achieve the policy objectives in the Core Strategy - e.g. where significant commercial developments are proposed the Council will seek to encourage the provision of necessary community infrastructure provision in accessible local centres (as proposed at policy CI 1). This approach would benefit centres such as the Heathrow Villages. No proposed change.
433	3.7	Imperial College NHS Trust		There is no information given on where the High Speed 2 link to Heathrow will run or where a station will be located.	The precise details of the HS2 scheme have yet to be finalised and it is not possible to include any details on the scheme in the Core Strategy. No proposed change.
227	4	Hillingdon Alliance of Residents Associations		The Vision Statement does not fit with what is happening in the borough. Policies on the Green Belt need to be rigorously adhered to across the borough.	<p>The Vision Statement is not intended to summarise current trends but sets out the overall direction of travel which the Core Strategy is to take for the borough over the Plan period.</p> <p>Policy EM2 explains the Council's commitment to maintain the current extent, hierarchy and strategic functions of the Green Belt in the borough.</p> <p>No proposed change.</p>
255	4	Warren Park Residents		Need to include reference to environmental inequality gaps in the Vision statement.	Primarily through the operation of its environmental policies - e.g. BE 1 and EM 4 - the

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		Association			Council aims to address improving the quality of the built and open environment across the borough as a whole. The first bullet point of the Vision statement also sets out the intention of protecting and enhancing the borough's natural and built environment generally - thereby addressing issues of environmental inequality. No proposed change.
552	4	English Heritage		4 The Vision – where we want to be (pg 18-19)-It is noted that our comments with regards to the Vision identifying the potential of heritage assets to be at the heart of regeneration have not been incorporated into the Pre-submission version of the Core Strategy. This omission is contrary to advice set out in PPS5 (paragraph 7) and the emerging Mayor's Replacement London Plan (policy 7.9 part c – Consolidated Draft Replacement London Plan December 2010)	The Vision statement does give prominence to the importance of heritage assets (at the first bullet point) and taking full advantage of these as part of the borough's distinctive strengths. The fourth bullet point in the Vision statement covers future economic growth and notes the ambition with respect to heritage assets that by 2026 "Hillingdon has maximised the potential of its heritage assets...". In particular this section notes the intention to make best use of the Grand Union Canal for regeneration in the Hayes - West Drayton corridor. No proposed change.
385	4	Royal Brompton & Harefield NHS Trust	CGMS Consulting	The Trust would like to see the inclusion of a new strategic vision to support existing social infrastructure providers (including acute trusts that provide hospital care and medical research and development) within the borough that meet both a local, national and international health	The Council considers that the fifth bullet point of the Vision statement in the Core Strategy already effectively meets this proposal by seeking to ensure improved accessibility to local facilities (which would include social infrastructure) in order to improve the quality of life for local residents. No proposed change.
531	4	Arla Foods UK Plc	BNP Paribas Real Estate	Support the Vision Statement.	Noted. No proposed change.
428	4	Individual		Overall the DPD is a document that gains general support and has a vision but I feel that the vision lacks description and therefore cannot be as effective as it should be. Use of the words "the Council will" is too frequent - it has not always been able to achieve its aims.	Noted - the Core Strategy is intended to cover a period of 15 years and it would be difficult to predict exactly how the Vision will take shape over that length of time. The Strategy does make commitments where it can to particular objectives, e.g. the amount of housing to be delivered, and

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					does commit the Council to monitoring and keeping under review progress towards meeting those objectives. No proposed change.
462	4	Mayor of London	Greater London Authority	Hillingdon Council be advised that the Submission Document is not in general conformity with the London Plan with regard to the strategic issues relating to waste sites and apportionment figure and Crossrail contributions.	The Council addresses this comment by the Mayor at its responses to his representations at 465 and 466.
463	4	Mayor of London	Greater London Authority	The core strategy sets a framework for concentrating economic growth in Uxbridge, Heathrow and the Hayes/ West Drayton Corridor, without ignoring local centres. This vision is pragmatic and is supported.	Noted. No proposed change.
26	4.1	British Waterways		<p>The borough's waterways are a distinct asset to its character, and should be mentioned in the vision - we suggest that the first point be slightly amended to read:</p> <ul style="list-style-type: none"> •Hillingdon is taking full advantage of its distinctive strengths with regard to its places, communities and heritage: The special character of the borough's natural and built assets have been protected and enhanced, fewer heritage assets and wildlife habitats are at risk, there are more locally-distinct buildings, and new higher standards of development, integrating renewable energy technology. More residents are enjoying the borough's waterways and quality public open spaces, particularly in Harefield and south of the A40. 	<p>Accepted - the borough's waterways are a significant local resource, adding to its character.</p> <p>Final sentence of first bullet point of the Vision statement to be amended as proposed to read: "More residents are enjoying the borough's waterways and quality public open spaces, particularly in Harefield and south of the A40."</p>
27	4.1	British Waterways		<p>As above, this point could include reference to the valuable network of waterways in the borough, which are being more widely recognised for their value in improving health and well-being. We would suggest the following amendment:</p> <ul style="list-style-type: none"> •Improved environment and infrastructure is 	<p>The more general nature of this part of the Vision statement does not need additional emphasis to waterways - which are covered under the general description of physical infrastructure.</p> <p>No proposed change.</p>

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				<p>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, including improving and better utilising the borough's network of waterways. Improved building design and less reliance on cars has helped the borough to reduce its carbon footprint. Generation of energy from renewable sources is common practice and older housing stock is also benefiting from climate change initiatives. Town and neighbourhood centres are the focus for community activities and have a diverse range of uses including health clinics, cultural activities, local and business services, as well as retail and office uses.</p>	
78	4.1	Universities Superannuation Scheme Ltd	Drivers Jonas Deloitte	General Approach to Employment- USS continues to support the Council's vision to concentrate economic growth in Uxbridge, Heathrow and the Hayes/West Drayton Corridor, without ignoring local centres.	Noted. No proposed change.
306	4.1	PRUPIM	CB Richard Ellis on behalf of PRUPIM	The bullet point on economic growth should give greater recognition to Heathrow's significant role and contribution to the local and national economy.	<p>The Core Strategy already contains references elsewhere to the importance of Heathrow Airport to the local economy as a key employment area - e.g. see paragraph 4.10 or Table 5.3 - and the final bullet point of the Vision statement adequately refers to the economic benefits of the Airport to the borough.</p> <p>No proposed change.</p>
434	4.1	Imperial College NHS Trust		Para. 4.1, will the economical benefit from Heathrow Airport be harmonised and prosper Heathrow Villages and the surrounding areas?	When development proposals come forward at the Airport the general policies in the Core Strategy aimed at encouraging the provision of community infrastructure (e.g. CI 1 at sub-section 6) should assist communities such as the Heathrow Villages to benefit.

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					No proposed change.
96	Strategic Objectives to deliver The Vision	Northwood Residents Association		Strategic Objective SO14 (page32) states that all new jobs are to be developed in the south of the Borough. Again the north is totally neglected. Thus, even more residents from the north will have to commute to the south to work therefore creating more congestion. This is one reason why SMSs should be encouraged to set up in the north.	Strategic Objective 14 addresses the need for economic growth to be steered towards the more deprived, southern parts of the borough - but it does not preclude growth also taking place in the northern half, e.g. on the Locally Significant Industrial Sites identified in Map 5.1 or in local town centres - the strategy for these is summarised at Map 5.3. No proposed change.
116	Strategic Objectives to deliver The Vision	Environment Agency		We support SO3, SO8 and SO10 because they will help deliver the environmental objectives that we want to see in the London Borough of Hillingdon.	Noted. No proposed change.
139	Strategic Objectives to deliver The Vision	Hillingdon Inter Faith Network		<p>The strategic objective includes the release of land for 'other uses' and this is specifically mentioned in section 5.10 where it is acknowledged that there is currently more employment land than is needed.</p> <p>In the last year alone, HIFN has been supporting a number of faith communities who have been searching for land and premises for community use. In dealing with policies on surplus land, there would appear to be an opportunity to meet other community needs.</p>	<p>Strategic Objective 6 already commits the Council to promoting social inclusion through the provision of equality of access to social, cultural and other facilities. It is not necessary to amend SO15 as suggested. This would put an undue emphasis on community uses alone where land is considered surplus to employment needs, rather than seeking to address a range of other land use needs in the borough such as housing, education or leisure uses.</p> <p>No proposed change.</p>
142	Strategic Objectives to deliver The Vision	Hillingdon Inter Faith Network		New development must try to overlook green space wherever possible. SO7 & SO19 should cross refer to EM4.	<p>The implementation section of policy H1 following paragraph 6.24 already covers this point. It promotes high quality design - outlook from residential properties being one aspect which the Council would consider - e.g. encouraging views towards local green space where possible.</p> <p>No proposed change.</p>
147	Strategic Objectives to deliver The Vision	Hillingdon Inter Faith Network		S06 should additionally specify that surplus employment land should be used for community infrastructure provision.	No further change is considered necessary here as the social and community facilities referred to already includes community infrastructure

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					<p>provision - and justifies its provision later in the Core Strategy in the preamble to Policy CI 1.</p> <p>No proposed change.</p>
155	Strategic Objectives to deliver The Vision	Individual		Suggested Text for Strategic Objectives SO1 "Related Policy: HE1."	<p>Strategic Objective SO1 is equally relevant to both policies. It is not simply aimed at conserving and enhancing the existing built heritage in the borough but also, in combination with other Strategic Objectives in the Core Strategy, encourages high quality design appropriate to the wider area.</p> <p>No proposed change.</p>
160	Strategic Objectives to deliver The Vision	Individual		Suggested Text for Strategic Objectives SO1 "Related Policy: HE1."	<p>Strategic Objective SO1 is equally relevant to both policies. It is not simply aimed at conserving and enhancing the existing built heritage in the borough but also, in combination with other Strategic Objectives in the Core Strategy, encourages high quality design appropriate to the wider area.</p> <p>No proposed change.</p>
192	Strategic Objectives to deliver The Vision	British Airways plc	Lichfield Planning	<p>SO23, SO24, SO25</p> <p>1. Inconsistency between the Council's appreciation of the important contribution that Heathrow Airport makes to the local economy, and the Council's intentions of curtailing the growth of Heathrow's capacity: without growth the airport's economic activity is bound to decline with dire impacts on the welfare of the local population.</p> <p>2. To ensure feasibility of the Heathrow Opportunity Area, British Airways should be party to its planning.</p> <p>The continued economic and employment</p>	<p>The Council's overall approach to the future development of the Airport is set out at Table 5.3 and the importance of the Airport to the borough's economy is recognised in the Core Strategy.</p> <p>The Council is also committed to preparing a future Heathrow Opportunity Area Development Plan Document - at policy E3. As a major commercial operator at the Airport, British Airways would be consulted and involved in the preparation of that Document.</p> <p>The Council does not consider it reasonable to expect that during the Plan period it would have to reserve land originally identified as required for the Runway 3 proposal - including its apron and</p>

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				<p>growth of the entire Heathrow Opportunity Area, together with wider economic and social benefits, are dependent on the competitiveness and economic viability of Heathrow Airport. This dependency ought to be recognised in the Strategic Objectives.</p> <p>In this context, British Airways attach cardinal importance to keeping open the options for increased capacity of Heathrow airport, to enable economic and social objectives of the Core Strategy to be realised.</p> <p>Although the R3 scheme has been rejected by the current Government, governments and policies change from time to time and the importance of Heathrow's growth is likely to be recognised in future.</p> <p>To keep the options open, the land which would have served that airport expansion should not be put to uses that would conflict with its future aviation uses. This principle should relate to the entire R3, its apron and services north of the Bath road, as well as to land that would be within the flight safety zone and noise contours.</p> <p>In terms of SO 24, BA provides the Community Learning Centre to the benefit of local residents, schools and community groups. Its continued operation depends on the viability and financial performance of the airport and BA. This should be reflected in the Strategic Objectives.</p>	<p>services north of the Bath Road, and land that would be within the flight safety zone and noise contours - to uses which would not conflict with its future use for aviation.</p> <p>No proposed change.</p>
267	Strategic Objectives to deliver The Vision	Cathedral Group	Nathaniel Lichfield & Partners	Reference to a specific Housing Need Study can be removed - as it is likely to be superseded during the Plan period.	Accepted - reference to the Housing Needs Study to be removed as this may become out of date during the Plan period. The primary policy framework for affordable housing provision is likely to remain being set by national (PPS3) and regional (London Plan) policy.

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312	Strategic Objectives to deliver The Vision	PRUPIM	CB Richard Ellis on behalf of PRUPIM	We support the strategic objective to provide new jobs and economic growth in the Heathrow Opportunity Area.	Noted. No proposed change.
291	Strategic Objectives to deliver The Vision	Garden City Estate Residents' Association		SO23: The policy needs to clarify it aims to improve air quality - and should read: "...reductions in noise and poor air quality."	The Core Strategy already includes Strategic Objectives 10 and 11 together with policy EM8 which aim to address the issue of the need for improved air quality in the borough. No proposed change.
297	Strategic Objectives to deliver The Vision	Garden City Estate Residents' Association		SO6 and SO9 Both strategic objectives need strengthening as they have been unable to prevent the loss of the Yiewsley Swimming Pool from an area identified as suffering from social deprivation.	The individual case here is not a Core Strategy matter but the Council would note that the Strategy does contain at policy EM4 a commitment to safeguard, enhance and extend the network of open spaces, informal recreational and environmental opportunities that meet local community needs and facilitate active lifestyles and at policy EM5 a commitment to provide and promote sport and leisure facilities to meet the needs of the local population. No proposed change.
300	Strategic Objectives to deliver The Vision	Garden City Estate Residents' Association		SO23, SO24 and SO25 The Heathrow Opportunity Area boundaries should be included in the Core Strategy with explanations of what this means for the area - this is a material omission for residents and others seeking explanations of what is proposed.	The Heathrow Opportunity Area designation will be a matter for the Mayor of London as this is a London Plan proposal which has yet to come forward. No proposed change.
380	Strategic Objectives to deliver The Vision	Planning Perspectives LLP		Strategic policy SO18 seeks to improve access to "local services and facilities, including health, education, employment and training, local shopping, community, cultural, sport and leisure facilities especially for those without a car and for those in remote parts of the Borough". This policy is welcomed but should be integrated with wider strategic policies relating to Housing, Green Belt and access to Green Belt and Green Chains.	Taken together the Strategic Objectives set out in the Core Strategy do cover the issues of access to housing (SO7, SO19) Green Belt and Green Chain access (SO3, SO9) - and these in turn support the relevant policies regarding housing provision (H1, H2) or Green Belt and Green Chains (EM2). No proposed change.

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384	Strategic Objectives to deliver The Vision	Planning Perspectives LLP		This policy is welcomed as it is considered that there are isolated residential communities in the Borough such as Charville, who have clearly obvious deficiencies in terms of access to local services and facilities. It is important that there are coherent strategies promoted to ensure that the accessibility of such communities is enhanced.	Noted - Strategic Objective 6 and policy CI 1 in the Core Strategy address the need to promote social inclusion through equality of access to social, cultural recreational and other facilities. No proposed change.
431	Strategic Objectives to deliver The Vision	Imperial College NHS Trust		The Strategy refers to the prosperity which Heathrow Airport brings but does not address the blight caused by BAA ownership of properties in the Heathrow villages. Further growth at the Airport will adversely affect the villages - e.g. with road congestion.	The Core Strategy encourages sustainable operation and growth at Heathrow Airport (policy T4) and makes clear that in implementing this policy it will look to encourage sustainable transport solutions there - e.g. to prevent road congestion stemming from additional development. It is beyond the remit of the Core Strategy to prevent housing acquisitions by individual organisations. No proposed change.
473	Strategic Objectives to deliver The Vision	Mayor of London	Greater London Authority	The GLA particularly supports the following objectives SO1, SO2, SO3, SO4, SO6, SO8 and SO11.	Noted. No proposed change.
477	Strategic Objectives to deliver The Vision	Mayor of London	Greater London Authority	SO12-TfL supports the Borough's objective to promote sustainable modes of transport (i.e. walking and cycling) and reduce car dependence. However it is considered that this would only achieve limited success without implementing demand management measures such as parking restrictions; e.g. limited car parking provision for new residential and business developments where public transport accessibility is good in order to restrain car ownership growth and car based trips.	Noted - comment to be used to inform drafting of the later Development Management Development Plan Document which will consider local parking standards. No proposed change.
478	Strategic Objectives to deliver The Vision	Mayor of London	Greater London Authority	SO21-TfL acknowledges the Borough's concern about north south links however at present there is no research which quantifies the level of demand that exists. TfL recommend that the Borough provide evidence to support the	The need for improved north-south links is supported by residents' surveys. The Council believes that north-south public transport links are currently slow and need to be improved to support planned growth in the south of the borough.

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				statement and suggest the text is amended to read: "Continue to improve public transport services and interchanges in the borough to assure that the network reflects the travel requirements of current and potential users."	Improving these links is a key objective for the Council. No proposed change.
513	Strategic Objectives to deliver The Vision	L B Hillingdon (Labour Group)		SO6 & SO9: Yiewsley and West Drayton are identified as areas of need yet the Yiewsley Swimming Pool has been closed and is to be disposed of contrary to these objectives - if they are not strong enough to prevent the loss of this local facility in an area of deprivation then they need strengthening.	The individual case here is not a Core Strategy matter but the Council would note that the Strategy does contain at policy EM4 a commitment to safeguard, enhance and extend the network of open spaces, informal recreational and environmental opportunities that meet local community needs and facilitate active lifestyles and at policy EM5 a commitment to provide and promote sport and leisure facilities to meet the needs of the local population. No proposed change.
518	Strategic Objectives to deliver The Vision	L B Hillingdon (Labour Group)		SO23 The wording needs changing here from "...reductions in noise & air quality." to "...reductions in noise & poor air quality..." to make clear the objective is to improve poor air quality.	Accepted - existing wording is unclear - add qualifying word "poor" in SO23 to read: "...reductions in noise & poor air quality..."
520	Strategic Objectives to deliver The Vision	L B Hillingdon (Labour Group)		SO23, SO24 and SO25 - The Heathrow Opportunity Area should not include:- (i) The Heathrow Villages area between the M4 and A4. (ii) The whole of West Drayton, the majority of Yiewsley and large parts of southern Hayes. It is worthwhile noting that one reason the Tavistock Road Coal Yard site in West Drayton was included in the West London Waste Plan proposals is that it was in the Heathrow Opportunity Area.	Designation of the Heathrow Opportunity Area will be a matter for the Mayor of London as this policy proposal relates to the London Plan. The Council will be able to make representations to the Mayor as to the nature and extent of the designation in Hillingdon when the proposed designation comes forward - which is expected to happen during the plan period covered by the Core Strategy. Strategic Objectives 23-25 state the Council's objectives of securing economic, environmental, social and other benefits for the local area stemming from presence of Heathrow Airport as development comes forward there and in the immediate area during the plan period.

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					<p>The Tavistock Road site was not included in the West London Waste Plan proposals because it was in the Heathrow Opportunity Area.</p> <p>No proposed change.</p>
522	Strategic Objectives to deliver The Vision	L B Hillingdon (Labour Group)		Should include reference to those unable to walk or cycle any distance - add words to SO12: "...whilst making adequate provision for elderly or disabled people who are unable to walk or cycle any distance."	Accessibility to homes, social & community facilities, leisure & recreation opportunities and other land uses is a general theme already running through the Core Strategy and it is not considered necessary to amend the Strategy further as suggested as other Strategic Objectives (e.g. SO2, SO3 or SO9) all stress the need for accessibility to be a key consideration in creating better neighbourhoods, accessing open space or the range of local recreation, health and leisure facilities. No proposed change.
526	Strategic Objectives to deliver The Vision	L B Hillingdon (Labour Group)		<p>SO23, SO24, SO25 and Table 5.3:</p> <p>The Plan should show the boundaries of the Heathrow Opportunity Area with an explanation of what it means to help residents and others understand the implications for the area.</p>	<p>Designation of the Heathrow Opportunity Area will be a matter for the Mayor of London as this policy proposal relates to the London Plan. The Council will be able to make representations to the Mayor as to the nature and extent of the designation in Hillingdon when the proposed designation comes forward - which is expected to happen during the plan period covered by the Core Strategy. Strategic Objectives 23-25 state the Council's objectives of securing economic, environmental, social and other benefits for the local area stemming from presence of Heathrow Airport as development comes forward there and in the immediate area during the plan period.</p> <p>No proposed change.</p>
179	4.2	Universities Superannuation Scheme Ltd	Drivers Jonas Deloitte	USS continues to support strategic objectives 14 and 15 which seek to provide 9,000 new jobs and accommodate most economic growth in Uxbridge / the Heathrow Opportunity Area and protect land for employment uses to meet the	<p>Noted.</p> <p>No proposed change.</p>

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				needs of different sectors of the economy.	
307	4.2	PRUPIM	CB Richard Ellis on behalf of PRUPIM	This policy should be redrafted as follows "SO15: Manage the supply of land for employment uses, as appropriate, to meet the needs of different sectors of the economy in accordance with PPS4".	The Strategic Objectives and policies in the Core Strategy covering employment land have to be read in the context of the wider national planning framework set by PPS 4 and regional framework set out in the London Plan. Consequently there is no need to specifically refer to PPS 4 as proposed here. No proposed change.
308	4.2	PRUPIM	CB Richard Ellis on behalf of PRUPIM	We acknowledge and support the broad principle of these strategic objectives. We agree that opportunities to optimise local employment opportunities in the Heathrow area should be pursued by the Borough. For example, we consider that opportunities to improve access to employment in town centre, service and leisure uses, alongside traditional B class uses should be pursued by the Council.	Noted. No proposed change.
288	4.2	Garden City Estate Residents' Association		Add another Strategic Objective "Develop a plan for movement of heavy goods vehicles and uses generating heavy goods vehicles and uses generating heavy goods vehicles traffic for the borough so that town and local centres as well as residential areas are protected and can grow in a sustainable way."	This Core Strategy will not be able to set out a strategy for heavy goods vehicle movements in the way suggested. That would properly fall within the remit of a transport strategy for the borough in conjunction with the Local Implementation Plan. No proposed change.
292	4.2	Garden City Estate Residents' Association		Does not refer to neighbourhood plans - another Strategic Objective should be added to state: "Develop neighbourhood plans in conjunction with residents where these are requested."	Until the Localism Bill is enacted it is not certain that a system of neighbourhood plans will be introduced. It would be premature for the Core Strategy to include an undertaking to develop these plans in conjunction with local residents. No proposed change.
354	4.2	Hayes Town Partnership		There is insufficient recognition of Hillingdon's diverse communities. Hayes Town is already richly diverse and this brings many benefits and also some challenges. Similar factors affect	There is a general theme running through the Core Strategy recognising the diversity of the borough's population and the need to capitalise on this. This comes through in the first part of the

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				<p>other parts of the south of the Borough and in the period up to 2026 this diversity is likely to become even more widely spread. A comprehensive vision therefore needs to recognise the importance of diversity and the need for appropriate action to maximise its benefits. There is also a need to acknowledge that the Borough still has a fairly clear north-south divide that has to be addressed.</p>	<p>Vision statement which sets the aim for the borough to take full advantage of its distinctive strengths - including those of its various communities. The importance of helping those communities then follows through in the Strategy's policies, e.g. by seeking to ensure the vitality and viability of local town centres at policy E5, which act as a focus for various communities, or by aiming to encourage community infrastructure provision at policy CI 1, to meet the needs of the diverse range of communities now present in the borough population.</p> <p>No proposed change.</p>
516	4.2	L B Hillingdon (Labour Group)		<p>Add another Strategic Objective to "Develop a plan for movement of Heavy Goods Vehicles and uses generating Heavy Goods Vehicle traffic for the borough so that town & local centres as well as residential areas are protected and can grow in a sustainable way."</p>	<p>Developing a plan for Heavy Goods Vehicle movements across the borough falls outside the scope of the Core Strategy - this comment will be passed to the relevant department of the Council dealing with road use.</p> <p>The Core Strategy does have a Strategic Objective 11 which looks to minimise air pollution and carbon emissions from new development and transport. Policy EM8 sets out how the Council will seek to safeguard and improve air quality and noise levels across the borough. Part of the implementation of this policy will involve implementing the borough Transport Strategy to ensure reductions in emissions from transport in the borough.</p> <p>No proposed change.</p>
523	4.2	L B Hillingdon (Labour Group)		<p>Does not include neighbourhood plan provision - add another strategic objective: "Develop neighbourhood plans in conjunction with residents where these are requested."</p>	<p>The proposals for Neighbourhood Plans in the Localism Bill have yet to be enacted. It would be premature for the Core Strategy to make a commitment of this kind in advance of the legislation. The Strategy already contains two "place shaping" strategic objectives: SO1 & SO2, which together would support the making of</p>

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					neighbourhood plans. No proposed change.
546		English Heritage		<p>LATE SUBMISSION</p> <p>We would advise that providing a sound evidence base, including a thorough understanding of the historic environment and local character will help ensure that Core Strategy policies are locally specific and reflect more fully the issues and aspirations of the Borough. This includes how locations identified for growth (as set out in The Spatial Strategy) will be delivered without causing irreversible damage to the environmental characteristics of the area (PPS1 para 19). At present there appears to be a lack of clarity on how and why these locations were identified, and their capacity to accommodate change. If the Borough has already produced such work, this should be made public and listed within the Core Strategy itself and /or linked to the evidence base so that it can be scrutinised.</p>	<p>The Core Strategy sets out the broad spatial approach which the Council intends taking over the next 15 years. It will be for other more detailed parts of the Local Development Framework - e.g. the Site Allocations, Development Management and Heathrow Area Development Plan Documents to bring forward detailed development proposals which will help meet the borough's overall development objectives. No proposed change.</p>
286		Garden City Estate Residents' Association		<p>Add reference at SO12 to those unable to walk or cycle any distance with this wording: "...whilst making adequate provision for the elderly or disabled people who are unable to walk or cycle any distance."</p>	<p>Improved accessibility for the elderly, disabled and others is a key theme running through the Core Strategy - e.g. the fifth bullet point of the Vision statement carries a general commitment to improved accessibility, the aim to create safe, functional and accessible neighbourhoods is set out at Strategic Objective 2 and policy BE1 aims to provide more homes and places which will be accessible for the elderly and disabled. Consequently it is not considered necessary to amend SO12 specifically for this purpose.</p> <p>The Council would note that it intends producing a Development Management Development Plan Document which will cover detailed planning standards for accessible buildings.</p>

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					No proposed change.
293		Garden City Estate Residents' Association		The Heathrow Opportunity Area designation should not cover: the Heathrow Villages area which is predominantly Green Belt; the large residential areas in West Drayton, Yiewsley and Hayes - it should only cover existing industrial or commercial areas.	The Heathrow Opportunity Area designation will be a matter for the Mayor of London as this is a London Plan proposal which has yet to come forward. No proposed change.
115	Table 4.1	Buccleuch Property	Drivers Jonas Deloitte	The Replacement London Plan 2009, identifies that through the LDF process, the Council should look to provide a target of 620 new units per annum. The current target provides a maximum of 425 units per annum.	The borough's housing target in the draft Replacement London Plan has been amended following discussions at the Examination in Public to 425 units per annum and this is the figure now included in the Core Strategy. No proposed change.
Page 61	4.8	British Waterways		Uxbridge benefits from the presence of the Grand Union Canal that runs through it and connects it to other centres, offering a sustainable transport link for pedestrians and cyclists and an amenity resource for employees working in the area. We would therefore suggest that the canal and its towpath be mentioned here.	Paragraph 9.25 already includes a general intention on the part of the Council to seek to encourage the use of the Grand Union Canal for better pedestrian and cycle links across the borough. It is not considered necessary to also amend paragraph 4.8 to highlight doing this specifically in Uxbridge. No proposed change.
186	4.10	British Airways plc	Lichfield Planning	There is inconsistency between the Council's appreciation of the important contribution that Heathrow Airport makes to the local economy, and the Council's intentions of curtailing the growth of Heathrow's capacity: without growth the airport's economic activity is bound to decline with dire impacts on the welfare of the local population.	There is no inconsistency in the Core Strategy's approach to Heathrow Airport - e.g. its importance is highlighted at Table 5.3 and the Council again re-iterates its broad support for delivering a renewal programme at the Airport. Equally, the Council has a responsibility to consider the environmental and amenity implications of any major future development in its area and it has to set out its intention to do this with respect to Heathrow Airport - the major commercial development in its area. No proposed change.

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206	4.10	Heathrow Airport Ltd		<p>HAL object to the Council's proposed policies on airport related development. Whilst acknowledging that the majority of development on airport shall be directly airport related, HAL consider there is a strong case for hotels on airport, particularly where they are well served by public transport. On that basis, there may be plans in the longer term for hotels in sustainable locations such as the Central Terminal Area and at Hatton Cross. Allowing hotels on the airport (in appropriate locations) allows for an improved passenger experience, provides equivalent levels of service at all terminals and reduces the need for additional journeys by road from hotels to terminals due to the proximity of railway stations, or within walking distance to terminals HAL find that the Council's policy on hotel provision confusing and this creates uncertainty.</p> <p>These comments are consistent across para 4.10, policy E2, the section on "future growth" on page 38 and Policy E3. It is also noted that the wording of paragraph 4.10 states that "the continuing demand for freight handling and commercial floor space within the airport boundary will only be met as long as environmental conditions are improved and maintained." The findings of the Inspector and Secretaries of State in respect of Terminal 5 require HAL to safeguard land for airport uses. This is to be reported on a 5 yearly basis (Condition A77 of the T5 permission), to demonstrate how airport related uses can be accommodated as passenger throughput increases. Environmental issues, such as local air quality, are not specific to airport related development. These apply to all developments in the Borough and therefore it is not considered appropriate that this additional "test" is applied in respect of airport related development. It is</p>	<p>As it stands paragraph 4.10 permits the development of associated freight handling and commercial development within the airport boundary. This would appear to meet with Heathrow Airport Ltd.'s requirements and it is reasonable for the Council to specify that existing environmental conditions should not be adversely affected by that development.</p> <p>No proposed change.</p>

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				<p>considered the Council's policy in respect of Air Quality is set out adequately in Policy EM8. HAL propose relevant wording in our comments on Policy E2 and text at para 4.10 should be amended accordingly to acknowledge the potential for hotel uses on airport, which although not defined as "airport related development" often form an important part of many passengers' overall journey from origin to destination. In respect of other airport related development, Condition A77 of the Terminal 5 permission requires HAL to review on a 5 year basis the potential to accommodate airport related uses on airport. The 2008 ARD report (submitted April 2009) demonstrates that there is more than adequate land (a surplus of 12.6 hectares) to accommodate airport related development at Heathrow up to a 90 mppa scenario. Therefore, it is important for HAL to continue to make provision for airport related uses on airport and to safeguard land in the longer term for this purpose, to satisfy the requirements of the Secretaries of State set out in the decision on Terminal 5 and as supported by other local planning authorities adjoining Heathrow.</p> <p>It is acknowledged that there is a need to take into account the environmental impacts of new development (e.g. air quality) but this is not an airport specific issue. As demonstrated elsewhere, contributors to air quality are not only located on airport and there are significant contributors in perimeter areas and beyond the immediate environs of the airport. As such, the general policies on this issue are relevant.</p> <p>We would suggest changing the wording of paragraph 4.10 as follows: "the continuing demand for freight handling, commercial floor</p>	

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				space and other airport related development within the airport boundary will be provided for.”	
207	4.12	Heathrow Airport Ltd		<p>HAL feel that clarification should be provided within the Core Strategy regarding the area defined as the Heathrow Opportunity Area. Given Heathrow’s important contribution we would envisage the entire airport boundary is included. In which case the proposed 700 ha boundary would be significantly larger with Heathrow Airport covering an area of circa 1,200 hectares. The text on page 40 refers to the Heathrow Opportunity Area being illustrated on Map 5.1. It is not considered that Map 5.1 is effective in defining the coverage of the Heathrow Opportunity Area.</p> <p>HAL feel that clarification should be provided within Core Strategy regarding the area defined as the Heathrow Opportunity Area. Given Heathrow’s important contribution we would envisage the entire airport boundary is included. In which case the proposed 700 ha boundary would be significantly larger with Heathrow covering an area of circa 1,200 hectares.</p>	<p>The Heathrow Opportunity Area will be defined by the Mayor of London as it is a proposal in the London Plan. It cannot be defined in the Core Strategy as the Mayor has yet to come forward with initial proposals for the Opportunity Area, including details of its extent.</p> <p>No proposed change.</p>
208	4.14	Heathrow Airport Ltd		<p>The figures quoted at para 4.14 should be updated. Furthermore, it is unclear why the Council have assumed that in 2012 there will be a rise in the number of larger aircraft. Passenger throughput for 2010 stands at 67 million passengers. The Draft Core Strategy refers to passenger numbers reaching 85 mppa by 2015. The decline in air traffic as a result of the economic recession means passenger numbers have not increased in line with previous forecasts. Our 2010 Capital Investment Plan illustrates that passenger numbers for 2015 are more likely to be in the range of 75-77mppa. Furthermore, it is unclear why the Council have assumed that in 2012 there will be a rise in the</p>	<p>Accepted - Paragraph 4.14 to be amended to refer to 75-77 mppa by 2015.</p> <p>Noted that there is some likely increase in the number of larger aircraft using the airport by 2012.</p>

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				number of larger aircraft. BAA would be happy to share the proposed fleet mix if desirable and are doing so through work on the ending of the Cranford Agreement. There is not indication that there will be a substantive increase in the use of larger aircraft in 2012. In line with our comments on paragraphs 3.5-3.6, this paragraph should articulate the parameters defined by the Terminal 5 planning permission and the recognised capacity of Heathrow. These are not repeated in the interests of brevity, either at paragraph 3.5-3.6 or in paragraph 4.14.	
209	4.15	Heathrow Airport Ltd		HAL feel that at least an indication of the boundary of the HOA should be given in the Core Strategy. The document identifies numerous site specific issues (e.g. designations) which are difficult to identify at the scale proposed and would be better left to the Proposals Map. It does however omit the boundary of the Heathrow Opportunity Area which would provide a good guide to the area covered by the future DPD and would be sufficiently "strategic" to minimise site specific issues. The text on page 40 refers to the Heathrow Opportunity Area being illustrated on Map 5.1. It is not considered that Map 5.1 is effective in defining the coverage of the Heathrow Opportunity Area. HAL consider that the boundary for the Heathrow Opportunity Area should be defined on the either Map 4.1 (Key Diagram) or Map 5.1 (Locations for Employment Growth).	The Heathrow Opportunity Area will be defined by the Mayor of London as it is a proposal in the London Plan. It cannot be defined in the Core Strategy as the Mayor has yet to come forward with initial proposals for the Opportunity Area, including details of its extent. No proposed change.
196	4.19	The Ballymore Group		Support statement that land at Blyth Road Hayes will be partially released for mixed-use development.	Noted. No proposed change.
28	4.21	British Waterways		We support the introduction of this statement, and would only suggest a small amendment to highlight the full potential of the GUC:	Policy EM3 and paragraph 8.33 already emphasise the potential of the borough's canals and rivers for leisure and other uses. It is not

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				"The Grand Union Canal will be a key open space, blue/ green corridor and sustainable transport link, with improved public access, strong biodiversity habitats, and increased opportunities for recreation and leisure activities, on and along the water."	considered necessary to amend paragraph 4.21 in addition. No proposed change.
95	4.31	Northwood Residents Association		Para 4.3.1 (page 25) states that strategies will be developed to ensure that local centres etc will respond to changes in shopping patterns. Table 5.5 (page 49) gives details of estimated extra square meterage required. The Council assumes that its policies will be successful and it does not state where the land/premises will come from to provide the extra retail space. The current Council policy of introducing higher parking charges for non-residents is driving people away from centres such as Northwood which is contrary to the declared strategy. Furthermore there is no strategy to encourage SME's to set up north of the A40 as policy E6 (page 51) indicates that all the land is found south of the A40. A strategy needs to be developed for the northern centres if they are to be vitalised.	The Core Strategy does not set out detailed strategies for individual centres but rather a broad strategy approach across the borough. As other parts of the Local Development Framework come forward, these can be expected to identify land potentially available locally for retail (and other) land uses - e.g. in a Site Allocations Development Plan Document. Policy E6 does make clear that the Council will look to encourage the development of accommodation for small and medium-sized businesses across the borough - not simply on sites south of the A 40. The Council does carry out annual land use surveys in its town centres and will keep their retail status under review. It may bring forward specific local area strategies as appropriate in future if survey information indicates these may be required.
30	Map 4.1	British Waterways		We are pleased to note the reference to the Grand Union Canal on the Key Diagram.	Noted. No proposed change.
194	Map 4.1	British Airways plc	Lichfield Planning	Map 4.1 Key Diagram is inaccurate. The site of the existing T5 and its satellites is shown as "retained greenbelt". BA suggest that the diagram should also show the boundary of land that was reserved for the R3 and its apron, as well as the areas that would	The Council intends reviewing all Green Belt designations in a Site Allocations Development Plan Document to be produced following preparation of the Core Strategy. Individual alterations to the Green Belt will not require alterations to the Key Diagram - which is purely illustrative and intended to summarise the broad

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				<p>be affected its safety and noise shadow, which should be reserved in case government policy regarding airport expansion changes in future years.</p>	<p>spatial planning approach being taken in the Core Strategy.</p> <p>The request to show the original Runway 3 proposals on the Key Diagram would not serve any useful purpose in terms of explaining the Core Strategy. Future proposals for the Airport's development could be dealt with in a future Heathrow Opportunity Area Development Plan Document.</p> <p>No proposed change.</p>
210	Map 4.1	Heathrow Airport Ltd		<p>The Green Belt designation affecting T5 should be removed or adjusted to reflect the current development. There are two options to resolve this, as follows:</p> <ul style="list-style-type: none"> • Amend the Key Diagram so it is more strategic in nature (rather than making site specific designations). This would include removal of Green Belt from the plan for definition in the Proposals Map at a later date and avoid this providing conflicting information. • Amending the boundary of the Green Belt so that land at Terminal 5 and Longford Meadows is removed; 	<p>The Key Diagram is purely illustrative, summarising the broad policy approach being taken by the Core Strategy. It is not a detailed development control document. The Council will prepare a subsequent Site Allocations Development Plan Document which will examine all local Green Belt designations and come forward with proposals for changes where these are considered necessary. It is not proposing to consider Green Belt alterations in the Core Strategy for that reason.</p> <p>No proposed change.</p>
386	Map 4.1	Royal Brompton & Harefield NHS Trust	CGMS Consulting	<p>The Trust requests the identification of Harefield Hospital on the Key Diagram as a major developed site in the Green Belt.</p>	<p>The Key Diagram is intended to show the broad policy themes included in the Core Strategy. It is purely illustrative and not a detailed land use plan. That purpose will be served by the Proposals Map Development Plan Document which is to be brought forward at a later stage. It will set out detailed land use proposals in the Local Development Framework and reflect the outcome of work on other Development Plan Documents - notably the Site Allocations and Development Management Development Plan Documents.</p>

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					No proposed change.
418	Map 4.1	PRUPIM	Maddox & Associates on behalf of PRUPIM	It is proposed that the Bath Road Employment Area highlighted on Map 4.1: Key Diagram is removed. If necessary, the designated areas of Locally Significant Employment Areas should be highlighted on this plan ensuring that the Core Strategy is consistent.	The Bath Road Employment Area does cover a broad area on the northern perimeter of Heathrow Airport and as such is shown as a significant proposal affecting that part of the borough. The Key Diagram is purely illustrative and only covers broad policy themes. The designated Locally Significant Employment Areas are already shown elsewhere in the Strategy - at Map 5.1 (Locations for Employment Growth) and do not need to be repeated on the Key Diagram. Their detailed designations will be shown on the later Proposals Map and in the Site Allocations Development Plan Documents. No proposed change.
77	5	Universities Superannuation Scheme Ltd	Drivers Jonas Deloitte	The London Plan identifies two Opportunity Areas within the Borough. One of these areas is North Heathrow, which includes Stockley Park. The Sub-Regional Development Framework expects the North Heathrow area to accommodate the capacity for 5,500 new jobs. Stockley Park is identified as a Locally Significant Employment Location in the London Plan. Both Riverside Way Industrial Estate and Eskdale Industrial Estate are identified as Industrial Business Parks in the London Plan. The Hillingdon Core Strategy aims to protect these London Plan allocations and also supports their growth. USS supports the recognition of the allocations.	Noted. No proposed change.
310	5.1	PRUPIM	CB Richard Ellis on behalf of PRUPIM	We support the recognition in the Core Strategy that there is currently an oversupply of employment land in the Borough and consequently, that there is scope for release to other uses.	Noted. No proposed change.
20		Tarmac Limited	Quarryplan (GB) Limited	The strategic objective of protecting employment land is supported by Tarmac. It is particularly	Noted.

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				<p>important to protect employment land where such land is well located on appropriate transport routes. The Tarmac operations at Pump Lane Hayes are a particularly good example of multiple industrial uses which are heavily dependent on the importation of raw materials by rail and export of materials by road. The Tarmac site imports crushed stone and sand by rail for use in manufacturing asphalt for roads, for the production of ready mixed concrete and for distribution as construction aggregates. Due to excellent road connections the site also imports asphalt plantings from road works for recycling and reuse in asphalt manufacture. The site is located on the Bristol to Paddington main rail line and adjacent to the Hayes by-pass. The policy regarding the release of surplus employment land for other uses needs to be carefully considered. The potential impact of new non-employment uses being established close to existing employment uses is not always appropriate. This is especially the case where remaining employment uses include major industrial operations such as the Tarmac Hayes site which operates 24 hours per day and seven days per week. The release of surplus employment land needs to be undertaken only after the most rigorous of assessments into the long term need for the land and also the potential impacts on other employment and industrial occupiers in the area.</p>	<p>No proposed change.</p>
31	5.3	British Waterways		<p>We would request the following amendment to this paragraph:</p> <p>"...much of this area was industrial and reliant on the Grand Union Canal for transport; employment has become increasingly office based with many office parks located on former industrial sites, becoming a poor neighbour to</p>	<p>The proposed change does not add to the context set out in this section. The Council would note that London Plan policies require canalside development to enhance the character of canals (see policy 4C.20 in the 2008 London Plan or policy 7.30A in the 2009 draft Replacement London Plan).</p>

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				the canal environment."	No proposed change.
393	5.3	Hillingdon Motorist Forum		The Grand Union canal should be developed to carry some of the freight through the Borough.	<p>The 2008 London Plan encourages boroughs to support new facilities which increase the use of the network for passenger & tourist traffic and bulk freight movement (policies 4C.7, 4C.8 and specifically policy 4C.20 re canals).</p> <p>The 2009 Draft Replacement London Plan is expected to be adopted by the Mayor as the latest version of the London Plan during 2011. Its policies largely re-iterate those of the current 2008 London Plan and again encourage greater use of the network for transport - especially for freight (policies 7.26 & 7.30).</p> <p>In the Core Strategy Section 8 on Environmental Management carries the main section on the borough's "Blue Ribbon Network". It notes that the borough has 20 km of the Grand Union Canal (GUC) - including the Main Line, Paddington and Slough Arms. Their value to the borough's open space network is stressed - e.g. the GUC is of regional importance as it crosses several local authority boundaries.</p> <p>The multi-functional role played by the GUC (and the rest of the Blue Ribbon network) is also highlighted. The policies in the Core Strategy recognise this and a number of policies support its implementation - e.g. policies covering landscape, flood risk, open space, sport & leisure and its use for sustainable transport (at policy EM3).</p> <p>No proposed change.</p>
508	5.3	Councillor P Harmsworth		<p>Economy (S3):</p> <p>Existing residential and green space areas should be deleted from the Heathrow</p>	The designation of detailed boundaries for the Heathrow Opportunity Area is still to be undertaken by the Mayor of London as this is a proposal within the London Plan. The Core

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				Opportunity Area designation - which should be limited to existing industrial and commercial areas.	Strategy already contains policies to maintain and enhance local green space and residential areas and these will continue to operate should the Mayor declare an Opportunity Planning Area Framework covering part of the borough. No proposed change.
60	5.4	Mr John McDonnell MP		There is insufficient concern expressed about the loss of employment sites to other uses. There should be a more positive commitment to protecting land for employment, particularly manufacturing.	The Council is committed to protecting Strategic Industrial Locations and Locally Significant Industrial Sites and Employment Locations - as well as maintaining its network of town centres, which are themselves significant employment locations. The Council is looking to maintain manufacturing industry through its policy approach on employment land (see policy E1) and is committed to monitoring the amount of employment land available and maintaining an appropriate supply of sites through the plan period. No proposed change.
394	5.4	Hillingdon Motorist Forum		Traffic congestion causes delays which in turn increases business costs. An adequate road network will encourage businesses to move into Hillingdon. Upgrade the road network to reduce traffic congestion.	Improvements to the road network are primarily dealt with in the borough's Local Implementation Plan and are only one facet of reducing traffic congestion. The transport policies in the Strategy aim to steer development to the most accessible locations (to facilitate access by all modes of transport), to improve public transport interchanges in local centres (to make use of public transport a more attractive option) and to improve north-south public transport links across the borough (to reduce pressure for private car use). Taken together these measures should help reduce road congestion within the existing road network. No proposed change.
309	5.5	PRUPIM	CB Richard Ellis on	This paragraph should be amended to reflect	The Core Strategy primarily sets out the spatial

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			behalf of PRUPIM	recognition of the other issues affecting the location choices of businesses.	land use planning priorities and policies for the borough. It is not an economic development document which might more appropriately cover the points raised in this objection. The Council take the view that no further clarification is required as such in paragraph 5.5 and would note that some location advantages for businesses are detailed in the section on Hillingdon's Key Facts following paragraph 3.3. No proposed change.
32	5.10	British Waterways		Add words: "...responding particularly to sensitive environments such as along the Grand Union Canal,..." to paragraph 5.10 to read: "...and any release of surplus industrial land will be carefully managed to support Hillingdon's employment generation, responding particularly to sensitive environments such as along the Grand Union Canal, whilst creating opportunities for regeneration and release to other uses including much needed housing."	The Council would note that London Plan policies already require canalside development to enhance the character of canals (see policy 4C.20 in the 2008 London Plan or policy 7.30A in the 2009 draft Replacement London Plan). In view of that policy requirement the proposed additional text here is considered unnecessary. No proposed change.
241	Map 5.1	Yiewsley and West Drayton Town Centre Action Group		It has been noted that the designated areas for hotels and offices has been reduced. However, it is still difficult to determine the exact scale as the map does not include detail of the area concerned.	Map 5.1 is purely illustrative - proposals for future hotel or office locations in the growth areas shown can be expected to come forward as part of later work on the Local Development Framework - either in the Site Allocations or Heathrow Area Development Plan Documents. No proposed change.
114	Map 5.1	Buckleuch Property	Drivers Jonas Deloitte	Map 5.1, 'Locations for Employment Growth' identifies an indicative area for the managed release of employment land through a purple circle. It is noted within the Council's response to comments to the previous draft of the Core Strategy, that this circle relates specifically to the Pump Lane and Blyth Road areas. In our previous representations, we commented	The information regarding potential employment land release given at Map 5.1 and in paragraph 5.11 is illustrative. The text does make clear the Council's intention to further explore the potential for any release in detail when it prepares the Site Allocations Development Plan Document. The wording of the Core Strategy is careful to point out that any sites to be examined for potential release from employment use may include those

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				<p>that full consideration had not been given to all available land around Hayes, in particular land adjoining Hayes Town Centre, Station Road and Nestles Avenue. Therefore, we are concerned that the identification of specific sites within this draft is premature ahead of a detailed site allocations review and Policy SO15 / Map 5.1 have not been fully justified by a robust evidence base.</p> <p>Further, the above policies are contrary to the 'Implementation of Policy E1' which states that the release of surplus land of the plan period 'will be delivered through the Site Allocations and Development Management Development Plan Documents.'</p> <p>In order to ensure that these policies are compliant and 'sound' we recommend that Map 5.1 is amended to extend the potential area for the release of employment land allowing for further analysis at the Site Allocations consultation stage.</p>	<p>sites named. It does not state that only these sites will be looked at - and allows for the examination of other employment sites in the Hayes area as the objector requests.</p> <p>No proposed change.</p>
195	Map 5.1	British Airways plc	Lichfield Planning	Map 5.1 – the bottom box headed 'Heathrow Opportunity Area' is misleading the reader to think that this applies to the entire area in that diagram.	<p>Map 5.1 is a diagram and purely for illustrative purposes.</p> <p>No proposed change.</p>
211	Map 5.1	Heathrow Airport Ltd		The diagram should be removed as it does not help clarify specific designations - a more general statement should be included in the Core Strategy and detailed designations dealt with in the Proposals Map. The document does not seem to be the appropriate forum for determining precise locations for development or specific designations. Instead, HAL would suggest that these are deleted from the document to aid clarity but that the policy intent can be set out in the Core Strategy. The precise boundaries can then be defined in the Proposals	<p>Map 5.1 is purely illustrative and not intended to set out precise locations for future development. The Council agrees that that would be the role of later documents brought forward as part of the Local Development Framework - including the Site Allocations and Proposals Map Development Plan Documents.</p> <p>No proposed change.</p>

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				Map.	
265	Map 5.1	Cathedral Group	Nathaniel Lichfield & Partners	Supports the managed release of employment land in the Blyth Road area of Hayes.	Noted. No proposed change.
409	Map 5.1	SEGRO Plc	Nathaniel Lichfield & Partners	Identifying Riverside Industrial Estate as being outside the North Uxbridge IBP is inconsistent with national policy, Designating Riverside Industrial Estate as an LSIS will undermine its role as a quality industrial business park - LSIS designation should be removed and IBP designation should apply.	The Core Strategy has to be in general conformity with the London Plan. This designation has not been raised by the Mayor of London as a conformity issue. The Council does not consider the designation as a Locally Significant Industrial Site as any lesser than the London Plan designation of Industrial Business Park. It will seek to protect employment generating uses on these sites. It will not simply restrict uses to B2 or B8 alone there, where other business uses may be acceptable. No proposed change.
419	Map 5.1	PRUPIM	Maddox & Associates on behalf of PRUPIM	It is proposed that Bath Road is highlighted on Map 5.1 as area for growth of offices and hotels, except those areas already identified as Locally Important Employment Areas.	Accepted in part - for consistency with the section in table 5.3 on Heathrow Airport and Perimeter, the Council will amend paragraph 5.20 to note the Bath Road area is also potentially suitable for hotel and office development.
425	Map 5.1	Tesco Stores Ltd	GL Hearn on behalf of Tesco Stores Ltd	Map 5.1 should be amended to acknowledge local conditions and other Council policy documents which anticipate growth in North Hillingdon Local Centre. Accordingly, North Hillingdon Local Centre should be identified as 'proposed areas of growth for hotels and office - reference 2'	The Council is to produce a revised Site Allocations Development Plan Document and new Development Management Development Plan Document as further parts of the Local Development Framework. These can be expected to detail the current position on any development sites / proposals in North Hillingdon and review the town centre boundary and shopping frontage designations. Until that work is completed the Council takes the view that it would be premature to make the proposed change to Map 5.1.

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
					No proposed change.
413	Map 5.1	Greater Manchester Pension Fund	Capita Symonds on behalf of Greater Manchester Pension Fund	Object to the designation of the Argent Centre as a "Locally Significant Industrial Area". Map 5.1 should be amended to identify it as a potential area for the managed release of employment land.	<p>The Council propose bringing forward detailed proposals for the managed release of employment land in the borough as part of work for the Site Allocations Development Plan Document. It will consider these representations as part of that work, together with other areas in Hayes.</p> <p>No proposed change.</p>
445	Map 5.1	Henry Streeter Automotive Ltd	CGMS Ltd on behalf of Henry Streeter Automotive Ltd	The annotation to the map advises that opportunities for growth in the Heathrow Opportunity Area (HOA) will be defined through a separate document. However the boundary of this area is not shown on the Map. Responses to our representations on the previous version of the Core Strategy suggested that hotel growth would include 'sites' outside of designated employment land on the Heathrow perimeter but these areas are not shown on the plan. It is unclear where this designation is to be from this Map.	<p>The Heathrow Opportunity Area is a London Plan proposal and the designation of its boundaries will be a matter for the Mayor of London who has yet to come forward with detailed proposals for the extent of the designation.</p> <p>The Core Strategy sets out the broad approach which the Council intends to take for the future spatial development of the borough. With respect to hotel development its approach will be primarily to seek to steer this towards those centres with high levels of public transport accessibility. Once further work is completed on other parts of the Local Development Framework, notably the Site Allocations and Heathrow Area Development Plan Documents, a more detailed strategy will effectively be in place for the development of hotels across the borough.</p> <p>No proposed change.</p>
21	5.11	Tarmac Limited	Quarryplan (GB) Limited	Part of Pump Lane, Hayes is listed within the areas that have been identified for potential release from industrial and warehouse use to other uses. The Employment Land Study (London Borough of Hillingdon, July 2009) considers existing employment and industrial uses including those at Pump Lane Hayes.	The Core Strategy is required to be in general conformity with the London Plan. The draft Replacement London Plan issued in October 2009 (at policy 4.4 and Map 4.1) identifies the borough as one where limited release of industrial land should be considered in future. In order to address this part of the London Plan, paragraph

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				<p>Approximately 1.74 hectares at the western end of the Pump Lane industrial area has been removed from the designation of Proposed Locally Significant Industrial Sites. This 1.74 hectare area is considered to have potential for retail/town centre mixed use redevelopment in part due to its proximity to the town centre and vacancy level. Tarmac wish to object to the potential removal of part of the Pump Lane area at Hayes from the industrial designation. Although Tarmac's land is not directly affected by the proposal, being at the eastern end of the Pump Lane industrial area, the 1.74 hectare area is only 150 metres from the Tarmac site. The Tarmac site operates 24 hours per day and seven days per week, it includes a number of industrial and manufacturing processes and has considerable train and lorry movements outside normal working hours. The presence of potentially sensitive receptors in close proximity to the Tarmac Hayes site may create unnecessary constraints and is therefore unacceptable. The entirety of the existing Pump Lane, Hayes industrial area should be retained. All of the Pump Lane Hayes industrial area should be retained for industrial use and there should be no release for alternative use due to the potential constraints this release would create on existing industrial occupiers on the remainder of the Pump Lane industrial area.</p>	<p>5.11 of the Core Strategy has identified those areas where it might consider release of some existing industrial land in future. Later parts of the Local Development Framework will address this issue in detail e.g. the Site Allocations Development Plan Document. As noted in the Core Strategy, the Council is proposing to look especially at existing industrial land designations alongside the Grand Union Canal in Hayes to assess whether opportunities for mixed use redevelopment might be brought forward.</p> <p>No proposed change.</p>
33	5.11	British Waterways		<p>We are pleased that the value of the GUC as a catalyst for regeneration has been recognised here, and that its potential for delivering benefits to Hayes has been identified.</p>	<p>Noted.</p>
112	5.11	Buckleuch Property	Drivers Jonas Deloitte	<p>The rewording of para 5.11: '...in accordance with Strategic Objective 15, the Council proposes a review of employment sites in Hayes, specifically those in highly accessible locations.' (Delete Where appropriate, sites in</p>	<p>It would be premature at this stage to commit the future strategy approach in Hayes Town Centre without further detailed investigation. Work on the Site Allocations and Development Management Development Plan Documents can be expected</p>

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				Hayes along the canal frontage will be identified through a review of the Council's Employment Land Study and brought forward for residential led mixed use development as part of the production of the Site Allocations DPD.)	to come forward with appropriate site proposals which might support regeneration in the Town Centre. Canal frontage locations may be further removed from the centre but offer better opportunities for residential development for example, whilst sites closer to the station and High Street may offer better locations for commercial and other social or community facilities. This will require more detailed investigation appropriate to those parts of the Local Development Framework rather than the Core Strategy. No proposed change.
171	5.11	BS Pension Fund Trustee Ltd	CGMS Consulting	Amendment of paragraph 5.11 to extend the list of employment land to be released to include part of Millington Road, Hayes.	The list of areas noted at paragraph 5.11 is purely illustrative. The Council will be looking at employment land release proposals as part of detailed work for the subsequent Site Allocations Development Plan Document. It will consider this proposal as part of that assessment. No proposed change.
262	5.11	Cathedral Group	Nathaniel Lichfield & Partners	Supports the managed release of employment land in the Blyth Road area of Hayes.	Noted. No proposed change.
414	5.11	Greater Manchester Pension Fund	Capita Symonds on behalf of Greater Manchester Pension Fund	Para 5.11 should be amended as follows: "5.11 Locations proposed for the managed release of employment land are shown in Map 5.1 above and may include: <ul style="list-style-type: none"> • Part of Summerhouse Lane/ Royal Quay/ Salamander Quay, Harefield • Part of Uxbridge Industrial Estate • Part of Braintree Road area, South Ruislip • Part of Trout Road area, Yiewsley 	The list at paragraph 5.11 is purely illustrative. The Council propose bringing forward detailed proposals for the managed release of employment land in the borough as part of work for the Site Allocations Development Plan Document. It will consider these representations as part of that work - together with other areas in Hayes. No proposed change.

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				<ul style="list-style-type: none"> • Chailey Industrial Estate and Argent Centre, Pump Lane, Hayes • Warwick Road/ Kingston Lane area, West Drayton • Part of Blyth Road area, Hayes • Hayes Bridge area" 	
22	Policy E1: Managing the Supply of Employment Land	Tarmac Limited	Quarryplan (GB) Limited	<p>Tarmac is fully supportive of the policy to protect industrial and employment sites. The Tarmac site at Pump Lane is included within the Proposed Locally Significant Industrial Sites designation. The Tarmac Hayes site at Pump Lane is a strategic site for the supply of asphalt and ready mixed concrete, recycled asphalt plantings, crushed rock and sand for use as construction aggregates. The majority of raw materials are brought to the site by rail and therefore its location on the Bristol to Paddington rail line is crucial. Many thousands of lorry movements are saved every year because raw materials are brought into the site by rail. The site is one of the largest producers of asphalt materials in the United Kingdom and supplies large parts of London and the south-east. The site should be regarded as "Strategic" rather than "Locally Significant".</p>	<p>As noted at paragraph 5.6 of the Core Strategy, the Strategic Industrial Location is a designation stemming from the London Plan. Their designation is a matter for the Mayor of London.</p> <p>The individual operation at this site may well be significant within its industrial sector. The Council considers the current mix of activities in the wider Pump Lane area to continue to merit the "Locally Significant Employment Location" designation - i.e. as noted at paragraph 5.7 of the Core Strategy, these are important local industrial areas where industrial and warehousing uses can operate together.</p> <p>No proposed change.</p>
84	Policy E1: Managing the Supply of Employment Land	Orbit Developments (Southern) Ltd	The Emerson Group	<p>Only B1c, B2 & B8 are listed as employment. PPS4 recognises economic development as the B use classes, public and community uses and main town centre uses and other development that provides employment, generates wealth or produces an economic output or product. This should be reflected in the policy.</p>	<p>The section referred to covers how employment floorspace is currently monitored in the Annual Monitoring Report. The policy itself does not seek to limit employment growth purely to the B1c, B2 & B8 use classes and does not need further amendment.</p> <p>No proposed change.</p>

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128	Policy E1: Managing the Supply of Employment Land		Gleeson Developments Ltd	We would suggest that the references within the policy to the release of surplus industrial land are removed from policy E1.	<p>Paragraph 5.8 in the Core Strategy explains how the two new employment sites at Stockley and South Ruislip together provide a total of 13.63 ha of new designated employment land in the borough.</p> <p>Policy 4.4 and Map 4.1 in the 2009 draft London Replacement Plan set the strategic policy context for the proposed limited release of employment land in the Core Strategy. Reference to assessing the potential for a limited release of employment land is to be retained in the Core Strategy to ensure conformity with the London Plan.</p> <p>The borough's 2010 Position Statement on Employment Land and Retail Capacity identified 17.58 ha of industrial and warehousing land which might be released from their current use in future. The Core Strategy makes clear that any release will have to be explored further in work on subsequent parts of the Local Development Framework - specifically the Site Allocations Development Plan Document - which might come forward with proposals for releases both in existing designated employment land areas as well as on sites elsewhere in the borough.</p> <p>No proposed change.</p>
138	Policy E1: Managing the Supply of Employment Land	Hillingdon Inter Faith Network		In dealing with policies on surplus land, there would appear to be an opportunity to meet other community needs.	The Council fully supports the provision of better social and community facilities in the borough. The Core Strategy Vision statement recognises the need to do this through its commitments to close inequality gaps over the plan period and to improve access to local facilities generally to improve the quality of life for residents. Policy CI 1 in the Strategy looks to deliver adequate social infrastructure to support new development and to locate new community centres in town centres or at other accessible locations - to maximise

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					community access to facilities. The Council will review possible new uses for surplus employment land during work on a later part of the Local Development Framework, for the Site Allocations Development Plan Document, and proposals for new community uses may come forward as part of that work. No proposed change.
162	Policy E1: Managing the Supply of Employment Land	Workspace Group	Ransome and Company Ltd	Workspace supports the identification of Blyth Road as a potential area for managed release of employment land and proposed area for growth for office and hotel uses. Workspace would want to be actively involved in any future planning of this area.	Noted. The Council will undertake detailed work for another part of the Local Development Framework - the Site Allocations Development Plan Document - which will consider the detailed case for the release of individual sites currently used for employment land. No proposed change.
180	Policy E1: Managing the Supply of Employment Land	Universities Superannuation Scheme Ltd	Drivers Jonas Deloitte	USS supports the main principles of Policy E1: Managing the Supply of Employment Land through the designation of Locally Significant Industrial Sites (LSIS) and Locally Significant Employment Locations (LSEL). However, USS continues to urge the Council to place a greater emphasis on sites which are no longer suitable or needed for industrial or commercial uses and are shown to be unviable. In such situations, consideration should be given to other uses such as housing or alternative uses outside the B classes that have the potential for employment generation.	Paragraph 5.11 explains how the Council intend considering where sites might be released from their current employment land use as part of work on the Site Allocations Development Plan Document. The list of locations proposed for the managed release of employment land in this paragraph is purely illustrative and does not preclude consideration of sites elsewhere in the borough. No proposed change.
250	Policy E1: Managing the Supply of Employment Land	Co-operative Insurance Society (managed by AXA REIM)	Gerald Eve on behalf of Co-operative Insurance Society	Support the release of land at Pump Lane, specifically the Chailey Industrial Estate, for residential-led mixed-use redevelopment.	Detailed site-specific allocations will be brought forward during preparation of the Site Allocations Development Plan Document. No proposed change.
251	Policy E1: Managing the Supply of	Threadneedle Property	Indigo Planning on behalf of	Policy E1 or paragraph 5.4 should acknowledge that the redevelopment of existing sites in	The emphasis of the policy is that the Council is placing a priority on protecting Strategic Industrial

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	Employment Land	Investments	Threadneedle Property Investments	employment use outside designated areas may be appropriate where the existing employment use is no longer viable.	Locations and its designations of Locally Significant Industrial Sites / Employment Locations. In the Core Strategy the Council does not seek to permanently maintain employment sites outside the designated areas. It will consider alternative use proposals on sites elsewhere - and the Strategy makes clear at paragraph 5.11 that it will pursue an approach of "managed release" of employment land (to conform with the requirements of the London Plan). No proposed change.
263	Policy E1: Managing the Supply of Employment Land	Cathedral Group	Nathaniel Lichfield & Partners	Object to the exclusion of an exemptions test from Policy E1 and want the policy amended to recognise the scope for appropriate ancillary uses. Add sentence at end of Policy E1 to read: Such protection will recognise the scope for appropriate ancillary uses.	This policy sets out the broad approach the Council will take to protecting Strategic Industrial Locations and Locally Significant Industrial Sites / Employment Locations. The Council is aware of national planning guidance that policies must be applied flexibly and the Core Strategy policies do not preclude ancillary / other uses coming forward on Locally Significant Industrial Sites. The Council would note that the range of criteria quoted in this objection are more appropriately considered for the detailed policies to be brought forward later in a Development Management Development Plan Document for the borough. No proposed change.
264	Policy E1: Managing the Supply of Employment Land	Cathedral Group	Nathaniel Lichfield & Partners	Supports the managed release of employment land.	Noted. No proposed change.
422	Policy E1: Managing the Supply of Employment Land	Individual		Increasing the supply of employment land should not be at the expense of residential areas. These should be protected and not placed under threat of take over by commercial enterprise. The policy should protect residential areas from mixed use.	The Core Strategy does not propose increasing the amount of employment land at the expense of existing residential areas. Preventing the loss of housing throughout London is already a requirement of the London Plan (e.g. see policy 3.15 B in the 2009 draft Replacement London Plan).

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
					<p>The Council cannot preclude mixed use redevelopment in existing residential areas as this might allow the introduction of a much-needed community use - e.g. a doctor's practice or community use - with the retention of a part of a scheme for residential accommodation.</p> <p>No proposed change.</p>
311	Policy E1: Managing the Supply of Employment Land	PRUPIM	CB Richard Ellis on behalf of PRUPIM	This policy should be redrafted as follows "The Council will accommodate growth through the appropriate management of SIL and LSIL/LSEL allocations...in accordance with PPS4". This affords greater flexibility to manage economic benefits and growth of employment locations e.g. in terms of profile of the area and employment generation (compared with land supply).	<p>The Council is aware of the need to operate all its policies with a degree of flexibility - in accordance with national planning policy guidance. It does not consider that a specific reference should be included in the policy to Planning Policy Statement 4.</p> <p>No proposed change.</p>
329	Policy E1: Managing the Supply of Employment Land	Garden City Estate Residents' Association		Employment land that is designated for release to other uses should be considered for new school sites before greenfield sites are identified. Growth should be directed to existing business or industrial areas or town centres. The policy should include the wording: "...any released land to be considered for educational use first if suitable."	<p>The Core Strategy will cover a 15-year period and to make a commitment in this way, firstly to consider educational needs above any other use would not be in the best planning interests of the borough. Its spatial planning priorities may change over the plan period and it has to take into account several land use needs at any particular moment as sites come forward for development.</p> <p>No proposed change.</p>
333	Policy E1: Managing the Supply of Employment Land	Southstream Holdings Ltd	Montagu Evans on behalf of Southstream Holdings Ltd	Policy vacuum until Site Allocations is adopted. The following wording to policy E1 will address this issue: "The Council will manage the release of 17.58ha of surplus industrial land for other uses over the plan period (see Map 5.1). Sites that come forward ahead of the adoption of the Site Allocations DPD will be subject to a sequential test of other appropriate sites and a marketing process."	Detailed consideration of proposals for development will continue to be based on the London Plan and 2007 Saved Unitary Development Plan policies as well as the broad policies contained in the Core Strategy. The approach taken in policy LE2 in the 2007 Saved UDP policies effectively covers the points raised in this objection - until work on later parts of the Local Development Framework can supersede the policy.

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					No proposed change.
408	Policy E1: Managing the Supply of Employment Land	CES Properties (Ickenham) Ltd	DP9 on behalf of CES Properties (Ickenham) Ltd	<p>This comment refers to Policy SO15 but relates to Policy E1 and Strategic Objective SO15.</p> <p>The policy and supporting text should make clear provision that existing offices outside of designated employment land will not be protected. If it is intended to protect this land then justification should be provided and clear criteria identified for when it would be released, particularly when there is a history of vacancy.</p>	<p>There is no proposal in the Core Strategy to protect existing office floorspace outside designated Locally Significant Employment Sites. With such proposals the Council would take each case on its merits and assess the relevant employment value of the existing use against any proposal, taking into account the land use priorities at the time and any relevant local information.</p> <p>No proposed change.</p>
364	Policy E1: Managing the Supply of Employment Land	Bell Farm Christian Centre		<p>Increasing the supply of employment land should not be at the expense of residential areas. These should be protected and not placed under threat of take over by commercial enterprise. The policy should protect residential areas from mixed use.</p>	<p>The Core Strategy does not propose increasing the amount of employment land at the expense of existing residential areas. Loss of housing throughout London is already a requirement of the London Plan (e.g. see policy 3.15 B in the 2009 draft Replacement London Plan).</p> <p>It cannot preclude mixed use redevelopment in existing residential areas as this might allow the introduction of a much-needed community use - e.g. a doctor's practice or community use - with the retention of a part of a scheme for residential accommodation.</p> <p>No proposed change.</p>
410	Policy E1: Managing the Supply of Employment Land	SEGRO Plc	Nathaniel Lichfield & Partners	<p>Object to the proposal to add an additional tier of policy to SIL designations. The priority should be to deliver economic and physical regeneration in the borough and local jobs. The policy as currently worded restricts the scope of employment uses on industrial sites. Creating an artificial distinction between LSIS and LSEL designations limits development options and detracts from the employment land resource.</p>	<p>The objection focuses on the distinction between the two designations; Locally Significant Industrial Sites and Employment Locations. Neither is considered by the Council to exclude other commercial uses coming forward. They are primarily delineating employment areas where either industrial / warehousing uses predominate at present or lighter, office-based businesses. In both cases employment growth will be the objective of the Council. It has to apply its policies flexibly to comply with national planning guidance</p>

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					requirements and it will not artificially divide future land uses in either of the designated areas. No proposed change.
532	Policy E1: Managing the Supply of Employment Land	Arla Foods UK Plc	BNP Paribas Real Estate	Intend submitting a planning application over the coming year for a mixed use development on the former dairy site - which is in an area designated for employment land release during the plan period. The proposal will accord with policy E2 in promoting a mixed use development in a highly accessible location.	Noted. No proposed change.
525	Policy E1: Managing the Supply of Employment Land	L B Hillingdon (Labour Group)		Priority should be given to sites for new schools where the release of employment land is under consideration. Policy E1 should include words: "Any released land to be considered for educational use first if suitable."	The Core Strategy will cover a 15-year period and to make a commitment in this way, firstly to consider educational needs above any other use would not be in the best planning interests of the borough. Its spatial planning priorities may change over the plan period and it has to take into account several land use needs at any particular moment as sites come forward for development. No proposed change.
242		Yiewsley and West Drayton Town Centre Action Group		Given the statistics on page 9 (in the sub-section on Economy following paragraph 3.3) how many of the 9,000 to 11,000 jobs will be taken up by the local workforce? What training opportunities will be made available to ensure the local workforce attains the skills that may / will be needed?	It is not possible for the Council to predict what proportion of future jobs will be taken by up the local workforce and to specify this in the Core Strategy with respect to employment at Heathrow. It can only state the current importance of the Airport as a provider of jobs for local people. The Council does undertake at policy E7 to: "...ensure training opportunities are linked with the development of major sites for both construction phases and end use occupiers, and through liaising with local colleges and businesses to ensure workforce development initiatives and training programmes reflect skill requirements in the workplace. The Council will engage with local businesses and universities to link high end jobs in the borough with higher education courses. The

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
					<p>Council will promote Hillingdon as a destination for visitors and tourists and ensure that local residents have access to jobs within related industries."</p> <p>To implement this approach it states in the Core Strategy that it will deliver policy E7:</p> <p>"...through preparing and implementing the Local Economic Assessment, and by means of partnership working with businesses, Adult Education services, universities and FE colleges, Jobcentre Plus, Chamber of Commerce, West London Working, Visit London and private developers."</p> <p>No proposed change.</p>
88	5.15	British Airways plc	Lichfield Planning	Addition to paragraph 5.15: Heathrow Airport is a major economic enabler for the Heathrow Opportunity Area, and the number of future jobs created would depend greatly on the viability and competitiveness of the airport.	<p>The Core Strategy already highlights the importance of the airport to the local economy - in the section on "Key Facts" following paragraph 3.3 and again at Table 5.3. The Council consider it unnecessary to add the proposed wording at paragraph 5.15.</p> <p>No proposed change.</p>
61	5.18	Mr John McDonnell MP		Concern has to be taken about the dominance of a particular area by hotel development. Hotel development should not be on a scale that it will be allowed to dominate a particular area or community.	<p>The Council does see Heathrow, Hayes and Uxbridge as the main areas for possible hotel development in future. It does undertake to monitor future hotel development through its Annual Monitoring Report and keep the position with future development under review.</p> <p>All hotel development will be expected to conform to the other Core Strategy policies e.g. regarding the general design criteria set out at policy BE1. Later work on the Local Development Framework on the Site Allocations Development Plan Document can be expected to identify appropriate locations for commercial development, including</p>

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					hotels. No proposed change.
313	5.19	PRUPIM	CB Richard Ellis on behalf of PRUPIM	We welcome the Council's recognition that hotel development in Hillingdon will help to meet employment targets for the Heathrow Opportunity Area, but comment that this is no longer consistent with national policy in PPS4 for other employment/commercial areas. As per our comments on policy E1, we consider that this paragraph should be amended to take into account the wider definition of economic development as set out in PPS4.	The Council is aware that it must operate its policies flexibly and will do so with respect to future hotel proposals. It does not consider that a specific reference at this paragraph to Planning Policy Statement 4 needs to be added at this paragraph. National planning guidance will automatically be a matter for consideration in future planning applications. No proposed change.
444	5.19	Henry Streeter Automotive Ltd	CGMS Ltd on behalf of Henry Streeter Automotive Ltd	Support the higher figures for hotel growth specific to Hillingdon. Need to identify strategically where these are to be delivered given the number of rooms proposed. Relying upon the planning application process, the response to our previous representations is insufficient.	<p>The Core Strategy sets out the broad approach which the Council intends to take for the future spatial development of the borough. With respect to hotel development its approach will be primarily to seek to steer this towards those centres with high levels of public transport accessibility. Once further work is completed on other parts of the Local Development Framework - notably the Site Allocations and Heathrow Area Development Plan Documents - a more detailed strategy will effectively be in place for the development of hotels across the borough.</p> <p>No proposed change.</p>
443	Table 5.2	Henry Streeter Automotive Ltd	CGMS Ltd on behalf of Henry Streeter Automotive Ltd	Support the higher figures for hotel growth specific to Hillingdon. Need to identify strategically where these are to be delivered given the number of rooms proposed.	The Core Strategy sets out the broad approach which the Council intends to take for the future spatial development of the borough. With respect to hotel development its approach will be primarily to seek to steer this towards those centres with high levels of public transport accessibility. Once further work is completed on other parts of the Local Development Framework - notably the Site Allocations and Heathrow Area Development Plan Documents - a more detailed strategy will effectively be in place for the development of hotels across the borough.

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					No proposed change.
212	5.20	Heathrow Airport Ltd		Map 5.1 fails to recognise the importance of Heathrow Airport and its perimeter for commercial and hotel development - and would preclude new hotels within the Airport.	<p>The Council has taken the position that land within the Airport boundary should be used for Airport-related development. This is partly to ease pressure for further Airport-related development beyond that boundary in future.</p> <p>With hotel development the Council has clearly stated its position as to where it would prefer future developments to take place - in local town centres with good public transport access and links with the Airport. The Council has to balance its future land use needs in the Heathrow area and one key objective (as elsewhere in the borough) has to be to retain sufficient employment land in the immediate area so as to provide employment opportunities for local residents.</p> <p>No proposed change.</p>
446	5.20	Henry Streeter Automotive Ltd	CGMS Ltd on behalf of Henry Streeter Automotive Ltd	The map fails to include the areas referred to in the text. This states: "Three key locations for hotel growth are identified by Hillingdon's Tourism Study; Heathrow, Hayes and Uxbridge. These areas for growth are shown on Map 5.1". The hotel growth location at Heathrow is not shown on Map 1.	<p>The Core Strategy sets out the broad approach which the Council intends to take for the future spatial development of the borough. With respect to hotel development its approach will be primarily to seek to steer this towards those centres with high levels of public transport accessibility. Once further work is completed on other parts of the Local Development Framework - notably the Site Allocations and Heathrow Area Development Plan Documents - a more detailed strategy will effectively be in place for the development of hotels across the borough.</p> <p>No proposed change.</p>
213	5.21	Heathrow Airport Ltd		HAL consider that paragraph 5.21 portrays an unbalanced view of Air Quality issues affecting the Borough. Paragraph 8.116 of this draft document sets a more balanced picture taking	The Council does not accept that the two paragraphs need to be more closely related - the emphasis of paragraph 5.21 is that development which focuses around the Airport needs to be

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				into account impacts on air quality from road traffic, rail and other sources. HAL believe this paragraph should be consistent with paragraph 8.116.	aware that - as elsewhere in parts of the borough with poor air quality, the Council will be looking to ensure that there is no worsening of air quality in the area as a result (i.e. the approach specified later in the Core Strategy at policy EM8). No proposed change.
447	5.21	Henry Streeter Automotive Ltd	CGMS Ltd on behalf of Henry Streeter Automotive Ltd	Further hotel development should be actively supported in the Heathrow area providing issues such as air quality can be addressed.	The Council accepts that demand for hotel development in the Heathrow Airport area is likely to continue. It has a responsibility for the proper planning of its area and must attempt to provide a range of uses in the area - e.g. to meet housing and other community needs for local residents and workers - and will not give undue emphasis in this part of the Strategy to the provision of hotel development. The Core Strategy sets out the broad approach which the Council intends to take for the future spatial development of the borough. With respect to hotel development its approach will be primarily to seek to steer this towards those centres with high levels of public transport accessibility. Once further work is completed on other parts of the Local Development Framework - notably the Site Allocations and Heathrow Area Development Plan Documents - a more detailed strategy will effectively be in place for the development of hotels across the borough. No proposed change.
85	Policy E2: Location of Employment Growth	Orbit Developments (Southern) Ltd	The Emerson Group	Only B1C, B2 and B8 developments are listed as employment. Policy should reflect that B classes, public, community and town centre uses that provide employment.	The section referred to covers how employment floorspace is currently monitored in the Annual Monitoring Report. The policy itself does not seek to limit employment growth purely to the B1c, B2 & B8 use classes and does not need further amendment. Monitoring will analyse the development of different employment uses by type - and will cover the whole B Use Class.

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					No proposed change.
113	Policy E2: Location of Employment Growth	Bucleuch Property	Drivers Jonas Deloitte	The policy accords with national policy in seeking to focus growth within existing centres and around sustainable transport nodes.	Noted. No proposed change.
152	Policy E2: Location of Employment Growth	Individual		<p>Stop the increase in Hotel bedrooms in the Heathrow OA. This will limit the growth in NO2 due to vehicles travelling to Heathrow. This will also prevent any increase in Parking problems for the local residents. Suggested Text for Policy E2 "The Council will accommodate a minimum of XXX additional Hotel bedrooms and new hotels and visitor facilities will be encouraged in Uxbridge, Hayes and on sites outside of the Heathrow OA and in other sustainable locations.</p> <p>Suggested Text for Monitoring of Policy E2 "LO3 (Local) Indicator: Number of hotel and visitor bedrooms in the Borough outside of protected Heathrow OA. Target XXXX new rooms between 2007-2026 Business registrations and failures will be regularly monitored using a combination of ONS business demography: Enterprise Births and Deaths statistics together with successful planning applications.</p>	<p>The Council cannot control how people will travel to hotel accommodation. It will look to locate new hotel development at the most accessible locations (e.g. through policy T1) so as to make travel by public transport as convenient as possible for hotel users. As paragraph 5.20 notes, Heathrow, Hayes and Uxbridge are expected to be the main locations for new hotel development in the borough and these locations do have a high level of public transport accessibility.</p> <p>The additional monitoring information is designed to assess hotel development across the borough rather than specifically in the Heathrow area. The Council already assembles information on an area basis for its Annual Monitoring Report and is able to monitor future hotel development specifically within and outside the Heathrow area in support of a future Heathrow Area Development Plan Document.</p> <p>No proposed change.</p>
157	Policy E2: Location of Employment Growth	Individual		<p>Stop the increase in Hotel bedrooms in the Heathrow OA. This will limit the growth in NO2 due to vehicles travelling to Heathrow. This will also prevent any increase in Parking problems for the local residents. Suggested Text for Policy E2 "The Council will accommodate a minimum of XXX additional Hotel bedrooms and new hotels and visitor</p> <p>facilities will be encouraged in Uxbridge, Hayes and on sites outside of the Heathrow OA and in</p>	<p>The Council cannot control how people will travel to hotel accommodation here. It will look to locate new hotel development at the most accessible locations (e.g. through policy T1) so as to make travel by public transport as convenient as possible for hotel users. As paragraph 5.20 notes, Heathrow, Hayes and Uxbridge are expected to be the main locations for new hotel development in the borough and these locations do have a high level of public transport accessibility.</p>

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				<p>other sustainable locations."</p> <p>Suggested Text for Monitoring of Policy E2 "LO3 (Local) Indicator: Number of hotel and visitor bedrooms in the Borough outside of protected Heathrow OA. Target XXXX new rooms between 2007-2026 Business registrations and failures will be regularly monitored using a combination of ONS business demography: Enterprise Births and Deaths statistics together with successful planning applications."</p>	<p>The additional monitoring information is designed to assess hotel development across the borough rather than specifically in the Heathrow area. The Council already assembles information on an area basis for its Annual Monitoring Report and is able to monitor future hotel development specifically within and outside the Heathrow area in support of a future Heathrow Area Development Plan Document.</p> <p>No proposed change.</p>
163	Policy E2: Location of Employment Growth	Workspace Group	Ransome and Company Ltd	<p>Workspace supports the promotion of Heathrow Opportunity Area, Strategic Industrial Locations, Locally Significant Employment Locations (LSEL), Locally Significant Industrial Sites (LSIS), Uxbridge town centre and Hayes Town Centre for employment growth.</p> <p>Workspace supports the promotion of a minimum of 3,800 additional hotel bedrooms and new hotels and visitor facilities at Uxbridge and Hayes.</p>	<p>Noted.</p> <p>No proposed change.</p>
181	Policy E2: Location of Employment Growth	Universities Superannuation Scheme Ltd	Drivers Jonas Deloitte	<p>USS also continues to support Policy E2: Location of Employment Growth which seeks to accommodate 9,000 new jobs during the plan period directed towards suitable sites in the Heathrow Opportunity Area, Locally Significant Employment Locations (LSEL), Locally Significant Industrial Sites (LSIS) and Uxbridge town centre.</p>	<p>Noted.</p> <p>No proposed change.</p>
189	Policy E2: Location of Employment Growth	British Airways plc	Lichfield Planning	<p>British Airways propose adding a sentence at the end of Policy E2 to read:</p> <p>Taking a long-term view, land that had been identified for the Heathrow third runway development should be safeguarded and not be released for any other uses. If Government policy on Heathrow expansion changes in the</p>	<p>The Council does not consider it reasonable to expect that during the Plan period it would have to reserve land originally identified as required for the Runway 3 proposal - including its apron and services north of the Bath Road, and land that would be within the flight safety zone and noise contours - to uses which would not conflict with its future use for aviation.</p>

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				<p>future, wishing to reintroduce the third runway, then the option to do so should be available. This would support Heathrow's position as the main economic enabler of the area.</p> <p>The Implementation section at Policy E2 should be modified to include references to the British Airports Authority and British Airways in connection with future partnership working and include a section regarding future hotel development so that it will read:</p> <p>Policy E2 will be delivered through partnership working with key stakeholders like TfL, BAA, BA, private land owners and developers. Inward investment opportunities will be identified in partnership with Think London. The Council will apply national, regional and local policies when considering development growth and set out area-specific policies through the Site Allocations and Heathrow Area Development Plan Documents.</p> <p>The Council will accommodate additional hotel bedrooms in line with anticipated demand taking account of demand generated by Heathrow Airport and other sources. The same is true for employment land.</p>	<p>The proposed wording modifications to the implementation section are considered unnecessary by the Council.</p> <p>The existing Statement of Community Involvement would ensure the involvement of the British Airports Authority and British Airways as two major stakeholders in the borough's Local Development Framework.</p> <p>The Council will take into account the future need for additional hotel accommodation generated by the demand from passengers using Heathrow Airport. But it will balance this against other land use needs coming forward when work proceeds on the Site Allocations and Development Management Development Plan Documents.</p> <p>No proposed change.</p>
197	Policy E2: Location of Employment Growth	The Ballymore Group		Where hotels are approved but not have not be able to attract viable operators the Council will take a pragmatic to a change of use, when presented with evidence of an unsuccessful marketing campaign.	The Council would consider any subsequent application on its merits in the context of London Plan and Hillingdon's Local Development Framework policies.
214	Policy E2: Location of Employment Growth	Heathrow Airport Ltd		With regards to the location of new hotels on airport, we reiterate our suggested amendments from the previous draft of the document and our comments on paragraph 4.10, 5.20 and in respect of Policy E2, as follows: "Hotels will be directed to locations outside of designated	The Council has taken the position that land within the Airport boundary should be used for Airport-related development. This is partly to ease pressure for further Airport-related development beyond that boundary in future.

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				<p>employment areas. Hotel uses are also likely to be acceptable on airport where they are located in sustainable locations close to public transport interchanges." Such wording would allow flexibility in the application of Policy E2 to allow new hotels in the Central Terminal Area and at Hatton Cross but would read as a general presumption against other less sustainable perimeter locations.</p>	<p>With hotel development the Council has clearly stated its position as to where it would prefer future developments to take place - in local town centres with good public transport access and links with the Airport. The Council has to balance its future land use needs in the Heathrow area and one key objective (as elsewhere in the borough) has to be to retain sufficient employment land in the immediate area so as to provide employment opportunities for local residents.</p> <p>No proposed change.</p>
315	Policy E2: Location of Employment Growth	PRUPIM	CB Richard Ellis on behalf of PRUPIM	<p>The policy as drafted is not sufficiently flexible nor in accordance with PPS4. We would suggest that the following phrase should be deleted "outside of designated employment land".</p>	<p>The Council is aware of the need to apply its policies flexibly. The policy as drafted does not preclude consideration of other uses on designated industrial or employment land. Elsewhere at paragraph 5.11 the Strategy does note how some areas of existing employment land will be considered for "managed release" from their existing use in later work on the Local Development Framework - e.g. as part of work on a Site Allocations Development Plan Document. Accordingly it does not consider the proposed wording change adds any further clarity to the Core Strategy. No proposed change.</p>
290	Policy E2: Location of Employment Growth	Garden City Estate Residents' Association		<p>The policy does not say how local people will benefit from jobs - it should clearly state that this will be linked to detailed planning policies and initiatives to ensure training and employment opportunities for local people.</p>	<p>Policy E7 in the Core Strategy sets out the Council's broad approach to raising skill levels in the local community to take advantage of new job opportunities. The policy notes: "The Council will ensure training opportunities are linked with the development of major sites for both construction phases and end use occupiers, and through liaising with local colleges and businesses to ensure workforce development initiatives and training programmes reflect skill requirements in the workplace. The Council will engage with local businesses and universities to link high end jobs in the borough with higher education courses....".</p>

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					<p>The section on implementation for the policy also notes that: "Policy E7 will be delivered through preparing and implementing the Local Economic Assessment, and by means of partnership working with businesses, Adult Education services, universities and FE colleges, Jobcentre Plus, Chamber of Commerce, West London Working, Visit London and private developers. Delivery will also be through implementing the Planning Obligations DPD, the economic development strategy, strategy for tourism and visitor attractions, and the Sub regional Employment and Skills Plan..."</p> <p>No proposed change.</p>
335	Policy E2: Location of Employment Growth	Kerville Associates	Montagu Evans on behalf of Kerville Associates	<p>As currently worded, the Stockley Park area falls under the wider heading of the "Heathrow Opportunity Area". Map 5.1 identifies the locations for employment growth, but does not identify either Stockley Park or the wider area on this map. The map does include an informative box stating that the Heathrow Opportunity Area will be defined through the Heathrow Opportunity Area Planning Framework, but does not identify the envisaged boundary of this area. It is therefore considered that this map and corresponding Policy E2 (Location of Employment Growth) and Policy E3 (Strategy for Heathrow Opportunity Area) is ineffective as it does not clearly set out the areas where these policies can be applied.</p>	<p>As the objector notes, the Core Strategy is a broad policy document. The issue of the final designation of the Heathrow Opportunity Area is a matter for the Mayor of London as this is a proposal in the London Plan. At present the Core Strategy can only give a general policy statement on its intentions, pending the detailed Opportunity Area designation and work on an Opportunity Area Planning Framework. No proposed change.</p>
365	Policy E2: Location of Employment Growth	Bell Farm Christian Centre		<p>Hotel and office growth is at odds with protecting character - residential areas should be protected and not placed under threat of take over by commercial enterprise.</p> <p>The Heathrow Opportunity Area should exclude expansion into current residential areas. Suitable</p>	<p>The Core Strategy does not propose increasing the amount of commercial development at the expense of existing residential areas. Loss of housing throughout London is already a requirement of the London Plan (e.g. see policy 3.15 B in the 2009 draft Replacement London Plan).</p>

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				<p>sites have not been identified and the Strategy does not protect existing residential areas. The policy should protect residential areas from mixed use.</p>	<p>Hotel development would normally be steered towards the main centres identified at paragraph 5.20 - i.e. commercial centres / areas with good public transport accessibility.</p> <p>The Heathrow Opportunity Area is a London Plan proposal and has yet to be designated by the Mayor of London.</p> <p>Suitable sites for future commercial development are expected to be identified in later parts of the Local Development Framework - e.g. the Site Allocations and Heathrow Area Development Plan Documents.</p> <p>No proposed change.</p>
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 30 94</p>	<p>Policy E2: Location of Employment Growth</p>	<p>L B Hillingdon (Labour Group)</p>		<p>E2 and E3:</p> <p>The Strategy does not state here how local people will benefit from jobs. It should state that this will be linked to specific detailed planning policies and initiatives to ensure training & employment opportunities for local people.</p>	<p>Policy E7 in the Core Strategy sets out the Council's broad approach to raising skill levels in the local community to take advantage of new job opportunities. The policy notes: "The Council will ensure training opportunities are linked with the development of major sites for both construction phases and end use occupiers, and through liaising with local colleges and businesses to ensure workforce development initiatives and training programmes reflect skill requirements in the workplace. The Council will engage with local businesses and universities to link high end jobs in the borough with higher education courses....".</p> <p>The section on implementation for the policy also notes that: "Policy E7 will be delivered through preparing and implementing the Local Economic Assessment, and by means of partnership working with businesses, Adult Education services, universities and FE colleges, Jobcentre Plus, Chamber of Commerce, West London Working, Visit London and private developers.</p>

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					<p>Delivery will also be through implementing the Planning Obligations DPD, the economic development strategy, strategy for tourism and visitor attractions, and the Sub regional Employment and Skills Plan..."</p> <p>No proposed change.</p>
355	5.24	Hayes Town Partnership		<p>The Plan should be more specific about how it is intended to achieve the redevelopment envisaged for Hayes Town Centre as a result of Crossrail and taking advantage of the Grand Union Canal.</p>	<p>The purpose of the Core Strategy is to set the broad spatial approach for the planning of the whole borough over the next 15 years. Detailed planning for particular parts of the borough can be expected to come through other parts of the Local Development Framework - the Site Allocations, Development Management and Heathrow Area Development Plan Documents. During this work it may be that the Council decides at some future point that there is a need for a detailed local strategy document of the type referred to. The Council will keep this proposal under review as work on the LDF continues and consider bringing forward such a strategy if the need arises.</p> <p>No proposed change.</p>
34	Table 5.3	British Waterways		<p>We are pleased that the potential value of the GUC is recognised as part of the regeneration of the Hayes West Drayton Corridor. However, we are concerned that it should be seen as more than just a setting for development. The Town and Country Planning Association's Policy Advice Note: Inland Waterways (http://www.tcpa.org.uk/pages/inland-waterways.html) suggests the following:</p> <p>"Applicants should be encouraged to include any waterway, towing path and environs lying within the application site edged in red on the location plan in order to ensure that:</p> <p>- the waterway is not just treated as a setting or</p>	<p>The Council would note that London Plan policies require canalside development to enhance the character of canals (see policy 4C.20 in the 2008 London Plan or policy 7.30A in the 2009 draft Replacement London Plan). The 2008 London Plan also encourages boroughs to support new facilities which increase the use of the network for passenger & tourist traffic and bulk freight movement (policies 4C.7, 4C.8 and specifically policy 4C.20 re canals) and for sport / leisure use (policy 4C.10).</p> <p>The 2009 Draft Replacement London Plan again gives emphasis to supporting development which respects the character of canals and encourages greater use of the network for transport -</p>

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				<p>backdrop for development, and that instead the land and water are integrated and the waterway is treated as a useable space;</p> <p>- the waterway, towing path and environs form an integral part of the public realm in terms of both design and management" (Page 23)</p> <p>We would also suggest the removal of 'natural environment', as the canal is man-made, and primarily a navigation channel, with the associated benefits of being a wildlife habitat and amenity resource.</p> <p>We would therefore suggest that the paragraph on the Hayes-West Drayton Corridor be amended to the following:</p> <p>"The Grand Union Canal runs through the corridor and will have a role to play in the regeneration of the area. The canal has the potential to provide an attractive waterfront setting, but regeneration projects will benefit from its presence and should therefore fully integrate with and address the waterspace, delivering enhancements to this important environment. These opportunities will be delivered through Policy EM3 as well as specific requirements in the Development Management and Heathrow Area Development Plan Documents."</p>	<p>especially for freight (policies 7.26 & 7.30), leisure and recreation.</p> <p>Taken together with policy EM3 in the Core Strategy, e.g. part of which aims to improve access to Hillingdon's canals, the Council considers there is already an adequate policy framework to meet the requirements of the wording change proposed.</p> <p>No proposed change.</p>
35	Table 5.3	British Waterways		<p>With regard to Hayes Town Centre, we support the reference to making the best use of the Grand Union Canal, but would like to enhance this to maximise the potential opportunities for this resource in delivering benefit to this area:</p> <p>We would therefore recommend that "The Council will also seek to make the best use of</p>	<p>The Council considers that the objectives of the further wording changes proposed here are already met by the existing policy framework set out in the London Plan and the draft Core Strategy on canals. All new development is expected to enhance the character of canals and policies in both look to increase its use - e.g. for passenger and freight traffic as well as for cycling</p>

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Page 97				<p>the Grand Union Canal in the regeneration process." be amended to:</p> <p>"The Council will require development proposals to address and integrate with the Grand Union Canal in the regeneration process."</p> <p>We would also recommend the following amendment to the final sentence of the first paragraph under Future Growth:</p> <p>"The Grand Union Canal offers an attractive and sustainable alternative for pedestrian and cycle routes through the area, as well as a leisure, education and recreational resource".</p> <p>With regard to Yiewsley and West Drayton Town Centre, we would add the following to the end of the first paragraph:</p> <p>"The town grew up as an industrial/manufacturing centre located on the Bristol-Paddington Railway line (West Drayton Station) and Grand Union Canal, although many of the area's manufacturing and industrial jobs have now gone, leaving sites and structures that present a poor neighbour to the waterfront.". Under Future Growth of Yiewsley and West Drayton Town Centre we would add "The Grand Union Canal will also have a role to play in the regeneration of the area in supporting sustainable transport, education, biodiversity, health, well-being and recreation."</p>	<p>and walking routes or leisure / recreation use.</p> <p>The Council would note that London Plan policies require canalside development to enhance the character of canals (see policy 4C.20 in the 2008 London Plan or policy 7.30A in the 2009 draft Replacement London Plan). The 2008 London Plan also encourages boroughs to support new facilities which increase the use of the network for passenger & tourist traffic and bulk freight movement (policies 4C.7, 4C.8 and specifically policy 4C.20 re canals) and for sport / leisure use (policy 4C.10).</p> <p>The 2009 Draft Replacement London Plan again gives emphasis to supporting development which respects the character of canals and encourages greater use of the network for transport - especially for freight (policies 7.26 & 7.30), leisure and recreation.</p> <p>Taken together with policy EM3 in the Core Strategy - e.g. part of which aims to improve access to Hillingdon's canals - the Council considers there is already an adequate policy framework to meet the requirements of the wording change proposed.</p> <p>No proposed change.</p>
	106	Table 5.3	Lafarge Aggregates Ltd		Lafarge supports the economic regeneration of the West Drayton area and notes that the document has identified Yiewsley and West Drayton as a suitable location for mixed use development. Lafarge have no objection in principle to mixed use development as long as

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				the requirements and guidance as set out in MPS 1 are reflected in the subsequent Heathrow Area and Site Allocations DPD, as currently there appears to be no regard to this national policy guidance document.	
172	Table 5.3	BS Pension Fund Trustee Ltd	CGMS Consulting	Under table 5.3 Heathrow Opportunity Area - Future Key Sub-Areas, Hayes Town Centre, Future Growth amend.....'Hayes is identified as having capacity for an additional 3,350 sq.m of comparison retail floorspace for the plan period which will be accommodated within the existing centre' to 'Hayes is identified as having capacity for an additional 3,350 sq.m of comparison retail floorspace for the plan period which will be accommodated as far as possible within the existing town centre. There is also a need for a new main foodstore to limit convenience expenditure currently leaving the town to out-of-centre stores'.	<p>The Council has a Town Centres and Retail Study which has identified limited capacity for further convenience retailing floorspace in the borough in the immediate future.</p> <p>The Council will bring forward a further study as part of later work on the Local Development Framework - particularly in support of the Site Allocations and Development Management Development Plan Documents - on retail need to help identify where further capacity might be required. These Development Plan Documents will look at potential employment land release across the borough and at existing town centre boundaries and shopping frontage designations and can be expected to come forward with detailed recommendations as to where further retail capacity might be accommodated in the borough. It would be premature for the Core Strategy to include a recommendation of this type in advance of work on the whole borough.</p> <p>No proposed change.</p>
215	Table 5.3	Heathrow Airport Ltd		Cross refer to proposal to amend Policy E2 to clarify that hotel development should be permissible on sites outside the protected employment sites on the Airport perimeter and at appropriate locations within the Airport.	<p>The Council has taken the position that land within the Airport boundary should be used for Airport-related development. This is partly to ease pressure for further Airport-related development beyond that boundary in future.</p> <p>With hotel development the Council has clearly stated its position as to where it would prefer future developments to take place - in local town centres with good public transport access and links with the Airport. The Council has to balance</p>

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					<p>its future land use needs in the Heathrow area and one key objective (as elsewhere in the borough) has to be to retain sufficient employment land in the immediate area so as to provide employment opportunities for local residents.</p> <p>No proposed change.</p>
266	Table 5.3	Cathedral Group	Nathaniel Lichfield & Partners	<p>Add following text to Table 5.3 at end of section on Future Growth in sub-section on Hayes - West Drayton Corridor to denote importance of managed release of employment land at the Blyth Road area in Hayes for regeneration opportunities in the Heathrow area:</p> <p>The Hayes West Drayton corridor also provides regeneration opportunities through the managed release of employment land at Blyth Road, Warwick Road / Kingston Lane, Pump Lane and the Hayes Bridge area. These opportunities will be delivered through Policy E1 as well as specific requirements in the Development Management and Heathrow Area Development Plan Documents.</p>	<p>The Council does not consider it necessary to add this further emphasis to the Plan. Table 5.3 already makes clear the opportunity for regeneration in the Hayes-West Drayton corridor. The note on the Grand Union Canal here is recognising its strategic role in the area as a focus for regeneration - rather than that of any individual sites.</p> <p>Given the inclusion of the list of areas at paragraph 5.11 where the Council already notes the potential for the managed release of employment land (including part of Blyth Road), the Council does not consider any further clarity will be added to the Core Strategy by this proposed additional wording. No proposed change.</p>
448	Table 5.3	Henry Streeter Automotive Ltd	CGMS Ltd on behalf of Henry Streeter Automotive Ltd	<p>In dealing with Heathrow Airport and perimeter sub area the table under "future growth" fails to consider opportunities in the Bath Road for hotel growth. It seeks to defer the matter to a later document when in considering boundaries this is of strategic importance.</p>	<p>The Core Strategy sets out the broad approach which the Council intends to take for the future spatial development of the borough. With respect to hotel development its approach will be primarily to seek to steer this towards those centres with high levels of public transport accessibility. Once further work is completed on other parts of the Local Development Framework - notably the Site Allocations and Heathrow Area Development Plan Documents - a more detailed strategy will effectively be in place for the development of hotels across the borough. No proposed change.</p>

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577	Table 5.3	Arora Management Services Ltd		<p>Core Strategy policies concerning development proposals at Heathrow Airport should be applied flexibly.</p> <p>Hotels sited directly adjacent to airport passenger terminals are highly sustainable and effectively comprise airport operational development as nearly 100% of guests are likely to be airline passengers or crew. Such hotels are far more sustainable than alternative sites off-airport - for example along the Bath Road – where transfer of guests to and from the airport terminals has to be made by road.</p> <p>The Core Strategy proposes a change of approach to that of the existing UDP policy and this is considered unjustified by any evidence. All major airports in Britain accommodate hotels on-airport where their sustainability benefits can far exceed those of airport developments such as some types of airport warehousing.</p> <p>Wording should be added to Table 5.3 and / or Policy E3 to the effect that: <i>“Exceptions for non-operational development will only be considered on a site specific basis having regard to the proposal’s:</i> <i>i) links to the operation of the airport;</i> <i>ii) sustainability benefits;</i> <i>iii) improved efficiency in the use of airport operational land.”</i></p>	<p>The Council is aware of the need to apply its policies flexibly. It has taken the position that land within the Airport boundary should be used for Airport-related development. This is partly to ease pressure for further Airport-related development beyond that boundary in future.</p> <p>With hotel development the Council has clearly stated its position as to where it would prefer future developments to take place - in local town centres with good public transport access and links with the Airport. The Council has to balance its future land use needs in the Heathrow area and one key objective (as elsewhere in the borough) has to be to retain sufficient employment land in the immediate area so as to provide employment opportunities for local residents.</p> <p>No proposed change.</p>
62	Policy E3: Strategy for Heathrow Opportunity Area	Mr John McDonnell MP		<p>No reference to:</p> <p>the need for community involvement</p> <p>the need to secure employment for local people not commuters and to improve skills and education to achieve this</p>	<p>The Statement of Community Involvement adopted by the Council in November 2006 sets out the community consultation arrangements for the preparation of Development Plan Documents. This would guide consultation arrangements for a Heathrow Area Development Plan Document and would ensure community involvement in its</p>

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				<p>the development of local targets for employment for local residents</p> <p>targets for air quality, and</p> <p>the need to restrict airport activities within the airport to prevent airport sprawl.</p> <p>The document needs to emphasise the need for local jobs for local people and describe how this could be achieved. There needs to be a commitment to the development of local community plans, setting out targets for promoting local employment within the constraints of improving air quality and tackling climate change.</p> <p>There should be a statement that airport activity will be retained within the airport to prevent airport sprawl.</p>	<p>preparation.</p> <p>The provision of job training (and aim to secure a percentage of additional growth from jobs created in the Heathrow area for local residents) is an objective of policy E7 on "Raising Skills" when major developments come forward.</p> <p>Policy EM8 in the Core Strategy already sets out the Council's approach on air quality - i.e. there should be no worsening of air quality resulting from new development in the Air Quality Management Area.</p> <p>At Table 5.3 the section on Heathrow Airport already undertakes to ensure that development within the airport boundary is protected for activity directly related to the Airport - i.e. to prevent sprawl occurring.</p> <p>No proposed change.</p>
125	Policy E3: Strategy for Heathrow Opportunity Area		Gleeson Developments Ltd	<p>We would suggest that flexibility as suggested within paragraph 4.14 and 4.46 of PPS 12 is identified within the document to allow additional growth to be provided within the Heathrow Opportunity Area should capacity testing identify it. This would allow the subsequent Opportunity Area DPD to be in conformity with the CS.</p>	<p>Work on subsequent parts of the Local Development Framework will require further capacity testing as the objector suggests. This is noted already in the Core Strategy at paragraph 4.12. Both the Site Allocations and Heathrow Area Development Plan Documents can be expected to come forward with detailed land use proposals for the area which will identify potential capacity which can then be tested at that stage. This will not prevent further development coming forward beyond that specified in the Core Strategy - which is intended to broadly indicate assumptions on future growth in the borough, rather than set levels of growth which cannot then be exceeded within the plan period.</p> <p>No proposed change.</p>

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153	Policy E3: Strategy for Heathrow Opportunity Area	Individual		<p>The wording for Policy E3 should be as follows: "Policy E3: Strategy for Heathrow Opportunity Area The Council will prepare a DPD for the Heathrow OA to achieve the future growth set out in table 5.3, in consultation with Local Residents Groups, and GLA. This DPD will help manage development and protect land within the boundaries of Heathrow Airport for airport related activities. It will balance demand for hotel and employment uses and ensure that local people benefit from sustainable economic growth.</p> <p>The DPD will also set out requirements for climate change and measures to improve local air quality especially with relation to the EU requirements. The wording for Monitoring Policy E3: "Policy E3 will be monitored through the Council's Local Development Scheme and subsequent targets will be set out in the AMR which will reflect EU regulations."</p>	<p>The two proposed changes involve including wording (a) in policy E3 to ensure the Council is committed to undertaking consultation with residents groups for the Heathrow Area Development Plan Document and (b) including wording in policy E3 and in its monitoring section on improving air quality in relation to EU regulations.</p> <p>Undertaking consultations with local residents' organisations is already a requirement of the Council's adopted Statement of Community Involvement for the preparation of Development Plan Documents. Consequently the Council does not consider it necessary to include a specific reference in this policy to consulting local residents' organisations.</p> <p>Specific reference to the EU air quality regulations is unnecessary - the Core Strategy is not required to carry references to other EU or national legislation within its policies.</p> <p>No proposed change.</p>
158	Policy E3: Strategy for Heathrow Opportunity Area	Individual		<p>The wording for Policy E3 should be as follows: "Policy E3: Strategy for Heathrow Opportunity Area</p> <p>The Council will prepare a DPD for the Heathrow OA to achieve the future growth set out in table 5.3, in consultation with Local Residents Groups, and GLA. This DPD will help manage development and protect land within the boundaries of Heathrow Airport for airport related activities. It will balance demand for hotel and employment uses and ensure that local people benefit from sustainable economic growth.</p>	<p>The two proposed changes involve including wording (a) in policy E3 to ensure the Council is committed to undertaking consultation with residents groups for the Heathrow Area Development Plan Document and (b) including wording in policy E3 and in its monitoring section on improving air quality in relation to EU regulations.</p> <p>Undertaking consultations with local residents' organisations is already a requirement of the Council's adopted Statement of Community Involvement for the preparation of Development Plan Documents. Consequently the Council does not consider it necessary to include a specific</p>

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				<p>The DPD will also set out requirements for climate change and measures to improve local air quality especially with relation to the EU requirements."</p> <p>The wording for Monitoring Policy E3: "Policy E3 will be monitored through the Council's Local Development Scheme and subsequent targets will be set out in the AMR which will reflect EU regulations."</p>	<p>reference in this policy to consulting local residents' organisations.</p> <p>Specific reference to the EU air quality regulations is unnecessary - the Core Strategy is not required to carry references to other EU or national legislation within its policies.</p> <p>No proposed change.</p>
182	Policy E3: Strategy for Heathrow Opportunity Area	Universities Superannuation Scheme Ltd	Drivers Jonas Deloitte	<p>USS remains in support of the strategy for Heathrow Opportunity Area (Policy E3). This seeks to help manage development and protect land within Heathrow, balance demand for hotel and employment uses and ensure that local people benefit from sustainable economic growth.</p> <p>USS continues to welcome the location of a range of B class uses in the Strategic Employment Locations, Locally Significant Industrial Sites and Locally Significant Employment Locations and designated allocated sites.</p> <p>However, in order to capitalise on job creation, the emerging policy should acknowledge the contribution of other forms of employment, other than those within the B classes, can have on the economic prosperity and wider regenerative effect of Hillingdon.</p> <p>Therefore, USS considers that applications for other employment uses should be judged on a case by case basis allowing economic, environmental and transport impacts to be assessed in relation to specific sites. Flexibility to allow this should be built into the policy in</p>	<p>The policies on employment land in the Core Strategy do not preclude consideration of other land uses being located there. In particular the Council would note that further work to be carried out on the Site Allocations Development Plan Document will consider whether sites can be proposed for managed release from previous employment use to accommodate other land uses.</p> <p>No proposed change.</p>

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				advance of adoption.	
190	Policy E3: Strategy for Heathrow Opportunity Area	British Airways plc	Lichfield Planning	<p>Revise text at Policy E3 to read: Strategy for Heathrow Opportunity Area</p> <p>The Council will prepare a Development Plan Document (DPD) for the Heathrow area to achieve the future growth set out in Table 5.3, in consultation with BA and BAA, the GLA and London Borough of Hounslow. This DPD will help manage development and protect land within and around Heathrow for airport-related activities, including for a potential future consideration of R3. It will balance demand for hotel and employment uses, and ensure that local people benefit from sustainable economic growth. The DPD will also set requirements consistent with national policy targets for climate change mitigation and adaptation through a low carbon emission strategy and measures to improve local air quality, having regard to emissions from buildings of various uses and road transportation to various destinations as well as the agreed environmental standards for Heathrow.</p>	<p>The proposed wording modifications are considered unnecessary by the Council.</p> <p>The existing Statement of Community Involvement would ensure the involvement of the British Airports Authority and British Airways as two major stakeholders in the borough's Local Development Framework - they do not need to be named in the policy - where the GLA and LB Hounslow are shown as the major plan-making authorities for the Airport and immediate area in conjunction with Hillingdon Council.</p> <p>The Council does not consider it reasonable to expect that during the Plan period it would have to reserve land originally identified as required for the Runway 3 proposal.</p> <p>The additional wording on air quality adds little to the existing policy. It also seeks to set out the nature of the approach to be taken in the Development Plan Document on the precise nature of the low carbon emission strategy and measures to improve local air quality. These are still some way ahead and need further investigation by the Council.</p> <p>No proposed change.</p>
216	Policy E3: Strategy for Heathrow Opportunity Area	Heathrow Airport Ltd		The boundary of the Heathrow Opportunity Area should be broadly defined. In line with HAL's comments on para 4.15, we believe that the Core Strategy should define the boundary (in broad terms) that will be covered by the DPD.	<p>The designation of the Heathrow Opportunity Area is a matter for the Mayor of London as this is a proposal in the London Plan. The proposal has yet to be taken forward by the Mayor and the extent of the proposed designation in LB Hillingdon is not known.</p> <p>No proposed change.</p>

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347	Policy E3: Strategy for Heathrow Opportunity Area	Individual		The policy is weak and should allow growth where it is not at the expense of the environment, heritage or existing communities. Current residential areas should be protected and firm boundaries placed around Heathrow Airport so that it does not encroach on the surrounding areas - where work needs to be done to improve the community life of the surrounding villages.	<p>Various sections of the Core Strategy aim to protect and enhance the environment, heritage and existing communities - as well as allow for further growth. A number of Strategic Objectives cover this theme, e.g. SO1-SO3, SO8, SO10 and SO11 and in turn various policies in the Core Strategy look to protect and enhance Hillingdon's heritage (HE 1), built environment (BE1), combat climate change (EM2), protect the borough's Green Belt, Metropolitan Open Land and Green Chains (EM2) and ecology (EM7).</p> <p>No proposed change.</p>
316	Policy E3: Strategy for Heathrow Opportunity Area	Individual		<p>I don't believe there has been full consultation.</p> <p>Not enough detail on how goals can be achieved. South of the borough does not have room to expand, roads, schools etc.</p>	<p>Consultations on the Core Strategy to date have been carried out in accordance with the Council's approved Statement of Community Consultation and these do constitute a full consultation exercise as required by the relevant regulations.</p> <p>The Council will be bringing forward further Development Plan Documents - on Site Allocations and specifically for the Heathrow Area - which can be expected to detail proposals explaining how the proposed growth in the south of the borough will be accommodated.</p> <p>No proposed change.</p>
336	Policy E3: Strategy for Heathrow Opportunity Area	Kerville Associates	Montagu Evans on behalf of Kerville Associates	We believe that the wording of Policy E3 is ineffective in its delivery for future growth. Despite the future of Stockley Park being discussed within Table 5.3, the policy wording focuses on the delivery of airport and hotel uses, with employment only receiving a passing reference. We believe that the policy and supportive text must recognise new and evolving industries, the benefits they bring for both Hillingdon and the wider London economy through utilising the location benefits of the borough. To overcome these problems, we	<p>Designation of the Heathrow Opportunity Area is a matter for the Mayor of London as this is a proposal from the London Plan.</p> <p>The Core Strategy has to be read as a whole and the Council takes the view that there is already sufficient detail in its broad policies and proposals to highlight the importance of employment generally and they do not preclude newer industries locating in the borough on existing employment / industrial sites.</p>

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				believe that Map 5.1 should be updated to identify the Heathrow Opportunity Area and include the wider Stockley Park area as an employment cluster. This will make the map sound and will help to overcome the related lack of effectiveness for Policies E2 and E3. With regard to Policy E3, we acknowledge and welcome further guidance through a specific Development Plan Document for the Heathrow area, and reference to this within the policy is appropriate. Notwithstanding this, Policy E3 requires further elaboration to make reference to the areas of growth in Table 5.3 to be sound.	No proposed change.
366	Policy E3: Strategy for Heathrow Opportunity Area	Bell Farm Christian Centre		The policy is not defined and appears to exclude residents from participating in the DPD - and does not protect residents from the erosion of residential areas. Consultation on the Strategy should be wider than just the GLA and London Borough of Hounslow and should include the residents who will be impacted by the expansion.	Consultations on the various parts of the Local Development Framework are undertaken in accordance with the Council's approved 2006 Statement of Community Involvement. This would equally be the case with a Heathrow Area Development Plan Document and local residents would be fully informed and involved in consultations during its preparation. No proposed change.
487	Policy E3: Strategy for Heathrow Opportunity Area	Mr John McDonnell MP		Policy E3: Strategy for Heathrow Opportunity Area - There is no reference to the need for community involvement, the need to secure local people employment not commuters, improve skills and education to achieve this, the development of local targets for employment for local residents, targets for air quality, and the need to restrict airport activities within the airport to prevent airport sprawl. The document needs to emphasise the need for local jobs for local people and describe how this could be achieved. There needs to be a commitment to the development of local community plans, setting out targets for promoting local employment within the constraints of improving air quality and tackling climate change. There should be a statement that airport activity will be retained	The Core Strategy is being drawn up following consultations with the local community - in accordance with the Council's approved 2006 Statement of Community Involvement. As further work proceeds on the Local Development Framework - e.g. for the Site Allocations Development Plan Document - the Council will consult the local community on proposals for future sites where growth for housing, community, commercial and other uses. It will again follow the requirements of the Statement of Community Involvement to do this. Neighbourhood plans are yet to be enacted - they are currently a measure in the Localism Bill. The Council will ensure again that it involves the local community in work on any detailed area plans -

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				within the airport to prevent airport sprawl.	<p>e.g. the proposed Heathrow Area Development Plan Document.</p> <p>The Council's series of proposed Core Strategy strategic objectives and policies seek to protect and enhance the local environment (policy BE1), heritage (policy HE1) and communities (strategic objective SO6 and policy CI 1).</p> <p>The extent of the Heathrow Opportunity area is not yet defined - this is a proposal in the London Plan and has yet to be brought forward by the Mayor of London.</p> <p>The Council makes clear its intention (at Table 5.3) that development within the Airport boundary should be directly related to airport operations - with the intention that this will partly reduce any pressure for development in surrounding residential areas.</p> <p>No proposed change.</p>
36	Table 5.4	British Waterways		This section does not recognise the asset of the Grand Union Canal in Uxbridge and should make reference to its value and potential in supporting sustainable growth, for sustainable transport and health and well-being.	<p>Policy EM3 already gives general recognition to the value of the borough's canals in these respects. Consequently the Council does not consider it necessary to further alter the Core Strategy as proposed and highlight the role of the canal specifically in Uxbridge.</p> <p>No proposed change.</p>
37	Table 5.4	British Waterways		This section does not recognise the asset of the Grand Union Canal in Uxbridge and should make reference to its value and potential in supporting sustainable growth, for sustainable transport and health and well-being.	<p>Policy EM3 already gives general recognition to the value of the borough's canals in these respects. Consequently the Council does not consider it necessary to further alter the Core Strategy as proposed and highlight the role of the canal specifically in Uxbridge.</p> <p>No proposed change.</p>

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83	Map 5.2	VSM Estates	GVA Grimley Ltd	The boundary of the town centre extension into RAF Uxbridge as shown on Map 5.2 should be redrawn to reflect the area specified as the extension quarter on Map 8 of the adopted RAF Uxbridge Supplementary Planning Document (January 2009). This change will ensure that draft policy E4 of the Core Strategy and the guidance in the RAF Uxbridge SPD can be effectively implemented.	Disagree - indicative Map 5.4 in the Core Strategy reflects the latest position on the town centre extension at RAF Uxbridge following the planning application considered by the Council in 2010. No proposed change.
134	Policy E4: Uxbridge	Client unspecified	Quod Planning	Policy E4 does not explicitly refer to residential as an acceptable use. This is an obvious omission in drafting.	<p>As both national guidance and London-region policies already refer to the acceptability of residential uses in town centres, there does not need to be a further specific reference to this in the Core Strategy.</p> <p>The reference to mixed-use development in policy E4 effectively covers the point that residential housing could be incorporated within existing town centre redevelopments in Uxbridge. It could be seen to be appropriate growth as specified in Strategic Objective 16, helping to support the viability of the town centre by increasing potential "footfall" there.</p> <p>No proposed change.</p>
492	Policy E4: Uxbridge	Mr John McDonnell MP		More account should be taken of health needs with a growing population.	<p>Policy CI 1 does recognise the need for adequate health care provision to be made for the borough's community - partly in response to the growing population. The Strategy aims to locate health care facilities in existing town centres and other accessible locations to maximise community access.</p> <p>No proposed change.</p>
562	Policy E4: Uxbridge	Individual		<p>LATE SUBMISSION:</p> <p>Rather than "will" should state: "the Council must make improvements...".</p>	The proposed change is not considered to add any helpful further emphasis to the policy. No proposed change.

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
259	5.31	IKEA	RPS on behalf of IKEA	Reference to Town & Neighbourhood Centres should be changed to Town Centres - to be consistent with the wording in PPS4.	<p>The Council has previously used a hierarchy of centres within its Unitary Development Plan which was divided into several categories of centres. Local businesses and residents organisations have become familiar with that categorisation. The Core Strategy has now simplified that hierarchy. The Council views the designation of its larger Town centres and other more local "neighbourhood" centres as comparable with that previous approach - and so easily understood by local businesses and residents - whilst also complying with the requirements of PPS4.</p> <p>No proposed change.</p>
543	5.31	Bride Hall Developments Ltd		Para 5.31 states that District, Minor and Local Centres are referred to as neighbourhood centres. Later in the paragraph references are made to local centres and previous paragraphs make references to town and neighbourhood centres. This inconsistent approach needs to be addressed.	<p>The Council has previously used a hierarchy of centres within its Unitary Development Plan which was divided into several categories of centres. Local businesses and residents organisations have become familiar with that categorisation. The Core Strategy has now simplified that hierarchy. The Council views the designation of its larger Town centres and other more local "neighbourhood" centres as comparable with that previous approach - and so easily understood by local businesses and residents - whilst also complying with the requirements of PPS4.</p> <p>No proposed change.</p>
63	Map 5.3	Mr John McDonnell MP		Lack of appreciation of the challenges facing Hayes Town Centre, the Uxbridge Road shopping area in Hayes and the local shopping parades, particularly the lack of commitment to improving the public realm in these areas and community involvement in improving these areas. There needs to be a greater emphasis placed upon improving the public realm in all the shopping areas and centres in the south of the borough, including engaging the local community in developing local plans to	The Core Strategy already contains a commitment at policy E5 to protect its local shopping centres and parades. It regularly surveys its retail centres annually to assess their nature and character and keep under review changes affecting them. Future work on the Site Allocations Development Plan Document can be expected to bring forward opportunities for new uses in town centres to support their continued functioning.

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				<p>implement these improvements. There also needs to be a commitment stated to ensuring community safety within the shopping areas and making these areas child friendly.</p>	<p>A Heathrow Area Development Plan Document is to be prepared as a later stage of the Local Development Framework. It can be expected to address the detailed policy aspects of improving the public realm in the town centres across the south of the borough. The Core Strategy deals with the borough as a whole and already broadly deals with the built environment standards the Council expects to see in all public spaces.</p> <p>Community safety for the whole community is already a requirement of the main policy in the Core Strategy dealing with the Built Environment - policy BE 1.</p> <p>No proposed change.</p>
243	Map 5.3	Yiewsley and West Drayton Town Centre Action Group		<p>Despite Yiewsley and West Drayton having a disproportionate amount of the borough's major residential developments the retail sector, alongside the rest of the infrastructure, has declined considerably. The legend for (Map 5.3) the map on page 48 does not include giving support to specialist retail or independent shops or strengthening core shopping areas in Yiewsley & West Drayton. These policies should be included to stop the retail sector going into terminal decline.</p>	<p>Map 5.3 is purely illustrative. It will be for later parts of the Local Development Framework (rather than the broad strategic approach in the Core Strategy) to set out the detailed development management policies to be adopted for each centre - e.g. with respect to strengthening the retail core in a particular centre.</p> <p>No proposed change.</p>
135	Map 5.3	c/o Turley Associates	Turley Associates	<p>Map 5.3 shows the hierarchy of the shopping centres in the Borough and classifies South Ruislip as a Local Centre. When referring to the hierarchy of centres as defined in PPS4 Policy XC3, South Ruislip has the characteristics of a District Centre and should be accorded this status.</p> <p>The Sainsbury's at 11 Long Drive, South Ruislip is still only partially included within the Local Centre Boundary of South Ruislip. The store itself is included within the Local Centre</p>	<p>Annex 2 of the 2009 draft Replacement London Plan specifies the network of Metropolitan, Major and District centres across London. The Core Strategy needs to be in general conformity with the London Plan and has followed the designations contained in the London Plan policies.</p> <p>The nature of the South Ruislip centre has been kept under review through the Council's annual shopping centre surveys and these support the London Plan's definition of the centre's role as</p>

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				<p>Boundary and the Core Shopping Area. However the car park and petrol filling station lay to the south of the store, with only the northern half of the car park falling within the Local Centre Boundary, the southern half together with the petrol filling station falling outside this boundary.</p> <p>Given these facilities provide an important local service for the community the southern half of the site should be included in the Local Centre Boundary and the Core Shopping Area.</p>	<p>being a local centre.</p> <p>The issue of the detailed boundary of the centre is not to be addressed by the Council in the Core Strategy. It will be analysing current shopping centre boundaries as part of work on other parts of the Local Development Framework - primarily in the Development Management Development Plan Document.</p> <p>No proposed change.</p>
136	Map 5.3	c/o Turley Associates	Turley Associates	<p>With reference to the hierarchy of centres as defined in PPS4 EC3.1(b) Uxbridge Road, including the Lombardy Retail Park, has the characteristics of a District Centre, and should be accorded this status</p> <p>Furthermore, Lombardy Retail Park is included within the town centre boundary of Uxbridge Road. The character and retail offer of Lombardy Retail Park is considered to be complementary to the existing Primary Shopping Frontage of Uxbridge Road, Hayes, and as such the Retail Park should be afforded equal status. It is suggested, therefore, that the Lombardy Retail Park be identified as Primary Shopping Frontage.</p>	<p>The current hierarchy of centres in the Core Strategy reflects that set out in the 2009 draft Replacement London Plan. The Core Strategy has to be in general conformity with the policies and proposals in the London Plan.</p> <p>In the case of Uxbridge Road and the Lombardy Retail Park the Council is aware of the changing nature of both and their inter-relationship. The Council will be considering the detailed boundaries and status of its local centres in later work for the Local Development Framework - for the Development Management Development Plan Document and will undertake to re-assess the designation of the centre as a whole then, together with the extent of primary and secondary shopping frontages.</p> <p>No proposed change.</p>
107	5.32	Lafarge Aggregates Ltd		<p>Prior to the final sentence of paragraph 5.32, we suggest additional wording as follows "Allocations will be put forward only if they are found consistent with National Policy".</p>	<p>The Council would have to take national policy into account when deciding on future designations in a Development Plan Document in order for it to be found sound at a future examination in public. It does not require a qualification adding here to the Core Strategy to specify this.</p> <p>No proposed change.</p>

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261	5.33	IKEA	RPS on behalf of IKEA	Paragraph 5.33 should be clear that it relates to the comparison goods floorspace needs of the Borough. The Core Strategy should not preclude additional comparison goods retail floorspace elsewhere within the Borough particularly in relation to the need identified over and above that indicated in Table 5.5 and Table 5.4 provided that such proposals comply with the policy tests set out in PPS4. applications	Paragraph 5.33 makes clear the requirement for comparison goods floorspace in the borough upto 2026. The accompanying Table 5.5 highlights the requirements for the individual district centres. Elsewhere the expected provision of floorspace will be expected to be in Uxbridge and at locations which have yet to be identified through later work on detailed parts of the Local Development Framework - the Site Allocations, Proposals Map, Heathrow Area and Development Management Development Plan Documents. No proposed change.
415	5.33	Greater Manchester Pension Fund	Capita Symonds on behalf of Greater Manchester Pension Fund	Paragraph 5.33 needs to bring into account convenience shopping requirements for the plan period to 2026.	<p>For the purposes of the Core Strategy the Council considers that the 2006 study together with the 2010 Position Statement on Employment Land and Comparison Retail Floorspace give the necessary evidence base for the broad approach set out on retailing and need not delay adoption of the Strategy.</p> <p>The Council will bring forward further research on town centres and retailing in connection with later work on the Local Development Framework - notably in support of the Site Allocations and Development Management Development Plan Documents which will look at detailed retail capacity in the borough's town centres and at detailed town centre boundaries and shopping frontage designations. No proposed change.</p>
281	Table 5.5	Legal and General Property Partners (Life Fund) Ltd	Drivers Jonas Deloitte on behalf of Legal & General Property Partners (Life Fund) Ltd	Support the roles of Ruislip & Ickenham town centres in the table.	<p>Noted.</p> <p>No proposed change.</p>
412	Table 5.5	Greater Manchester Pension Fund	Capita Symonds on behalf of Greater Manchester Pension Fund	The Core Strategy does not have an up to date retail study and any assumptions regarding retail growth are unsound as a result	For the purposes of the Core Strategy the Council considers that the 2006 study together with the 2010 Position Statement on Employment Land and Comparison Retail Floorspace give the

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				It follows that table 5.5 should reflect and quantify convenience shopping needs.	<p>necessary evidence base for the broad approach set out on retailing and need not delay adoption of the Strategy.</p> <p>The Council will bring forward further research on town centres and retailing in connection with later work on the Local Development Framework - notably in support of the Site Allocations and Development Management Development Plan Documents which will look at detailed retail capacity in the borough's town centres and at detailed town centre boundaries and shopping frontage designations.</p> <p>No proposed change.</p>
74	5.34	Waitrose Ltd	Barton Willmore	Amend paragraph 5.34 to refer to an additional 1,300 sq m of additional convenience floorspace instead of 415sq.m.	<p>For the purposes of the Core Strategy the Council considers that the 2006 study together with the 2010 Position Statement on Employment Land and Comparison Retail Floorspace give the necessary evidence base for the broad approach set out on retailing and need not delay adoption of the Strategy.</p> <p>The Council will bring forward further research on town centres and retailing in connection with later work on the Local Development Framework - notably in support of the Site Allocations and Development Management Development Plan Documents which will look at detailed retail capacity in the borough's town centres and at detailed town centre boundaries and shopping frontage designations. No proposed change.</p>
260	5.34	IKEA	RPS on behalf of IKEA	The Council should give serious consideration to updating the Retail Study to ensure that it adequately covers the Core Strategy vision period to 2026. This will ensure the evidence base is consistent with the national policy requirement set out in PPS4.	For the purposes of the Core Strategy the Council considers that the 2006 study together with the 2010 Position Statement on Employment Land and Comparison Retail Floorspace give the necessary evidence base for the broad approach set out on retailing and need not delay adoption of the Strategy.

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				<p>In particular the Retail Study should consider the need arising from increases to the residential population of the borough by reference to proposed housing growth (policy H1 and Table 6.5) and how this informs the town centre improvements shown on Map 5.3.</p> <p>Paragraph 5.34 should be amended to exclude reference to 415sqm convenience floorspace need and should be replaced with a statement which requires new convenience goods retail floorspace to be directed to existing centres in accordance with policy E5 and tested against PPS4.</p> <p>The Core Strategy should not preclude proposals for new retail floorspace within the Borough provided that such proposals comply with the policy tests set out in PPS4.</p>	<p>The Council will bring forward further research on town centres and retailing in connection with later work on the Local Development Framework - notably in support of the Site Allocations and Development Management Development Plan Documents which will look at detailed retail capacity in the borough's town centres and at detailed town centre boundaries and shopping frontage designations.</p> <p>No proposed change.</p>
273	5.34	Lidl (UK) GmbH	RPS	<p>The Retail Study should be updated to ensure that it adequately covers the Core Strategy period to 2026. This will assist in ensuring that the retail strategy is justified by credible evidence, is effective and also consistent with the national policy requirements set out in PPS4.</p> <p>In particular, the Retail Study should consider the need for convenience goods retail floorspace arising from the planned increases in housing and the residential population of the Borough as proposed by Policy H1.</p> <p>The reference to convenience retail needs within the Borough at paragraph 5.34 should be amended to reflect the findings of the updated Retail Study.</p> <p>Further to the above, the Core Strategy should not preclude proposals for new food stores</p>	<p>For the purposes of the Core Strategy the Council considers that the 2006 study together with the 2010 Position Statement on Employment Land and Comparison Retail Floorspace give the necessary evidence base for the broad approach set out on retailing and need not delay adoption of the Strategy.</p> <p>The Council will bring forward further research on town centres and retailing in connection with later work on the Local Development Framework - notably in support of the Site Allocations and Development Management Development Plan Documents which will look at detailed retail capacity in the borough's town centres and at detailed town centre boundaries and shopping frontage designations.</p> <p>No proposed change.</p>

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				<p>within the Borough coming forward, provided that they comply with the policy tests set out in PPS4. This is not only inconsistent with national policy but will stifle economic growth and job creation.</p> <p>The retail strategy should also recognise the benefits that can be provided by discount/LAD retailers in terms of improved choice and competition and social inclusion.</p>	
542	5.34	Bride Hall Developments Ltd		<p>LATE SUBMISSION:</p> <p>The Retail Study only assessed the period up to 2016 and does not account for retail growth in the Core Strategy. As such, it does not accord with PPS4, or provide a robust evidence base for the Core Strategy. The Retail Study should be updated to provide a sound evidence base.</p>	<p>For the purposes of the Core Strategy the Council considers that the 2006 study together with the 2010 Position Statement on Employment Land and Comparison Retail Floorspace give the necessary evidence base for the broad approach set out on retailing and need not delay adoption of the Strategy.</p> <p>The Council will bring forward further research on town centres and retailing in connection with later work on the Local Development Framework - notably in support of the Site Allocations and Development Management Development Plan Documents which will look at detailed retail capacity in the borough's town centres and at detailed town centre boundaries and shopping frontage designations.</p> <p>No proposed change.</p>
86	Policy E5: Town and Local Centres	Orbit Developments (Southern) Ltd	The Emerson Group	<p>It should be stated in paragraph 5.31 or policy E5 that the strategic town has become the metropolitan centre (Uxbridge). The major town centre has become a district centre and local centres remain local centres (I have established this from the definitions in the core strategy). It should be listed which centres identified in the current UDP fall into which of the new four categories of centre. The glossary should have a definition for a parade referred to in E5. The</p>	<p>The purpose of the Core Strategy is to set out the general spatial policy approach being taken across the borough. Detailed matters are to be dealt with in other parts of the Local Development Framework.</p> <p>Metropolitan, Major and District centre designations used in the Core Strategy reflect those already laid down in the London Plan and do not need to be explained as such in the Core</p>

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				<p>definitions in the glossary should more closely reflect the definitions in PPS4. Where do the previously defined corner shops and parades fall - are they in the local centres now and if so this should be stated. Each local centre and parade should be identified on a plan/listed.</p>	<p>Strategy. They are shown diagrammatically at Map 5.3. It will be for subsequent parts of the Local Development Framework - notably the Development Management Development Plan Document - to specify designated frontages within those local centres and shopping parades.</p> <p>No proposed change.</p>
173	Policy E5: Town and Local Centres	Waitrose Ltd	Barton Willmore	<p>Further clarification is requested in relation to the monitoring of convenience and comparison floorspace in both the Core Strategy and subsequent Annual Monitoring Reports (under Indicator BD4 (Core)). In our view the identified convenience retail floorspace would be met at the extended Waitrose store in Ruislip, and the Core Strategy would include this as a strategic allocation now.</p>	<p>For the purposes of the Core Strategy the Council considers that the 2006 study together with the 2010 Position Statement on Employment Land and Comparison Retail Floorspace give the necessary evidence base for the broad approach set out on retailing and need not delay adoption of the Strategy.</p> <p>The Council will bring forward further research on town centres and retailing in connection with later work on the Local Development Framework - notably in support of the Site Allocations and Development Management Development Plan Documents which will look at detailed retail capacity in the borough's town centres and at detailed town centre boundaries and shopping frontage designations. This will be informed by the Council's annual town centre surveys and analysis of planning permissions for the Annual Monitoring Report.</p> <p>No proposed change.</p>
175	Policy E5: Town and Local Centres	Waitrose Ltd	Barton Willmore	<p>Amend second paragraph in 'Implementation of Policy E5' to refer to change in town centre boundary to Uxbridge and add sentence to refer to other town centre boundary changes that will be identified in the Site Allocations DPD.</p>	<p>Map 5.2 already illustrates the proposed boundary change for Uxbridge town centre and a further statement at the implementation section of policy E5 is considered unnecessary by the Council.</p> <p>The Council will bring forward further research on town centres and retailing in connection with later work on the Local Development Framework -</p>

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					notably in support of the Site Allocations and Development Management Development Plan Documents which will look at detailed retail capacity in the borough's town centres and at detailed town centre boundaries and shopping frontage designations. No proposed change.
97	Policy E5: Town and Local Centres	Northwood Residents Association		Policy E5 (page 52) refers to the development of Town and Local Centres but no provision seems to have been made for additional parking. The council should not assume that additional journeys will be made by public transport.	Policy T1 in the Core Strategy aims to ensure that local centres providing services and facilities have good access. The emphasis in the policy is on securing more sustainable travel modes to provide that access, but does not preclude the provision of further car parking. The Council does keep car parking demand under review. It will also bring forward a Site Allocations Development Plan Document as a later part of the Local Development Framework which might provide further options for car parking provision in some centres. No proposed change.
129	Policy E5: Town and Local Centres		Gleeson Developments Ltd	Policy E5 & Map 5.3 - we support the identification of Harlington as a Local Centre.	Noted. No proposed change.
148	Policy E5: Town and Local Centres	WM Morrison Supermarkets Plc	Peacock and Smith Ltd	The retail study is out of date - the Core Strategy should reflect the findings of an up-to-date retail study, as required by the guidance set out in PPS4.	For the purposes of the Core Strategy the Council considers that the 2006 study together with the 2010 Position Statement on Employment Land and Comparison Retail Floorspace give the necessary evidence base for the broad approach set out on retailing and need not delay adoption of the Strategy. The Council will bring forward further research on town centres and retailing in connection with later work on the Local Development Framework - notably in support of the Site Allocations and Development Management Development Plan Documents which will look at detailed retail capacity in the borough's town centres and at

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					<p>detailed town centre boundaries and shopping frontage designations.</p> <p>No proposed change.</p>
258	Policy E5: Town and Local Centres	IKEA	RPS on behalf of IKEA	<p>The Council should give serious consideration to updating the Retail Study to ensure that it adequately covers the Core Strategy vision period to 2026 including the projected growth in new housing within the Borough. This will ensure the evidence base is consistent with the national policy requirement set out in PPS4.</p> <p>Policy E5 should reasonably set out, by reference to a similar table to Table 5.5, comparable convenience goods needs within the Borough arising from the conclusions of any new Retail Study with particular regard areas promoted for significant housing growth (policy H1 and Table 6.5). Furthermore, the Retail Study should provide justification for the range of improvements planned for each of the centres as indicated on Map 5.3 and have regard to any major development sites, the development of which could affect the role and function of individual centres over the Core Strategy period and increase the need for additional retail floorspace.</p> <p>Policy E5 should not preclude additional retail floorspace within the Borough over and above that indicated in Table 5.5 (and any equivalent table relating to convenience goods) provided that such proposals comply with the policy tests set out in PPS4.</p>	<p>For the purposes of the Core Strategy the Council considers that the 2006 study together with the 2010 Position Statement on Employment Land and Comparison Retail Floorspace give the necessary evidence base for the broad approach set out on retailing and need not delay adoption of the Strategy.</p> <p>The Council will bring forward further research on town centres and retailing in connection with later work on the Local Development Framework - notably in support of the Site Allocations and Development Management Development Plan Documents which will look at detailed retail capacity in the borough's town centres and at detailed town centre boundaries and shopping frontage designations.</p> <p>No proposed change.</p>
553	Policy E5: Town and Local Centres	English Heritage		Policy E5: Town Centre and Local Centres (pg 50)-It is noted that the opportunity for Policy E5 to include a reference to investment into the historic environment as part of improvements to town centres has not been taken. This objective	Throughout the Core Strategy importance is given to the need to conserve and enhance the local historic environment. The Vision statement makes clear the importance of the borough taking full advantage of its distinctive strengths with regard

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				<p>is recognised within PPS4 (paragraph 10), which states the Government's intention for "the historic, archaeological and architectural heritage of centres to be conserved and, where appropriate, enhanced to provide a sense of place and a focus for the community and for civic activity." We would suggest that Policy E5 should recognise the importance of the historic environment as part of the strategy to improve the quality of Hillingdon's town centres.</p>	<p>to places, communities and heritage. Later policy HE 1 directly covers the approach the Council will take to the conservation and enhancement of the historic environment and policy BE 1 sets out general design criteria which the Council will use to assess new development. These include ensuring that new development is "...designed to be appropriate to the identity and context of Hillingdon's buildings (and) townscapes...and make a positive contribution to the local area in terms of layout, form, scale and materials..."</p> <p>No further level of explanation is considered necessary by the Council. No proposed change.</p>
274	Policy E5: Town and Local Centres	Lidl (UK) GmbH	RPS	<p>The Core Strategy should be supported by an up to date Retail Study. The current Retail Study does not adequately cover the Core Strategy vision period to 2026. Furthermore the Retail Study should reasonably assess the need for additional retail floorspace arising from the projected growth in new housing units within the Borough. An updated study will assist in ensuring the evidence base is consistent with the national policy requirements set out in PPS4.</p> <p>Policy E5 should reasonably set out, by reference to a similar table to Table 5.5, comparable convenience goods needs within the Borough arising from the conclusions of any new Retail Study.</p> <p>Policy E5 should not preclude additional retail floorspace within the Borough over and above that indicated in Table 5.5 provided that such proposals comply with the policy tests set out in PPS4. This is not only inconsistent with national policy but will stifle economic growth and job creation.</p>	<p>For the purposes of the Core Strategy the Council considers that the 2006 study together with the 2010 Position Statement on Employment Land and Comparison Retail Floorspace give the necessary evidence base for the broad approach set out on retailing and need not delay adoption of the Strategy.</p> <p>The Council will bring forward further research on town centres and retailing in connection with later work on the Local Development Framework - notably in support of the Site Allocations and Development Management Development Plan Documents which will look at detailed retail capacity in the borough's town centres and at detailed town centre boundaries and shopping frontage designations.</p> <p>The Core Strategy already makes clear that it will be flexible in its approach to the figures quoted in Table 5.5, that it will monitor them and keep them under review.</p> <p>No proposed change.</p>

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				The retail strategy should also recognise the benefits that can be provided by discount/LAD retailers in terms of improved choice and competition and social inclusion.	
367	Policy E5: Town and Local Centres	Bell Farm Christian Centre		The change in town centre boundaries has not been defined - there is no indication of the magnitude of development nor of potential areas that might be adversely affected. The boundaries of town centre expansion should be defined.	<p>Detailed consideration of individual town centre boundaries is not a requirement for the Core Strategy.</p> <p>Work on a subsequent Development Management Development Plan Document is expected to consider existing town centre boundaries (and designated shopping frontages) in detail and come forward with proposals for any necessary changes in the light of current information.</p> <p>No proposed change.</p>
493	Policy E5: Town and Local Centres	Mr John McDonnell MP		The policy should refer to reducing anti-social behaviour and removing Heavy Goods Vehicles from local / town centres; no real measures are set out to protect and improve local / town centres - and there is no effective parking strategy. The influx of betting shops and pawn shops in Hayes town centre is damaging its vitality & viability and should be controlled more tightly. There needs to be recognition of the threat large, out-of-centre supermarkets pose. The Strategy should be more proactive in attracting a diversity of retail outlets and improving the environment of existing centres. The amount of non-retail uses should be reduced.	<p>The Core Strategy already aims to help build safe and inclusive local communities through its policies - e.g. at policy BE 1 (7). Detailed policies for local town centres will be addressed in later parts of the Core Strategy - notably the Development Management and Heathrow Area Development Plan Documents. These can be expected to address the composition of existing shopping frontages and approach to further shopping provision in individual centres.</p> <p>A parking strategy and the routing of Heavy Goods Vehicles are outside the remit of the Core Strategy and will be addressed in other Council documents - e.g. the Local Implementation Plan.</p> <p>No proposed change.</p>
533	Policy E5: Town and Local Centres	Arla Foods UK Plc	BNP Paribas Real Estate	Generally support the policy but call for redesignation of South Ruislip town centre as a minor centre rather than a local one to recognise its existing retail offer, its catchment area and	The Council will bring forward further research on town centres and retailing in connection with later work on the Local Development Framework - notably in support of the Site Allocations,

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				potential to further cater for everyday needs of the local area. The Arla Food former dairy site offers potential to expand and improve the retail, residential and commercial offer of South Ruislip.	Proposals Map and Development Management Development Plan Documents which will look at detailed retail capacity and role of the borough's town centres and at detailed town centre boundaries and shopping frontage designations. No proposed change.
424	Policy E5: Town and Local Centres	Tesco Stores Ltd	GL Hearn on behalf of Tesco Stores Ltd	Policy lacks consistency with Site Allocations document. And SO16. Map 5.1 does not acknowledge town centre improvements that are likely to accrue from the redevelopment of the Master Brewer Site. Reliance on specialist retail and independent shops will not secure retail led development of the site.	<p>The Council is in the process of substantially redrafting the Site Allocations Development Plan Document. What will effectively be a new document will produced later by the Council. At present it is uncertain what approach will be taken to individual sites across the borough and it would be premature to include a commitment in the Core Strategy concerning the Master Brewer Site.</p> <p>The Council would also note that it will be producing a Development Management Development Plan Document which will consider the issue of detailed town centre boundaries and shopping frontage designations.</p> <p>No proposed change.</p>
544	Policy E5: Town and Local Centres	Bride Hall Developments Ltd		Policy E5 sets out the proposals for the provision of additional retail floorspace and proposals for town centres up to 2026. It is considered that the Council should update its retail study to take account of population increases and growth up to 2026. In accordance with PPS4 the level of convenience floorspace required should be set out in a similar fashion to comparison floorspace. Further depth should be provided to set out how town centres will be improved and how this will be accommodated over the period of the Core Strategy.	<p>For the purposes of the Core Strategy the Council considers that the 2006 study together with the 2010 Position Statement on Employment Land and Comparison Retail Floorspace give the necessary evidence base for the broad approach set out on retailing and need not delay adoption of the Strategy.</p> <p>The Council will bring forward further research on town centres and retailing in connection with later work on the Local Development Framework - notably in support of the Site Allocations and Development Management Development Plan Documents which will look at detailed retail capacity in the borough's town centres and at detailed town centre boundaries and shopping frontage designations.</p>

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					The Core Strategy already makes clear that it will be flexible in its approach to the figures quoted in Table 5.5 that it will monitor them and keep them under review. No proposed change.
38	Policy E6: Small and Medium-Sized Enterprises (SME)	British Waterways		The Grand Union Canal offers opportunities for supporting SMEs through business barges, particularly suitable for small creative and ITC businesses that would complement adjacent employment and mixed use land uses. Barges, as at Tottenham Hale and Paddington Basin, also provide activity on the waterspace and passive surveillance, encouraging better use of this resource.	The Council would consider such proposals within the overall planning policy framework provided on canals by the London Plan and the Core Strategy. No proposed change.
64	Policy E6: Small and Medium-Sized Enterprises (SME)	Workspace Group	Ransome and Company Ltd	Add an additional criterion to policy E6 that sets out how small and medium sized accommodation can be delivered through enabling development whereby a higher value land use is included within a mixed-use development to bring forward modern employment space for SMEs.	The policy already clearly states the Council's intention to seek provision of affordable accommodation for SME firms across the borough. It is also undertaking to keep the provision of SME accommodation under review through its Annual Monitoring Report. The Council appreciate that enabling development could be sought to provide SME accommodation as proposed by the objector - e.g. through the use of a planning obligation with an appropriate site. It is not considered necessary to detail this approach in addition within the Core Strategy. No proposed change.
534	Policy E6: Small and Medium-Sized Enterprises (SME)	Arla Foods UK Plc	BNP Paribas Real Estate	Support the development of accommodation for small and medium size firms but do not support any reference to affordability in the policy - which suggests the policy would control market and rental levels for these businesses.	Support for further accommodation noted. The Council would not seek to control market or rental levels but would seek to provide a range of different types of business accommodation so as to ensure a range of premises are available to support different sized firms in the borough. No proposed change.
356	5.39	Hayes Town Partnership		The Plan should be amended to recognise that in addition to promoting retraining the Council's economic strategy should seek to build on the	This is a matter for the Council's Economic Strategy rather than the spatial Core Strategy.

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				existing skill base and to target appropriate industries to come to the Borough and use these skills.	No proposed change.
165	Policy E7: Raising Skills	Workspace Group	Ransome and Company Ltd	Workspace supports the promotion of links between local businesses and universities.	Noted. No proposed change.
368	Policy E7: Raising Skills	Bell Farm Christian Centre		Does not set targets for jobs for local people - the policy should set targets which demonstrate it is effective.	The Core Strategy is a spatial policy document - the setting of targets as proposed would instead be covered by the Council's Economic Strategy. The Core Strategy's role here is more one of identifying a need for further employment growth and then to make broad spatial provision for that (included at section 5), rather than to set a detailed jobs target for local people. No proposed change.
6		Individual		<p>With regard to housing, there are suggestions:</p> <ol style="list-style-type: none"> 1. Better water usage and sustainability methods taken into consideration with regard to housing density 2. Residents in the local area where housing is to be built should be better consulted and their views taken into consideration rather than being disregarded lightly. After all, the changes will impact upon them and their area of residence. 3. Better placing of the road drainage systems so no localised flooding occurs 4. Making sure that the correct Brownfield sites are developed, and this doesn't cause Hillingdon to move facilities to a new location without any need. This would be a waste of money, time and resource. 5. Instead of building lots of offices (which is already surplus at Stockley Park) or hotels, it would be better to consider these sites for 	<p>Responses to the above points are as follows:</p> <ol style="list-style-type: none"> 1. Housing density will need to reflect guidance in the Mayor's London Plan and is addressed in paragraph 6.24 of the document. 2. Residents are consulted throughout the production of the Core Strategy and other development plan documents, in accordance with the Council's Statement of Community Involvement. 3. Issues related to drainage and water provision have been considered as part of the production of the Infrastructure Schedule in Appendix 2 and the Strategic Infrastructure Plan. This takes account of water supplies over the period of the Core Strategy. Discussions with Thames Water indicate the some drainage improvements may be required along the A4 to accommodate growth. Site specific drainage issues would be addressed as part of the determination of planning applications, through discussion with statutory consultees.

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				<p>housing (provided the transport links are also considered alongside</p> <p>6. Better (and longer than the minimum) consultation with residents located around an area that is going to be developed, whether that is for waste management or housing. I mean that residents are actively consulted and made aware of changes rather than being passively notified by the minimum legal requirement-this is not the best method as it involves the Council resident to be always looking actively. This would be a constant worry as sometimes Council deadlines are changed and delayed. Surely, it would be better to have a better notification e.g. signs posted up in the affected area? Also, to take their views into consideration with empathy in the decisions that are made.</p> <p>7. Better usage of currently unoccupied council housing stock so that the housing needs can also be met that way; it must be better than letting houses become derelict. That is a waste of resource when the need of more housing is always being publicly declared in the media.</p>	<p>4 and 5. Specific sites will be identified for development in the forthcoming Site Allocations DPD. Sites will be identified to meet targets for housing provision or office space in the London Plan or other evidence based documents. The Site Allocations document will be consulted on to allow residents to comment.</p> <p>6. The Council has held two six week rounds of consultation on the Core Strategy. This included a range of drop in sessions across the borough.</p> <p>7. Issues related to social housing will be addressed in other Council housing strategy documents, including the Council's Housing Market Assessment.</p> <p>No proposed change.</p>
244	6	Yiewsley and West Drayton Town Centre Action Group		<p>Concern has been expressed as to the allocation of space in Yiewsley & West Drayton to provide more housing. As stated previously, this area has taken the brunt of major developments with more to come. Current policy has let this area down badly by failing to ensure a commensurate upgrading of the infrastructure. There is no definitive policy detail in this document that indicates the current situation would change, if this Core Strategy is adopted. It has been noted that the document states that developments will have 50% affordable housing. The definition of affordable housing continues to cause some confusion as it now seems to</p>	<p>The Council is considering introducing the Community Infrastructure Levy as a new mechanism of funding community infrastructure. The following paragraph will be introduced in the supporting text to policy CI1.</p> <p>The Council currently secures developer contributions towards infrastructure by way of planning obligations, with the support of Hillingdon's adopted Planning Obligations Supplementary Planning Document. In November 2010, the government confirmed that this mechanism of funding infrastructure will be replaced with the Community Infrastructure Levy</p>

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				indicate 'Social Housing' rather than affordable property for those wishing to purchase their homes. The strategy should define, unambiguously, what affordable housing means. There is no definitive data as to the need for more housing in Yiewsley & West Drayton. The allocation of sites, as laid down in the Core Strategy, for such a purpose would indicate a contradiction in relation to Chapter 5. Page 60 indicates an underestimate of the housing trajectory (pages 54-65)	(CIL). Unlike S106, CIL payments will apply to the majority of new development in the borough. The Council has undertaken to prepare a CIL Charging Schedule and will be consulting on this in accordance with Government Guidance. The Core Strategy includes the definition of affordable housing as set out in government planning guidance for housing. It contains a borough-wide target for provision; this is not broken down into area specific targets. No proposed change.
238	6	Individual		If housing growth is to take place, there should be a clear link to the number of additional educational places that will be required locally - and the amount of additional parking for teachers and parents.	The Core Strategy acknowledges that 18 new primary school forms of entry are required to address population growth. The majority of these places are required in the south of the borough. No proposed change.
194	6.6	Garden City Estate Residents' Association		The retention of indicative density targets in the draft Replacement London Plan is unacceptable. High densities for housing are having an adverse effect on the accommodation available to residents and resulted in pressure on local schools, health and community infrastructure. Densities must be reduced to enable a balanced provision of these to be made.	The Core Strategy is required to be in general conformance with the Replacement London Plan. Densities figures are provided as a guide and are subject to local circumstances. No proposed change.
521	6.6	L B Hillingdon (Labour Group)		Para 6.6 (4) The retention of indicative density targets in the Replacement London Plan is unacceptable.	The Core Strategy is required to be in general conformance with the London Plan. This provides indicative densities and the implementation section of policy H1 notes that these guideline densities will be applied subject to local characteristics and circumstances.
98	6.10	Northwood Residents Association		[NOTE: The submitted letter refers to Policy E6 but the page reference (page 56) appears to refer to paragraph 6.10 and the Council has replied on that basis] The section at paragraph 6.10 covering new homes makes no mention of provision for the elderly. There is a specific need for pensioners who own their own homes to	The issue of equality of opportunity for all is a key theme running throughout the Core Strategy. The Vision statement includes an objective of securing improved accessibility for all sections of the community to housing in the borough - this includes the specialised needs of older residents. The Strategy notes the need to meet specific local

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				<p>downsize into good quality suitable housing. Neither is there mention of additional sheltered accommodation, private or otherwise.</p> <p>As stated before, no mention is made of the Southall development.</p>	<p>housing needs alongside its overall housing targets (at paragraph 6.5) and the need for affordable housing development in particular to include provision for older people (at paragraph 6.29). Housing developments are monitored annually by the Council and will be kept under review to assess whether housing provision for different sectors of the population - notably the growing proportion of older people in the borough - is sufficient.</p> <p>No proposed change.</p>
468	6.11	Mayor of London	Greater London Authority	The borough is asked to consider whether the promotion and support for student accommodation could be appropriate. The Mayor's DRLP recognises there may be scope for a more dispersed distribution of student accommodation in London. The borough may also wish to consider how student housing can contribute to mixed and balanced communities.	Hillingdon is home to Brunel University, which has provided some 1,600 new halls of residence in recent years. It is considered unlikely that further provision will be made in the near future. No proposed change.
469	6.12	Mayor of London	Greater London Authority	The London SHMA should be recognised in Para 6.12 as a 'relevant document'. The Council needs to be mindful that London's housing market is unique and is generally considered as a single housing market area, with little regard to borough boundaries. Although the Council is correct to consider its own housing needs and challenges as a priority, the Council should also consider the impact of its approach on London as a whole. This is in accordance with Para 3.39 of the Draft Replacement London Plan.	The London-wide SHMA is recognised as a relevant document at paragraph 6.12.
357	6.16	Hayes Town Partnership		It is recommended that Policy H1 Housing Growth should recognise that the strategic dwelling requirement should take into account the need for family accommodation with 2, 3 or 4 beds	Paragraph 6.30 reflects the need for larger accommodation. This paragraph will be amended to refer specifically to family accommodation.
16	Policy H1: Housing Growth	Individual		1) There is no overall thought/action to housing and the infrastructure e.g. the roads / traffic /	No proposed change. 1) Infrastructure providers have been consulted as part of the production of

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				<p>health / education. Needs to have proper regard to housing density and the effect of the same on the environment and health demands, education now and in the future, traffic requirement, pollution etc.</p> <p>2) There is inadequate planning /monitoring / enforcement of infill sites and their effect. Present standards are inadequate with regard to all planning matters particularly smaller infill site / outbuildings and all aspects of enforcement. The standard of enforcement is terrible.</p> <p>3) There is inadequate response / monitoring / enforcement of the use of outbuildings.</p>	<p>the Core Strategy and the results have fed into the production of the Strategic Infrastructure Plan. No significant physical infrastructure requirements were identified as being necessary to support planned growth in the short to medium term. The provision of community infrastructure and in particular additional school places to address the current and expected increase in birth rates is seen as a key priority for the Core Strategy. 2) Issues related to infill sites will be addressed in the DMDPD. 3) Issues related to outbuildings and enforcement will be addressed in the DMDPD.</p>
76	Policy H1: Housing Growth	Waitrose Ltd	Barton Willmore	We support the Council's housing target at Policy H1.	Support noted
08	Policy H1: Housing Growth	Lafarge Aggregates Ltd		Para 6.23 - we suggest additional wording at the end of this sentence "...and conformance to National Policy".	Any future planning decision on site allocations would need to take national planning guidance into account - there is no need for this to be highlighted in the Core Strategy. No proposed change.
126	Policy H1: Housing Growth		Gleeson Developments Ltd	Paragraphs 6.1 / 6.7 / 6.8 / 6.13 & Policy H1- we support the Councils identification that the delivery of more housing, and particularly affordable housing is a key priority of the Council. Moreover, we note the statements regarding the London Plan and whilst we object to the reduction in the Councils target as set down within the emerging replacement London Plan, this is not the arena within which to detail these objections. Furthermore, we note the statement that the draft HMA indicates an annual requirement to provide 2,623 affordable dwellings, and whilst this level cannot be actively planned for we support the Council's position as set out within policy H1 that they will meet and exceed their minimum strategic dwelling	Support noted

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				requirement. We also support the Councils comment regarding flexibility and the identification that proposed growth figures may change as a result of the London Plan EiP.	
133	Policy H1: Housing Growth	Hillingdon Hospital NHS Trust	Broadway Malyan on behalf of Hillingdon Hospital NHS Trust	We support Policy H1 Housing Growth.	Support noted
140	Policy H1: Housing Growth	Hillingdon Inter Faith Network		We would ask for the inclusion of 'public buildings and spaces' to be part of the implementation and monitoring of H1 and H2.	It is agreed that community facilities are essential to support housing growth. The issues raised in policy C11 (community infrastructure provision) will be cross-referenced to this policy.
149	Policy H1: Housing Growth	Thorney Farm Developments	Boyer Planning	Suggested rewording for policy H1: After the final paragraph of H1 the following should be inserted: "The Council will in certain, special circumstances in accordance with national policy release land outside the built up area to tackle the escalating demand and current deficit of affordable housing. Broad areas of the Borough should be identified within the Allocated Sites DPD where there is a specific demand which will provide alleviation to the current escalating need."	Policy H1 reflects the proposed minimum annual monitoring target for housing provision. In addition, Policy H2 will be amended to refer to the provision of the 'maximum reasonable proportion' of affordable housing. The Council's Economic Viability Assessment indicates that in the current market conditions 35% of total housing provision would constitute a reasonable proportion for affordable housing. The policy allows sufficient flexibility for more affordable housing to be delivered by RSLs, developers or the Council. It is considered unlikely that a significant amount of affordable housing will be delivered from Green Belt sites. In accordance with national policy, affordable housing could be delivered in the Green Belt, subject to very special circumstances tests. This point does not need to be re-iterated in the Core Strategy.
166	Policy H1: Housing Growth	Workspace Group	Ransome and Company Ltd	Workspace supports the housing growth approach, which seeks to exceed its minimum strategic dwelling requirement.	Support noted
187	Policy H1: Housing Growth	British Airways plc	Lichfield Planning	The following policy wording is proposed: Policy H1: Housing Growth	The proposed additional sentence at paragraph 6.23 is a development management issue and will be covered in the forthcoming Development Management Development Plan Document.

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				<p>The Council will meet and exceed its minimum strategic dwelling requirement, where this can be achieved, in accordance with other Local Development Framework policies.</p> <p>The borough's current target is to provide an additional 3,650 dwellings, annualised as 365 dwellings per year, for the ten year period between 1 April 2007 and 31 March 2017.</p> <p>Rolled forward to 2026, this target equates to a minimum provision of 5,475 dwellings over the period of the Core Strategy. Sites that will contribute to the achievement of this target will be identified in the Site Allocations DPD, and will be a subject to a number of impact assessments.</p> <p>'6.23 The specific locations for new housing contained in the Site Allocations DPD will be subject to an assessment of impacts on flood risk, ecology and conservation, the ability to deliver decentralised energy, sustainable transportation, access to green infrastructure and social quality. The sites will also be assessed in terms of the suitability of their location in relation to Heathrow Airport's Noise Contours and the Airport's potential expansion to the north.'</p>	<p>The Replacement London Plan and associated borough wide housing targets have now been tested at EIP. The proposed annual monitoring target of 425 units has been agreed with the GLA and will be referred to directly in policy H1.</p> <p>No proposed change.</p>
229	Policy H1: Housing Growth	McCarthy & Stone Retirement Lifestyle Ltd	The Planning Bureau Ltd	<p>Policy H1 Paragraph 4.2 (Additional policy in Chapter 6)</p> <p>There is already a great deal of evidence at national level as to the need for more housing aimed at meeting the needs of an ageing UK population. Older people's accommodation should have the same priority - and a more positive policy emphasis in the Core Strategy - as affordable housing. Specialist retirement</p>	<p>Paragraph 6.29 refers to the specific needs of older people and for groups in need of supported housing. More detailed policies will be included in the DMDPD.</p> <p>No proposed change.</p>

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				<p>housing meets a number of Core Strategy aims yet is given little weight. Sheltered housing and assisted living close care brings older people closer to transport links, local shops and services reducing car dependency. It enables older people to free up the housing chain, reduces under occupation and meets the wider Core Strategy aims of retaining and enhancing much-needed housing stock for families. The Core Strategy strategic objectives should identify the implications for an ageing population in relation to social, economic and housing need for the borough. There should be a specific policy or supporting text at Chapter 6 to draw out the importance and planning implications of an ageing population: "The Government's desire to provide greater housing choice for older people means there will be a need for a variety of housing choices to be made available, including support for older people living independent lives in their own homes, sheltered or extra care housing.....for a significant number the benefits of sheltered or extra care housing will be essential if they are to maintain an independent lifestyle. The provision of such housing offers choice frees up under-occupied family-sized homes and offers an improved quality life including improved mental and physical wellbeing of people".</p>	
343	Policy H1: Housing Growth	Individual		Paragraph 1 - the policy is not robust - the Council should work to provide the strategic dwelling requirement.	Housing policy in the Core Strategy reflects the provisions of the current and Replacement London Plans.
276	Policy H1: Housing Growth	Legal and General Property Partners (Life Fund) Ltd	Drivers Jonas Deloitte on behalf of Legal & General Property Partners (Life Fund) Ltd	Draft Replacement London Plan target of 425 homes pa should be quoted in the Core Strategy.	The Replacement London Plan and associated borough wide housing targets have now been tested at EIP. The proposed annual monitoring target of 425 units has been agreed with the GLA and will be referred to directly in policy H1.
277	Policy H1: Housing	Legal and	Drivers Jonas	A higher target for housing development north of	The Core Strategy sets a borough wide target for

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	Growth	General Property Partners (Life Fund) Ltd	Deloitte on behalf of Legal & General Property Partners (Life Fund) Ltd	the A40 should be set in the Core Strategy and consideration should be given to the release of Green Belt land.	housing provision based on the London Plan annual monitoring targets. No proposed change.
317	Policy H1: Housing Growth	Individual		<p>There is already an over-concentration of housing development in the south of the Borough. I would like the policy to commit to a more even geographical dispersal of development. I would like the policy to require local neighbourhood consultation on the location, design, and layout of housing development. I would like to see a clear policy statement on re-utilisation of empty properties. The policy should state that housing development must be accompanied by the provision of satisfactory access to community resources, such as transport, primary health care, schools, play areas for children, communal meeting space. The policy should commit to the capital income from housing development to be invested in the local area where the development has been agreed.</p>	<p>Map 6.1 shows the possible distribution of large housing sites in Hillingdon based on the Mayor's identification of sites over 0.25 hectares. The forthcoming Site Allocations document will identify specific housing sites and the geographical dispersal of housing development in the borough. Housing growth will need to take place in sustainable locations and be supported by appropriate levels of social, physical and green infrastructure.</p> <p>The issue of empty properties will be addressed in other Council policy documents.</p> <p>The Core Strategy has been subject to two six week rounds of consultation and other development plan documents, including the Site Allocations document will follow this model.</p> <p>Policy C11 addresses the provision of community infrastructure to support growth. The Council is considering the introduction of a Community Infrastructure Levy as one means of funding infrastructure provision to support growth.</p>
326	Policy H1: Housing Growth	CEMEX	Drivers Jonas Deloitte	CEMEX proposes that its Harlington site should be used to meet future housing needs in the Borough and should be released from the Green Belt. Furthermore, CEMEX questions the approach behind the suggested housing target of 365 units per annum, and urges the Council to give greater weight to the Draft Replacement London Plan and subsequent Technical Assessment, including the higher housing target of 425 dwellings per annum.	Site specific issues will be addressed in the Site Allocations DPD. The proposed annual monitoring target of 425 units per annum has been approved at the Replacement London Plan EIP and will be carried forward in the Core Strategy.

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377	Policy H1: Housing Growth	Planning Perspectives LLP		(Policy H1 and Tables 6.1 to 6.5) Given the stage of the London Plan, and the certainty that can be attributed to the adjusted target, it is considered that in accordance with Paragraph 55 of PPS3 the Core Strategy should seek to demonstrate how the adjusted housing target can be met.	In accordance with PPS 3 the Site Allocations DPD will identify appropriate sites to meet the Replacement London Plan Annual Monitoring target. Beyond 2021, the document will identify broad areas for housing growth. No proposed change.
381	Policy H1: Housing Growth	Planning Perspectives LLP		<p>H1 - Tables 6.1 to 6.5:</p> <p>"The emerging London Plan annual monitoring target has now been agreed with the GLA. As the target will be adopted during 2011 it is considered that Hillingdon should be planning to meet the adjusted target of 6,375 over the 15 year plan period rather than the adopted target. The Core Strategy does not adequately demonstrate how the existing housing target of 5,475 will be met over the plan period, let alone the adjusted target. In fact, it states that it "cannot be demonstrated that the target will be met beyond 2021". Given the stage of the London Plan, and the certainty that can be attributed to the adjusted target, it is considered that in accordance with Paragraph 55 of PPS3 the Core Strategy should seek to demonstrate how the adjusted target can be met. This is particularly important given the potential need to release land for housing from alternative uses to meet the housing target. In these circumstances, it is considered that the Core Strategy should be based on the adjusted annual target and furthermore that the Core Strategy should demonstrate that this target is deliverable. This is essential in order to underpin and validate that the Core Strategy is sound."</p>	In accordance with PPS 3 the Site Allocations DPD will allocate appropriate sites to meet the housing target up to 2021. Beyond this period the document will identify broad areas for growth. No proposed change.
494	Policy H1: Housing Growth	Mr John McDonnell MP		Policy is not strong enough in addressing housing needs, poor quality of existing stock - particularly in the private rented sector e.g. due to overcrowding and a lack of basic amenities.	The Core Strategy needs to strike a balance between meeting housing needs and proposing a level of affordable housing that is realistic and achievable across the borough. Evidence

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				<p>Need to assess more carefully the population density and to ensure a fairer distribution of housing across the borough. Greater emphasis on consultation with local people is needed on housing schemes - avoiding piecemeal development. RAF Uxbridge should be a key site for housing development. Retrospective planning permissions should be addressed as they have led to too much back garden development. Insufficient weight is given to ensuring all housing has sufficient social / Community infrastructure. The Core Strategy also fails to address the need for greater provision for people with special housing needs.</p>	<p>indicates that a target to provide 35% of all new housing as affordable housing is economically viable and deliverable. Measures to address the condition of new housing are contained in other Council documents. It is acknowledged that specific references to the need for family and specialist accommodation should be included in the document.</p> <p>The distribution of housing identified in policy H1 and the allocation of specific sites will be addressed in the forthcoming Site Allocations DPD. The issue of back garden development is addressed in policy BE1. Part 9 of this policy states that all new development should not result in the inappropriate development of back gardens that erode the character and bio-diversity of sub-urban areas. Policy C11 sets out the measures the Council will use to ensure appropriate provision of community infrastructure. No proposed change.</p>
535	Policy H1: Housing Growth	Arla Foods UK Plc	BNP Paribas Real Estate	Support the policy.	Support noted.
423	Policy H1: Housing Growth	Tesco Stores Ltd	GL Hearn on behalf of Tesco Stores Ltd	Policy H1 does not take account of the Master Brewer site and does not take account of the contribution that the site can make to maximising housing potential in the borough. Map 6.1 should be updated to reflect this change.	The housing target in policy H1 reflects the current London Plan. The policy will be amended to reflect the proposed housing target in the Replacement London Plan, which has now been tested at the EIP. This is a minimum target and has been set through discussions with GLA, taking account of sites identified in the GLAs SHLAA.
436	Policy H1: Housing Growth	Royal Brompton & Harefield NHS Trust	DP9 on behalf of Royal Brompton & Harefield NHS Foundation Trust	Policy should be amended to refer to the proposed Replacement London Plan annual monitoring target of 425 units, rather than the current target of 365 units per annum.	The revised target has been tested in the Replacement London Plan EiP and will be incorporated into policy H1.
565	Policy H1: Housing Growth	Individual		<p>LATE SUBMISSION:</p> <p>Most recent properties have been built too small. Family housing in particular needs more</p>	The Council's room size standards are currently contained in its Housing, Design and Accessibility Statement (HDAS). Revised room size standards, reflecting the Replacement London Plan, will be

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				spacious provision with utility rooms, separate bathrooms and toilets, etc.	outlined in the forthcoming Development Management Policy Document. No proposed change.
453	Policy H1: Housing Growth	Hayes and Harlington Community Development Forum		Policy H1- The target should be increased to at least 425 new homes per annum to comply with the revised target in the draft replacement London Plan. [The housing trajectory evidence would support 494 homes per annum over the 1st 5 years and 755 homes pa over years 6 -10 so a case could be made for more housing if this was desirable].	The Replacement London Plan annual monitoring target has been tested at EiP and will be incorporated in policy H1.
456	Policy H1: Housing Growth	Hayes and Harlington Community Development Forum		Whilst density and design will be covered in detail in the Development Management DPD, there should be strategic direction in Policy H1, to complement what is said in the text (paragraph 6.24). The density of developments should be within set ranges to comply with the London Plan. To be sound there should be reference to exemplary standards of design and protecting the character of places.	The current and Replacement London Plans provide guidance on appropriate densities for central, urban and suburban locations. The implementation section of policy H1 notes that the provisions of policy H1 will be achieved by promoting the design and density of new homes to reflect the specific and different land use characteristics in the north and south of the borough. Further guidance on density will be contained in the forthcoming Development Management Policies Document. No proposed change.
454	Table 6.2	Hayes and Harlington Community Development Forum		Table 6.2 demonstrates that in excess of 425 homes per annum can be achieved in 4 of the next 5 years. The housing trajectory (Appendix 3, figure 10) demonstrates a large increase in completions for years 6-10, only tailing off in years 11-15. However, the housing trajectory appears to be based on data from the 2004 London Housing Capacity Study and may not be reliable.	The housing trajectory is based on sites with an existing planning permission and/or those where the Council accepts the principle of residential development. No proposed change.
554	6.20	English Heritage		Design and density (pg 59). Welcome the changes made to para 6.20, subject to the local and historic context of the site and its surroundings being taking into account when identifying the optimum density levels. This reflects more closely PPS1 and PPS5.	Support noted

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455	Table 6.4 Proposed units to be delivered from large and small SHLAA sites	Hayes and Harlington Community Development Forum		<p>Tables 6.4 and 6.5 do not show an assessment of identified sites. Planning policy Statement 3 requires that sites for inclusion in the 5 year supply are assessed to show they are available now, offer a suitable location and that housing will be delivered on the site in the next 5 years. Nor is there an indication of how many sites have outstanding planning permissions, the number that have been allocated in existing plans and the number that depend on allocation in future Development Plan Documents.</p> <p>The spatial distribution of housing in table 6.5 has not been considered against alternatives.</p>	Tables 6.4 and 6.5 relate to sites identified by the GLA in its SHLAA. Table 6.2 sets out Hillingdon's five year supply of housing land. This is based on the Housing Trajectory in the Council's Annual Monitoring Report, which is summarised at Appendix 3 of the Core Strategy. No proposed change.
268	Table 6.5 Proposed delivery of units from large SHLAA sites, by area	Cathedral Group	Nathaniel Lichfield & Partners	Given the development potential identified in the London Plan and in the Core Strategy, the housing estimate for Hayes / West Harlington needs increasing to account for the managed release of employment land and higher building densities envisaged.	Tables 6.4 and 6.5 provide an indication of large sites identified in the Mayoral SHLAA. It is acknowledged that additional residential sites may come forward through the Site Allocations process.
438	Table 6.5 Proposed delivery of units from large SHLAA sites, by area	Royal Brompton & Harefield NHS Trust	DP9 on behalf of Royal Brompton & Harefield NHS Foundation Trust	The SHLAA identifies sites for housing land, can it be confirmed how these sites have been identified? In the context of the need to reflect the higher housing figure identified in the Replacement London Plan the Core Strategy should acknowledge that other sources of supply will be required.	Potential housing sites were identified in accordance with the GLA's SHLAA methodology. No proposed change.
417	Map 6.1	Skylark CA		It is indicated that there is a proposed delivery of 130 housing units with a possible 524 more – the area which this affects has not been outlined. There are no large brownfield sites north of the Uxbridge Road in Yeading/Hayes End leaving only current open green space to be used. Therefore this policy is contradictory to that of Policy 8 Environmental Improvement in maintaining, expanding an protecting greenbelt/sites of metropolitan interest and all other sites mentioned this Policy	Map 6.1 is based on sites over 0.25 hectares identified in the Mayor's SHLAA. These sites are not located in the Green Belt. No proposed change.

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117	6.24	Environment Agency		We support the inclusion of “ensuring development makes the most use of brownfield land” as redevelopment is one of the best ways to remediate existing contaminated land.	Support noted
150	Policy H2: Affordable Housing	Thorney Farm Developments	Boyer Planning	Suggested rewording for policy H2: "Housing provision is expected to include a range of housing to meet the needs of all types of households. The Council will seek to maximise the delivery of affordable housing from all sites with certain sites to be identified as exception sites which could deliver up to 100% affordable housing. These will be appropriately identified and allocated through the Site Allocations DPD to ensure appropriate mitigation against current demand."	The Council proposes amendments to state that the Council will seek to maximise the delivery of affordable housing. The proposed minimum target of 35% provision is not arbitrary and is informed by the Council's Affordable Housing Viability Assessment, which has been completed.
167	Policy H2: Affordable Housing	Workspace Group	Ransome and Company Ltd	To make this policy sound, it should be redrafted to state: “An indicative tenure mix of 70:30 between social rented accommodation and intermediate housing will be sought. Where it is considered that the affordable housing dwelling tenure mix is not appropriate, applicants will be required to justify a more appropriate mix. The Council will take into consideration factors such as the latest available affordable housing evidence, the site context, viability and regeneration benefits”.	Comments noted and accepted. The provisions of this text will be incorporated within 6.28, 6.29 and 6.30.
198	Policy H2: Affordable Housing	The Ballymore Group		Policy should be reworded so that the proposed tenure split reflects that in the Replacement London Plan.	No proposed change. The proposed tenure split reflects housing need in the borough, but is flexible to allow for local market conditions.
237	Policy H2: Affordable Housing	Individual		Paragraph 6 - given the level of local need, the policy is not robust and developers should not be able to avoid providing a fixed number of affordable homes within any development with arguments based on scheme viability. Independent experts should set the number of homes that any developer must provide - reflecting local need - and this number should be	Policy H2 has been developed to take account of the Mayor's policy on affordable housing provision. It sets a borough wide target based on housing needs and a realistic assessment of the level of affordable housing that could be delivered over the period of the Core Strategy. The policy wording will be changed to seek 'the maximum reasonable proportion' of affordable housing from

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				rigidly adhered to by the developer.	new development.
256	Policy H2: Affordable Housing	Warren Park Residents Association		Policy needs to be aligned more closely with that in the draft Replacement London Plan e.g. re-aiming to provide balanced communities.	The Council acknowledges and supports the aim of the London Plan to create mixed and balanced communities. This is an objective of the London Plan and does not need to be repeated in the Core Strategy. However, it is suggested that the second sentence of paragraph 6.28 should be reworded as follows: These include an acknowledgement of the role that intermediate housing can play in helping to get Londoners on the first step of the housing ladder, reducing the call on the social rented sector and creating mixed and balanced communities in accordance with the London Plan.
269	Policy H2: Affordable Housing	Cathedral Group	Nathaniel Lichfield & Partners	Support recognition that the level of affordable housing provision will need to reflect viability considerations.	Support noted
279	Policy H2: Affordable Housing	Legal and General Property Partners (Life Fund) Ltd	Drivers Jonas Deloitte on behalf of Legal & General Property Partners (Life Fund) Ltd	Support the policy as now worded.	Support noted
536	Policy H2: Affordable Housing	Arla Foods UK Plc	BNP Paribas Real Estate	The tenure split refers to the 2009 Replacement London Plan and should now be updated - with any split reflecting the most up to date information.	The proposed tenure split takes account of the provisions of the Replacement London Plan and the conclusions of Hillingdon's Strategic Housing Market Assessment. No proposed change.
439	Policy H2: Affordable Housing	Royal Brompton & Harefield NHS Trust	DP9 on behalf of Royal Brompton & Harefield NHS Foundation Trust	The policy should not include the stated figures of 35% provision and 60/40 tenure split. The requirements of the Replacement London Plan to provide the 'maximum reasonable proportion' of affordable housing should be included.	Policy will be amended to take account of the wording in the Replacement London Plan and the recently published Panel Report.
566	Policy H2: Affordable Housing	Individual		LATE SUBMISSION: Current system of affordable home allocation seems unfair as it does not meet people's needs and often a first offer of accommodation cannot be refused.	No proposed change. This issue will be addressed in other Council documents.

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457	Policy H2: Affordable Housing	Hayes and Harlington Community Development Forum		<p>Policy H2</p> <p>The delivery of affordable housing is a priority in the Sustainable Community Strategy and emphasised as a main challenge in paragraph 6.10. The Housing Market Assessment (HMA) recommends 50% affordable housing For Policy H2 to propose 35% affordable housing is therefore unjustified.</p> <p>Policy H2 should be changed to 50% affordable housing to comply with the statutory London Plan 2008 and to provide a strategic direction over the next 15 years. Retaining the wording in the policy “subject to viability” already gives flexibility to deal with all circumstances. Since the economic viability assessment has not been completed (paragraph 6.27) there is no substantive evidence to indicate that a 50% threshold would not be viable over the 15 years of the Plan.</p> <p>The Core Strategy is unsound as it does not make adequate provision for family housing. The reference in Policy H2 to larger social rented family units does not provide strategic direction. The policy should include a target for housing mix that is consistent with the HMA as recorded in paragraph 6.15. For example, that 75% of social rented housing should have 3 bedrooms or more.</p> <p>Under housing policy there is no mention of student housing, supported housing, special needs housing, and protection of existing social rented housing. These are important: they should be addressed.</p>	<p>Policy H2 will be amended to reflect the provisions of the Replacement London Plan and its associated Panel Report. The wording of policy H2 will be amended to state that Hillingdon will seek to maximise affordable housing provision. The supporting text will refer to the conclusions of Hillingdon's economic viability assessment and the recently published Panel Report. The Panel Report notes that boroughs ‘should aspire towards securing 50% of all new housing as affordable.</p>
467	Policy H2: Affordable Housing	Mayor of London	Greater London Authority	The Council will need to consider how it will address the recent proposed changes to the	Comments noted. Policy H2 will refer to achieving the maximum reasonable amount of affordable

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				<p>PPS3 definition of affordable housing. Although it is in draft form, the direction of travel has been established. The council need to ensure it provides sufficient flexibility in the text to make the necessary policy changes as new Government policy on affordable housing emerges.</p> <p>The Councils' approach to affordable housing is supported. However, the Mayor asks the borough to consider whether it is necessary to include the 35% 'viable' affordable housing target in the Policy box, as well as in the supporting text. This is likely to cause confusion when negotiating on a reasonable amount. The borough needs to be clear whether 35% is based on current economic circumstances. If it is, the borough should make it clear that over the life of the plan, the 35% will change. The Mayor would recommend the removal of the figure and the inclusion of either the aspiration 50% target (based on need) and/or 'maximum reasonable amount subject to viability'. If the borough wishes to include the 35% in the policy box as well as the supporting text, this should clearly be stated as a minimum. This will also allow the 35% to be updated as economic conditions change, if the borough wished to do so, without having to re-write the policy.</p>	<p>housing subject to viability. References to the conclusions of Hillingdon's Economic Viability Assessment will be reallocated to the supporting text of this policy.</p>
511	Policy H2: Affordable Housing	L B Hillingdon		Policy H2 needs to be altered to emphasise the key priority of affordable housing by deleting the words "seek to".	Policy H2 to be amended as proposed.
64	6.29	Mr John McDonnell MP		Lack of reference to mixed cohesive communities, special housing needs, the upgrading of existing housing to tackle substandard housing in the area. greater emphasis on family housing and the involvement of the community of site selection. There needs to be a commitment to creating socially mixed	Chapter 6 of the Core Strategy deals with new homes and refers to housing needs in the borough. Paragraph 6.30 notes the requirement for 'larger accommodation'. This paragraph will be amended to include reference to 'family accommodation'.

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				cohesive communities with more family housing and greater commitment to tackling existing substandard housing. In addition greater attention should be paid to site selection regarding accessible local services.	The contribution that housing can make to the creation of mixed and balanced communities is already addressed in policy 3.10 of the Mayor's London Plan. This policy would not be repeated in the Core Strategy.
24	Policy H3: Gypsy and Traveller Pitch Provision	Traveller Law Reform Project		<p>Policy H3 Gypsy and Traveller Site provision</p> <p>We welcome the presence of a policy to address these issues but we have concerns about the criteria and also the evidence base on which plans will be made and a lack of information about when and how pitches will be developed. This leads us to object to the plan on the grounds that it is not justified and will not be effective.</p> <p>The Policy</p> <p>We welcome the decision to retain the Colne Park site, the only site in the Borough which was established in 1980. Since then there has been no additional provision and no other sites established.</p> <p>Circular 1/2006 stands as current national guidance and it is clear that local authorities must allocate sufficient sites in terms of the number of pitches required by the RSS (in this case the London Plan) in site allocations DPDs (para 33). Whilst policy is in a state of flux at the moment the indications contained in the Chief Planning Officer's letter of 6th July 2009 that local authorities should continue to determine the right level of site provision reflecting local need and historic demand and for bringing forward land in relevant DPDs.</p> <p>The London Plan was examined in relation to Gypsy and Traveller Policy in December of 2009</p>	Support noted. Issues related to pitch provision are linked to the Mayor's policy in the London Plan. The recently published Panel Report for the Replacement London Plan identifies sub-regional targets and these will be referred to in the emerging policy.

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				<p>and we await the result of the examination. Whether or not the policy decided upon give pitch requirements or not (and the Mayor declined to take a view on this issue) the boroughs will be required to make provision. This should be based on the best available evidence.</p> <p>The policy declines to take a view on the level of need despite the presence of a robust GTAA commissioned by the Boroughs. That GTAA found a need in the Borough for 35 residential pitches for 2007-12 and a further 8 pitches for 2012 -17. The CLG and GOL guidance states that any minimum figure has no validity. This contrasts with policy H1 which sets a target and gives annualised figures. The core strategy is thus internally inconsistent.</p> <p>In our view the policy should, given the presence of an adequate evidence base, set out a borough target, recognise that the need for additional pitches is immediate and real and begin the process of site identification, assembly and development. It should following the guidance encourage the provision of Gypsy and Traveller pitches within major development schemes and incorporate them within the definition of social/affordable housing that is used for negotiating s 106 agreements.</p> <p>There must be a timetable of delivery.</p> <p>Criteria:</p> <p>Hillingdon should be mindful that the main barrier to the construction of Traveller sites is public and official prejudice. We consider that the statement that site should 'have no significant adverse effects on the amenity of</p>	

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				<p>occupiers of adjoining land' to be contrary to the guidance of Circular 1/2006 and an invitation to express prejudice through the planning process. It should therefore be deleted.</p> <p>Para 6.32 As stated above the outcome of the London plan examination remains to emerge so that this statement is inaccurate in relation to pitch targets.</p> <p>Para 6.33 Whilst acknowledging the problems surrounding availability of suitable sites the lack of commitment to explore the role of sec 106 agreements in relation to major developments is disappointing and remiss and should be inserted.</p> <p>Implementation</p> <p>As stated above needs have already been identified - the West London Partnership research is mentioned but we have no sight of this material and no numbers of pitches are mentioned. As such this statement is meaningless in policy terms and gives no certainty in terms of pitch provision. It makes no statement of a timetable for provision and should do so.</p> <p>Flexibility and Monitoring</p> <p>These issues are partly left open and uncertain dependent upon the outcome of the London Plan. Policy H1 Housing growth seems to be able to set annualised targets for housing provision and absence of such a target for Gypsy and Traveller sites means that monitoring will be meaningless, especially if no target is set by the London Plan as the Mayor argued for at the EIP.</p>	

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				<p>1. The policy should be changed to commit the council to delivering in an appropriate Site Allocations DPD to meet the needs identified in the existing GTAA.</p> <p>2. The policy should encourage the provision of sites via major development schemes and incorporate them in the definition of social/affordable housing.</p> <p>3. There should be a timetable for delivery with targets.</p> <p>4. Delete criterion referring to amenity.</p> <p>5. Make necessary corrections to para 6.32 as above.</p> <p>6. Add in commitment to explore role of sec 106 agreements in para 6.33</p>	
65	Policy H3: Gypsy and Traveller Pitch Provision	Mr John McDonnell MP		Lack of recognition of the need for increased number of sites and improvement of existing site. The local authority should commit itself to the provision of additional sites spread throughout the borough and the upgrading of existing site.	Policy H3 is required to reflect the provisions of the Replacement London Plan. The Mayor's policy on this issue has changed a number of times during the production of this document. The recently published Replacement London Plan Panel Report proposes sub regional targets for additional pitch provision. These will be reflected in policy H3.
154	Policy H3: Gypsy and Traveller Pitch Provision	Individual		Any policy that LBH have must ensure that the diversity of people across the borough is mixed. This removes the possibility of no-go areas for any section of the community. Whilst at this point in time there is no need for further Gypsy sites, the plan spans a number of years and the need may arise that further site(s) are required. There is already a site in the south of the borough at the Colne Park site. To ensure this diversity the Council should select one or two sites within the	Policy H3 to be amended to make clear additional sites for gypsy and traveller pitch provision will be addressed in the Site Allocations DPD as appropriate, to reflect the latest position as recommended in the Replacement London Plan Panel Report.

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				borough and protect them for future use.	
159	Policy H3: Gypsy and Traveller Pitch Provision	Individual		Any policy that LBH have must ensure that the diversity of people across the borough is mixed. This removes the possibility of no-go areas for any section of the community. Whilst at this point in time there is no need for further Gypsy sites, the plan spans a number of years and the need may arise that further site(s) are required. There is already a site in the south of the borough at the Colne Park site. To ensure this diversity the Council should select one or two sites within the borough and protect them for future use.	Policy H3 to be changed to make clear additional sites for gypsy and traveller pitch provision will be addressed in the Site Allocations DPD as appropriate, to reflect the policies in the Replacement London Plan.
376	Policy H3: Gypsy and Traveller Pitch Provision	Bell Farm Christian Centre		C i) should read that sites will be made available in an area that is environmentally acceptable for residential occupation. C ii) should read that sites will be found that have no significant effect on the amenity of occupiers of adjoining land.	The Council seeks to minimise adverse effects on adjoining land. No proposed change.
558	Policy H3: Gypsy and Traveller Pitch Provision	Hayes and Harlington Community Development Forum		Policy H3 To be sound the policy should contain a target for new pitches linked to the evidence of need. The policy should provide clarity about how, and in which development plan document, specific site allocations for gypsies and travellers will be carried forward.	Policy H3 to be amended to make clear that additional pitch provision will be based on guidance contained in the Replacement Plan and its associated Panel Report.
548		English Heritage		LATE SUBMISSION Historic Environment- In general many of the detailed points made in our response to the consultation draft Core Strategy have been addressed. However there are still shortcomings with the Core Strategy approach to managing Hillingdon's historic environment. In particular there are concerns that the distinctiveness of Hillingdon's historic environment is not fully reflected in the policies or the supporting text. For example the only sense of the area's unique characteristics is reflected in the limited	Agree - amend supporting text of the 'Heritage' section to include reference to the distinctive qualities of the Borough's historic environment, the following text added after paragraph 7.3: "There is evidence to confirm that parts of the borough, such as Harmondsworth, and Harefield were occupied in prehistoric times. Up until the 20th century, the borough was mainly rural in character; today it is predominantly suburban, with its main urban centre at Uxbridge. This was an important market town that took advantage of the stage coach route between Oxford and London in the 18th century and developed further

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				<p>reference made to the Borough's 'Metrolands' (para 7.3). It is noted that the Borough contains an extensive range of designated and other heritage assets, which should be used to help describe in more detail the unique historic environment of Hillingdon and inform the framing of the Borough's approach to creating a positive and proactive strategy that is locally specific to the conservation of Hillingdon's historic environment. For example the Borough's conservation area appraisals and relevant management plans could help inform this current deficiency of the Core Strategy. PPS5 Policy HE3 supports this approach by expecting plans to take into account the variations in type and distribution of heritage assets, their contribution to the character of the environment in their area. This includes highlighting how the Borough's approach to conservation is delivered through the whole Core Strategy including in areas such as Environmental Improvements (Core Strategy Section 8), and Transport and Infrastructure (Core Strategy Section 9). For example opportunities could exist through the application of other policies that could enable a number of the heritage assets currently 'At Risk' to be removed from the Register through appropriate implementation of these policies. This could include highway enhancement schemes that coincide with a conservation area that may be 'At risk'. Through good high quality contextually sensitive design the highway measures proposed (i.e. public realm improvements) could address the current deficiencies of the conservation area and ensure it is no longer on the 'At Risk' register. However to successfully deliver this approach and establish a robust conservation strategy that is specific to Hillingdon, it is essential that a robust evidence base is developed that justifies the method</p>	<p>with the building of the Grand Junction Canal, the GWR and more recently the Metropolitan and Piccadilly Lines. There are also a number of smaller town centres across the borough, such as Northwood, Ruislip, Eastcote, Hayes, Yiewsley and West Drayton. Most of these were originally villages, some dating back to medieval times, which grew as local transport links developed."</p> <p>The 'Implementation of Policy HE1' outlines the Council's overall approach to conservation. Point 2 highlights that the Council will update and review its character appraisals and management plans for conservation areas. Reference to existing Conservation Area Appraisals and Management Plans added to bullet point 1 of paragraph 7.4 to read: "30 Conservation Areas (with Appraisals for Longford Village, Harmondsworth Village, Ruislip Village, The Glen and Eastcote Park Estate and Management Plans for The Glen and Eastcote Park Estate)".</p> <p>Paragraph 7.4 identifies that 'there are 35 entries in English Heritage's Heritage at Risk Register of which 24 are buildings, 9 are conservation areas and 2 are Scheduled Ancient Monuments.' Point 3 of 'Implementation of Policy HE1' sites examples, it is not considered necessary to provide a full list. No proposed change.</p>

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				taken. In terms of the Implementation section we welcome the Council's commitment to proactively managing heritage assets, including those that are 'At Risk'. However it is with surprise that the Manor Farm barn at Harmondsworth (listed grade 1) has not been identified in the text.	
217	7.5	Heathrow Airport Ltd		Clarification should be provided as to the meaning of the terms Archaeological Priority Areas (APAs) and Archaeological Priority Zones (APZs).	Agree - explanation of Archaeological Priority Areas (APAs) and Archaeological Priority Zones (APZs) to be provided in the 'Glossary'.
551	7.5	English Heritage		<p>LATE SUBMISSION</p> <p>Proposals Map - It is not clear from the information provided whether significant changes are proposed to the Proposals Map. If they are then we would seek to ensure that the development of the Proposals Map is in compliance with PPS12 (para 8.1) and the requirement that it identify all areas of protection, such as nationally protected landscapes and internationally, nationally and locally designated areas and sites. We would advise that this includes designated assets such as conservation areas, registered parks and gardens, and Scheduled Monuments, plus any other spatially defined local designations, such as Archaeological Priority Areas.</p>	The Proposals Map will be updated as part of the consultation on the Development Management DPD and Site Allocations DPD. A final Proposals Map will be published when the LDF is completed. No proposed change.
54	Policy HE1: Heritage	Hayes Conservation Area Advisory Panel		While supporting the aspirations set out in Policy HE1, we are sceptical that they are all deliverable and therefore could be considered unsound. Our recent experience is that LBH does not adequately enforce planning regulations in Conservation Areas and Areas of Special Local Character, nor actively support local groups who wish to make use of access provisions in Section 106 agreements. Their attempts to promote community engagement	Enforcement of planning regulations in Conservation Areas/ Areas of Special Local Character is a Development Management matter. The Council's approach to planning obligations is already set out in detail in the Planning Obligations Supplementary Planning Document. Paragraph 7.4 identifies that 'there are 35 entries in English Heritage's Heritage at Risk Register of which 24 are buildings, 9 are conservation areas and 2 are Scheduled Ancient Monuments.' It is

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				<p>tend to be 'top-down' while we consider two-way communication would be more effective. The criteria that have been identified for monitoring do not cover all of the areas identified in the policy, perhaps because their effects are qualitative rather than quantitative and hence difficult to assess. We are also concerned that the examples given under the notes on implementation of the policy all relate to sites in the north of the borough and feel this selection, while justified in itself, does not adequately reflect the needs and potential across the whole of the borough. Our comments reflect general unease rather than specific issues. We would, however, like to see mention of some of the 'at risk' Conservation Areas and buildings in the south of the borough, such as the Great Barn at Harmondsworth, added to the examples in the implementation policy.</p>	<p>not necessary to provide a full list in the 'Implementation of Policy HE1'.</p> <p>No proposed change.</p>
67	Policy HE1: Heritage	Mr John McDonnell MP		<p>Lack of proactive action in raising awareness and seeking protection. The local authority should place greater emphasis on a programme to raise awareness within the local community, decision makers and developers of the need to protect our local heritage and on its role to be proactive in inspecting, preserving, protecting and enhancing local heritage sites, particularly the sites and buildings at risk.</p>	<p>These points are addressed in Policy HE1. Point 2 seeks to ensure consultation with the local community on heritage matters and point 3 seeks to 'promote increased public awareness, understanding of and access to the Borough's heritage assets and wider historic environment, through Section 106 agreements and via community engagement and outreach activities' thus raising awareness. No proposed change.</p> <p>Also, point 3 of 'Implementation of Policy HE1' seeks to proactively manage heritage assets including those considered 'at risk' working with heritage groups and partners. No proposed change.</p>
245	Policy HE1: Heritage	Yiewsley and West Drayton Town Centre Action Group		<p>In the past the preservation of the Historic and Built Environment was not as it should be. The inclusion of a definitive policy, which will be strictly implemented, should be welcomed.</p>	<p>The Council considers that policies HE1 and BE1 are sufficiently robust to preserve and enhance the borough's historic and built environment. No change proposed.</p>

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168	Policy HE1: Heritage	Workspace Group	Ransome and Company Ltd	<p>1) Policy should reflect PPS5 and include a section to allow enabling development to secure the future conservation of a heritage asset.</p> <p>It is considered that to make this policy sound an additional criterion is needed that states that the Council will consider enabling development to secure the future of heritage assets.</p> <p>2) Enterprise House on Blyth Road is a locally listed building that has structural and damp problems. It is necessary that a higher value residential use is included in the refurbishment of this building to ensure viability of the scheme and therefore secure the future of this building.</p>	<p>1) Enabling development is covered by point 2 of Policy HE1, under “actively encouraging the regeneration of heritage assets”. This approach will include the consideration of enabling development where appropriate and particularly for assets which are considered “At Risk”. No proposed change.</p> <p>2) The Core Strategy is a high-level strategic document and details of specific sites will be considered through the Development Management policies, forthcoming Heritage Strategy SPD and relevant Area Action Plans. It should be noted that Enterprise House is grade II listed. No proposed change.</p>
555	Policy HE1: Heritage	English Heritage		<p>1) Historic environment (pgs 66 – 70)- Support in general the majority of changes. However we would still seek to ensure that Policy HE1 makes an explicit reference to ensuring that all developments are appropriate to its historic context and that regeneration proposals make use of heritage assets and reinforce their significance. Inserting this reference would reflect the principles of PPS5 (para 7) and the promotion of sustainable development as set out in PPS1.</p> <p>2) In addition under Implementation the 6th point needs to be expanded so that records of heritage assets that are lost (in accordance with PPS5) are disseminated so enabling increased understanding, as well as being deposited with the GLHER.</p>	<p>1) Disagree, the suggested text was considered more relevant to Policy BE1 and therefore incorporated within points 2 and 5. No proposed change.</p> <p>2) Agree, amend point 6 of Implementation of Policy HE1 to read: "Where the loss of a heritage asset is justified, ensure that there will be a commitment to recording the structure and to disseminating this information to enable increased understanding of the heritage asset. Copies of these documents will, where appropriate, be deposited with local libraries and the Greater London Historic Environment Record (HER)"</p>
407	Policy HE1: Heritage	CES Properties (Ickenham) Ltd	DP9 on behalf of CES Properties (Ickenham) Ltd	<p>It is widely regarded that the best way to protect vacant listed buildings is to bring the building back into active use. While Policy HE1 (Point 2) does encourage the regeneration of heritage assets, we believe it is equally important to stop heritage assets from falling into further</p>	<p>The ‘At Risk Register’ includes a number of buildings that are in reasonable condition, but are at risk because they are vacant. Agree to amend Policy HE1 (criteria 2) to include reference to vacant buildings to read:</p>

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Page 149				<p>dilapidation through vacancy and abandonment. As Policy HE1 is currently worded, it would seem to want to regenerate those assets which have already fallen into disrepair and not actually prevent asset from reaching that state in the first place. By adding the words "...particularly those which are vacant and have been included..." this strengthens the argument for regenerating vacant heritage assets to prevent their loss.</p> <p>Point 2 of Policy HE1 should be revised to read:</p> <p>"2. Actively encourage the regeneration of heritage assets, particularly those which are vacant and have been included in English Heritage's 'Heritage at Risk' register."</p> <p>Implementation of Policy HE1 should be revised to read:</p> <p>"3. Pro-actively manage heritage assets, including those vacant and considered "At Risk" by English Heritage, working with heritage groups and partners where appropriate, to ensure buildings and structures such as those at Eastcote House Gardens, RAF Uxbridge and Breakspear House are repaired and reused."</p>	<p>"Actively encourage the regeneration of heritage assets, particularly those which have been included in English Heritage's 'Heritage at Risk' register or are currently vacant".</p>
	488	Policy HE1: Heritage	Mr John McDonnell MP		<p>Policy HE1: Heritage - the local authority should place greater emphasis on a programme to raise awareness within the local community, decision makers and developers of the need to protect our local heritage and on its role to be proactive in inspecting, preserving, protecting and enhancing local heritage sites, particularly the sites and buildings at risk.</p>

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					seeks to proactively manage heritage assets including those considered 'at risk' working with heritage groups and partners. Whilst desirable for local authorities to have as full a record as possible for historic assets, legal and other documents may not be readily available and may be held more appropriately elsewhere. No proposed change.
440	Policy HE1: Heritage	Royal Brompton & Harefield NHS Trust	DP9 on behalf of Royal Brompton & Harefield NHS Foundation Trust	Policy wording should be amended from conserve and enhance to preserve and enhance.	Disagree, PPS 5: Planning for the historic Environment recommends the use of the term 'conserve'. No proposed change.
563	Policy HE1: Heritage	Individual		LATE SUBMISSION: Enforcement is not being carried forward to prevent the loss of heritage buildings as a result of fire, dereliction and/or compulsory purchase. Paragraph 2 - rather than "Actively encourage" should state the Council will: "Actively support...".	Disagree, the term 'encourage' is considered more appropriate in this context. No proposed change.
474	Policy HE1: Heritage	Mayor of London	Greater London Authority	The GLA supports HE1, however it would be useful to reference non-designated assets that still have heritage value to be more in line with PPS5 and Draft Replacement London Plan Policy 7.8 and 7.9.	Support welcomed. BE1 already makes reference to non designated heritage assets as defined by PPS5, these include Locally Listed Buildings Areas of Special Local Character and Archaeological Priority Areas and Zones. Some heritage assets may, however, be identified through the decision making process. To cover this point criteria 1 of Policy HE1 is to be amended by deleting "their wider historic environment" and replacing with "the wider historic environment" to read: "Conserve and enhance Hillingdon's unique historic environment, including its heritage assets such as statutorily Listed Buildings, Conservation Areas, Scheduled Ancient Monuments, Registered Parks and Gardens, Locally Listed

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					Buildings, Areas of Special Local Character, and Archaeological Priority Zones and Areas, their settings and the wider historic environment."
57		Individual		Has serious consideration been given to the allocation of housing sites and also office/hotel sites? It may be more beneficial to have fewer offices (surplus space in Stockley Park, also offices near Hayes and Harlington station are empty) and have more of the land given to building houses. The same may apply to hotels too. Better consideration as to whether we really need more hotels/offices in Hillingdon, when there seems to be too many anyway.	<p>The Council has undertaken work to assess current housing land needs and provision. Its housing trajectory shows that at present and in the immediate future it has capacity to meet its housing needs. It will keep this situation under review and monitor housing growth in the borough. Work on other parts of the Local Development Framework - e.g. the Site Allocations Development Plan Document - are expected to bring forward further local housing capacity.</p> <p>Offices and hotels are examples of other land uses which the Council must look to provide locally to meet other objectives in the Core Strategy - e.g. to secure local employment and tourism opportunities. Again the council will keep their provision under review as part of its annual monitoring process.</p> <p>No proposed change.</p>
549	7.11	English Heritage		<p>LATE SUBMISSION</p> <p>Built Environment: Tall buildings (paragraph 7.11 and 7.12, pg 71)</p> <p>Following EH/CABE Guidance and the emerging Mayor's Replacement London Plan (policy 7.7 part e – Consolidated Draft Replacement London Plan December 2010), the Core Strategy should set out a plan-led approach to tall buildings based on a clear understanding of the Borough's environmental characteristics (PPS1). The Core Strategy should identify, with greater specificity than demonstrated at present, which areas of the borough that may be</p>	Due to the presence of tall buildings within parts of Uxbridge and Hayes, these areas were identified as appropriate for tall buildings. An assessment of tall buildings will be carried out as part of the Borough's proposed Character Study which will follow the CABE/ English Heritage guidance. Detailed criteria will be identified in the Development Management DPD. Agree a firm commitment to produce a Character Study is required. Amend 3rd bullet in the 'Implementation' section, delete 'Consider the production of' and replace with 'Produce a borough-wide Character Study'.

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				<p>considered appropriate or inappropriate, taking into account historic environment and urban design considerations such as the presence of heritage assets, historic character, prevailing building heights and typologies, sight lines, existing landmarks, topography, skylines and views. This needs to be spatially expressed in the Core Strategy supported by clear and concise textual detail. In areas that may be considered appropriate we would seek to ensure that there is a commitment to further detailed urban design analysis in order to fine tune where within these areas tall buildings may be appropriate or sensitive. There should also be policy links to any more detailed policy documents or any other evidence used to determine which parts of those areas might be considered suitable for tall buildings, based on appropriate definitions of 'tall' (such as Development Management Policies, area-specific policy in AAPs). At present the approach proposed is not robust and does not provide a sufficiently clear plan-led approach to the management of tall buildings. The details provided are not appropriately supported by existing evidence, which raises concerns with regard to its deliverability and justification. This therefore makes this part of the Core Strategy unsound.</p>	
118	7.22	Environment Agency		<p>We support this paragraph as it lays the foundation to ask for biodiversity improvements on both small and large scale developments.</p>	<p>Support welcomed.</p>
68	Policy BE1: Built Environment	Mr John McDonnell MP		<p>There is a lack of acknowledgement of the many areas with poor environments, excessive housing densities, excessive infill developments in gardens and poor housing standards. There should be greater emphasis on tackling areas that have poor and unattractive community areas and poor local environments on estates.</p>	<p>Point 5 of Policy BE1 seeks to improve areas of poorer environmental quality, including within the areas of relative disadvantage of Hayes, Yiewsley and West Drayton. Point 9 of Policy BE1 seeks to prevent the inappropriate development of gardens that erode the character and biodiversity of suburban areas. No proposed change.</p>

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				<p>Housing densities in the south of the borough are resulting in population concentrations that are swamping local services. This is not addressed adequately in the document. There needs to be a local policy preference to protect gardens and prevent any excessive further infilling development.</p>	
141	Policy BE1: Built Environment	Hillingdon Inter Faith Network		<p>1) Policy BE1 – the built environment section 7 mentions the importance of public spaces but there appears to be a lack of this being linked to policy H – an example of the need for a more holistic methodology mentioned in the HIFN overview.</p> <p>2) In addition to providing 'neighbourhood space', future developments should be approved only if maximum opportunity for outlook onto green space has been sought. Evidence on the mortality age differential across the borough is not just an economic factor.</p>	<p>1) Disagree, it is unclear which housing policy this representation seeks linkages with. It is not considered appropriate to include reference to public spaces specifically in Policies H1, H2 or H3 as Policy BE1 is relevant to all developments, including new housing. In addition, provision of and access to open spaces is also covered by Policy EM4 both of which would be taken into account alongside the housing policies where relevant. No proposed change.</p> <p>2) Disagree, it is not considered that outlook onto a green space should be a minimum requirement for new developments. Access to public spaces is covered by Policy EM4. No proposed change.</p>
169	Policy BE1: Built Environment	Workspace Group	Ransome and Company Ltd	<p>1) Whilst Workspace supports the promotion of high quality design in new developments, it is considered that the requirement to achieve a Building for Life Assessment rating of at least silver is too inflexible and makes no allowance for other factors such as feasibility and viability. It is likely that such a requirement will not be feasible for many schemes, particularly conversions of historic buildings. Delete criterion (5) from Policy BE1.</p> <p>2) Workspace objects to the Sustainable Code Level and BREEAM requirements set out in Policy BE1(10) on the basis that significant changes to national policy result in this policy not being necessary. The Climate Change Act 2008 introduced statutory targets of reducing carbon</p>	<p>1) Disagree, a new indicator (H6) is set for 2010-2011 in the Council's Annual Monitoring Report which requires the Council to increase the number and proportion of total new build completions on major housing sites (ten units or more) reaching very good or good ratings against the Building for Life criteria. In addition, Policy HE1 (point 4) seeks to 'address the need to conserve the historic environment when implementing climate change mitigation and adaption measures'. No proposed change.</p> <p>2) Part agree, criterion (10) of Policy BE1 deleted and replaced with "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</p>

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				<p>emissions and the framework for delivering these targets i.e. through building regulations. It is considered that the current London Plan (2004 consolidated with changes), the Replacement London Plan (2009) and Part L of the Buildings Regulations will provide sufficient policy cover.</p> <p>Furthermore, Workspace considers that if such requirements are to be incorporated they should be considered on a site-by-site basis. Delete criterion (10) from Policy BE1 - or ensure it refers to viability and feasibility.</p>	<p>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. The Council will seek to merge a suite of sustainable design goals, such as the use of SUDS, water efficiency, lifetime homes, and energy efficiency into a requirement measured against the Code for Sustainable Homes and BREEAM. These will be set out within the Development Management DPD."</p>
199	Policy BE1: Built Environment	The Ballymore Group		<p>We acknowledge and support Policy BE1 point 11 particularly that appropriate locations for tall buildings include Hayes. We consider the gateway location of Hayes and Harlington Station including Blyth Road to be appropriate, subject to the safeguarding outlined.</p>	<p>Support welcomed.</p> <p>An assessment of tall buildings will be carried out as part of the Borough's proposed Character Study. Details of specific sites and boundaries will be considered through the Site Allocations DPD and Proposals Map. Detailed criteria will be identified in the Development Management DPD. No proposed change.</p>
218	Policy BE1: Built Environment	Heathrow Airport Ltd		<p>Object to Council's proposal that all new non-residential development should achieve BREEAM Very Good status - recommend policy refers to all applicable development.</p>	<p>Part agree, criterion (10) of Policy BE1 deleted and replaced with '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. The Council will seek to merge a suite of sustainable design goals, such as the use of SUDS, water efficiency, lifetime homes, and energy efficiency into a requirement</p>

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					measured against the Code for Sustainable Homes and BREEAM. These will be set out within the Development Management DPD.'
230	Policy BE1: Built Environment	McCarthy & Stone Retirement Lifestyle Ltd	The Planning Bureau Ltd	There is no justification to exceed the requirements of the current Building Regulations in meeting design requirements such as Code for Sustainable Homes Level 4 for all new residential development. The Strategy should follow the regulations set out at national level to meet sustainable housing & renewable energy targets. The wording of the policy should be amended to allow a more flexible approach to the standards to be applied - taking into account site viability and balanced against the need to meet other policies in the Strategy. It is recommended that the wording of such a policy is amended to enable a more flexible approach to such standards taking into account site viability and balanced against the need to ensure other policies in the Local Plan are satisfied.	Part agree, criterion (10) of Policy BE1 deleted and replaced with '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. The Council will seek to merge a suite of sustainable design goals, such as the use of SUDS, water efficiency, lifetime homes, and energy efficiency into a requirement measured against the Code for Sustainable Homes and BREEAM. These will be set out within the Development Management DPD.'
547	Policy BE1: Built Environment	English Heritage		<p>LATE SUBMISSION</p> <p>We recommend that a characterisation study is produced to substantiate the appropriateness of growth locations across the borough as identified within the London Plan, as well as general management of change across the whole Borough. The study should, for example, inform the parameters for optimal residential and non-residential densities in growth areas, and should provide a robust evidence base for character areas, management of heritage assets and defining appropriate and inappropriate locations for tall buildings within the borough. It is noted that the Implementation of Policy BE1 (bullet point 3) considers the production of a borough-wide Character Study to address this</p>	Proposed growth is generally focused on existing town centre and employment areas, such as Uxbridge and the Hayes/West Drayton Corridor. These areas are generally defined on the key diagram; further definition will take place through the Site Allocations process. Areas of historic and heritage value will be protected through policies in the Development Management Policies Document and forthcoming Heritage SPD. It is proposed that a Character Study will be produced to help inform these growth areas including appropriate locations for tall buildings. Amend 3rd bullet in the 'Implementation' section, delete 'Consider the production of' and replace with 'Produce a borough-wide Character Study'.

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				<p>issue, including the appropriateness of tall buildings. However we would advise that this evidence should be produced to inform the development of the Core Strategy as a policy framework, rather than after it has been finalised. This delay in developing a robust evidence base and weak commitment to undertaking this type of work undermines the justification and deliverability of the Core Strategy.</p>	
295	Policy BE1: Built Environment	Garden City Estate Residents' Association		<p>Lifetime homes need at least one parking space per home to be available for use by residents with impaired mobility or their carers. Paragraph 3 should be amended to read: "Be designed to include `Lifetime Homes' principles including the provision of at least one parking space so that..."</p>	<p>Car parking standards will be considered as part of work on the Development Management Development Plan Document. No proposed change.</p>
18	Policy BE1: Built Environment	Surrey County Council		<p>Core Strategy Policy BE1 misses an important opportunity to promote the sustainable management of CDEW and therefore fails to reinforce the intentions of Policy EM11 and strategic objective SO13 of the Core Strategy, and lacks coherence with policies 4A.3 and 4A.21 of the London Plan and policies 5.3, 5.16 and 5.18 of the Consultation Draft Replacement London Plan. As a consequence, the Core Strategy is considered to be unsound and not effective. The London Borough should propose a minor amendment to Policy BE1 requiring all new development to include sustainable design and construction techniques to increase the re-use and recycling of construction, demolition and excavation waste and reduce the amount disposed to landfill.</p>	<p>Agree, add sentence to end of point 10 of Policy BE1 to read:</p> <p>"and include sustainable design and construction techniques to increase the re-use and recycling of construction, demolition and excavation waste and reduce the amount disposed to landfill."</p>
321	Policy BE1: Built Environment	Surrey County Council		<p>Policy BE1 and EM1</p> <p>There is some concern that neither Core Strategy policies BE1 or EM1 promote the efficient use of natural resources. In order to</p>	<p>Agree, amend point 10 to include reference to "making the most efficient use of natural resources whilst safeguarding historic assets and their settings and local amenity"</p>

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				address this point, the London Borough should propose a minor amendment to either Policy BE1 or Policy EM1 to encourage the design of all development to make the most efficient use of natural resources.	
537	Policy BE1: Built Environment	Arla Foods UK Plc	BNP Paribas Real Estate	The set of standards in this policy should more appropriately be included in Supplementary Planning guidance where they can be revised and updated more readily - as they may be subject to change or could impact on project viability.	Disagree, the Core Strategy is a high-level strategic document, Policy BE1 is an overarching policy that seeks to improve the quality of the built environment. More detailed criteria will be contained in the Development Management DPD and supplementary planning documents.
564	Policy BE1: Built Environment	Individual		LATE SUBMISSION: Paragraph 4 - it is not clear how this "silver" rating will create a certain amount of "Buildings for life".	All developments of 10 dwellings or more will need to achieve a building for life scoring. Further clarification will be provided in para 7.9 and Policy BE1 to explain that the 'silver' standard includes 'good' or 'very good' ratings. Policy BE1 and para 7.9 amended to reflect this.
175	Policy BE1: Built Environment	Mayor of London	Greater London Authority	The GLA supports Built Environment policy BE1 – particularly in relation to promoting the principles of Lifetime Neighbourhoods. However in relation to Tall Buildings (paragraph 11), the Core Strategy should clearly identify the locations appropriate for tall buildings. Currently it states that appropriate locations including parts of Uxbridge and Hayes will be defined as in the Character Study; this however would only form part of the evidence base and would not be formally examined. In the section on how the policy will be implemented, it states that “consideration” will be given to undertaking a Characterisation Study – as opposed to a firm commitment. To be fully consistent with Draft Replacement London Plan Policy 7.7 it would also be helpful to identify if the rest of the borough is sensitive to tall buildings or indeed whether there are locations that are inappropriate for tall buildings.	Support welcomed. Due to the presence of tall buildings within parts of Uxbridge and Hayes, these areas were identified as appropriate for tall buildings. Other appropriate locations will be identified as part of the Borough's proposed Character Study. Agree a firm commitment to produce a Character Study is required. Amend 3rd bullet in the 'Implementation' section, delete 'Consider the production of' and replace with 'Produce a borough-wide Character Study'.

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519	Policy BE1: Built Environment	L B Hillingdon (Labour Group)		All dwellings should include one parking space so that they can be designed to a true "Lifetime Homes" standard. For people in wheelchairs or too elderly or disabled to walk any distance a car is the only of leaving the house and accessing other facilities. In many cases these residents are also dependent on carers or other service providers being able to access them by car - so a minimum of one parking space per home is required. Paragraph 3 should be amended to read: "Be designed to include "Lifetime Homes" principles including the provision of at least one parking space so that...".	Car parking standards will be considered as part of work on the Development Management Development Plan Document. No proposed change.
88	8	Natural England London Region		As per previous comments we recommend that a Green Infrastructure (GI) policy be included. A number of policies (such as EM1 – Climate Change Adaptation and Mitigation and EM7 - Biodiversity) have objectives linked to the delivery of GI (living roofs and wall etc). As such, incorporating a GI policy would further strengthen GI delivery.	The Council consider its environmental management policies, notably policies EM1 and EM7 give sufficient guidance of the strategic approach being taken by the Council towards Green Infrastructure. More detailed policies on its provision can be brought forward in the Development Management Development Plan Document. No proposed change.
246	8	Yiewsley and West Drayton Town Centre Action Group		The aspirations for Environmental Management are welcomed. This section is too vague as to how the Council intends to improve, for example, air quality. Given the statistics for the amount of traffic Heathrow generates alongside residents and workers from outside the Borough, it should be imperative that a definitive policy should be included.	The approach to addressing air quality issues is the policy requirement for all new development in the borough to demonstrate its impact on air quality. More detailed measures will be outlined in subsequent DPDs and Council Strategies. No proposed change.
550		English Heritage		LATE SUBMISSION Environmental Improvement: Climate Change (pg 77-82) - It is important that due regard is shown to impacts on the historic environment from climate change mitigation and adaptation measures. English Heritage has published Climate Change and the Historic Environment which sets out potential impacts on the historic	Agree suggested wording added to section on 'Climate Change Adaptation and Mitigation' at the end of paragraph 8.9 to read "There will also be a requirement to address the need to conserve the historic environment when implementing climate change mitigation and adaption measures taking a balanced approach between the extent of the mitigation of climate change involved against the potential harm to the heritage asset or its setting."

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Page 159				<p>environment in this regard, and how to address them. Following PPS5 policy HE1, Core Strategies should promote climate change measures which avoid harm to the historic environment, and where climate change and historic environment objectives conflict, a balanced approach should be taken which best meets the public interest as judged against PPS5 and other relevant policies. At present there is insufficient consideration given to this issue with this part of the Core Strategy, contrary to national policy. It is noted that Core Strategy Policy HE1 point 4 makes a reference to the need for a balanced approach; however this important message is not reflected in this key section of the Core Strategy. To ensure the soundness of the Core Strategy we would advise stronger references are made to the messages of PPS5 (Policy HE1) in this section, along with cross references to the Core Strategy heritage policy.</p>		
	52	8.5	Individual		<p>Not effective in monitoring the noise and air pollution. Time given to digest the details of the PDP far too short.</p>	<p>The monitoring of noise and air pollution will be amplified in the proposed Development Plan Document for the Heathrow area. No proposed change.</p>
	53	8.7	Individual		<p>Not enough notice given to go through the Core Strategy. How can the CO2 emissions for Hillingdon be controlled if Heathrow pollution is excluded?</p>	<p>Figures for reducing CO2 emissions in Hillingdon take account of national targets and regional targets in the London Plan (2008). No proposed change.</p>
	358	8.11	Hayes Town Partnership		<p>Amend Policy EM1 and paragraph 8.11 to give increased emphasis to an area-based approach to climate change adaptation and mitigation concentrating particularly on town centres.</p>	<p>Policy EM1 sets out the broad policy criteria that will be considered throughout the development of the LDF. The subsequent Site Allocations DPD and Development Management DPD will come forward with detailed proposals and standards as to how the local open space and other features might be used to help address local climate change issues - e.g. the use of water for local cooling schemes. No proposed change.</p>

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69	Policy EM1: Climate Change Adaptation and Mitigation	Mr John McDonnell MP		None of the actions are sufficiently decisive, recommending and promoting action rather than insisting or ensuring action is taken. There should be more assertive action taken to ensure action takes place, with targets set and systems in place to both monitor and enforce compliance. In particular there is inadequate attention given to developing and installing renewable energy sources in the borough.	Disagree - the Core Strategy provides the strategic approach to meeting the challenge of climate change. However, it will be the Development Management Development Plan Document that will provide the more detailed policy direction. The DMDPD will also take into account the replacement London Plan as well as the broad objectives of the Core Strategy. The carbon reduction targets are set within the regional London framework and the Council adopts the replacement London Plan approach to allowing specific development to assess the best method for reducing carbon. The replacement London Plan moves away from setting specific targets for renewable energy and instead provides flexibility on how to achieve carbon reduction targets. The Council adopts the same principles. No proposed change.
70	Policy EM1: Climate Change Adaptation and Mitigation	Mr John McDonnell MP		Lack of requirements on developers to tackle climate change. There should be greater emphasis on requiring action from developers and others to tackle climate change rather than simply exhorting them to. Words like promoting and encouraging should be changed to requiring to.	Disagree - the Core Strategy provides the strategic approach to meeting the challenge of climate change. However, it will be the Development Management Development Plan Document that will provide the more detailed policy direction. The Core Strategy is part of the development plan system that includes the London Plan. It should not reiterate requirements or set specific development management policies. Instead, the development management document will set the specific aims for the Council which reflects the requirements of the London Plan and the aspirations set out in the Core Strategy. No proposed change.
119	Policy EM1: Climate Change Adaptation and Mitigation	Environment Agency		We support points 7, 10, 11 and 13 of EM1: Climate Change Adaptation and Mitigation and the monitoring indicator E1.	Support welcomed.
170	Policy EM1: Climate Change Adaptation and Mitigation	Workspace Group	Ransome and Company Ltd	The policy simply repeats draft Replacement London Plan policy and is unnecessary - nor does it reflect the need for feasibility. This policy	Disagree - the Core Strategy does not require developers to link into decentralised energy networks. It provides the strategic basis for

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				<p>repeats the energy policy coverage of the Replacement London Plan and is therefore not necessary. Furthermore, it does not take account of feasibility. Not all development sites will be able to incorporate renewable technologies for reasons such as location and orientation. As such, this requirement should be considered on a site by site basis.</p>	<p>including policies within the Development Management Development Plan Document which will be worded to ensure feasibility is considered. The London Plan states that "LDFs boroughs should develop policies and proposals to identify and establish decentralised energy network opportunities. Boroughs may choose to develop this as a supplementary planning document and work jointly with neighbouring boroughs to realise wider decentralised energy network opportunities." The Council's Core Strategy provides the strategy for other documents within the LDF to prescribe the necessary approach to decentralised energy without setting specific requirements. This allows for flexibility in approach and to establish more specific development management policies that is relevant to the emerging evidence base. No proposed change.</p>
344	Policy EM1: Climate Change Adaptation and Mitigation	Individual		<p>The policy lacks instructions on what should be included in new housing schemes - e.g. solar panels, salvaged construction materials and other "green" facilities such as waste/rain water flush WCs.</p>	<p>Noted - the emphasis in the Replacement London Plan consultation and within the Core Strategy is on energy efficiency and reducing carbon emissions. Both documents need to maintain flexibility in the approach to be taken by developers without favouring one technology over another.</p> <p>However, these requirements for new housing will be spelt out in detail in the emerging Development Management DPD.</p> <p>No proposed change.</p>
345	Policy EM1: Climate Change Adaptation and Mitigation	Individual		<p>Recycling should be noted - as fundamental to tackling climate change - and there should be a commitment to promoting education amongst borough residents on these issues.</p>	<p>Noted.</p> <p>However, recycling forms part of waste management process which in turn contributes to tackling climate change. The London Plan sets out targets for recycling and composting for waste from households, businesses and industry. The</p>

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					London Plan requires that the majority of waste generated in London is managed in London to enable the capital to move towards self-sufficiency.
346	Policy EM1: Climate Change Adaptation and Mitigation	Individual		Paragraph 1-The policy should also only permit development in urban & town centres where there is sufficient local infrastructure to cope with this.	The Council will keep the position regarding local community infrastructure under review as new development comes forward. It will look to steer development towards existing town centres as these represent the most sustainable locations in terms of public transport accessibility and access to local services. No proposed change.
314	Policy EM1: Climate Change Adaptation and Mitigation	PRUPIM	CB Richard Ellis on behalf of PRUPIM	We broadly support the aim of this policy to ensure that new developments contribute towards the sustainable development and climate change agenda.	Support welcomed.
287	Policy EM1: Climate Change Adaptation and Mitigation	Garden City Estate Residents' Association		The policy omits a reference to trying to reduce road traffic from Heathrow Airport - this should be included.	The Council's aim for a reduction in the use of private vehicles in the borough including Heathrow Airport is expressed extensively throughout the document and forms part of its Strategic Objective (SO) as expressed in SO20, SO21 and SO22 and Policy T2. Policy T2 will be delivered through the Local Implementation Plan (LIP) and partnership working with TfL, transport providers and other partners.
289	Policy EM1: Climate Change Adaptation and Mitigation	Garden City Estate Residents' Association		A safe cycle route to Heathrow - a major employer in the borough - could help modal shift away from the car. Both EM1 and SO12 should be amended to include provision for designated cycle routes segregated in heavily trafficked areas such as Heathrow.	Provision for designated cycle routes is already noted in the infrastructure schedule (Appendix 2) of the Core Strategy - to be delivered between 2015 and 2017.
334	Policy EM1: Climate Change Adaptation and Mitigation	Southstream Holdings Ltd	Montagu Evans on behalf of Southstream Holdings Ltd	Green Belt policy is unsound, no evidence submitted to justify the approach in policy EM2. The Core Strategy notes that a Green Belt review is being undertaken, but does not yet form part of the evidence base. As such, the	Noted - Green Belt designations are carried forward from the current Unitary Development Plan which has been subject to a previous examination in public. Work on the review of Green Belt study is continuing as part of the

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				Core Strategy is not informed by a formal review which identifies the likely areas of change or to assess the role, function and quality of the Green Belt. Without this evidence, it is unclear as to whether the current approach to make minor adjustments to the boundary at a later stage in the LDF process is the most appropriate. It is therefore considered to be unjustified.	evidence base for the emerging Site Allocation DPD. When work on the review of Green Belt study is completed it will be made available for public information. No proposed change.
369	Policy EM1: Climate Change Adaptation and Mitigation	Bell Farm Christian Centre		Objects to prioritising higher density development in urban areas - such developments erode the amenity of the generally open residential estates. Would like to see the provision of additional land for allotment gardening.	The Council will seek to ensure proposed development in existing residential areas respects the existing character and amenity of those areas as new development comes forward (policy BE1 sets out the Council's general approach to the design of new developments). Later work on the Local Development Framework for the Site Allocations and Proposals Map Development Plan Documents may bring forward proposals for further allotment land in the borough. No proposed change.
489	Policy EM1: Climate Change Adaptation and Mitigation	Mr John McDonnell MP		Policy EM1: Climate Change Adaptation and Mitigation - There should be more assertive action taken to ensure action takes place, with targets set and systems in place to both monitor and enforce compliance. In particular there is inadequate attention given to developing and installing renewable energy sources in the borough.	The emphasis in the Replacement London Plan consultation and within the Core Strategy is on energy efficiency and reducing carbon emissions. Figures for reducing CO2 emissions in Hillingdon take account of national targets and regional targets in the London Plan (2008) monitored through Core Indicators which sets a 20% target of energy needs from renewable sources for larger applications (or any other targets set by Government). This is monitored annually in Annual Monitoring Report. No change proposed.
495	Policy EM1: Climate Change Adaptation and Mitigation	Mr John McDonnell MP		The entire section is too weak in setting out definite actions - and there is no reference to environment in the Vision statement. The overall aim is not mitigation of climate change - it should be halting & reversing it. There is no specific	Both the first and third bullet points in the Vision statement cover the Council's goals for the borough's future environment. Policy EM1 does cover the broad approach being taken to encourage use of renewable energy, promoting

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				<p>reference to extending the use of solar or wind power and inadequate reference to recycling. There should be an aim not just to prevent the loss of green spaces but to create new ones. The reference to local waterways misses such aims as Little Britain pond, flooded gravel pits and the River Frays. Seeking air quality neutrality is not enough - the Strategy should seek an improvement - and there is no reference to tackling the impact of Heathrow & Northolt airports on the environment. There is a lack of explanation on some issues - e.g. "living walls" or "quiet areas". Much more explanation is needed on how policies will be achieved - e.g. how developments are tested re sustainability - and too often developers are asked to consider actions to tackle climate change rather than required to do so. The Strategy does not link local employment helping to reduce travel demand and thereby affecting climate change. Nor does it address better building insulation in the housing stock or reducing housing waste production. It should also acknowledge the lack of a biodiversity plan which needs to be urgently addressed and look to involve the community in monitoring policies on climate change.</p>	<p>living walls and generally upgrading the housing stock - which might encompass better building insulation. Detailed policy on these aspects can be brought forward in a Development Management Development Plan Document. Policy EM4 looks to maintain existing open space and expects developers to address local deficiencies of open space when new development comes forward. The Borough's Blue Ribbon network is depicted at Map 8.2 and covered at policy EM3 and includes the full range of water spaces and areas in Hillingdon. The Core Strategy is a spatial planning document and sets out broad planning policies towards air pollution issues - e.g. by such measures as looking to locate major developments in existing town centres with good public transport access to try to reduce reliance on use of the car and reduce air pollution. No proposed change.</p>
538	Policy EM1: Climate Change Adaptation and Mitigation	Arla Foods UK Plc	BNP Paribas Real Estate	<p>Have concerns over the promotion of decentralised energy and the installation of renewable energy on a site by site basis. It may be more appropriate to look to incorporate sustainable energy provision, rather than costly, front-loaded renewables which in the medium- to long-term often prove to be unsuccessful.</p>	<p>Disagree - the Council has deliberately not specified renewable or decentralised energy targets for new development as this can reduce flexibility in other approaches to minimise carbon emissions. Policy EM1 allows for the development management document to set more specific policies in line with the replacement London Plan. This requires a site by site assessment to be made at planning application stage so a developer is not forced into using renewables if they are not the most appropriate solution. The Core Strategy is considered to provide enough flexibility to make a feasibility assessment on a</p>

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					site by site basis. No proposed change.
559	Policy EM1: Climate Change Adaptation and Mitigation	Individual		<p>LATE SUBMISSION:</p> <p>Paragraph 1 - offers no alternative to prioritising higher density development in urban & town centres. Paragraph 2 - we cannot reduce car dependency in the borough without better public transport; redevelopment going ahead without adequate public transport will only create more car use. Paragraph 7 - rather than "encouraging" the Strategy should state that developers "must" have sustainable techniques. Paragraph 9 - rather than "encouraging" the Strategy should state that developers "must" install renewable energy. Paragraph 12 rather than seeking to avoid losing green areas the Strategy should aim to create further green areas.</p>	<p>Paragraph 1 - Where higher density development is proposed, the Council will seek to locate it at the most sustainable locations - which are normally the borough's town centres where there is a higher level of public transport accessibility and other services readily available to serve the development (policy T1).</p> <p>Paragraph 2 - Policies T2 and T3 seek to improve the borough's public transport network so as to encourage modal shift away from car use.</p> <p>Paragraph 7 - all policies have to be flexible in their approach to meet national planning guidance requirements. It is not possible for the Council to insist on the installation of renewable energy.</p> <p>Paragraph 9 - Disagree - the Core Strategy should not be worded to set development management policies. Instead it provides the strategic approach to allow more specific policies to be included within the development management document. The Development Management Development Plan Document will therefore set the requirements that will have to be followed by developers and applicants.</p> <p>Paragraph 12 - Policy EM4 does state that the Council will extend the network of open spaces to meet local community needs - and require local development proposals to address deficiencies in the quantity of open spaces. No proposed change.</p>
470	Policy EM1: Climate Change Adaptation and Mitigation	Mayor of London	Greater London Authority	Policy EM1 broadly reflects the energy hierarchy but contains very little detail on how the policy would be applied. To ensure these policies are applied effectively the policy should be complemented in more detail in the	Noted - the Council will look at how to emphasise application of the policy in more detail when drafting the subsequent Development Management DPD. No proposed change.

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				Development Management Plan document (i.e. expanded in line with Policy 5.2, 5.3, 5.6 and 5.7 of the draft replacement London Plan.)	
514	Policy EM1: Climate Change Adaptation and Mitigation	L B Hillingdon (Labour Group)		SO12 and EM1: Should include reference to those unable to walk or cycle any distance - add words to SO12: "...whilst making adequate provision for elderly or disabled people who are unable to walk or cycle any distance."	Equality of access for all sections of the community is already a requirement of Strategic Objectives SO2 and SO 6. Ensuring access for all the community is a theme running through the Core Strategy and is highlighted in some key policies - e.g. policy BE 1 on design of the built environment. No proposed change.
517	Policy EM1: Climate Change Adaptation and Mitigation	L B Hillingdon (Labour Group)		The policy should state that measures will be taken to reduce road traffic movements to and from Heathrow Airport.	Policy T4 in the Core Strategy covers this objective and states that the Council will support the sustainable operation of Heathrow by facilitating improvements to public transport, public transport interchanges and cycle links to provide the opportunity for a modal shift from the use of private cars to sustainable transport modes. No proposed change.
40		British Waterways		The Strategic Objective should also include 'sustainable transport' as one of the opportunities presented by the borough's canals, as recognised by the London Plan and the Mayor's transport strategy.	This is noted in the Core Strategy at paragraph 8.17. No proposed change.
71	8.12	Mr John McDonnell MP		Inadequate reference to determination to protect green belt land and open spaces. A clear statement should be made of the absolute determination of the borough to protect all green belt land and to protect our open spaces for the long term.	Policy EM2 reflects national and regional policies which emphasise the need to protect Green Belt land from development. No proposed change.
449	8.14	Henry Streeter Automotive Ltd	CGMS Ltd on behalf of Henry Streeter Automotive Ltd	The plan fails to deal with a strategic reassessment of the Green Belt boundaries. The review of Green Belt boundaries is a matter for the Core Strategy, not for some unspecified subsequent review.	The Core Strategy does not propose changes to the Borough's Green Belt boundary. This will be assessed in the emerging Site Allocation DPD. The Council intend setting out any detailed changes to the Green Belt designations in its area when preparing the Site Allocations Development Plan Document. No proposed change.

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41	8.15	British Waterways		<p>We would suggest this paragraph be amended to read:</p> <p>"The river and canal corridors and associated hinterlands (also known as the Blue Ribbon Network) link across borough boundaries and also have a strategic function in west London. The Grand Union Canal originated as an arterial freight route that carried materials between sites from London and links all the way to Birmingham - today, the scale of industrial activity on the water has been largely outgrown by leisure use. It is therefore a very important link between boroughs and provides much wider opportunities for walking, angling and cycling.</p>	<p>Agree to the inclusion of "and provides much wider opportunities for walking, angling and cycling" at the end of the last sentence in paragraph 8.15 to recognise the leisure and recreational value of the canal.</p>
50	8.18	Henry Streeter Automotive Ltd	CGMS Ltd on behalf of Henry Streeter Automotive Ltd	<p>The plan fails to deal with a strategic reassessment of the Green Belt boundaries.</p> <p>The Council has indicated that they intend to review boundaries and this in our view is function of the Core Strategy. In response to our previous submission it was indicated that 'no significant release of Green belt are required'. This implies that some release of Green Belt is required that is not dealt with in the Core Strategy.</p>	<p>The Core Strategy does not propose changes to the Borough's Green Belt boundary. This will be assessed in the emerging Site Allocation DPD.</p> <p>The Council intends setting out any detailed changes to the Green Belt designations in its area when preparing the Site Allocations Development Plan Document. No proposed change.</p>
82		Individuals		<p>Particularly concerned about the future of Hayes Park field. It is vital that the council maintain the land in the green belt and that it is fully protected from development. The area cannot sustain further development of housing or commercial types, the pressure on the local community would be terrible. It is the responsibility of us all to ensure that the green belt (the lungs of our community) is maintained for our future generations. Once it has gone it has gone for ever. Please protect it.</p>	<p>The Core Strategy does not propose changes to the Borough's Green Belt boundary. This will be assessed in the emerging Site Allocation DPD.</p> <p>The Council intends setting out any detailed changes to the Green Belt designations in its area when preparing the Site Allocations Development Plan Document. No proposed change.</p>

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105		Individual		Need to protect Green Belt from inappropriate development.	<p>The Core Strategy does not propose changes to the Borough's Green Belt boundary. This will be assessed in the emerging Site Allocation DPD.</p> <p>The Council intends setting out any detailed changes to the Green Belt designations in its area when preparing the Site Allocations Development Plan Document. No proposed change. No proposed change.</p>
219	8.19	Heathrow Airport Ltd		In line with our comments on Map 4.1, HAL would like to see the figure of 4,970 hectares of Green Belt revised to reflect revisions to the Green Belt boundary.	<p>The Core Strategy does not propose changes to the Borough's Green Belt boundary. This will be assessed in the emerging Site Allocation DPD.</p> <p>The Council intends setting out any detailed changes to the Green Belt designations in its area when preparing the Site Allocations Development Plan Document. No proposed change.</p>
	8.20	London Green Belt Council		We consider that paragraph 8.20 represents a concise and accurate description of the function Green Belts, which we fully support.	Support welcomed.
3	8.26	London Green Belt Council		We welcome Hillingdon's commitment to maintaining the Green Belt. We trust that this Core Strategy principle will inform any policies or minor adjustments which will be brought forward as part of the Site Allocations DPD and the Development Management DPD. (Para 8.24 above)	Support welcomed.
220	Map 8.1	Heathrow Airport Ltd		<p>In line with our comments on Map 4.1 (key diagram) HAL wish to see the Green Belt designations adapted to remove land at Terminal 5 and Longford Meadows.</p> <p>Alternatively, the precise boundaries of the Green Belt could be omitted from the Core Strategy and presented on the Proposals Map once these are determined. There are two options to resolve this, as follows:</p>	<p>The Core Strategy does not propose changes to the Borough's Green Belt boundary. This will be assessed in the emerging Site Allocation DPD.</p> <p>The Council intends setting out any detailed changes to the Green Belt designations in its area when preparing the Site Allocations Development Plan Document. No proposed change.</p>

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				<ul style="list-style-type: none"> • Amend Map 4.1 and Map 8.1 so it is more strategic in nature (rather than making site specific designations). This would include removal of Green Belt from the plan for definition in the Proposals Map at a later date and avoid this providing conflicting information. • Amending the boundary of the Green Belt so that land at Terminal 5 and Longford Meadows is removed; 	
387	Map 8.1	Royal Brompton & Harefield NHS Trust	CGMS Consulting	The trust requests the identification of Harefield Hospital as a major developed site in the Green Belt within this map.	Major developed sites are not identified in Map 8.1 which illustrates the main open space designations. Proposals for Major Developed Site designations will be considered as part of further work on the Site Allocations and Proposals Map Development Plan Documents. No proposed change.
4	8.27	London Green Belt Council		We are concerned by the sentence "In very exceptional circumstances the Council will consider the release of greenfield sites for schools. "First, it appears to be redundant. PPG2 empowers the Planning Authority to allow inappropriate developments in the Green Belt in very special circumstances and this sentence appears to be trying to say the same thing specifically in relation to schools. Second, it does not use the expression "very special circumstances" as used in para 3.1 of PPG2 in relation to allowing inappropriate developments in Green Belt. Instead, it says "exceptional circumstances". This term is used in PPG2 in relation the situations in which a Planning Authority may change the established boundaries of Green Belt (paras 2.6 and 2.7). By using a different term from PPG2, para 8.27 raises the possibility that its meaning differs from PPG2, which would amount to an unsound	Agreed. Replace the text 'exceptional' in paragraph 8.27 by 'special'.

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				departure from national policy. Preferably: Omit the sentence "In very exceptional circumstances the Council will consider the release of greenfield sites for schools. "As a second best: replace "exceptional" by "special".	
5	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	London Green Belt Council		This policy is not clearly in accordance with national policy as expressed in PPG2 because of the reference to "the exceptional circumstances test". As mentioned in relation to para 8.27, PPG2 used the word "exceptional" in relation to the variation of Green Belt boundaries in the plan production process. Where it refers to allowing inappropriate development in Green Belt, it uses the phrase "very special". Using a different word in Policy EM2, raises the possibility of introducing a meaning different from PPG2. Such a difference would make Policy unsound. We cannot see how the "Monitoring" section of the policy would be effective. The number of applications refused and/or appropriate developments allowed is going to depend on the number and nature of projects people bring forward in the Green Belt. It is not even clear to us whether a high or low number would be regarded as success. The third limb of the Monitoring section is more promising but defective in two ways: (a) When inappropriate development is allowed on Green Belt, because very special circumstances, the site does not cease to be Green Belt (so that any subsequent re-development has to be appropriate in Green Belt or itself justified by very special circumstances). The area of Green Belt is not reduced or "lost". (b) The use of the word "Net" implies that if, when Green Belt land is used for inappropriate development, an equivalent amount of land is added to the Green Belt, then the policy has succeeded. This is a fallacy. It is where the Green Belt land is that is	Agreed - replace 'exceptional' in Policy EM2 by 'very special'. No proposed change to the Monitoring section as each development proposal involving the loss of Green Belt land will be considered on its merits and in accordance with the criteria contained in PPG2 and the emerging Development Management DPD.

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				important rather than the amount of it there is. If land adjoining the built up area is built on inappropriately, then, even though more Green Belt be added elsewhere, the Green Belt has failed in its objective of preventing urban sprawl.	
+	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Individual		Policy EM2: Green Belt, Metropolitan Open Land and Green Chains - I support the Council's commitment to maintain and protect the Green Belt within Hillingdon Borough. I am particularly keen to ensure that the Green Belt around Hayes Park is protected from development. I note the policy states that minor adjustments to the Green Belt will be undertaken as part of the Site Allocations Development Plan Document. I trust that this will simply relate to amendments to historical Green Belt boundaries that no longer reflect the existing situation, rather than releasing large areas of Green Belt for residential development, such as Hayes Park. Having regard to the housing policies and the background evidence on housing provision, I understand that there is no requirement to release large expanses of Green Belt for housing development to meet housing targets/need. To do so would mean that the Local Development Framework would fail to meet the tests of soundness and in those circumstances I would expect the Inspector to find the Core Strategy unsound.	Support welcomed
127	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains		Gleeson Developments Ltd	Paragraphs 8.19 / 8.20 & Policy EM2- we note the Council's comments regarding the Green Belt that lies within the Borough and the recognition that the most important attribute of green belts is their openness. We also support the Council's position that minor adjustments to the Green Belt will be undertaken in the Site Allocations DPD. Whilst the representations jointly submitted by	Support welcomed. Site specific issues will be addressed through the Site Allocations Development Plan Document.

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				<p>Gleeson Developments Ltd and Mr J Walls relate to the pre-submission draft Core Strategy, they have been prepared as part of the ongoing promotion of land off the High Street, Harlington. We are promoting the land, which is located to the north of the settlement of Harlington and within the Heathrow Opportunity Area. Harlington is a sustainable settlement with a number of services and amenities that serve the settlement. Indeed, as will be commented later, the emerging planning strategy for the Borough identifies Harlington as a Local Centre.</p> <p>The land is adjacent to the settlement boundary with access to the existing road network. The site measures approximately 4 acres and is well related to the existing residential area of Harlington, which is to the south and west of the submission site. It is expected that the site could accommodate a range of dwelling numbers depending upon different densities, with access onto the existing highway network, via Bletchmore Close or directly onto the High Street.</p> <p>The land is under the control of a single family, with Gleeson Developments having an interest in the land. The site can achieve the delivery of residential development in accordance with the tests within PPS3. Housing can be delivered within 2 years of a consent being granted.</p>	
131	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Hillingdon Hospital NHS Trust	Broadway Malyan on behalf of Hillingdon Hospital NHS Trust	We note that Policy EM2 states that Mount Vernon Hospital is designated as a Major Developed Site within the Green Belt. But the northern area of the site is almost entirely developed with buildings and hard standing. It adjoins the settlement of Northwood to the east and we consider that there is no justification for it to be designated as Green Belt. This area of the	A review of the 2006 Green Belt Study is being carried out against the criteria/test as set out in PPG2. Site specific issues will be addressed through the Site Allocations Development Plan Document with the proposed Green Belt review as part of its evidence base documents. No proposed change.

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				<p>site does not fulfil any of this purposes or uses of Green Belt as set out in PPG2. It is appropriate therefore that it is excluded from the Green Belt and included within the settlement.</p> <p>Policy EM2 is therefore not consistent with national policy and we consider that it should be amended to make clear that the developed area of the Mount Vernon site will be excluded from the Green Belt.</p>	
151	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Thorney Farm Developments	Boyer Planning	<p>"Policy should specifically state that Green Belt boundaries will be adjusted to meet development requirements within the Site Allocations DPD. Suggested additional wording for policy EM2: The second paragraph should be replaced with the following wording:</p> <p>"Outside of existing urban areas, the overall integrity of the Green Belt and Metropolitan Open Land will be maintained, but a review of existing boundaries will be undertaken and adjustments proposed to meet development requirements in sustainable locations, as outlined in the Site Allocations Development Plan Document."</p>	<p>The Core Strategy does not propose changes to the Borough's Green Belt boundary. This, including site specific issues, will be considered in the emerging Site Allocation DPD. However, significant releases of Green Belt land are not considered to be appropriate and would not be supported.</p> <p>No proposed change.</p>
183	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	ACS International Schools	Preston Bennett Holdings Ltd	School site should be classified as a Major Developed Site within the Green Belt.	A review of the 2006 Green Belt Study is being carried out against the criteria/test as set out in PPG2. Site specific issues will be addressed through the Site Allocations Development Plan Document. No proposed change.
221	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Heathrow Airport Ltd		Object to "maintain the current Green Belt" - the Core Strategy needs to reflect Green Belt de-designation at T5 - or omit this from Core Strategy and deal with in Proposals Map. The same issues are raised in relation to para. 4.1.	The Council is aware of the need to reconsider the Green Belt boundary further to the development of Terminal 5. A borough wide review of Green Belt and other detailed land use designations is being carried out. Detailed proposed changes will be brought forward as part of the Site Allocations and Proposals Map Development Plan Documents. No proposed

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					change.
252	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Threadneedle Property Investments	Indigo Planning on behalf of Threadneedle Property Investments	We welcome Policy EM2 and highlight an anomaly in the Green Belt boundary, particularly the Lodge and Aviation House in Harmondsworth, where part of the site is included within the Green belt and should be removed. We request that this anomaly is recognised in the review of the Green Belt study referred to at Section 8.24 of the Core Strategy and is rectified in future DPDs including the Proposals Map and the Site Allocations DPD.	Site specific issues will be addressed through the Site Allocations Development Plan Document with the proposed Green Belt review forming part of the evidence base. No proposed change.
232	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Individual		Green space is already short in the heavily built-up south of the borough and the loss of Green Belt land there is not justified. The Council has a duty to maintain Green Belt land for future generations. Loss of green Belt land would not be consistent with the draft Replacement London Plan. The policy should be changed to state: at paragraph 1 - The Council will maintain... (etc.); paragraph 2 - No adjustments will be made to Green Belt - minor adjustments to Metropolitan Open Land will be undertaken in the Site Allocations Development Plan Document; paragraph 4 - The Council will firmly resist any proposals for development in Green Belt land. Metropolitan Open Land will be assessed against national and London Plan policies, including the exceptional circumstances test.	The Core Strategy supports the retention of the Green Belt, and only minor changes will be made through the Green Belt review. National planning guidance does allow certain development / uses on Green Belt land in very special circumstances. Policy EM2 has to reflect this. No proposed change.
233	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Individual		Green space is already short in the heavily built-up south of the borough and the loss of Green Belt land there is not justified. The Council has a duty to maintain Green Belt land for future generations. Loss of green Belt land would not be consistent with the draft Replacement London Plan. The policy should be changed to state: at paragraph 1 - The Council will maintain... (etc.); paragraph 2 - No adjustments	The Core Strategy supports the retention of the Green Belt, and only minor changes will be made through the Green Belt review. National planning guidance does allow certain development / uses on Green Belt land in very special circumstances. Policy EM2 has to reflect this. No proposed change.

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				will be made to Green Belt - minor adjustments to Metropolitan Open Land will be undertaken in the Site Allocations Development Plan Document; paragraph 4 - The Council will firmly resist any proposals for development in Green Belt land. Metropolitan Open Land will be assessed against national and London Plan policies, including the exceptional circumstances test.	
235	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Individual		Wording should be changed to make clear that the Green Belt is important for local flora & fauna - e.g. for wildlife corridors - and its loss will be resisted. Monitoring of the policy should be made stronger.	Policy EM7 of the Core Strategy already seeks to protect and enhance biodiversity and geological resources in the borough. No proposed change.
239	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Individual		The Green Belt at Hayes should be retained to prevent any development there causing flooding by affecting local underground streams. Local bungalows built in back gardens have already caused flooding to neighbouring gardens. The policy should be changed from seeking to maintain the current extent of the Green Belt to state it must be maintained.	The Core Strategy does have to build in some flexibility into its policies to reflect national planning guidance. Detailed policy on the prevention of flood risk from new developments will be dealt with by the Development Management Development Plan Document. No proposed change.
240	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Individual		Given the presence of several major road routes and airports, the Green Belt should be retained to protect local air quality and as a habitat for local flora & fauna. The policy should be changed from seeking to maintain the current extent of the Green Belt to state it must be maintained.	Policy EM2 reflects national and London-region policies aimed at protecting all existing Green Belt land. The policy has to be framed with some flexibility to comply with national planning policy requirements. No proposed change.
398	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Brunel University	VRG Planning Ltd on behalf of Brunel University	It is necessary to ensure that the Core Strategy meets the tests of soundness, more specifically the requirements for the document to be effective and consistent with National policy. The draft Core Strategy departs from National planning policy guidance, as contained at Annex C of PPG2 (Green Belts) which specifically states that the needs of Higher Education institutions located within the Green Belt should	Support for additional growth at Brunel University would need to be discussed and agreed on a site specific basis as part of the work for the Site Allocations Development Plan Document. No proposed change.

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				be given due consideration in preparing development plan documents. It states that such reviews represent the appropriate time at which to consider whether Green Belt boundaries should be changed, in order to facilitate such growth. The document must therefore consider the future needs of the University and seek to work proactively with it as a key delivery partner.	
399	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Brunel University	VRG Planning Ltd on behalf of Brunel University	Add following text to first paragraph: In addition, consideration will be given within this document to an adjustment to accommodate the future needs to Brunel University.	<p>The Council intends setting out any detailed changes to the Green Belt designations in its area when preparing the Site Allocations Development Plan Document. If proposals involving the extension of the University Campus are then available they will be considered at that stage and public consultations undertaken. Otherwise it would be premature to amend the Core Strategy as proposed and the Council will deal with any future proposals to extend the campus through the usual development management process.</p> <p>No change proposed.</p>
400	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Brunel University	VRG Planning Ltd on behalf of Brunel University	Remove reference to Brunel University as a Major Developed Site. To acknowledge that the Brunel University site should be removed from the Green Belt, given that it does not form open land within the countryside and could not be considered to perform any of the functions set out at paragraph 1.5 of PPG2.	A review of the 2006 Green Belt Study is being carried out against the criteria/test as set out in PPG2. This will determine the status of site within the Green Belt. Site specific issues will be addressed through the Site Allocations Development Plan Document with the proposed Green Belt review forming part of its evidence base documents.
401	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Brunel University	VRG Planning Ltd on behalf of Brunel University	Change word 'exceptional' for 'very special' circumstances.	<p>Agreed.</p> <p>Replace 'exceptional' in Policy EM2 by 'very special'.</p>
278	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Legal and General Property Partners (Life Fund) Ltd	Drivers Jonas Deloitte on behalf of Legal & General Property Partners (Life Fund) Ltd	Delivery of housing beyond 2014 is uncertain and the Core Strategy should give consideration to major Green Belt changes now to assist in meeting future housing needs.	Disagree - the Council has identified sufficient capacity to meet requirements up to 2021 - in accordance with the guidance in PPS3. Further work on other LDF documents - the Site Allocations and Proposals Map Development Plan

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					Documents - can be expected to bring forward further proposals for long term housing capacity. No proposed change.
337	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Kerville Associates	Montagu Evans on behalf of Kerville Associates	Green Belt policy is unsound, no evidence submitted to justify the approach in policy EM2. The Core Strategy notes that a Green Belt review is being undertaken, but does not yet form part of the evidence base. As such, the Core Strategy is not informed by a formal review which identifies the likely areas of change or to assess the role, function and quality of the Green Belt. Without this evidence, it is unclear as to whether the current approach to make minor adjustments to the boundary at a later stage in the LDF process is the most appropriate. It is therefore considered to be unjustified.	The general context for the protection of Green Belt land is already laid down in national planning guidance and in London Plan policies. A review of the Council's Green Belt and other detailed land use designations is being carried out as part of work on the Site Allocations Development Plan Document. No proposed change.
388	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Royal Brompton & Harefield NHS Trust	CGMS Consulting	The trust supports the continued identification of Harefield Hospital as a major developed site in the Green Belt. However, the trust requests that within the supporting text paragraphs 8.19-8.26, it is also stated the detailed boundaries, scale and mix of uses within the Harefield Major Developed Site within the Green Belt will be reviewed as part of the Site Allocation DPD, given that during the plan period Harefield Hospital will be developed.	The review of Green Belt boundaries will cover the whole borough. It is unnecessary to make the detailed point regarding the hospital site in the Core Strategy text. The Council will continue to liaise with RBHT as their future proposals for Harefield Hospital are brought forward. No proposed change.
327	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	CEMEX	Drivers Jonas Deloitte	CEMEX notes that Policy EM2 of the Core Strategy seeks to maintain the current extent, hierarchy and strategic functions of the Green Belt. However, it does state that minor adjustments to the Green Belt will be undertaken in the Site Allocations DPD. CEMEX proposes that the site at Frog's Ditch Farm in Harlington should be used to meet future housing needs in the Borough and should be released from the Green Belt. The site provides an opportunity to enable the Borough to help meet their housing	Site specific issues will be addressed through the Site Allocations Development Plan Document.

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				targets in a sustainable location.	
378	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Planning Perspectives LLP		The Plan fails to categorically demonstrate how it will meet its adjusted housing target beyond 2021 and that there will not be a requirement to release Green Belt land to assist in achieving its target. If the Housing target cannot be met over the plan period then consideration needs to be given to strategic releases of Green Belt. Furthermore, the Green Belt Study has not been formally published and in such circumstances the evidence base on which the Core Strategy is predicated is considered to be questionable if not unsound and it has clearly not been demonstrated that the policies are deliverable.	Disagree - the Council has identified sufficient capacity to meet requirements up to 2021 in accordance with the guidance in PPS3. Further work on other LDF documents - the Site Allocations and Proposals Map Development Plan Documents - can be expected to bring forward further proposals for long term housing capacity. A review of existing Green Belt designations will form part of that work. No proposed change.
379	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Planning Perspectives LLP		The Green Belt and Green Chains should be reviewed to ensure that they achieve the priorities and objectives outlined in Policy EM2 and its supporting text. Without a thorough review of the existing Green Belt and Green Chains, it is considered that the Core Strategy may be unsound, as it does not demonstrate whether these areas meet the requirements identified in Policy EM2. The Core Strategy also fails to demonstrate how increased access to the Green Belt and Green Chain can be achieved in circumstances where large swathes are in private ownership. Models and case scenarios need to be examined and investigated to ensure that the Green Belt and Green Chains are made accessible to the general public through public/private partnerships. Unfortunately the absence of a sound evidence base in the formulation of the plan leaves it open to interpretation and clearly does not deliver the original aspirations of the plan. In these circumstances, the plan cannot be considered to be sound.	The broad approach on Green Belt and Green Chains in policy EM2 reflects national planning guidance and London Plan policies. A review of the Borough's Green Belt and other major land use designations is being undertaken as part of work for the Site Allocations Development Plan Document. No proposed change.

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382	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Planning Perspectives LLP		A thorough evidence base is needed to justify the existing extent of Green Belt and the Green Chain. This is particularly important in circumstances where there is uncertainty regarding the Borough's housing figures. This is needed before the Council can develop a strategy for the Green Belt and Green Chain.	The broad approach on Green Belt and Green Chains in policy EM2 reflects national planning guidance and London Plan policies. A review of the Borough's Green Belt and other major land use designations is being undertaken as part of the work for the Site Allocations Development Plan Document. The Council's housing trajectory meets the requirements of PPS3. No proposed change.
496	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Mr John McDonnell MP		The density of local housing development means that a stronger statement is needed that all Green Belt and local open spaces must be protected from incremental incursions. Similarly, allotments must be protected - and new ones sought. Provision for local sports activities needs greater emphasis. There should be more emphasis on upgrading existing open space.	<p>The Core Strategy covers a period of 15 years, and as such it is unlikely to be effective if it cannot deal with changing circumstances. The Core Strategy does not propose changes to the Borough's Green Belt boundary. This will be assessed in the emerging Site Allocation DPD. However, significant releases of Green Belt land are not considered to be appropriate and would not be supported.</p> <p>The provision of local sports activities is supported in Policies C11 and C12. Similarly, Policy EM4 seeks the protection and other informal recreational spaces. It is anticipated that the Site Allocations Development Plan Document will allocate specific sites for formal and informal recreational spaces.</p> <p>No proposed change.</p>
441	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Royal Brompton & Harefield NHS Trust	DP9 on behalf of Royal Brompton & Harefield NHS Foundation Trust	Status of the Hospital as a major developed site in the Green Belt is welcomed. Core Strategy should acknowledge opportunities for infilling. Site allocations DPD should carefully consider adjustments to Green Belt. The Trust would like to be closely involved in the Site Allocations DPD and a pragmatic approach should be adopted to the hospital site.	<p>Support welcomed. As a result of the status of the hospital being a major developed site in the Green Belt, it affords it the opportunity for infilling to take place in accordance with the criteria contained in PPG2 (and the emerging Development Management DPD).</p> <p>Additional growth at Harefield Hospital would need to be discussed as part of work for the Site Allocations Development Plan Document. No proposed change.</p>

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416	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Individual		<p>Policy EM2 starts “The Council will seek to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains.....</p> <p>I am not happy with the term ‘seek to’ in the first paragraph of this policy. I would expect my council to state positively that they are going to maintain the “current extent.... of the Green Belt...” You are either going to do something or not do something, not something in between. The words ‘seek to’, is a meaningless phrase and would not make this policy at all effective.</p> <p>Please delete the words ‘seek to’ from the first paragraph of Policy EM2 so that the policy reads:</p> <p>The Council will maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains.....</p>	<p>The Core Strategy covers a period of 15 years, and as such it is unlikely to be effective if it cannot deal with changing circumstances. The work "seeks" allows that flexibility and provides deliverability and monitoring of the policy as required by Planning Policy Statement 12 (PPS12).</p> <p>No proposed change.</p>
435	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Individual		<p>First paragraph - change to state the Council will maintain the current extent of the Green Belt. Second paragraph - change to state that no adjustments will be made to the Green Belt. Fourth paragraph - change to state that the Council will firmly resist any proposals for development in the Green Belt.</p>	<p>The Core Strategy covers a period of 15 years, and as such it is unlikely to be effective if it cannot deal with changing circumstances. The work "seeks" allows that flexibility and provides deliverability and monitoring of the policy as required by Planning Policy Statement 12 (PPS12).</p> <p>Any development proposal involving the loss of Green Belt land will be considered on its merit and in accordance to criteria contained in PPG2 and the emerging Development Management DPD.</p> <p>No proposed change.</p>
569	Policy EM2: Green Belt, Metropolitan	Individual		LATE SUBMISSION:	All policies have to be flexible in their approach to meet national planning guidance requirements.

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	Open Land and Green Chains			Rather than "will seek to" should state : "...The Council must maintain..."	The work "seeks" allows that flexibility. No proposed change.
451	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Henry Streeter Automotive Ltd	CGMS Ltd on behalf of Henry Streeter Automotive Ltd	The plan fails to deal with a strategic reassessment of the Green Belt boundaries. Strategic changes to the Green belt should be addressed in the Core Strategy, not at some later date.	The Core Strategy does not propose changes to the Borough's Green Belt boundary. This will be assessed in the emerging Site Allocation DPD. However, significant releases of Green Belt land are not considered to be appropriate and would not be supported.
485	8.28	Mayor of London	Greater London Authority	Blue Ribbon Network - the Mayor considers the BRN as 'Green Infrastructure' rather than 'open space' (see GLA Note to the EIP Panel clarifying the relationship between green infrastructure and open space http://www.london.gov.uk/sites/default/files/eip/E111GLAMatter71.pdf)	Agreed - reference to 'open space' to be replaced by 'green infrastructure' in paragraphs 8.28 and 8.30.
482	8.31	British Waterways		<p>We are very pleased that a dedicated policy has been introduced to address the value and significance of the waterways in the borough.</p> <p>We would suggest expanding the first point here to:</p> <ul style="list-style-type: none"> •The need to improve the quality of and access to open spaces, rivers and canals for a wide variety of uses, exploiting their full potential for the benefit of all groups of people in the community; <p>Para 8.37 We support this statement.</p>	<p>The policy already provides a broad approach to increasing access to the borough's Blue Ribbon Network for a variety of uses. Its value to the borough's open space network is stressed - e.g. the Grand Union Canal is of regional importance as it crosses several local authority boundaries - and its multi-functional role is also highlighted. The policies in the Core Strategy recognise this and a number of policies support its implementation - e.g. policies covering landscape, flood risk, open space, sport & leisure and sustainable transport.</p> <p>The Strategy also notes that the Council is keen to ensure that canals benefit from any waterside development. No proposed change.</p>
43	8.32	British Waterways		The Grand Union Canal does not present the same flood risk as other rivers and tributaries in the borough.	Noted. No proposed change.
44	Policy EM3: Blue Ribbon Network	British Waterways		We strongly support this policy and the intention for a waterspace strategy for the Grand Union Canal, which will help to realise its potential in	The Section 8 on Environmental Management carries the main section on the borough's "Blue Ribbon Network". It notes that the borough has 20

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				<p>supporting the strategic aims of the Core Strategy for healthy, sustainable communities. However, the wording of policy EM3 could be amended to highlight the multi-functional role of the waterways, which represents opportunities for not just wildlife habitats, visual amenity, transport and leisure, but also tourism, education and promoting skills and training, such as through volunteering projects, both corporate and community, and community payback schemes through collaboration with probation services. We would recommend the policy read:</p> <p>"The Council will continue to promote and contribute to the positive enhancement of the multi-functional strategic river and canal corridors, in supporting the local character, visual amenity and furthering opportunities for ecology, transportation, leisure opportunities, sustainability, education, tourism and skills training. This will be supported by the Biodiversity Action Plan and the Thames River Basin Management Plan, and developer contributions where appropriate."</p> <p>The Council will collaborate with adjacent local authorities to ensure that Hillingdon's river and canal corridors complement and link with cross boundary corridors.</p> <p>Under Implementation, we would suggest an amendment to the final point to read:</p> <p>"•Improving access to and the quality of Hillingdon's river and canal corridors, thereby providing a healthier lifestyle accessible to all, through positive design of waterside developments and developer contributions."</p> <p>Under Monitoring, we would not support the</p>	<p>km of the Grand Union Canal (GUC) - including the Main Line, Paddington and Slough Arms. Their value to the borough's open space network is stressed - e.g. the GUC is of regional importance as it crosses several local authority boundaries. The multi-functional role played by the GUC (and the rest of the Blue Ribbon network) is also highlighted. The policies in the Core Strategy recognise this and a number of policies support its implementation - e.g. policies covering landscape, flood risk, open space, sport & leisure and sustainable transport. The Strategy also notes that the Council is keen to ensure that canals benefit from any waterside development.</p> <p>The Council wishes to improve access to the Canal as a leisure resource and does wish to monitor the success of providing new access and use of the system in future regeneration initiatives. No proposed change.</p>

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				proposal for "Number of new and improved access points to the river and canal network" as a measure of success, as this could be misleading and does not necessarily guarantee high quality water environments. British Waterways monitors pedestrian counters along our network to count visitor numbers, and also undertakes customer surveys. The amount of waterborne freight or other boat traffic could also be monitored as a way of assessing the success of the policy.	
120	Policy EM3: Blue Ribbon Network	Environment Agency		We support Policy EM3, its Implementation and Monitoring. We also support the inclusion of Map 8.2 River and Canal Corridors.	Support welcomed.
159	Policy EM3: Blue Ribbon Network	Hayes Town Partnership		<p>In order to achieve their full potential there is a need for a specific canals strategy. This would include the following elements:</p> <ul style="list-style-type: none"> • Development of vibrant water fronts in both Hayes and West Drayton which can become open and attractive focal points in our town centres. • Potential to replace old and worn out buildings with modern well designed schemes that could include housing, offices and public services. • Exploitation of local heritage and retention and sensitive development of old features such as Shackles Dock in Hayes Town. • Temporary moorings for visitors and permanent fully serviced moorings for people to live in the heart of our town centres. • Use of the canal for freight transport, trip boats, water taxis and canoes. • Improved access for pedestrians and cyclists 	The Council will bring forward proposals for making full use of the Blue Ribbon Network as part of its subsequent Site Allocations, Proposals Map and Heathrow Area Development Plan Documents. No proposed change.

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				<p>together with purpose-built walking and cycling routes which are traffic free, quiet and safe</p> <ul style="list-style-type: none"> • Places to fish, to enjoy nature and to relax. • Recycling of canal water for sustainable cooling for factories and offices. 	
370	Policy EM3: Blue Ribbon Network	Bell Farm Christian Centre		No comments	None
510	Policy EM3: Blue Ribbon Network	Councillor A Macdonald		<p>Policy EM3 and Paragraph 8.105</p> <p>The Core Strategy does not set out adequately the full range of opportunities the canals can offer throughout the borough - it should give greater detail on such issues as water quality; transport (people & materials); leisure - where the canals could be opened up to residents in Hayes, West Drayton & Yiewsley; tourism and business / job opportunities alongside the canals - notably by increasing links from the canals to local historical and cultural sites.</p>	<p>The importance of the canal and the opportunities it offers are well documented in the Core Strategy. Section 8 on Environmental Management carries the main section on the borough's "Blue Ribbon Network". It notes that the borough has 20 km of the Grand Union Canal (GUC) - including the Main Line, Paddington and Slough Arms. Their value to the borough's open space network is stressed - e.g. the GUC is of regional importance as it crosses several local authority boundaries. The multi-functional role played by the GUC (and the rest of the Blue Ribbon network) is also highlighted. The policies in the Core Strategy recognise this and a number of policies support its implementation - e.g. policies covering landscape, flood risk, open space, sport & leisure and sustainable transport.</p> <p>The Strategy also notes that the Council is keen to ensure that canals benefit from any waterside development - policy EM3 states: "The Council will continue to promote and contribute to the positive enhancement of the strategic river and canal corridors and the associated wildlife and habitats through the Biodiversity Action Plan and the Thames River Basin Management Plan, and developer contributions where appropriate. The Council will continue to enhance the local character, visual amenity, ecology, transportation,</p>

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					<p>leisure opportunities and sustainable access to rivers and canals. The Council will collaborate with adjacent local authorities to ensure that Hillingdon's river and canal corridors complement and link with cross boundary corridors."</p> <p>Elsewhere in the Core Strategy the value of the GUC as a having potential to offer attractive waterside locations for regeneration scheme is noted at Table 5.3 where it is considered to have particular importance in the regeneration of the Hayes-West Drayton Corridor and in Hayes Town Centre where the canal "...offers an attractive and sustainable alternative for pedestrian and cycle routes through the area."</p> <p>Exploiting and exploring the full range of opportunities the canals can offer is outside the scope of this document as they have to be carried out in conjunction with other external bodies including statutory bodies charged with such responsibility. The Council will deal with any future proposals to exploiting their potential through the relevant Development Plan Document (DPD) and the usual development management process and in conjunction with the British Waterways. No proposed change.</p>
15	Policy EM4: Open Space and Informal Recreation	Individual		No response to Hayes End Community Park Green Flag failure. No further action - why? Public survey has shown demand in the park for 1) lockable gates, 2) public toilets, 3) skate board and BMX ramp, 4) quiet area, 5) dog training area and 6) a defined cycle track. These are necessary to comply with public concerns and health and safety / environmental issues. The community centre in the park should be improved.	<p>These detailed park management matters are not covered in the Core Strategy - which is a strategic level planning policy document. These concerns will be relayed to the relevant Council department for consideration.</p> <p>No proposed change.</p>
143	Policy EM4: Open Space and Informal	Hillingdon Inter Faith Network		Policy EM4 and the related implementation markers need to be more robust in addressing	Policy EM4 does state that the Council will extend the network of open spaces to meet local

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	Recreation			the need for additional open spaces.	community needs - and require local development proposals to address deficiencies in the quantity of open spaces. No proposed change. Elsewhere in the Strategy policy EM 5 looks towards using the development management process to securing additional leisure spaces that meet local community needs. The Council consider this to be sufficient a policy framework expressing its intention to address the need for further open space - and its Vision statement notes that an objective for the Strategy is that more residents will have access to open space during the plan period. No proposed change.
349	Policy EM4: Open Space and Informal Recreation	Individual		The Council should state it will not allow the closure of current allotments and will work to expand them where possible and create new sites where there is a need.	The Core Strategy has a more general commitment to preventing the loss of open space generally across the borough at policy EM4; other policies in the Strategy effectively give and additional protection - e.g. policy EM5 looks to protect spaces for leisure activities within walking distance of people's homes and policy CI 1 seeks to prevent the loss of uses which constitute community infrastructure - which might include local allotments. No proposed change.
280	Policy EM4: Open Space and Informal Recreation	Legal and General Property Partners (Life Fund) Ltd	Drivers Jonas Deloitte on behalf of Legal & General Property Partners (Life Fund) Ltd	The policy should acknowledge that there will be occasions when development can be permitted despite significant adverse environmental or quality of life impacts as it helps to meet other important planning objectives.	Disagree - there is no need to highlight possible exceptions being made in one particular Core Strategy policy. Development proposals will be considered on their individual merits and applied flexibly - to meet with the requirements of national planning policy guidance. No proposed change.
371	Policy EM4: Open Space and Informal Recreation	Bell Farm Christian Centre		The policy does not provide for the provision of additional land for allotment gardening. Would like to see the provision of additional land for allotment gardening.	The Core Strategy sets out the Council's broad strategic level planning policies to meet its key land use challenges over the next fifteen years. Further work for the Local Development Framework will consider the need for various land uses to meet identified detailed community needs in the borough - e.g. housing, leisure and recreation. Where opportunities for further open space use such as allotments can be identified

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					these will be brought forward in a Site Allocations or Proposals Map Development Plan Document. No proposed change.
383	Policy EM4: Open Space and Informal Recreation	Planning Perspectives LLP		Policy EM4 is welcomed but needs to be grounded on a sound evidence base, identifying existing areas of deficiency. It also needs to acknowledge that accessibility to existing green spaces is restricted in many instances. Strategies need to be developed to open up access to these spaces in order to address existing deficiencies. Simply safeguarding existing areas of open space is not sufficient to address areas of deficiency. In order for this to happen, alternative models need to be looked at to deliver greater access and meet deficiencies in circumstances where public sector finances are under strain.	The Council has an Open Space study in preparation which can be expected to identify areas of open space deficiency in the borough and which will support the policies in the Core Strategy and inform further preparation of the Local Development Framework. No proposed change.
91	Policy EM4: Open Space and Informal Recreation	Hillingdon Play Association		<p>We want to see play being explicitly addressed in this policy. The London Plan states that LDFs 'should address this by providing policies on play provision, including for high quality design.</p> <p>"We therefore propose the following wording to be included in Policy EM4:</p> <p>'The Council understands the cross-cutting nature of children and young people's play, and will therefore develop a new play strategy. It will ensure this policy for play provision is integrated into this overall open space strategy and every other relevant strategy. Consultation with children and young people in the different parts of the borough will be undertaken, about the design of new provision and to understand their changing needs. The Council will make appropriate provision for different age groups, and for providing environmentally friendly and natural designs including roof gardens and indoor space for young children. It will also make</p>	<p>The Core Strategy does not need to repeat the provisions of The London Plan. The issue of play space is addressed in the infrastructure schedule at Appendix 2 and also in the emerging Open Space Strategy as areas of public open space. The detail of how additional play space will be provided will be addressed in forthcoming DMDPD, however it is suggested that an additional sentence is added to policy 8.64 as follows:</p> <p>Play space is classified as public open space and detailed policies on this issue will be contained in the forthcoming DMDPD. No proposed change.</p>

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				arrangements for management and maintenance of play and communal facilities. It will ensure that the Council Planning Department works with a wide variety of relevant community groups such as Hillingdon Play Association to integrate play in all areas of provision – housing, transport etc' . "	
570	Policy EM4: Open Space and Informal Recreation	Individual		LATE SUBMISSION: The basis for the statement that there will be a presumption against a net loss of open space in the borough is unclear. Rather than "will seek to protect" should state: "...The Council must protect..."	The presumption against the loss of open space places a significant level of protection on this valuable resource. In order to justify release developers would be required to demonstrate that no other suitable sites were available. No proposed change.
350	Policy EM5: Sport and Leisure	Individual		Paragraph 3 - not robust and needs to state that the Council will ensure that where there is a lack of private garden space provision will be sought for communal gardens with areas to grow fruit or vegetables - or allotments will be created.	Policy EM4 in the Core Strategy already requires developers to address local deficiencies in the quantity and accessibility of local open space. Rather than specify what should be provided the Council would wish to retain flexibility in the policy and use the development management process to achieve whatever any local community needs may be at the time. The Council would note that it intends producing detailed garden space provision standards as part of work on a subsequent Development Management Development Plan Document. No proposed change.
360	Policy EM5: Sport and Leisure	Hayes Town Partnership		Policy EM5 should be amended to include specific reference to physical exercise other than sport including walking and cycling.	Policy 5 already refers to "active sports and active lifestyle" which encompasses physical exercise other than sport (including walking and cycling). No proposed change.
429	Policy EM5: Sport and Leisure	Individual		Use of the words "the Council will" is too frequent - it has not always been able to achieve its aims. The Strategy is not specific enough in detailing where future services (e.g. for sport and leisure) will be provided - and these are not provided within easy walking distance of peoples' homes. Children's play spaces are only	The Core Strategy is a broad policy document and later parts of the Local Development Framework can be expected to come forward with detailed proposals for further leisure, recreation and playspace or community needs. It is anticipated that the Site Allocations Development Plan Document will allocate specific sites for

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				<p>encouraged in the Strategy - there should be much greater detail on how they will be supported, renovated and created. No mention is made of the need for provision for teenagers or of youth centres - which are particularly needed in the south of the borough. The wording "youth facilities" is too ambiguous - and should be replaced with youth centres if that is what is envisaged. Loss of a facility in one area and its reprovision elsewhere in the borough results in a community being worse off - this is not addressed in the Strategy.</p>	<p>formal and informal recreational spaces. Criteria for the siting or retention of leisure / recreational centres will be considered in the proposed Development Management DPP. No proposed change.</p>
571	Policy EM5: Sport and Leisure	Individual		<p>LATE SUBMISSION: Rather than "Providing opportunities for improved cycleways" should state : "...Provide improved cycleways..."</p>	<p>The Council is not always responsible for direct provision of cycleway. The proposed policy as worded refers to creating opportunities for the creation of cycleway by third party organisations such as developers. No proposed change.</p>
221	Policy EM6: Flood Risk Management	Environment Agency		<p>We support Policy EM6, its Implementation and Monitoring. We also support paragraphs 8.76-8.93 and the inclusion of Map 8.3 Flood Risk Assessment.</p>	<p>Support welcomed.</p>
222	Policy EM6: Flood Risk Management	Heathrow Airport Ltd		<p>We object to the wording of final paragraph of proposed Policy EM6: Flood Risk Management. We believe it is essential that there are caveats to implementation of this policy to reflect the practical implications of implementing Sustainable Urban Drainage Systems (SUDS). There would be two possible approaches to this:</p> <ol style="list-style-type: none"> 1. We would encourage the Council to adopt the approach proposed in the Draft Replacement London Plan, Policy 5.13 which suggests "Development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so." 2. HAL strongly feel that the policy could acknowledge the unique circumstances 	<p>Site specific issues relating to SUDS will be considered through the usual development management process in accordance with national and regional policies. No proposed change.</p>

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				applicable at Heathrow and the existing campus wide approach to flood risk management and pollution control. On that basis, SUDs would not be applicable to most developments at the Airport.	
560	Policy EM6: Flood Risk Management	Individual		LATE SUBMISSION: Rather than "encourage" should state: "The Council must use sustainable...".	Agreed in part as to the choice of word used. The Council cannot 'require' developers in all cases. There has to be flexibility built into the policy. Nevertheless, Policy EM6 has been changed to read: "The Council will require all development across the borough to use sustainable urban drainage systems (SUDS) unless demonstrated that it is not viable. The Council will encourage SUDS to be linked to water efficiency methods. The Council may require developer contributions to guarantee the long term maintenance and performance of SUDS is to an appropriate standard".
472	Policy EM6: Flood Risk Management	Mayor of London	Greater London Authority	The Council seeks to 'encourage' sustainable urban drainage systems in policy EM6 (Flood risk). This wording appears to be weak, considering that the Flood and Water Management Act 2010 gives the London boroughs the responsibility to ensure the use of sustainable drainage in new developments. The sustainable urban drainage systems should be "required."	Agreed - change EM6 text to "The Council will require all development across the borough to use sustainable urban drainage systems (SUDS) unless demonstrated that it is not viable. The Council will encourage SUDS to be linked to water efficiency methods. The Council may require developer contributions to guarantee the long term maintenance and performance of SUDS is to an appropriate standard".
486	Policy EM6: Flood Risk Management	Mayor of London	Greater London Authority	The Council seeks to 'encourage' rather than "require" sustainable urban drainage systems. This wording appears to be weak, considering that the Flood and Water Management Act 2010 gives the London boroughs the responsibility to ensure the use of sustainable drainage in new developments.	Agreed - change EM6 text to "The Council will require all development across the borough to use sustainable urban drainage systems (SUDS) unless demonstrated that it is not viable. The Council will encourage SUDS to be linked to water efficiency methods. The Council may require developer contributions to guarantee the long term maintenance and performance of SUDS is to an appropriate standard".

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329		London Geodiversity Partnership		The Partnership welcomes your recognition of areas of geological importance and the need to protect them. Hillingdon already contains one geological SSSI at Harefield Pit. This is potentially an important site for research and education. At present it is threatened by vegetation and the build up of screen. The Partnership is hoping to assist in improving this site with the Harrow and Hillingdon Geological Society. We welcome the inclusion of The Gravel Pits as a Regionally Important Geological and Geomorphological Site (RIGS). This site is recreation land close to Northwood, which is an excellent site for school education and interpretation and already has an information board describing the pits.	Support welcomed.
223	Map 8.4	Heathrow Airport Ltd		HAL object to the designation of land at Terminal 5 as a "Nature Conservation Site of Metropolitan or Borough Grade 1 Importance". The area defined is the former Perry Oaks site but is now all operational land as part of Heathrow Airport and does not have any particular nature conservation importance.	The Council is aware of the need to reconsider the designation of the land at Terminal 5 and will bring forward any proposed detailed changes as part of the work for the Site Allocations Development Plan Document. No proposed change.
89	Policy EM7: Biodiversity and Geological Conservation	Natural England London Region		Point 2 It is our opinion that all SINCS regardless of grade should be protected from adverse development. In principal, we do not support the development of SINCS. New developments should seek at first to protect the natural environment, secondly mitigate against adverse effects and thirdly seek to enhance and protect biodiversity. With this in mind, we recommend that this section be re-worded to state that all SINCS within the borough will be protected from any adverse impacts and loss.	Disagree - it is not possible or feasible to provide the same level of protection for all SINCS. SINCS have been designated for a variety of reasons, and given a hierarchical grade. Local and Grade 2 level SINCS should not command the same level of protection as Grade 1 and Metropolitan designations. The London Plan requires nature conservation sites to be afforded a level of protection commensurate with their status. Policy EM7 provides suitable criteria to ensure the borough's ecological features are properly protected allowing for compensation where necessary.
90	Policy EM7: Biodiversity and	Natural England		Point 6	Agreed - add point 7:

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	Geological Conservation	London Region		We are encouraged by the reference to living roofs and walls, however the provision of other greening measures (such as rain gardens and SUDSs) which can contribute to the development of ecological connectivity are not included. GI encompasses all of these measures and we therefore recommend that GI is reference accordingly.	"The use of sustainable drainage systems that promote ecological connectivity and natural habitats".
122	Policy EM7: Biodiversity and Geological Conservation	Environment Agency		We support Policy EM7, in particular point 6 which champions the provision of green roofs and living walls.	Support welcomed
351	Policy EM7: Biodiversity and Geological Conservation	Individual		The Council should seek to provide nectar bars that create a joined link across the borough to ensure the protection of valuable insects.	Disagree - the requirement for nectar bars is too detailed for the Core Strategy. The requirement for considering ecological enhancements is already included within the Core Strategy without specifying the specifics. The development management document (DMDPD) will provide more specific details of what is required in terms of ecological improvements. The Council will consider the use of nectar bars as part of this more detailed policy document. No proposed change.
330	Policy EM7: Biodiversity and Geological Conservation	London Geodiversity Partnership		Policy should include the following wording "Planning permission will be conditioned to conserve and maintain important geological features and, in cases where no permanent features can be retained, temporary geological exposures should be recorded."	Disagree - The Core Strategy is not the tool for setting specific conditions for planning conditions as suggested. Furthermore, the Council needs to ensure each site is considered on a site by site basis. Decisions on planning applications need to be made at the detailed proposal stage when more information is available. No proposed change.
572	Policy EM7: Biodiversity and Geological Conservation	Individual		LATE SUBMISSION: Rather than "The Council will seek to designate..." should state: "...The Council must designate...". The statement at paragraph 2 that harmful impacts will be mitigated through appropriate compensation weakens the	Disagree - It is not possible or feasible to provide the same level of protection for all SINCS. SINCS have been designated for a variety of reasons, and given a hierarchical grade. Local and Grade 2 level SINCS should not command the same level of protection as Grade 1 and Metropolitan designations. The London Plan requires nature

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				protection from harmful impacts for Borough Grade 2 and Sites of Local Importance for biodiversity and geological conservation.	conservations sites to be afforded a level of protection commensurate with their status. Policy EM7 provides suitable criteria to ensure the borough's ecological features are properly protected allowing for compensation where necessary. No proposed change.
123	8.107	Environment Agency		We support paragraphs 8.107- 8.110 as they highlight the importance of the ground water beneath the borough.	Support welcomed.
99	Map 8.5	Northwood Residents Association		Map 8.5 (page 113) and associated paragraphs make no mention of aircraft flight paths and their attendant noise.	In the text accompanying Map 8.5 the Council draws attention to the issue of aircraft noise at paragraph 8.121. The Council opposes any further capacity increase at Heathrow, including any further runway expansion. The general approach taken to noise pollution in the Core Strategy is set out at policy EM8. No proposed change.
124	8.135	Heathrow Airport Ltd		Refers to Heathrow Opportunity Area dpd - elsewhere this is denoted as Heathrow Area dpd - should be a consistent title used throughout.	Agreed - change reference to "Heathrow Opportunity Area DPD" in the document to "Heathrow Area DPD" for consistency and also to tally with the title of the development plan document in the published Local Development Scheme.
124	Policy EM8: Land, Water, Air and Noise	Environment Agency		We support Policy EM8 in particular the sections on water Quality and Land contamination.	Support welcomed.
257	Policy EM8: Land, Water, Air and Noise	Warren Park Residents Association		<p>Any new development should not only protect the environment but contribute actively to improvement of air quality, in the area.</p> <p>In policy EM8 at paragraph 3: "Council seeks" should be replaced by "Council will" to make the objective more focused and challenging. In addition, setting measurable targets for reduction of pollutants and evaluating outcomes is more likely to protect the environment and improve air quality.</p>	Where practical the Council will look towards encouraging more sustainable modes of access to new developments to minimise the need for car use and thereby aim to reduce potential air pollution. This will be allied to its seeking use of renewable energy in new developments where practicable - again partly with the aim of reducing air pollution. Whilst understanding the request that the wording in the policy should be made stronger, the Council is required by national planning guidance to retain a degree of flexibility in its policies and does not propose to amend the

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					wording used. No proposed change.
561	Policy EM8: Land, Water, Air and Noise	Individual		<p>LATE SUBMISSION:</p> <p>Water Quality - rather than "seek" should state : "the Council must safeguard...". Ponds should have been included in the Source Protection Zones list. Air Quality - rather than "seek" should state : "the Council must safeguard..." and "...must reduce the levels of pollutants". Noise - rather than "seek" should state : "the Council must identify..."; rather than "seek" should state : "the Council must ensure...". The word mitigated is not sufficient - the Strategy should state that noise must be controlled and stopped. Land Contamination - rather than "expect" should state : "the Council must have proposals...". Similarly, the words "Major development proposals will be expected to demonstrate..." should be replaced with "...must demonstrate...".</p>	Disagree - The policy provides sufficient strategic aims for more detailed policies to be included within the Development Management Development Plan Document. The policy also provides an approach to be adopted on a site specific basis. No proposed change.
471	Policy EM8: Land, Water, Air and Noise	Mayor of London	Greater London Authority	<p>Water resources/supply is not covered at all within the policy EM8. – This needs to be included to provide a 'hook' for the requirement of water efficiency measures. The only mention of water resources is in para 8.129, but the 105 litres per person per day target for residential (which is in line with the London Plan) should be in the policy rather than the supporting text (or the policy should refer to the relevant London Plan policy - 4A.16 (DRLP 5.15))</p> <p>The water quality aspect of the policy does not explicitly relate to the role/impact of development. Highlighting that adequate sewerage infrastructure capacity has to be available would represent a tangible addition (or a reference to the relevant London Plan policy 4A.17 (DRLP 5.14))</p>	<p>Agree in part. Add to policy:</p> <p>Water Resources:</p> <p>The Council will require that all new development demonstrates the incorporation of water efficiency measures within new development to reduce the rising demand on potable water. All new development must incorporate water recycling and collection facilities unless it can be demonstrated it is not appropriate. For residential developments, the Council will require applicants to demonstrate that water consumption will not surpass 105 litres per person per day.</p> <p>Comments on Water Quality:</p> <p>The Development Management Development Plan Document will use the Core Strategy</p>

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					wording as a basis for more detailed protection measures.
6	8.146	Mineral Products Association		Quantify the contribution towards delivering the West London apportionment (and of any revised apportionment emerging from the Minor Alterations to the London Plan process) .	Agreed - following publication of the Panel Report on the draft Replacement London Plan the Council accept that there is now an agreed annual target for mineral extraction in the London Plan and this should be reflected in the Core Strategy. Paragraph 8.146 to be amended by adding wording at end of bullet point to read:"... of 250 000 tonnes per annum upto 2031."
13	8.148	Mineral Products Association		A new policy should be inserted to deal with secondary and recycled aggregates, as follows: The Council will give priority to the production and supply of recycled and secondary aggregates. Provision will be made through the Site Allocations DPD for a network of permanent and long term temporary recycling facilities across the Borough which will make a significant contribution to the production of recycled and secondary aggregates. Suitable locations for permanent recycled and secondary aggregates facilities include: general industrial land; waste transfer stations; permanent waste management sites; railheads Suitable locations for temporary recycled and secondary aggregates facilities include: mineral sites & major development areas (brownfield land). Also, a new policy should be inserted to deal with railhead capacity, as follows: The sustainable transport of minerals will be encouraged. Railheads and ancillary facilities will be identified, encouraged and safeguarded. Development that could prejudice the potential use of the protected transport facility for the transport of minerals will not be permitted.	Accept in part - to reflect the requirements of Minerals Planning Statement 1 and the London Plan - by inserting section at end of 8.148 to read: "Provision for the production and supply of recycled and secondary aggregates will be made through the Site Allocations DPD whereby permanent and long term temporary recycling facilities across the Borough which will make a significant contribution to the production of recycled and secondary aggregates will be identified. Railheads and ancillary facilities will be identified, encouraged and safeguarded to provide for the sustainable transport of minerals."
353	Map 8.6	SITA UK		We welcome the identification of 'minerals areas for safeguarding' in Map 8.6 of the Core Strategy. However, we'd welcome clarification of	For clarification the Council proposes to amend the wording of policy EM9 to better reflect the guidance in Minerals Planning Statement 1.

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				<p>the areas identified at paragraph 8.151 as 'Land west of the present Harmondsworth Quarry' and 'Land north of the village of Harmondsworth' since the areas outlined in Map 8.6 of the Core Strategy do not match Map 8.3 (Suggested Preferred Areas) of the Minerals Technical Background Report (2008). We would welcome further discussion on this point.</p>	<p>Policy to read: "The Council will safeguard mineral resources in Hillingdon from other forms of development that would prejudice future mineral extraction. The Council will define the 'Mineral Safeguarding Area' in the Site Allocations DPD based on the geologically mapped sand and gravel resource that is considered to be of current and future economic importance. Major developments in the Area will only be permitted where it has been demonstrated that</p> <ul style="list-style-type: none"> a. the mineral concerned is no longer of any value or potential value, or b. the mineral can be extracted prior to the development taking place, or c. the development will not inhibit extraction if required in the future, or d. there is an overriding need for the development and prior extraction cannot be reasonably undertaken, or e. the development is allocated in a local development plan document, or f. the development is not incompatible. <p>The Council will also safeguard areas within 250m of the Preferred Mineral Safeguarding Area as a buffer for the future extraction of the sand and gravel reserve, to safeguard the resource from the impact of 'proximal development'."</p> <p>Map 8.6 in the Core Strategy is diagrammatic - if it requires further change the Council will make any necessary drafting change to match the background technical report.</p>

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7	8.152	Mineral Products Association		The DPD should identify Mineral Safeguarding Areas (para 13, MPS1) including following agreed methodologies to identify MSAs which should identify the entire sand and gravel resource that needs to be safeguarded.	Detailed site allocations for minerals and other uses in the borough will be brought forward as part of the Site Allocations and Proposals Map Development Plan Documents. In addition, detailed policy on Safeguarding Mineral Areas will be brought forward in the emerging Development Management DPD. No proposed change.
8	8.152	Mineral Products Association		The DPD should identify Mineral Safeguarding Areas (para 13, MPS1) including following agreed methodologies (see below) to identify MSAs which should identify the entire sand and gravel resource that needs to be safeguarded. This comment reflects our previous comments on the Consultation Draft in June 2010. The 2008 BGS A Guide to Mineral Safeguarding in England was produced to facilitate a more sustainable approach to mineral safeguarding. This allows a variety of local conditions to be taken into account but according to a common format and approach. This approach starts with the assumption that all minerals of economic importance should be safeguarded against development and identified so that mineral issues can be taken into account in the development process. In other words, safeguarding should be resource driven rather than constraint driven. The BGS document states that, "Effective safeguarding of mineral resources for the long term requires their definition be based principally upon the best available geological information. Mineral safeguarding should not be curtailed by other planning designations, such as urban areas and environmental designations without sound justification. Defining MSAs alongside environmental and cultural designations will ensure that the impact of any proposed development on mineral resources will be taken into account alongside other planning	Detailed site allocations for minerals and other uses in the borough will be brought forward as part of the Site Allocations and Proposals Map Development Plan Documents. In addition, detailed policy on Safeguarding Mineral Areas will be brought forward in the emerging Development Management DPD. No proposed change.

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				<p>considerations. In urban areas, MPAs should define MSAs where they consider this will be of particular value. This might comprise highlighting the potential for extracting valuable or scarce minerals (such as Etruria Formation clays, coal or river terrace sand and gravel resources) beneath large regeneration projects, brownfield sites and reservoirs." (page 15).</p>	
9	Policy EM9: Safeguarding Mineral Resources	Mineral Products Association		<p>Policy EM9 should also set out how the safeguarding of the resource is to be implemented by stating in what circumstances development that may sterilise the resource may be permitted. Our comments are similar to those made on the previous Consultation Draft in June 2010: Policy EM9 should be amended as follows (additions in bold; deletions in strikethrough); The Council will safeguard mineral resources in Hillingdon from other forms of development that would prejudice future mineral extraction. The Council will define the 'Mineral Safeguarding Area' in the Site Allocations DPD based on the geologically mapped sand and gravel resource that is considered to be of current and future economic importance. Major developments in the Area will only be permitted where it has been demonstrated that a. the mineral concerned is no longer of any value or potential value, or b. the mineral can be extracted prior to the development taking place, or c. the development will not inhibit extraction if required in the future, or d. there is an overriding need for the development and prior extraction cannot be reasonably undertaken, or e. the development is allocated in a local development plan document, or f. the development is not incompatible. The Council will also safeguard areas within 250m of the Preferred Mineral Safeguarding Area as a buffer for the future extraction of the sand and gravel reserve, to safeguard the resource from</p>	<p>Agreed - to amend wording of policy EM9 to better reflect the guidance in Minerals Planning Statement 1. Policy to read:</p> <p>"The Council will safeguard mineral resources in Hillingdon from other forms of development that would prejudice future mineral extraction. The Council will define the 'Mineral Safeguarding Area' in the Site Allocations DPD based on the geologically mapped sand and gravel resource that is considered to be of current and future economic importance. Major developments in the Area will only be permitted where it has been demonstrated that</p> <ul style="list-style-type: none"> a. the mineral concerned is no longer of any value or potential value, or b. the mineral can be extracted prior to the development taking place, or c. the development will not inhibit extraction if required in the future, or d. there is an overriding need for the development and prior extraction cannot be reasonably undertaken, or e. the development is allocated in a local development plan document, or

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				the impact of 'proximal development'.	f. the development is not incompatible. The Council will also safeguard areas within 250m of the Preferred Mineral Safeguarding Area as a buffer for the future extraction of the sand and gravel reserve, to safeguard the resource from the impact of 'proximal development'."
109	Policy EM9: Safeguarding Mineral Resources	Lafarge Aggregates Ltd		We feel that Policy EM9 does not sufficiently cover the aspects of MPS1 - there is no reference to the safeguarding of facilities for the transport of aggregates or processing facilities which is a clear requirement of MPS1.	Agreed - this has been raised by another representation, and to clarify how the Council intends to meet the requirements of MPS1 and the London Plan, additional wording (in response to representation 13) is to be added at the end of paragraph 8.148 to clarify that: "Provision for the production and supply of recycled and secondary aggregates will be made through the Site Allocations DPD whereby permanent and long term temporary recycling facilities across the Borough which will make a significant contribution to the production of recycled and secondary aggregates will be identified. Railheads and ancillary facilities will be identified, encouraged and safeguarded to provide for the sustainable transport of minerals." .
324	Policy EM9: Safeguarding Mineral Resources	Henry Streeter (Sand and Ballast) Ltd	Consultant Planning Group	The current position is described (page 38) and includes reference to the associated businesses, including hotels, that are located around the perimeter just outside the airport boundary, where there is a "... requirement to balance demand for hotel and employment uses in order to manage economic growth" (page 38). Further "There is particular pressure on employment land for hotel uses in the Heathrow area and hotel development will be directed to locations outside the airport boundary and outside the designated employment areas" (page 38). (Hotels are, of course, one form of employment use.) There would appear to be no policy on hotels, other than that they should not be located in designated employment areas, and not	Map 5.1 in the Core Strategy (which is to be amended to include the Bath Road area - see objection 419) shows the broad areas in the borough which are proposed for hotel and office growth - i.e. Uxbridge and the Hayes - West Drayton corridor. this is also noted at paragraph 5.20. Given the guidance available in PPS 4 on economic regeneration and in the London Plan on town centre development, the Council considers there is a sufficient strategic planning policy framework for future hotel development in the borough. It will be for later, more detailed parts of the Local Development Framework - the Site Allocations, Proposals Map, Heathrow Area and Development Management Development Plan Documents to bring forward detailed policies and

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				necessarily on the airport itself	proposals on hotel development. No proposed change.
325	Policy EM9: Safeguarding Mineral Resources	Henry Streeter (Sand and Ballast) Ltd	Consultant Planning Group	In view of the continuing need for minerals in and beyond the Plan period the safeguarding of Cranford Park will allow for flexibility within the Core Strategy and also add robustness to the mineral deposits identified for working. Changes considered to be necessary a) the inclusion of Cranford Park as a safeguarded area b) separation of the Policy so that it considers preferred areas and safeguarded areas separately	Detailed proposals for the future designation of sites will be dealt with in the Site Allocations and Proposals Map Development Plan Documents. No proposed change.
12	8.155	Mineral Products Association		The Borough's apportionment proposed by the London RAWP and included in the 2010 Minor Alterations to the London Plan (Policy 5.20) is 0.25 mtpa	Agreed. Following publication of the Panel Report on the draft Replacement London Plan the apportionment figure for the borough is 250 000 tonnes per annum upto 2031. This should be reflected in the Core Strategy and paragraph 8.155 is to be amended to quote the revised figure by deleting the reference to 0.5 million tonnes per annum and replacing this with 0.25 million tonnes.
10	Policy EM10: Mineral Extraction	Mineral Products Association		Policy EM10 should be amended as follows The Council will make an appropriate contribution towards the West London apportionment figure in the London Plan in the form of mineral working at the principal Broad Locations and will aim to maintain a minimum land bank equivalent to seven years production for the West London area at a rate of 0.25 million tonnes per annum. The principal Broad Locations for mineral development are land west of the present Harmondsworth Quarry, land north of the village of Harmondsworth, and land at Sipson Lane, east of the M4 spur. Outside the allocated areas identified in this Plan mineral extraction will not be permitted except where: it is demonstrated that the proposal is sustainable, essential to maintain the West London land bank in	Agreed in part - to update the Core Strategy to accurately reflect the findings of the Panel Report into the draft Replacement London Plan and reflect more accurately the wording of Minerals Planning Statement 1 by amending policy EM10. Existing wording after "London Plan" in first paragraph and whole second paragraph to be deleted and replaced by wording: "...in the form of mineral working at the principal Broad Locations and will aim to maintain a minimum land bank equivalent to seven years production for the West London area at a rate of 0.25 million tonnes per annum. The principal Broad Locations for mineral development are land west of the present Harmondsworth Quarry, land north of the village of Harmondsworth, and land at Sipson Lane, east of the M4 spur. Outside the allocated areas

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				<p>accordance with national policy, and necessary to maintain apportioned provision for West London as set out in the London Plan; suitable measures and controls can be put in place to ensure there is not an unacceptable adverse impact on the environment or human health; the mineral workings can be restored to the highest standards using progressive restoration techniques, and secure a beneficial and acceptable after use in line with Green Belt objectives.</p>	<p>identified in this Plan mineral extraction will not be permitted except where: ...".</p> <p>Final part of policy to reflect recommendation of Sustainability Appraisal regarding restoration of sites.</p>
11	Policy EM10: Mineral Extraction	Mineral Products Association		<p>Policy EM10 should be amended as follows</p> <p>“The Council will make an appropriate contribution towards the West London apportionment figure in the London Plan in the form of mineral working at the principal Broad Locations and will aim to maintain a minimum land bank equivalent to seven years production for the West London area at a rate of 0.25 million tonnes per annum. The principal Broad Locations for mineral development are: land west of the present Harmondsworth Quarry, land north of the village of Harmondsworth, and land at Sipson Lane, east of the M4 spur. Outside the allocated areas identified in this Plan mineral extraction will not be permitted except where: it is demonstrated that the proposal is sustainable, essential to maintain the West London land bank in accordance with national policy, and necessary to maintain apportioned provision for West London as set out in the London Plan; suitable measures and controls can be put in place to ensure there is not an unacceptable adverse impact on the environment or human health; the mineral workings can be restored to the highest standards using progressive restoration techniques, and secure a beneficial and acceptable after use in line with Green Belt objectives.</p>	<p>Agreed in part - to update the Core Strategy to accurately reflect the findings of the Panel Report into the draft Replacement London Plan and reflect more accurately the wording of Minerals Planning Statement 1 by amending policy EM10. Existing wording after "London Plan" in first paragraph and whole second paragraph to be deleted and replaced by wording: "...in the form of mineral working at the principal Broad Locations and will aim to maintain a minimum land bank equivalent to seven years production for the West London area at a rate of 0.25 million tonnes per annum. The principal Broad Locations for mineral development are land west of the present Harmondsworth Quarry, land north of the village of Harmondsworth, and land at Sipson Lane, east of the M4 spur. Outside the allocated areas identified in this Plan mineral extraction will not be permitted except where: ...".</p> <p>Final part of policy to reflect recommendation of Sustainability Appraisal regarding restoration of sites.</p>

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156	Policy EM10: Mineral Extraction	Individual		<p>Policy EM10 should refer to monitoring the impact on the environment or human health - and sites should be restored within a set time of 12 months following the cessation of works.</p> <p>The text in policy EM10 implementation should include:</p> <p>Suitable measures and controls will be put in place to ensure there is no adverse impact on the environment or Human health.</p> <p>Promoting the restoration of the site to the highest standards within 12 months of extraction being completed</p>	<p>Concerns as to the health aspects of mineral workings are effectively dealt with elsewhere in the Core Strategy at policy EM8, which sets out the Council's broad approach regarding land, water, air and noise aspects of any development. The development management process will require environmental impact assessment of any new significant development, including mineral workings, to ensure that any adverse impacts are addressed prior to development taking place. Site restoration requirements will vary from case to case and the Council must maintain a degree of flexibility in its policies. It would not be possible to insist on a set restoration period.</p> <p>No proposed change.</p>
61	Policy EM10: Mineral Extraction	Individual		<p>The text in policy EM10 implementation should include:</p> <ol style="list-style-type: none"> 1. Suitable measures and controls will be put in place to ensure there is no adverse impact on the environment or Human health. 2. The Council will promote the restoration of the site to the highest standards within 12 months of extraction being completed. 	<p>Concerns as to the health aspects of mineral workings are effectively dealt with elsewhere in the Core Strategy at policy EM8 - which sets out the Council's broad approach regarding land, water, air and noise aspects of any development. The development management process will require environmental impact assessment of any new significant development, including mineral workings, to ensure that any adverse impacts are addressed prior to development taking place. Site restoration requirements will vary from case to case and the Council must maintain a degree of flexibility in its policies. It would not be possible to insist on a set restoration period.</p> <p>No proposed change.</p>
322	Policy EM10: Mineral Extraction	Surrey County Council		<p>Strategic Objective SO5 and Policy EM10 seeks to make a proportionate / appropriate contribution to West London's target to extract 0.5 million tonnes per annum (mtpa) of minerals. However, the Core Strategy contains no indication of what this contribution might be. In order to address this issue, the London Borough</p>	<p>Agreed. Following publication of the Panel Report on the draft Replacement London Plan the apportionment figure for the borough is 250,000 tonnes per annum up to 2031. This should be reflected in the Core Strategy and both policy EM10 and paragraph 8.155 are to be amended to quote the revised figure by deleting the reference</p>

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				<p>should propose a minor amendment to Policy EM10 to explain the actual contribution that Hillingdon propose to make to the 0.5 mtpa apportionment figure contained in the London Plan. A further proposed amendment to the first sentence of para 8.155 should also be proposed as it is factually incorrect to say that Hillingdon's apportionment is 0.5 mtpa.</p> <p>Draft Replacement London Plan included proposed revisions to Policy 5.20 on aggregates. This proposed that the LB of Hillingdon LDF should make provision for 250,000 tpa of land-won aggregates until 2031. Should these minor alterations be endorsed in the Inspector's Report which is understood to be imminent, then the London Borough will need to propose a further minor amendment to Policy EM10 prior to the Examination to confirm that Hillingdon will make provision to provide 0.25 mtpa of land-won aggregates throughout the plan-period</p>	<p>to 0.5 million tonnes per annum and replacing this with 0.25 million tonnes.</p>
567	Policy EM10: Mineral Extraction	Individual		<p>LATE SUBMISSION:</p> <p>The policy needs to be worded more strongly: rather than "seek" should state : "the Council must safeguard..." ; rather than "can" should state : "...suitable measures and controls must be put in place..."; rather than "can" should state : "...the minerals must be restored to...".</p>	<p>The Core Strategy covers a period of 15 years, and as such it is unlikely to be effective if it cannot deal with changing circumstances. The work "seeks" allows that flexibility and provides deliverability and monitoring of the policy as required by Planning Policy Statement 12 (PPS12). No proposed change.</p>
55	8.159	Individual		<p>With regard to the re-examination of the waste sites, I feel that further consideration should be made to retaining existing waste sites. Maybe current sites could be updated to make them more efficient (this may be better than spending a lot of money on building one brand new site).</p> <p>I was unable to find a copy of the West London Waste Plan - would it be possible to make this more available?</p>	<p>This representation primarily concerns the draft West London Waste Plan which was published for consultation concurrently with the Pre-Submission Core Strategy.</p> <p>The Core Strategy does include a commitment to safeguarding existing waste sites at paragraph 8.159. The Council would also note that a proposed change to policy EM11 in response to representation 465 from the Mayor of London</p>

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				<p>Has further consideration been given to:</p> <ol style="list-style-type: none"> 1.the impact of the consolidated waste management areas on the surrounding areas eg. air, noise and traffic pollution? 2. the impact on nearby residents? 3. the green jobs that come out of this seem to be positive, but are usually heavily subsidised by Government. <p>Certain waste sites already have the appropriate facilities for heavy traffic (eg road surfaces) - these sites would benefit from redevelopment rather than being scrapped.</p> <p>Has consideration been given to generating energy from waste incineration in Hillingdon? This may be more feasible and more environmentally friendly-I think it is being done in other areas.</p>	<p>would incorporate similar wording there. The environmental impact of proposed waste management sites and impact on local residents would be taken into account through the development management process. The draft West London Waste Plan Development Plan Document (DPD) does contain a policy setting out key criteria which all six boroughs would use to assess the quality of future waste management proposals when assessing applications. The draft DPD also includes a proposed policy encouraging the generation of renewable energy from waste. No proposed change.</p>
19	Policy EM11: Sustainable Waste Management	London Borough of Richmond		As one of the West London Waste Boroughs, the London Borough of Richmond supports policy EM11.	Support welcomed.
319	Policy EM11: Sustainable Waste Management	Surrey County Council		<p>EM11 and SO13</p> <p>The London Borough should propose a minor amendment to include a policy promoting sustainable site waste management which applies the main principles contained in WLWP Policy 4 to all new development in Hillingdon.</p>	<p>As noted in the draft West London Waste Plan Development Plan Document (DPD) the London Plan waste apportionment does not include a Construction, Demolition and Excavation Waste (CDE) component - although it is a significant waste stream.</p> <p>Work on the next stage in the preparation of the Waste Plan DPD may provide more detailed data for the evidence base on CDE arisings - and where this is dealt with. At present the six West London boroughs are keeping to the general commitment at policy 4 in the Waste Plan DPD</p>

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					<p>that the preferred option with CDE waste is to ensure through the development management process that more on-site recycling and re-use of materials takes place. It will not be for the individual West London borough Core Strategies to come forward with detailed policies on the treatment of CDE waste in future. This should be dealt with by the specific joint Waste Plan DPD. There is a broad guideline set out in the third paragraph of policy EM10 in the Hillingdon Core Strategy that the Council will promote waste as a resource and encourage the increased re-use of materials and recycling through the development management process. The detailed approach to be taken by the six west London boroughs on CDE waste can be expected to come forward as part of the next stage of the West London Waste Plan DPD.</p> <p>The Council would note that policy EM10 covers all new development - not simply waste management sites. No proposed change.</p>
352	Policy EM11: Sustainable Waste Management	SITA UK		We welcome Hillingdon's approach to delivering sustainable waste management which is to identify suitable sites and policies through the joint West London Waste Plan. In particular, we support the wording of your Core Strategy Policy EM11 on Sustainable Waste Management which seeks to promote waste as a resource and to maximise the use of existing waste management sites through the intensification or co-location of facilities.	Support welcomed.
395	Policy EM11: Sustainable Waste Management	Hillingdon Motorist Forum		Paragraph 8.159, Waste Management - The West London Waste Plan must ensure that the road network feeding the waste processing sites is improved to handle the additional heavy lorries that will be used to transport the waste.	Noted - with regard to the location of sites, the Council will be guided by the locational criteria provided in PPS10 which include access including sustainability and durability of the surrounding road network. No proposed change.

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497	Policy EM11: Sustainable Waste Management	Mr John McDonnell MP		The Strategy does not adequately cover the need for better and proactive waste management, greater recycling facilities and do more to promote opportunities for renewable energy from waste.	As noted at paragraph 8.158, the Council is working with its neighbouring west London partner boroughs to produce a joint West London Waste Plan Development Plan Document (DPD) - a draft of which was published concurrently with the Pre-Submission Core Strategy for consultation. This DPD deals with the detailed issues raised by this respondent regarding better waste management; encouraging waste minimisation and increasing recycling (in accordance with the waste hierarchy as identified in the Waste Strategy for England (DEFRA, 2007) and the requirements of the London Plan); and seeking opportunities to generate renewable energy from waste. Policy EM10 and its supporting section in the Core Strategy seek to provide a broad policy statement on the approach the borough will take towards sustainable waste management during the Plan period, which will then be detailed in the accompanying West London Waste Plan DPD. No proposed change.
568	Policy EM11: Sustainable Waste Management	Individual		LATE SUBMISSION: Rather than "will aim to" should state : "...the Council must promote..." ; rather than "recycling and seek to maximise" should state : "...recycling and must maximise...".	Where policy EM11 is applicable its objectives will need to be met unless material considerations indicate otherwise. The Council does not consider that the proposed wording compromises this principle or detracts from the strength of the policy. Balanced against this is the need to incorporate flexibility into policy wording and an acknowledgement that the delivery of policy objectives is dependant on a range of organisations, not just the Council. No proposed change.
465	Policy EM11: Sustainable Waste Management	Mayor of London	Greater London Authority	Policy EM11 refers to the Joint West London Waste Plan which will provide sufficient capacity to meet the apportionment requirements of the London Plan. This policy should clearly set out the apportionment target for Hillingdon which is 270 thousand tonnes per annum by 2026.	Agreed - to ensure conformity with the requirements of the London Plan two wording changes are to be made to policy EM11: (1) add the following words at the end of the first paragraph: "...which is 382 thousand tonnes per annum for Hillingdon by 2026." and (2) add further sentence at end of third paragraph to read: "The

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				The supporting text at paragraph 8.159 states that the council will safeguard existing waste sites unless compensatory provision is made. This commitment to safeguard all waste sites needs to be within the Policy in the core strategy as well as in the Joint Waste Plan.	Council will safeguard existing waste sites unless compensatory provision can be made."
45	9	British Waterways		The Grand Union Canal represents a transport facility for walking and cycling, but also for waterborne freight, with a 26 mile section of lock free canal. We recently made representations in response to the Local Implementation Plan and requested that the use of the canal for waterborne freight be highlighted and promoted, which should also be referenced within this section. There are waterside sites within LB Hillingdon that could make use of this and help reduce road congestion.	The opportunities for the GUC to be used as a means of transporting freight are limited. Consideration to this will be given in the Local Implementation Plan. No proposed change.
47	9	Yiewsley and West Drayton Town Centre Action Group		The aspirations for Transport and Infrastructure are welcomed. However, there is no indication that current policy will change substantially. The consultation in 2005 and 2009 on the Porters Way SPD failed, in the main, to take into account the views expressed in the consultation process. Both developments have/will not provide the commensurate upgrade to the infrastructure, for example, health provision, education, leisure/sports, transport (pages 126-145)	The Implementation section sets out how the key provisions of the policy will be delivered. No proposed change.
503	9	Councillor L J Allen		SO6,SO12, SO17 & SO18: The Core Strategy needs to address traffic congestion within Hayes Town Centre leading down to Pump Lane. A bus service should be extended to the end of Pump Lane to reduce car traffic there.	The policy in relation to traffic congestion is to focus on 'congestion hotspots'. These are identified on Map 9.1.
51	9.5	Individual		Time given to understand such a comprehensive document, PDP is much too short. Monitoring of air pollution for Hillingdon, already the 4th	The Core Strategy is a strategic planning document. Further detail on carbon emissions in the borough is contained in other Council

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				highest CO2 emitter in London is worrying, especially when this excludes the Heathrow effect; aviation fuel and motorway travel. It will need far more effective monitoring followed by precise and emphatic legal action.	documents.
50	9.6	Individual		Not effective in reducing Heathrow noise and flight control. The night time flight ban is often broken. It needs more effective representation to Heathrow to stop breaking the agreed night time ban.	This issue will be addressed in other Council policies and strategies.
556	9.7	English Heritage		Transport and infrastructure (pgs 126-145) - We note that the Core Strategy seeks to reflect the six goals of the Mayor's Transport Strategy (MTS), which we welcome. However as part of delivering improvements in the quality of life of the Hillingdon through transport provision and management we would urge you to identify opportunities for investment in the historic environment as part of the Borough's transport objectives. A more explicit link to this aim would help ensure the Core Strategy complies with the MTS. This includes the principles of 'Better Streets' (para 4.3 and 5.18), policy 14 (under para 4.4.4 Enhancing the built and natural environment) and its applications through Proposals 83, 84, 85, 90 and 113. In addition ensuring that transport provision and management is of high quality contextual design that conserves and enhances the historic environment would, in line with PPS5, contribute towards Hillingdon's commitment to developing a robust strategy for the conservation of the Borough.	No proposed change.
25	9.14	Individual		The issue of high dependency on private vehicles and low proportion of trips made by cycling, walking and public transport is to be addressed by policy T1, T2 & T4 and Planning Policy Statement 12 on aspects of the town	The Strategic Infrastructure Plan is being updated as an evidence base for the Core Strategy and will be available for discussion at the forthcoming Examination in Public.

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				planning framework. These issues cannot be considered without reference to the strategic infrastructure plan (SIP) which is currently in preparation to support the Core Strategy. This also governs paragraphs 9.34 & 9.35.	
46	Map 9.1	British Waterways		The Grand Union Canal offers potential for waterborne freight and this should therefore be highlighted in this map.	If appropriate, this issue will be addressed in the Council's emerging Local Implementation Plan.
144	Policy T1: Accessible Local Destinations	Hillingdon Inter Faith Network		There is no mention of the 110 plus faith community centres or the important role they play both for their religious community or their involvement with the wider community. Subsequently, T1 fails to address the strengths and requirements in supporting these facilities.	The Core Strategy is a strategic planning document. Policy CI1 recognises the importance of community infrastructure and sets general criteria for its provision. Apart from primary school provision where there is specific evidence of need, the policy does not provide a definitive list of the facilities that will be supported. Further more detailed policies for specific types of facility may come forward in subsequent development plan documents.
145	Policy T1: Accessible Local Destinations	Hillingdon Inter Faith Network		The current Travel Plan initiative depends on alternative transport to the car being available. The LDF needs to consider how to improve community cohesion by recognising the changing demographics both in faith need and in age and having SMART objectives, which will address the issues.	The Core Strategy recognises the importance of community facilities but does not provide locational criteria. This issue may be covered by the provisions of subsequent development plan documents.
200	Policy T1: Accessible Local Destinations	The Ballymore Group		Support the policy.	Support noted.
348	Policy T1: Accessible Local Destinations	Individual		All developments should be fully accessible - and uneven surfacing should not be used.	Comments noted. Issues related to accessibility will be addressed in the forthcoming Development Management Policies Document.
396	Policy T1: Accessible Local Destinations	Hillingdon Motorist Forum		Paragraph 9.5: This paragraph suggests that road travel is not sustainable. The pollution levels emitted by road transport has been significantly reduced in recent times. There is every reason to expect that this trend will continue in the period covered	As an outer London borough it is accepted that local residents will continue to use private cars over the period of the Core Strategy. However, measures such as improved interchanges are proposed to maximise public transport use. Improvements to the road network are highlighted in the infrastructure schedule contained in

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				by this strategy. The strategy should take account of this development and while improving Public transport there should be steps taken to improve the travelling experience by private vehicles. It should be noted that an improved road network will reduce congestion for all types of vehicle.	Appendix 2.
498	Policy T1: Accessible Local Destinations	Mr John McDonnell MP		The Strategy fails to address the problem of heavy traffic congestion; nor does it detail how interchanges in town centres will be improved or how North-South links will be improved - or cross-borough links in the South.. Cycle routes are often insufficiently protected from other traffic. Greater use of the Canal towpath should be positively recommended.	The Implementation section of Policy T1 notes that measures to improve north/south public transport links will be identified in the Council's Local Implementation Plan. This document identifies specific sources of funding for improvements to the borough's transport network.
339	Policy T1: Accessible Local Destinations	Arla Foods UK Plc	BNP Paribas Real Estate	Support the policy.	Support noted
73	Policy T1: Accessible Local Destinations	Individual		LATE SUBMISSION: Rather than "The Council will steer development..." should state : "...The Council must develop...". The statement that "All development should encourage access by sustainable modes.." is weak and vague - to improve the public transport network and the flow of traffic roads and pavements must be enlarged and resurfaced. Cycle paths must be located away from road traffic. Wheelchair users should have paths specifically for their use. Many public rights of way are often not accessible - e.g. due to gates being permanently locked in the Beck Theatre area.	Comments noted. Whilst the Council undertakes development on its own land the majority of planning applications are submitted by private developers or land owners. The Council cannot force developers to submit planning applications for development away from congested areas. However, the impact of development on the transport network will be a key factor in the determination of planning applications. The Core Strategy is a strategic planning document and specific details of improvements to Hillingdon's transport network are outlined in the Council's Local Implementation Plan and the Strategic Infrastructure Plan.
460	Policy T1: Accessible Local Destinations	Hayes and Harlington Community Development Forum		Policy T1 To be sound the policy should require that new development will not result in any material increase in traffic congestion or on-street parking pressure.	The Council will request the submission of site specific Transport Assessments to support development proposals that are likely to have an impact on the transport network. A requirement that new development should not result in traffic congestion is not a test of soundness.

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				<p>To be sound the Core Strategy must demonstrate it can deliver significant increases in cycling and walking. Paragraphs 9.8 and 9.13 show the need for a step-change in policy. There should be policy reference to safe and separate cycle paths It is very dangerous to cycle in the borough and without safe cycle paths the policy of encouraging people to use bicycles instead of cars will not work.</p>	<p>Specific improvements to the transport network are outlined in the Council's LIP.</p>
466	Policy T1: Accessible Local Destinations	Mayor of London	Greater London Authority	<p>The Core Strategy should make reference to Crossrail specifically as a strategic infrastructure project and should highlight the relevant London Plan Policies (3C.12A 6A.4 and 6A.5 of London Plan Crossrail Alterations, April 2010) and SPG (July 2010) under which s106 funding will be sought from office and retail development through Planning Obligations and the proposed Mayor's CIL. TfL suggests that the Core Strategy should include a general policy on transport-related planning obligations, including the need to collect planning obligations for public transport, walking and cycling. TfL suggests the overall policy on planning obligations should include explicit support for pooled contributions, as advocated in circular 05/05, but having regard to the limitation on such contributions as specified in the Community Infrastructure Regulations (CIL) 2010. Transport for London suggests that the following wording is incorporated: "Contributions will be sought for transport infrastructure and service improvements to ensure that efficiency and capacity on the transport network is maintained and that the impact of the development on the transport network is mitigated. In circumstances where the combined impact of a number of developments creates the need for the provision of additional transport infrastructure and or</p>	<p>Crossrail is referred to in the Infrastructure Schedule at Appendix B of the Core Strategy. Specific reference will be made to CIL by adding an additional clause in policy CI1.</p> <p>A new section has been added at the end of section 3 referring to Crossrail as a strategic infrastructure project and to the relevant London Plan policies and SPG on Section 106 funding and to the Mayor's proposed CIL.</p>

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				<p>services, it will be appropriate to pool the contributions from these developments having regard to the limitations on pooling arrangements imposed by the Community Infrastructure Regulations 2010. The level of contribution, whether pooled from a number of developments or not, may be based on a formula or standard charge which reflects the actual impact of the development.”</p> <p>A clear distinction should be made between a Community Infrastructure Levy (CIL), should the Borough propose to raise one, and legally binding planning obligations to avoid limiting the scope for funds; this is particularly important for Bus Network contributions which at present are not considered as infrastructure under the CIL.</p>	
76	Policy T1: Accessible Local Destinations	Mayor of London	Greater London Authority	<p>It is recommended that the policy states that developments and businesses should be encouraged to produce a Delivery & Servicing Plan (DSP) or Construction Logistics Plan (CLP) to rationalise servicing/ deliveries or construction vehicle movements across both the TLRN and the Borough's highway network. It should be noted that the A40 is extremely congested during peak hours; therefore the Borough should set out policies which would encourage deliveries to take place during the off-peak periods.</p>	<p>No proposed change. This issue will be addressed in the forthcoming Development Management Policies Document.</p>
101		Northwood Residents Association		<p>No consideration is made to improving parking at stations to take cars off local roads. Such parking should be included in ticket prices.</p>	<p>The transport policies in the Core Strategy look towards encouraging more sustainable modes of transport generally across the borough - and to steering development towards the most accessible locations to reduce their impact on the transport system. To prevent "rail heading" where commuters seek to park their cars near stations to carry on their journeys by rail / Tube into central London the Council is using parking controls where appropriate to prevent commuters' cars</p>

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					creating congestion on local streets. No proposed change.
102		Northwood Residents Association		Traffic into Heathrow will increase. No consideration has been given to creating drop-off/pick-up points outside the airport perimeter, such as Stockley Park, so that passengers can complete the last/first part of their journey by public transport.	Detailed issues of this nature will be addressed in the subsequent Development Management Policies document.
479	9.19	Mayor of London	Greater London Authority	TfL note typo in relation to 9.19 which should be amended to read: 'Uxbridge is home to a regionally important Underground / bus interchange that cannot accommodate current or future demand without significant improvements. The bus station has inadequate capacity for the number of vehicles which currently use it. The surrounding area is in need of upgrading to improve accessibility for people with restricted mobility.'	Agreed, text will be amended in accordance with representation. Paragraph 9.19 will be amended to read: 'Uxbridge is home to a regionally important Underground / bus interchange that cannot accommodate current or future demand without significant improvements. The bus station has inadequate capacity for the number of vehicles which currently use it. The surrounding area is in need of upgrading to improve accessibility for people with restricted mobility.'
480	9.20	Mayor of London	Greater London Authority	Transport for London does not agree with the statement that the Uxbridge service is "slow and deficient" compared to similar centres in London. TfL maintains this view and suggests that the wording which states that Uxbridge be described as being 'deficient in good public transport links' be taken out.	No proposed change. The Council maintains the view that Hillingdon's transport service is slow and deficient in comparison with other metropolitan centres.
100	9.21	Northwood Residents Association		Public Transport (page 132) No mention is made of how the north/south public transport network is to be funded – so far TfL has refused to provide funds. The Metropolitan line is going to be very slow, and unreliable, until the extensive track and signalling works are completed in 2018 and yet paragraph 9.2.1 states that there is scope to improve both the frequency and travel times. How is this comment justified?	The Implementation section associated with policy T3 notes that some improved north - south public transport links will be delivered from funding sources identified in the Local Implementation Plan. These sources have been discussed and agreed with the TfL.

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226	9.23	Heathrow Airport Ltd		Text states Crossrail will provide a direct connection from Maidenhead to Heathrow - but the Airport will be on a spur link from Hayes & Harlington.	Agreed. Reference to the Heathrow spur will be included in the policy.
361	9.23	Hayes Town Partnership		There are various mentions of Crossrail in the document but in view of its enormous potential significance for the south of the Borough it is suggested that there would be strong arguments in favour of a specific policy in the Plan in order to achieve the maximum possible benefits for local people.	The primary benefits of Crossrail will be accrued in the South of the borough. The exact nature of these benefits are as yet unknown however they are likely to consist of regeneration opportunities around Crossrail Stations and the associated jobs. Overall, Crossrail could affect commuter patterns, providing a direct route to the City from the west of London. Increased demand for new housing could result. These points are reflected in point 3 of the Vision for Hillingdon.
381	9.23	Mayor of London	Greater London Authority	Paragraph 9.23 notes the Crossrail links in the Borough. The Borough may wish to amend the CS pointing out that Crossrail will bring extra travellers through these stations who will need to travel on to/from their origin/destination by a feeder mode. TfL will be looking to work with the Borough and Crossrail/Network Rail to discuss how the interchange with buses, taxis, cycles and walking at West Drayton can cope with the high volume of passengers from 2017. For Hayes and Harlington, TfL Interchange and Crossrail are considering an Urban Integration study.	Agreed, wording to be amended in accordance with representation. Final sentence will read: The improved Crossrail stations will provide the catalyst for the regeneration of Hayes and West Drayton (see Table 5.3) and will bring extra travellers through these stations who will need to travel to and from their original destination by feeder mode.
482	9.24	Mayor of London	Greater London Authority	TfL has assessed the possibility of achieving an interchange between the Metropolitan and Piccadilly lines and the Central line and Chiltern Railway in the Ruislip area and have concluded that there is no business case for this and hence it will not be taken further.	This paragraph will be updated to reflect the latest discussions regarding the proposed Central Line extension.
201	Policy T2: Public Transport Interchanges	The Ballymore Group		Support the policy.	Support noted.
282	Policy T2: Public	Legal and	Drivers Jonas	Support the policy - particularly seeking	Support noted.

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	Transport Interchanges	General Property Partners (Life Fund) Ltd	Deloitte on behalf of Legal & General Property Partners (Life Fund) Ltd	improved public transport interchange at West Ruislip.	
574	Policy T2: Public Transport Interchanges	Individual		LATE SUBMISSION: Due to pedestrianised shopping centres near transport interchanges it is often difficult to continue a journey there by bicycle.	Policy T2 notes that proposed public transport interchanges will accommodate measures to encourage shorter journeys by foot or cycle. The detail of these measures will be outlined in subsequent development plan documents.
483	Policy T2: Public Transport Interchanges	Mayor of London	Greater London Authority	The intention to improve public transport interchanges and facilities for passengers is welcomed. However additional infrastructure for increased bus services such as garages and terminating space would also need to be considered with land and funding secured through various channels, including developer contributions. Additional bus priority measures should be provided to improve journey times and to enhance the attractiveness of public transport use within the Borough.	Supported noted. Specific transport improvement schemes will be identified in Hillingdon's Local Implementation Plan.
362	9.27	Hayes Town Partnership		Amend Policy T3 to recognise that improving north-south transport links is not just to provide links for people in the north of the Borough to gain access to employment areas and transport interchanges in the south and that people living in the south have legitimate reasons for travelling to the north. Also give greater emphasis to the need to improve public transport interchange facilities as part of an overall plan to achieve a fundamental shift towards the use of public transport rather than cars.	Improved north/south transport links are provided for the benefit of all residents to provide access to and improve the delivery of new jobs. As an outer London borough many residents will continue to rely on travel by car however improvements to public transport interchanges will increase public transport options.
484	9.27	Mayor of London	Greater London Authority	The bus network is under constant review. Capacity is one of the key concerns of Transport for London Network Development. It is worth noting that if passengers are standing it does not necessarily mean buses are over capacity. On	Comments noted.

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				<p>busy routes it is not always possible for all passengers to be seated, and appropriately fitted out standing areas are provided.</p> <p>Transport for London will continue to work with the Borough to ensure that bus services suit passenger demands in a cost-effective way.</p>	
509	9.27	Councillor P Harmsworth		Measures should be taken to restrict vehicles using the main road through Yiewsley to cars, vans and buses only - to improve safety for all - including cyclists.	The Core Strategy is a strategic planning document. Detailed measures of this nature will be identified in the Council's forthcoming Development Management Policies Document.
298	9.29	Garden City Estate Residents' Association		The paragraph should state that in any consideration of High Speed 2 the Council will seek to support measures to mitigate any damaging effects of High Speed 2 on the environment and residents.	Hillingdon Council is supportive in principle to high speed rail travel, however it does not support the current 'preferred route' through Hillingdon.
224	9.29	L B Hillingdon (Labour Group)		The Plan should include a section in this paragraph that the Council will support measures to mitigate any damaging effects of High Speed 2 on the environment and residents.	The Government's proposals for HS2 are currently out for consultation and are detailed at paragraphs 3.7 - 3.9 of the Core Strategy. Hillingdon Council is supportive in principle to high speed rail travel, however it does not support the current 'preferred route' through Hillingdon. No proposed change.
271	Policy T3: North-South Sustainable Transport Links	Individual		I'm not aware of a full consultation – more of a last minute rush I found it difficult to understand how these policies can be delivered	The consultation was undertaken in accordance with the Council's Statement of Community Involvement. The deliverability of policies is detailed in the 'implementation' section for each policy.
302	Policy T3: North-South Sustainable Transport Links	Garden City Estate Residents' Association		The residential areas of Hayes are not linked to the Pump Lane employment area and workers consequently use their cars to travel there. He policy should include a reference to how this will be done - e.g. a gating system is needed in Pump Lane.	No proposed change. The Core Strategy is a strategic planning document and detailed issues of this nature will be addressed in subsequent development plan documents.
461	Policy T3: North-South Sustainable Transport Links	Hayes and Harlington Community		<p>Policy T3</p> <p>The Core Strategy emphasises the importance</p>	Evidence of specific transportation improvements is contained in the borough-wide Local Implementation Plan. Issues related to

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		Development Forum		<p>of improving the north-south transport links across the Borough but does not provide evidence of improvements can be achieved.</p> <p>There is a need for policy concerning disabled people's access to public transport. Investment in community transport is much needed. The Dial –a-ride service continues to be very poor as evidenced by reports from the London Assembly. Neither are mentioned in the Core Strategy.</p>	accessibility are addressed in Hillingdon's Accessibility SPD and will be covered by the provisions of the Development Management Policies Document.
527	Policy T3: North-South Sustainable Transport Links	L B Hillingdon (Labour Group)		Concerned at the amount of private car use required to access employment area at Pump Lane - better public transport services are required to link the two - the policy should explain how this will be done - a gating system could be used in Pump Lane.	The Core Strategy does not address site specific planning issues. These will be dealt with in subsequent Development Plan Documents.
527	Policy T4: Heathrow Airport	Orbit Developments (Southern) Ltd	The Emerson Group	<p>The policy requires developers to provide a transport solution which includes public transport, walking, cycling & the use of electric vehicles, low emission vehicles & car clubs.</p> <p>The policy does not have sufficient regard for the fact different scales of development will enable different scales of transport solution. The use of low emission vehicles & electric vehicles will not be appropriate in every case, nor will public transport solutions.</p>	No proposed change. The Core Strategy identifies support for sustainable transport measures and is in accordance with Government policy. More detailed policies on specific transport measures will be contained in subsequent policy documents.
191	Policy T4: Heathrow Airport	British Airways plc	Lichfield Planning	<p>Policy T4, SO21, Table 3.1 / Transport</p> <p>Please refer also to Sheet 1 for British Airways detailed argument about:</p> <p>1. inconsistency between The Council's appreciation of the important contribution that Heathrow Airport makes to the local economy, and the Council's intentions of curtailing the growth of Heathrow's capacity: without growth</p>	<p>1. The Council supports the development of operational uses within the airport boundary, however the extension of such uses beyond the airport boundary will be resisted.</p> <p>2. The Heathrow Opportunity Area is a London Plan policy and will need to be progressed by the Mayor.</p> <p>3. Support for policy T4 is noted.</p>

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				<p>the airport's economic activity is bound to decline with dire impacts on the welfare of the local population.</p> <p>2. To ensure feasibility of the Heathrow Opportunity Area, British Airways should be party to its planning.</p> <p>British Airways support Policy T4 for improvement of public transport services to and from Heathrow in all directions and sees a need for clear support for HS2 link to Heathrow to encourage shift from short haul flights to high speed rail.</p> <p>BA are conscious of the high levels of vehicular traffic and the resultant emissions in the south western corner of Hillingdon. Although Heathrow related transport movements play a large part in that situation, the Core Strategy should acknowledge the considerable amount of passing traffic on the M25, M4 and A30 which is not related to Heathrow, while Heathrow operators have undertaken to reduce emissions in accord with statutory requirements.</p>	
225	Policy T4: Heathrow Airport	Heathrow Airport Ltd		<p>We would suggest subtle amendments to Policy T4 as follows:</p> <p>"The Core Strategy will support the sustainable development, renewal and operation of Heathrow and growth in the....." This would then provide explicit policy support for projects to enhance Heathrow Airport as the UK's only Hub Airport.</p>	Proposed wording agreed, however the supporting text should also be amended to clarify that the Council would consider development or expansion of the airport beyond the existing boundary to be unsustainable.
374	Policy T4: Heathrow Airport	Bell Farm Christian Centre		<p>What is the nature of the growth referred to - is this an expansion of the area ? If so, where is this growth defined and what is the magnitude of the expansion ? The Strategy should define what is meant by "growth".</p>	The Replacement London Plan proposes housing and employment growth in the Heathrow Opportunity Area. It is the Mayor's responsibility to implement this policy through discussions with the Council and other key stakeholder groups.

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504	Policy T4: Heathrow Airport	Imperial College NHS Trust		Within the Heathrow development cleaner vehicle technologies such as electric vehicles should be imprint in our planning policies ensuring that any new development does not adversely impact on the local air quality and offers protection to both existing residents and new residents.	This detailed issue will be considered as part of the production of the Development Management Policies Document.
575	Policy T4: Heathrow Airport	Individual		LATE SUBMISSION: How can the Strategy reduce noise and improve air quality for local communities which are located so close to Heathrow Airport?	Policy T4 proposes a number of measures to reduce road traffic congestion, which is a key contributor to noise and air pollution.
505	Policy T4: Heathrow Airport	Councillor P Curling		Policy T4 and Paragraph 9.45: The Strategy should identify new school sites as there is a shortage of school places. It should also address the issue of schools without playing fields. Amend paragraph 9.45 to state after "Greenfield sites" : "if no council land or brownfield sites are available" and add at the end of this paragraph:" and the provision of playing fields for schools with no or inadequate playing fields."	The identification of new sites for schools will be addressed in the forthcoming Site Allocations document. In order to justify the release of greenfield sites the Council would need to demonstrate exceptional circumstances. Such circumstances could be that no suitable brownfield sites are available.
506	Policy T4: Heathrow Airport	Councillor P Jarjussey		T2 and T4: There is nothing in the Strategy on how traffic problems will be solved in Hayes, North Hyde Road, the A312, etc.. North / south public transport provision needs urgent attention.	Measures to address traffic congestion will focus on 'congestion hotspots' identified on map 9.1. Sources of funding for improved north/south public transport with be identified in Hillingdon's Local Implementation Plan
103		Northwood Residents Association		Social and Community infrastructure (page139). This section almost completely ignores the needs of the elderly, particularly in the Leisure, Recreation and Culture part yet there are thousands of reasonably fit pensioners who have every right to be considered.	Agreed. Reference to the needs of Hillingdon's aging population will be made in paragraph 9.42.
328	9.34	Highways Agency		Appendix 2	The Strategic Infrastructure Plan will be made available for comment prior to the submission of

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				SIP should be made available prior to submission to submission of the Core Strategy. Welcome inclusion of infrastructure schedule.	the Core Strategy to the Secretary of State.
397	9.34	Hillingdon Motorist Forum		Community Infrastructure - Para 9.34 mentions a Strategy Infrastructure Plan which will also deal s with Transport issues. It is difficult to comment fully on Transport issues without seeing the SIP. A separate consultation is required on this document.	The Strategic Infrastructure Plan sets out the plans of key infrastructure providers and will be made available prior to the submission of the Core Strategy to the Secretary of State.
74	9.35	Hillingdon Primary Care Trust		Page 140-text says primary and acute care although there is nothing in the documentation to show how acute care will be supported in the future (currently the only support is via S106 contributions to primary care and at the time of planning applications. Can the London wide HUDU planning model be introduced to Hillingdon this time around).	The Core Strategy will be amended to reflect the government's latest policy on health.
363	9.35	Hayes Town Partnership		Policy CI1 is supported with the following qualifications: <ul style="list-style-type: none"> • The range of community facilities listed is very limited and there is no specific reference in the policy to youth centres and although they were mentioned in the Strategic Infrastructure Plan in the draft core strategy they do not appear to feature in the Infrastructure Schedule (Appendix 2) • Similarly there is nothing about facilities such as restaurants and cinemas which are particularly important in developing a night time economy in Hayes and other town centres. • Faith centres are mentioned in paragraph 9.39 and in the Infrastructure Schedule (page 154) which states that the Council should identify 	As a general principle Policy CI1 supports the retention and provision of new community facilities to support growth. Those listed in relation to the policy are provided as examples and other community uses, such as youth centres, would be subject to the same policy provisions. Restaurants and cinemas are not considered to be community facilities; however the importance of the night time economy is recognised - specifically regarding Uxbridge at paragraph 5.27. Further wording will also be inserted at Table 5.3 in the section dealing with Future Growth of the Hayes - West Drayton Corridor at the end of the second sentence to read: "...and development of a night time economy."

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				<p>appropriate locations for places of worship. However there is no mention of this in the policy. It is an especially important issue in Hayes where some ethnic communities have places of worship and others do not while groups are often moving into premises without planning permission and then in conflict with the Council as a result of enforcement notices. There is a clear need for the Council to take the lead in helping groups to find suitable sites.</p> <ul style="list-style-type: none"> • The improvement of children's play areas is mentioned in the Infrastructure Schedule (Page 159) but the resources for the second phase of the scheme were not used for this purpose. 	
211	9.39	Heathrow Airport Ltd		<p>"My comments are on "Sites for New Schools"</p> <p>Strategy needs to identify suitable sites for new schools in the borough rather than keep building on current schools. By so doing, the children are being deprived of play areas. As there is an urgent need for these, I would like to see specific mention of sites which would be suitable for this development.</p> <p>Please ensure this is picked up.</p> <p>Also generally, I would like to see words like "seek" changed to "will" or "must". Let's make this document more trusting and committed."</p>	<p>In order to meet the demand for additional school places the Council will provide capacity in existing schools wherever possible. Where this capacity cannot be met new school places may need to be provided.</p>
389	9.44	Royal Brompton & Harefield NHS Trust	CGMS Consulting	<p>We would request that within the supporting text paragraph 9.44 is amended to recognise that not all new community facilities can and should be located in town centres, or in locations of maximum accessibility. Harefield Hospital is in the Green Belt and yet a new hospital and other community uses are established on the site.</p>	<p>The Council will seek to ensure that all new community facilities are located in accessible locations. No proposed change.</p>

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285	9.45	Garden City Estate Residents' Association		Despite an increasing shortage of school places, no new sites for schools are identified. Some schools lack playing fields and this is not addressed. Any attempt to build in the Green Belt to meet exceptional circumstances is unjustified - new provision should be in the developed areas of the borough. Proposed changes: delete "exceptional" from last sentence. Amend the paragraph to state (after "greenfield sites")... "if no Council land or brownfield sites are available." At the end of the paragraph add: "...and the provision of playing fields for schools with no or inadequate playing fields."	Specific sites will be allocated in the Site Allocations DPD. The demand for school places continues to grow and may result in the need to release greenfield sites. Proposals involving development of Greenfield land would need to meet tests of very special circumstances identified in PPG 2. No proposed change.
512	9.45	L B Hillingdon (Labour Group)		There is an increasing shortage of school places in the borough yet no new sites for schools are identified. As the most affordable option will probably be on council-owned land this should be done as a matter of urgency and identified in the Strategy. Also there are schools without playing fields in the borough yet there is no mention in the Strategy that this is something which should be addressed. Identifying where new school places and facilities are to be located is a priority if development continues at the same high residential density as child yield has undergone a step change in the borough. The Plan should not advocate a school being developed in the Green Belt - there is ample land in the developed area and this is where they should be located. Delete "exceptional" from last sentence of paragraph 9.45 and amend it to state after "greenfield sites" : "...if no council land or brownfield sites are available." At the end of the paragraph add: "...and the provision of playing fields for schools with no or inadequate playing fields."	Specific sites for new schools will be identified in the forthcoming Site Allocations Policy Document.
402	9.46	Brunel University	VRG Planning Ltd on behalf of Brunel	Revise Para 9.46 as follows:	It is not yet known if the Development Management Policies Document will contain

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			University	"In addition to primary and secondary provision, Hillingdon contains highly respected places of further and higher education. Policies will be developed in subsequent DPDs to ensure that these institutions are facilitated in their aim to continue improving accommodation for research and teaching provision over the period of the Core Strategy"	policies related to accommodation for Higher Education provision. No proposed change.
23	Policy CI1: Community Infrastructure Provision	Thames Water Utilities Ltd		<p>There is no specific policy on utility infrastructure within the pre submission version of the Core Strategy. The pre submission version of the Core Strategy makes reference to a Strategic Infrastructure Plan, but this has yet to be completed. We suggest that the following policy is included in the Core Strategy to ensure the Core Strategy meets the tests of soundness, particularly having regard to ensuring that infrastructure is in place to meet the proposed growth proposed in the Borough.</p> <p>Utility Infrastructure will be required to serve the requirements of the Borough's residents and businesses. New development proposals must ensure that adequate infrastructure capacity is available to meet the needs of future occupiers and not intensify existing deficiencies. The necessary infrastructure should be put in place in a timely manner, and where appropriate prior to the occupation of the development.'</p> <p>We also consider that the following sub-text should be included in the policy to reinforce the important references to water and sewerage infrastructure capacity:-</p> <p>"The Council will also seek to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will be</p>	This policy reflects the provisions of government guidance and does not need to be repeated in the Core Strategy. Detailed policies related to the provision of physical infrastructure may be included the DMDPD. It is accepted that there is scope to make reference to the need for physical infrastructure in paragraphs 9.34 - 9.38.

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				<p>required to demonstrate that there is adequate infrastructure both on and off the site to serve the development and that it would not lead to problems for existing users or future occupiers.</p> <p>In some circumstances a drainage strategy will need to be produced by the developer in liaison with the statutory undertaker to ensure the appropriate upgrades are in place ahead of occupation of the development. Where there is a capacity problem or potential adverse amenity impact on future occupiers, and no improvements are programmed by the statutory undertaker, the Council will require the developer to fund in full the appropriate improvements which must be completed prior to occupation of the development.</p> <p>The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact and that any such adverse impact is minimised."</p> <p>These type of policies proposed by Thames Water have been adopted into recent Core Strategies in other Districts and Boroughs.</p>	
104	Policy CI1: Community Infrastructure Provision	Yiewsley and West Drayton Town Centre Action Group		I believe the policy is unsound because it does not fully take into account the increased number of school places, both primary and secondary required, in the stipulated period. To meet the requirements of the increased number of school places required as indicated in the forecast of the Local Education Authority, up to and	Paragraphs 9.43 - 9.45 refer to the number of school places needed in the borough over the period of the Core Strategy. Potential sites for new school development will be identified in the forthcoming Site Allocations DPD.

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				including the year 2026, Council owned land will have to be made available to accommodate an additional 34 classes of 30 pupils at the Primary Level, which could involve an additional 17 two form entry schools followed on by an additional 4 large Secondary Schools mostly in the South of the Borough.	
110	Policy C11: Community Infrastructure Provision	M D Homes	Howard J Green	My client's representation is that the Core Strategy should acknowledge that there is also a "...pressing need..." for Pre-School Nursery places and policies should be flexibly worded to enable them to be established; including allowing the change of use of residential accommodation.	At this stage the Council does not have an evidence base on which to justify a statement or policy regarding the need for additional nursery places.
132	Policy C11: Community Infrastructure Provision	Hillingdon Hospital NHS Trust	Broadway Malyan on behalf of Hillingdon Hospital NHS Trust	We support Policy C11 Community Infrastructure.	Support noted.
146	Policy C11: Community Infrastructure Provision	Hillingdon Inter Faith Network		The LDF does not recognise the role played by the faith community centres for neither faith or other use. There needs to be greater provision for future populations.	The current wording of policy C11 provides general support for community facilities and allows more detailed policies to be developed in subsequent development plan documents.
184	Policy C11: Community Infrastructure Provision	ACS International Schools	Preston Bennett Holdings Ltd	Support the policy.	Support welcomed.
253	Policy C11: Community Infrastructure Provision	English Democrats (Hillingdon)		The document states that it supports extensions to existing schools, yet the council have already told us that they cannot provide new buildings on school grounds due to lack of funds and the cut in the Local Area Grant from central government. Therefore, this aim cannot be achieved with current central government policy.	As a land use policy document the Core Strategy supports the development and extension of existing schools.
254	Policy C11: Community Infrastructure Provision	English Democrats (Hillingdon)		The document states how many houses are to be built over the next 10 years. The national government have been unable to accurately predict immigration rates, and therefore cannot gauge how much housing will be needed in	Housing targets reflect annual monitoring targets in the Replacement London Plan. These are based on the availability of suitable sites, rather than assessed housing need.

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				Hillingdon to accommodate population growth. Because England no longer controls her borders, the calculations are flawed	
338	Policy CI1: Community Infrastructure Provision	Individual		Paragraph 1 - policy wording is weak and does not allow for growth. Where growth takes place community facilities should be fully expanded to cope - and no community facility should be closed without an improved replacement.	Policy CI1 seeks to ensure there is no net loss of community facilities. The Strategic Infrastructure Plan identifies infrastructure required to support growth, a key area being additional school places.
339	Policy CI1: Community Infrastructure Provision	Individual		Paragraph 3 - should only support the expansion of schools where this will not cause overcrowding, stress to local infrastructure or a loss of playing fields or playgrounds.	Additional school places are being provided to minimise overcrowding of existing facilities. No proposed change.
340	Policy CI1: Community Infrastructure Provision	Individual		Paragraph 7 - Rather than locate health facilities in town centres they should be located in the centre of local residential areas - e.g. with 2000 or more dwellings - making them more accessible to all and reducing the need for transport and parking spaces.	Paragraph 9.42 notes that further social infrastructure will be required to meet the needs of Hillingdon's growing population and that such provision will respond to changing needs. No proposed change.
403	Policy CI1: Community Infrastructure Provision	Brunel University	VRG Planning Ltd on behalf of Brunel University	Add new item: "10. Encouraging and facilitate expansion and improvements to the accommodation of Higher Education Institutions, to ensure their continued success."	The Council will only allow the expansion of higher education institutions within the parameters of existing policy and subject to the provisions of forthcoming development plan policies. No proposed change.
275	Policy CI1: Community Infrastructure Provision	Her Majesty's Court Service (HMCS)	DPP on behalf of Her Majesty's Court Service	Court services should be recognised as a community facility & social infrastructure in the policy and addressed in the Strategic Infrastructure Plan. Note of the need for criminal justice facilities should be included in paragraphs 9.35 & 9.39.	The list of social infrastructure provision in paragraphs 9.35 and 9.39 is not definitive. The absence of facilities in this list does not necessarily mean they would not be supported.
296	Policy CI1: Community Infrastructure Provision	Garden City Estate Residents' Association		Measures should be taken to restrict heavy goods vehicles using the main road through West Drayton & Yiewsley - a reference should be included to excluding heavy goods vehicles from town & local centres in order to preserve the vitality and viability of the centres and make them safer and less polluted for residents and	This issue will be addressed in the forthcoming Development Management Policy Document.

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				visitors.	
301	Policy C11: Community Infrastructure Provision	Garden City Estate Residents' Association		The policy should include provision for the night-time economy as many town centres are currently "no-go" areas after dark. It should state that the Council "...will seek to make a more varied provision of entertainment & attractions for evening visitors."	The importance of the night time economy is recognised - specifically regarding Uxbridge at paragraph 5.2 in the Core Strategy. Further wording will also be inserted at Table 5.3 in the section dealing with Future Growth of the Hayes - West Drayton Corridor at the end of the second sentence to read: "....and development of a night time economy."
303	Policy C11: Community Infrastructure Provision	Garden City Estate Residents' Association		The lack of youth facilities and initiatives is a major problem and the policy should state that the Council "...will provide programmes of youth facilities and initiatives for young people."	Youth facilities are categorised as community infrastructure and are covered by the provisions of Policy C11. A number of new youth centres have recently been provided as part of the Hillingdon Improvement Programme. A suitable evidence base would need to be provided to justify references to a specific need for further facilities. The provision of such facilities will be addressed the emerging strategic infrastructure plan.
390	Policy C11: Community Infrastructure Provision	Royal Brompton & Harefield NHS Trust	CGMS Consulting	The Trust would also request the amendment of Policy C11, point 7 to also acknowledge that there are other established sites within the borough that are not necessarily in accessible locations - such as Harefield Hospital - and yet where new health care facilities are to be supported given the established use.	The Council acknowledges that a limited number of existing community facilities are within the Green Belt. However as a general principle new facilities should be located in areas of maximum accessibility.
375	Policy C11: Community Infrastructure Provision	Bell Farm Christian Centre		(1) The policy should seek to grow and expand the provision of community facilities. (6) There should be a measure of success for demonstrating this. (7) Does not recognise or support the building of community outside town centres - this should be recognised, supported and promoted. (9) Localisation is at odds with the centralisation of facilities only available in town centres. Appropriate social infrastructure is not currently being considered in planning applications for new housing development. What changes are to be made to ensure this happens	The policy supports the retention and enhancement of community facilities. New community facilities would generally be supported where a need can be demonstrated. The monitoring of policy C11 is identified on page 141 of the Pre-Submission document. Community facilities are to be located in areas with high levels of public transport accessibility to maximise use. Policy C11 states that appropriate social infrastructure should be provided to cater for the needs of the existing community and future

Appendix 1: Responses received to the Pre-Submission Draft Core Strategy

ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				in future ?	populations. The policy criteria will be key in the determination of planning applications. Further, more detailed policies will be set out in the forthcoming Development Management Policies Document (DMDPD).
499	Policy CI1: Community Infrastructure Provision	Mr John McDonnell MP		The Strategy fails to register local concern at the loss of community facilities and failure of new developments to include these - which needs the Council to ensure planning agreements are adhered to. Developers should fully fund community facilities - based on an independent assessment of their need.	Paragraph 9.40 states that social infrastructure is essential in providing people with better life opportunities. Additional information will be added to this paragraph to register concern at the loss of such facilities. In addition, the intention to introduce a borough-wide CIL will be stated in the supporting text associated with policy CI1.
540	Policy CI1: Community Infrastructure Provision	Arla Foods UK Plc	BNP Paribas Real Estate	Support the principles of the policy.	Support noted
420	Policy CI1: Community Infrastructure Provision	PRUPIM	Maddox & Associates on behalf of PRUPIM	It is proposed that Policy CI1, part 6 is revised to state: "development that will impact on the community infrastructure of the Borough should contribute towards the provision of community facilities to meet the needs of new communities and mitigate impact on existing communities."	Under the provisions of the Government's CIL Regulations most new development will be required to make a contribution towards community infrastructure. In anticipation that Hillingdon will be preparing a CIL charging schedule no changes are proposed to this aspect of the policy.
430	Policy CI1: Community Infrastructure Provision	Individual		Loss of a facility in one area and its reprovision elsewhere in the borough results in a community being worse off - this is not addressed in the Strategy.	<p>The policy states that where the loss of community facilities is justified, the Council will seek to ensure that the resulting development compensates the uses to ensure no net loss.</p> <p>Developments proposing the loss of community facilities would firstly need to demonstrate that the loss of community facilities was justified and then address the issue of compensation to obtain planning consent. This is a stern test for developers and the policy will be developed further in the Development Management Policies Document.</p>
459	Policy CI1: Community Infrastructure	Hayes and Harlington		Policy CI 1	The policy states that where the loss of community facilities is justified, the Council will

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
	Provision	Community Development Forum		<p>For the policy to be sound, there needs to be an additional bullet point which addresses the needs of the voluntary and community sector for accessible and affordable premises and meeting spaces. We regard the policy justifying the loss of community facilities and their replacement as unsound as currently worded. There should be more emphasis on protecting the present social and community facilities, the loss of which should only be permitted where it can be demonstrated it is supported by the local neighbourhood, an important protection for retaining the vitality of local communities.</p> <p>The policy should refer specifically to the protection and enhancement of community premises. Otherwise, there is the risk that community premises will be lost and replaced by other community uses.</p> <p>More account should be taken of the need for social and community infrastructure to meet the needs of increased population. With planned population increases, there is a need for more community premises and other social infrastructure.</p> <p>These should be located spatially in accordance with those parts of the borough where the population is planned to increase significantly. The diversity of the borough and the community needs which flow from this should also be recognised in meeting population needs.</p> <p>There are plenty of empty properties in different use classes, which community and faith organisations could use. A successful town centre or neighbourhood centre is one which contains a diverse mix of uses, including social and community use, and there should be</p>	<p>seek to ensure that the resulting development compensates users to ensure no net loss.</p> <p>Developments proposing the loss of community facilities would firstly need to demonstrate that the loss of community facilities was justified and then address the issue of compensation to obtain planning consent. This is a stern test for developers and the policy will be developed further in the Development Management Policies Document.</p> <p>The purpose of the policy is to provide general support for the retention of community facilities. The list of facilities is not exhaustive and the policy would therefore apply to places of worship. More detail would be included in the Development Management Policy document.</p>

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				<p>planning tools to enable social and community use of properties which have been empty for a considerable period of time.</p> <p>The list of community facilities in point 7 should include faith centres, for which evidence is given in paragraph 9.39. This list contains the only reference to health; to be sound the Core Strategy needs a stand alone policy on health in conformity with draft replacement London Plan Policy 3.2.</p> <p>Point 9 should be more explicit about having local neighbourhood facilities within a short walking distance (this could be 400 metres or 800 metres), as an essential characteristic of local life. To be sound the policy should give support to walkable neighbourhoods.</p>	
515	Policy C11: Community Infrastructure Provision	L B Hillingdon (Labour Group)		<p>C11, SO16 and SO18:</p> <p>Specific reference must be made to Heavy Goods Vehicles which must be excluded from town & local centres in order to preserve vitality & viability of the centres and make them safer and less polluted for residents & visitors.</p>	No proposed change. This issue will be addressed in the forthcoming Development Management Policies document.
528	Policy C11: Community Infrastructure Provision	L B Hillingdon (Labour Group)		Need more varied facilities in town centres to provide a "night time economy" - the policy should state that it "Will seek to make a more varied provision of entertainment and attractions for evening visitors."	Agreed - reference to the night time economy is already included in the Core Strategy, specifically regarding Uxbridge at paragraph 5.27. Further wording will also be inserted at Table 5.3 in the section dealing with Future Growth of the Hayes - West Drayton Corridor at the end of the second sentence to read: "...and development of a night time economy."
529	Policy C11: Community Infrastructure Provision	L B Hillingdon (Labour Group)		The current lack of youth facilities and initiatives is one of the main causes of anti-social behaviour in the borough. The policy should state that it: " Will provide programmes of youth facilities and initiatives for young people."	It is agreed that the provision of youth facilities will be important over the period of the Core Strategy. Such facilities are covered by the provisions of policy C11 and more detailed policies on community infrastructure provision will be

Appendix 1: Responses received to the Pre-Submission Draft Core Strategy

ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
					contained in the forthcoming Development Management Policy Document.
47	Policy C12: Leisure and Recreation	British Waterways		This section could include the promotion of canalside leisure and recreation facilities, such as cafes, bike hire, and canoe and boat hire, to encourage active and healthy communities.	Reference to the canal as a leisure resource will be included in para 9.54.
73	Policy C12: Leisure and Recreation	Hillingdon Primary Care Trust		Page 143 - correct text where duplicated.	No duplication of text occurs on page 143. No proposed change.
341	Policy C12: Leisure and Recreation	Individual		Paragraph 3 - this seeks to improve the geographical spread of leisure and recreational facilities - it does not include anything within Yiewsley, West Drayton, Harlington, Harmondsworth and Sipson - and should do.	No proposed change. Policy C12 sets out proposed measures to improve the geographical spread of leisure and recreation facilities and does not identify areas of specific deficiency.
342	Policy C12: Leisure and Recreation	Individual		Paragraphs 5 & 6 - the policy is weak here and needs to ensure development proposals improve or increase existing leisure & recreation facilities - or replace them with facilities that will be of greater benefit.	The policy wording is considered wide-ranging in scope and to adequately refer to leisure and recreation potential. No proposed change.
372	Policy C12: Leisure and Recreation	Bell Farm Christian Centre		Current provision of indoor facilities for older people should be defined and targets set to demonstrate this is being increased.	It is agreed that there should be a greater emphasis on the provision of facilities to take account of Hillingdon's aging population in paragraph 9.42.
500	Policy C12: Leisure and Recreation	Mr John McDonnell MP		The words "seek to" should be change to a more positive "will".	The delivery and maintenance of leisure facilities is dependant on a range of organisations and other Council departments. The words 'seek to' reflect that this is key strategic objective for the Council.
421	Policy C12: Leisure and Recreation	PRUPIM	Maddox & Associates on behalf of PRUPIM	It is proposed that the last bullet point of Policy C12, is revised to state: "Where there is a direct impact, developer contributions will be sought towards improvements to the quality and quantity of leisure and recreational facilities"	No proposed change. Developer contributions are currently subject to the provisions of the Council's Section 106 SPD and in future will relate to the forthcoming CIL. The Core Strategy does not need to specify the circumstances in which this document would apply.

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
557	Policy C13: Culture	English Heritage		<p>Culture (pgs 144-145) - Policy C13: Culture and its supporting text should make reference to the historic environment as a cultural resource that invested in as part of the Borough's conservation strategy (PPS5 Policy HE3 – '...positive, proactive strategy for the conservation and enjoyment of the historic environment in their area..'). For example many cultural activities take place in, or are magnets for visitors because they are buildings, spaces and landscapes of historic interest. This includes places such as Uxbridge Town Centre, which contains and is defined by a number of heritage assets (i.e. listed buildings, conservation area), as well as Manor Farm, which is an interesting complex of listed buildings and Scheduled Monument.</p>	<p>It is agreed that the historic environment is a cultural resource and should be included in the definition of culture in the glossary. A further bullet point will be added to Policy C13, stating that the historic environment will be protected as a cultural resource.</p>
270	Policy C13: Culture	The Theatres Trust		<p>Objectives SO6 and SO18 overlap in that they both deal with access to all community facilities. Their distinction is not clear. However we are surprised that the Glossary entry for Culture does not include the word 'theatres'. As cultural anchors these buildings provide the basis for your cultural offer and should be afforded an entry in this item.</p>	<p>Theatres to be included in the definition of culture in the glossary.</p>
501	Policy C13: Culture	Mr John McDonnell MP		<p>The affordability of some facilities for community use is not acknowledged - and greater emphasis given to addressing the diversity of the local community.</p>	<p>Financial issues are not a matter for the Core Strategy. Recognition of the diversity of the borough's communities is given in the Vision statement where the Council looks to Hillingdon taking full advantage of its distinctive strengths - this includes its range of local communities and also to closing the social and economic inequality gaps that exist at present. No proposed change.</p>
48	Appendix 1	British Waterways		<p>This section should include reference to the Town and Country Planning Association's Policy Advice Note: Inland Waterways (2009) and the recent English Heritage-BW guide, England's</p>	<p>It is not possible to list all potential sources of evidence for the Core Strategy. Only those that are directly relevant or have informed its production have been listed in Appendix 1. The</p>

Appendix 1: Responses received to the Pre-Submission Draft Core Strategy

ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				Historic Waterways: A working heritage.	<p>Town and Country Planning Association is a non statutory organisation and its advice notes have not been included as sources of evidence.</p> <p>Whilst the historic significance of the Canal is acknowledged the Core Strategy sets a broad development strategy for the borough. In this context the role of the canal is to act as a focus for sustainable development and regeneration in the Hayes/West Drayton corridor. No proposed change.</p>
545	Appendix 1	English Heritage		<p>LATE SUBMISSION:</p> <p>Evidence base - Although many changes have been made to the text of the Core Strategy there unfortunately still appears to be a lack of robust evidence base on the historic environment for Hillingdon, beyond the inclusion of the Borough's conservation area appraisals and management plans (as listed in Appendix 1). It is noted that the Spatial Portrait (pg 10-11) lists key heritage assets, but as stated in our previous letter, it is not clear what evidence has been established regarding the environmental characteristics of the borough as a basis for the spatial strategy and tall buildings locations. It is a requirement of PPS1 (paragraph 19) and PPS5 (policy HE 2) that local plans be based on up-to-date evidence of local environmental characteristics such as the historic environment and its heritage assets, and that this evidence be documented and made publicly available. For example Hillingdon's web page does not include any reference to the borough's character or historic environment as part of its evidence base.</p>	<p>5 Conservation Area Appraisals and 2 Management Plans have been completed and the Local List of buildings of architectural and historical importance including 292 entries was adopted by the Council on 27 May 2010. The Council has also submitted a bid for a grant from English Heritage as part Community Heritage Initiative Project (CHIP) to assist in the development of further appraisals and reviews. The Council intends to produce a Character Study as part of its evidence base including appropriate locations for tall buildings.</p> <p>A link to the current heritage documents to be provided under the 'Evidence base' documents for the LDF on the Council's website. No proposed change.</p>
331	Appendix 1	London Geodiversity Partnership		Appendix 1 (Evidence Base) should list London's Foundations, The London Plan Implementation Report, GLA, March 2009 (http://www.london.gov.uk/who-runs-	Agreed - include 'London's Foundations, The London Plan Implementation Report: Protecting the geodiversity of the capital (Greater London Authority, March 2009)' in Appendix 1.

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				london/mayor/publications/planning/londons-foundations).	
49	Appendix 2	British Waterways		<p>We have the following comments to make on the references to works on the Grand Union Canal:</p> <p>The first project, relating to the approved mooring scheme at Hayes should be described as "offside" rather than "offline". Offline moorings are those within a dock or marina, off the main navigation, which is not what has been approved.</p> <p>The second project, relating to repairs at Iron Bridge Narrows, has already been completed in the last financial year. We would also suggest that towpath/National Cycle Network improvements be referred to, which British Waterways are coordinating with TfL and LB Hillingdon (Bob Castelijm) and which are described within the current draft Local Implementation Plan.</p>	Noted. Comments will be included.
75	Appendix 2	Hillingdon Primary Care Trust		Page 153, the table setting out planned/potential developments needs reference to a potential development at Eastcote Health Centre added under the PCT section.	Comments noted. Proposed changes will be included.
76	Appendix 2	Hillingdon Primary Care Trust		As a general note the text refers to joint working and sharing of facilities across public sector organisations, although the developments noted in the summary tables (pages 153, 154 etc) don't reflect this.	Comments noted.
248	Appendix 2	Yiewsley and West Drayton Town Centre Action Group		The contents of the London Borough of Hillingdon Draft Infrastructure Schedule have been noted and on issues such as Crossrail and a new Health Centre for Yiewsley the Council is to draw up contingency plans in the event that neither project materialises. It has also been noted that Hillingdon Hospital is applying for an extension to their original planning permission	The Primary Care Trust was consulted as part of the production of the Core Strategy and the Infrastructure Schedule. Amendments have been made to the Schedule in response to these comments.

Appendix 1: Responses received to the Pre-Submission Draft Core Strategy

ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				for a new hospital. Also the long awaited upgrade of Hayes Station by 2015. The issues regarding health provision are not 'sound' as they do not take into account the implications of the government's reforms which are still being rolled out and will require input from each Local Authority.	
249	Appendix 2	Yiewsley and West Drayton Town Centre Action Group		Residents have objected to the inclusion of the Old Coal Depot site in Tavistock Road as a site for recycling facilities. The site is surrounded by residential units and the impact of traffic in and out of the site has been estimated at 2,000 journeys. If this site is approved under the West London Waste Plan the Core Strategy indicates that the site will be safeguarded for this purpose. The environmental impact on the community will mitigate against any proposal on environmental improvements contained in the Core Strategy.	Comments noted - they refer to a proposal in the West London Waste Plan Development Plan Document (DPD), a draft of which was published concurrently with the Pre-Submission Draft Core Strategy and are being considered as part of the consultation responses for that DPD. No proposed change.
404	Appendix 2	Brunel University	VRG Planning Ltd on behalf of Brunel University	Revise as follows: "To enable the University to deliver international standards of research and teaching facilities, which necessitates continued expansion and improvements to its accommodation."	Comments noted. Proposed wording will be included in the infrastructure schedule as an aspiration of the University, however the Council cannot provide unqualified support for proposals which could involve development on Green Belt land.
405	Appendix 2	Brunel University	VRG Planning Ltd on behalf of Brunel University	Revise as follows: "The key outstanding project from the existing master plan is phase 1 of the Eastern Gateway Building, which is due for completion in 2012 and an extension to the main refectory building, due for completion in 2013 / 2014. A number of future projects are being	Comments noted and agreed.

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ID	Policy/para/section/map/ table	Consultee	Agent	Summary	Officer's Recommendation
				considered for the next master planning period from 2014 to 2021.	
406	Appendix 2	Brunel University	VRG Planning Ltd on behalf of Brunel University	Revise as follows: "Current master planning period comes to an end in 2014. Production of new master plan is currently under preparation."	Comments noted and agreed.
558	Appendix 2	English Heritage		Infrastructure (appendix 2, pgs 148-154): We note that an infrastructure schedule is set out within the appendix, but it is still not clear how the Council seeks to deal with planning obligations. For example planning obligations can provide an important source of funding for the conservation of the historic environment. In addition it should be recognised that the historic environment is a valuable asset that can be harmed through investment in the infrastructure, unless sufficient mechanisms are in place which help continue to conserve appropriately the Borough's heritage assets. With this in mind we would seek to be involved in the production of any further planning policy on this matter.	The Council's approach to dealing with Planning Obligations is contained in its Planning Obligations SPD. It is also considering introducing a borough-wide Community Infrastructure Levy (CIL) and reference to this will be included in Policy C11.
437	Appendix 3	Royal Brompton & Harefield NHS Trust	DP9 on behalf of Royal Brompton & Harefield NHS Foundation Trust	Trajectory should be amended to reflect housing figures from the draft Replacement London Plan. Can it be confirmed how the Trajectory relates to published five year supply of deliverable land for housing (2007).	<p>The housing trajectory is Hillingdon's assessment of expected completions. It includes sites with an outstanding planning permission and those that are expected to come forward for development and gain planning consent. Borough-wide targets in the Replacement London Plan are based on the GLA's SHLAA. The housing trajectory demonstrates how Hillingdon's annual monitoring target will be met.</p> <p>Hillingdon's housing trajectory is updated on an annual basis as part of the production of the Annual Monitoring Report and demonstrates a five year land supply. The five year supply of deliverable land for housing (2007) was produced as a separate document for that year. No</p>

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
					proposed change.
332	Appendix 4	London Geodiversity Partnership		Appendix 4 (Glossary) should give a definition of Geodiversity.	Agreed - add definition to read "Geodiversity: The variety of rocks, fossils, minerals, landforms and soils along with the natural processes that shape the landscape."
SA1	Sustainability Appraisal	Individual		<p>There are a number of issues regarding the creation of the waste management locations. They are:</p> <ol style="list-style-type: none"> 1. the impact of the consolidated waste management areas on the surrounding areas eg. air, noise and traffic pollution. 2. the green jobs that come out of this seem to be positive, but are usually heavily subsidised by Government. <p>With regard to housing, there are issues:</p> <ol style="list-style-type: none"> 1. Hillingdon is in a region that is water-stressed so care will need to be taken with regard to housing density 2. Residents in the local area where housing is to be built should be better consulted and their views taken into consideration rather than being disregarded lightly. After all, the changes will impact upon them and their area of residence 3. loss of permeable surfaces will lead to increased water run off and increase the risk of flooding. 4. I have noticed that the road drainage systems seem to be placed in inappropriate places and simply add to localised road flooding when it rains. I have no idea how this can continue to happen. 	<p>No proposed change to the Sustainability Appraisal (SA).</p> <p>These concerns are addressed through the application of the SA on the Core Strategy. Issues regarding waste management locations will be considered through the West London Waste Plan. The other issues raised about environmental impacts, such as flood risk, water consumption and brownfield development are all considered within Core Strategy policies. These are considered to answer the issues raised and no further changes are necessary.</p> <p>With regards to the issues about consultations on planning applications, there are already a number of methods for the public to get involved in the planning process. Experience in the planning department suggests that the Hillingdon public already actively engage to a high standard in planning applications and the Core Strategy will continue to support this.</p>

Appendix 1: Responses received to the Pre-Submission Draft Core Strategy

ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				<p>5. Brownfield sites are not necessarily the easiest to develop. Sometimes, they will need a lot of preparation (eg foundation and sewer system placing or land decontamination) before any housing can be built. Has the true cost of these been considered? It is likely that this will be a burden on the Council.</p> <p>6. Instead of building lots of offices (which is already surplus at Stockley Park) or hotels, it would be better to consider these sites for housing (provided the transport links are also considered alongside).</p> <p>Better consultation with residents located around an area that is going to be developed, whether that is for waste management or housing. I mean that they are actively consulted and made aware of changes rather than being passively notified by the minimum legal requirement-this is not the best method as it involves the Council resident to be always looking actively. Surely, it would be better to have a better notification eg. signs posted up in the affected area? Also, to take their views into consideration with empathy in the decisions that are made.</p> <p>Better usage of currently unoccupied council housing stock so that the housing needs can also be met that way-it must be better than letting houses become derelict.</p> <p>Better usage of current waste facilities rather than building a new facility. Surely it would be easier (and cheaper) to upgrade/demolish and upgrade existing facilities than getting a new facility built on land that has to be pre-prepared for it?</p>	

Appendix 1: Responses received to the Pre-Submission Draft Core Strategy

ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
SA2	Sustainability Appraisal	Regional Urban Designer - English Heritage		In terms of the Updated Sustainability Appraisal we would still suggest that the concerns above have not been fully addressed as part of the SA. For example the lack of a robust approach on the management of tall buildings (as promoted in policy BE1) would not improve the sustainability scoring against the heritage and landscape Sustainability Objective.	Disagree – no proposed change. The consideration of tall buildings in BE1(11) provides a satisfactory level of control to ensure they will not have an adverse impact on existing townscapes. The SA is therefore considered to adequately consider the historic environment.
SA3	Sustainability Appraisal	Hillingdon Motorist Forum		<p>West London Sub Regional Development Framework guidance</p> <p>The strategic priorities for the West London sub-region will be to:</p> <p>The West London Tram Project has been abandoned.</p> <p>Under the Transport strategy road transport is not mentioned.</p> <p>Page 36: Table 5. Plans, Programmes, Strategies and Initiatives</p> <p>A Hillingdon Transport Strategy is mentioned. Where can a copy of this document be obtained.</p> <p>Page 38 - Topic: Transport and Air Quality Causal Factors</p> <p>The West London Tram Project is again mentioned.</p> <p>Page 61 - Table 6. Key Sustainability Issues Identified for Hillingdon</p> <p>Comment:</p>	Noted. No proposed change.

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				<p>Car ownership and use is high in comparison with other London boroughs and is likely to increase with the 35,000 jobs and 8,900 homes in opportunity areas to be provided as requirements of the London Plan. What the plans to accommodate this increase.</p> <p>Page 65 Traffic Congestion:</p> <p>Congestion issues have been highlighted with the identification of key junctions for improvement in the Local Implementation Plan (LIP). The Forum have submitted comments on the LIP.</p> <p>Page 88 Air Quality Objective. Traffic congestion is identified as a contributor to poor air quality. No active plans to reduce congestion.</p>	

Appendix 2: Schedule of Proposed Changes

LBH Reference No.:	Proposed Change	Relevant Page No. / Section / Para.
Chapters 1 and 2		
1.1 Text updating to reflect latest position	<p>Section revised to read:</p> <ul style="list-style-type: none"> • A considerable amount of work has been undertaken to ensure that the Core Strategy reflects local issues and is based on sound evidence. It has been developed through discussion with Hillingdon Partners to ensure a close fit with the Sustainable Community Strategy. This version of the Core Strategy has evolved following consultation on the following documents: • Issues and Options (Spring 2005): This document set out the key social, environmental and economic issues facing Hillingdon with a number of strategic alternatives. • Preferred Options (Autumn 2005): This built on the Issues and Options document and identified a preferred option. • Revised Preferred Options (Spring 2007): Refined the process further and identified a series of challenges for Hillingdon with alternative options. • A Vision for 2026: Local Development Framework Core Strategy Consultation Draft (June 2010): Sets out the revised seven point Vision for Hillingdon, based on discussions with its Local Strategic Partnership • <u>A Vision for 2026: Local Development Framework Core Strategy Pre-submission Consultation Draft (February 2011): representations were sought on the 'soundness' of the final publication version of the Plan.</u> <p>How to get involved – making representations</p> <ul style="list-style-type: none"> • You are invited to comment on this 'Pre-Submission Core Strategy' Development Plan Document, February 2011 (Regulation 27 stage) and its 'soundness' and the accompanying documents. The accompanying documents comprise: the Sustainability Appraisal, the Equalities Impact Assessment and a Statement of Consultation. The six week period for public consultation begins on 9 February 2011 and ends at 5pm on 25 March 2011. <p><u>Submission to the Secretary of State</u></p> <ul style="list-style-type: none"> • <u>Following public consultation on the Pre-submission Core Strategy in February/ March 2011, the Council have carefully considered all representations received and incorporated the changes within this final version known as the Submission Core Strategy. The Submission Core Strategy along with the accompanying submission documents have been submitted to the Secretary of State for an independent examination to test its soundness (or legal compliance with relevant government planning guidance and policies).</u> • The documents are available for inspection at the following addresses: 	Pages 6-8, paras. 1.6 – 1.13

LBH Reference No.:	Proposed Change	Relevant Page No. / Section / Para.																		
	<ul style="list-style-type: none"> • Council's Website: www.hillingdon.gov.uk under 'Have your say' • Limehouse Link http://hillingdon-consult.limehouse.co.uk • Planning Information Services: Civic Centre, High Street, Uxbridge, UB8 1UW (Mon, Tue, Wed and Fri 9.00am – 5.00pm, Thursday 9am-7.30pm). • Hayes One Stop Shop: 49-51 Station Road, Hayes UB3 4BE (Mon, Tue, Thur and Fri 8.30am-4.30pm, Wed 9.30am-4.30pm) • All Hillingdon Libraries: full details of library opening hours are available at: http://www.hillingdon.gov.uk/index.jsp?articleid=8911 <table border="1" data-bbox="427 667 1149 1384"> <tbody> <tr> <td>Uxbridge, High Street Uxbridge, UB8 1HD</td> <td>Northwood Hills, Potter Street, Northwood HA6 1QQ</td> </tr> <tr> <td>Botwell Green, East Avenue, Hayes UB3 2HW</td> <td>Oak Farm, Sutton Court Road, Hillingdon UB10 9PB</td> </tr> <tr> <td>Charville, Bury Avenue, Hayes UB4 8LF</td> <td>Ruislip (Manor Farm) - Bury Street, Ruislip HA4 7SU</td> </tr> <tr> <td>Eastcote, Field End Road, Eastcote HA5 1RL</td> <td>Ruislip Manor, Linden Ave, Ruislip Manor HA4 8TW</td> </tr> <tr> <td>Harefield, Park Lane, Harefield UB9 6BJ</td> <td>South Ruislip operating from Learning & Development Centre, Queen's Walk, HA4 0LR</td> </tr> <tr> <td>Harlington, Pinkwell Lane, Hayes UB3 1PB</td> <td>West Drayton, Station Road, West Drayton UB7 7JS</td> </tr> <tr> <td>Hayes End, Uxbridge Road, Hayes UB4 8JQ</td> <td>Yeading, Yeading Lane, Hayes UB4 0EW</td> </tr> <tr> <td>Ickenham, Long Lane, Ickenham UB10 8RE</td> <td>Yiewsley, High Street, Yiewsley UB7 7BE</td> </tr> <tr> <td>Northwood, Green Lane Northwood HA6 3AA</td> <td></td> </tr> </tbody> </table> <ul style="list-style-type: none"> • All comments must be made on a 'representations' form which is available from the venues mentioned above or can be requested by phoning 01895 250230 or e-mailing ldfconsultation@hillingdon.gov.uk or downloading from Limehouse Link: http://hillingdon-consult.limehouse.co.uk. Representation forms should be completed and can be sent: • By Email: ldfconsultation@hillingdon.gov.uk • Via the Limehouse Link: http://hillingdon-consult.limehouse.co.uk • By post: LDF Team, Planning, Environment and Community Services, London Borough of Hillingdon, Civic Centre, Uxbridge UB8 1UW • By fax: 01895 277042 marked for the attention of the LDF Team • Representations may be accompanied by a request to be notified at a specified address of any of the following: • that the Core Strategy has been submitted to the Secretary of State for independent examination 	Uxbridge, High Street Uxbridge, UB8 1HD	Northwood Hills, Potter Street, Northwood HA6 1QQ	Botwell Green, East Avenue, Hayes UB3 2HW	Oak Farm, Sutton Court Road, Hillingdon UB10 9PB	Charville, Bury Avenue, Hayes UB4 8LF	Ruislip (Manor Farm) - Bury Street, Ruislip HA4 7SU	Eastcote, Field End Road, Eastcote HA5 1RL	Ruislip Manor, Linden Ave, Ruislip Manor HA4 8TW	Harefield, Park Lane, Harefield UB9 6BJ	South Ruislip operating from Learning & Development Centre, Queen's Walk, HA4 0LR	Harlington, Pinkwell Lane, Hayes UB3 1PB	West Drayton, Station Road, West Drayton UB7 7JS	Hayes End, Uxbridge Road, Hayes UB4 8JQ	Yeading, Yeading Lane, Hayes UB4 0EW	Ickenham, Long Lane, Ickenham UB10 8RE	Yiewsley, High Street, Yiewsley UB7 7BE	Northwood, Green Lane Northwood HA6 3AA		
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	<p>under section 20 of the above Act,</p> <ul style="list-style-type: none"> • the publication of the recommendations of any person appointed to carry out an independent examination of the Core Strategy, and • the adoption of the Core Strategy. • All information will be available on request in Braille, large copy print, audio cassette or in a number of different languages other than English. 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 5pm on 25 March 2011. Comments received after the end of the consultation period do not have the right to be considered. <p>Next Steps</p> <ul style="list-style-type: none"> • Following the consultation period, the Council will carefully consider all representations received and where appropriate, seek to resolve objections. This document will then be and formally submitted to the Secretary of State, with a statement of all representations submitted during the consultation process and how this influenced the policies and provisions of the document. • All representations received to the submission version will be considered at an Examination to be conducted by an independent Planning Inspector. <u>The Core Strategy will be subject to an Examination in Public conducted by an Independent Planning Inspector.</u> He / she will test the 'soundness' of the plan. The Inspector's report will be binding on the Council. The Core Strategy is scheduled for adoption in December 2011 <u>expected to be adopted during 2012.</u> 	
Chapter 3		
3.1 Heathrow Airport Ltd. (203)	Each year Heathrow accommodates 480,000 flights and approximately 67m passengers. By 2015 passenger numbers at Heathrow Airport are predicted to rise to 80 <u>75-77</u> mppa; this is under current operating conditions. Although this may have the potential to create more jobs it will also bring added pressures to the road network and public transport capacity which will need to be recognised and addressed.	Page 12, Hillingdon's Key Facts, Economy
3.2 Text updating	London Borough of Hillingdon Housing Market Assessment, Draft, September 2009 <u>2011, Fordham Research</u>	Page 12, Footnote 5
3.3 Hillingdon Primary Care Trust (72)	Hillingdon Primary Care Trust owns and manages 25 <u>20</u> health centres, clinics and administrative buildings and manages 51 GP practices.	Page 14, Hillingdon's Key Facts, Community Facilities
3.4 Heathrow Airport Ltd. (204)	The borough is home to Heathrow Airport, a key gateway for the UK, <u>the UK's only hub airport</u> and one of the busiest airports in the world. Heathrow Airport is also the second busiest public transport interchange in the UK, with rail, bus and coach links around the country.	Page 15, Hillingdon's Key Facts, Community Facilities
3.5 Lichfield Planning on behalf of British Airways (193) and	Further enhancements to the rail network are planned, including Crossrail (<u>under construction</u>) and Airtrack .	Page 15, Hillingdon's Key Facts, Transport

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Text update		
3.6 Mayor of London (464)	London Plan requirement to accommodate a proportion of 9-11,000 <u>12,000 new jobs and 9,000 new homes</u> in the Heathrow Opportunity Area.	Page 16, Table 3.1, Economy
3.7 Text updating to reflect latest position	The Coalition Government intends to begin <u>carried out</u> an extensive public consultation on HS2 early in 2011.	Page 20, para. 3.9
3.8 Update to reflect recent discussions with TfL	<p>Insert new para after 3.9:</p> <p><u>Central Line</u></p> <p><u>3.10 Hillingdon Council has an aspiration for securing an extension of the Central Line to Uxbridge by means of a spur in the area to the west of Ruislip Gardens, with the route to West Ruislip also being retained. The extension to Uxbridge would support growth in the Uxbridge area, which is needed to maintain its Metropolitan town centre status to enable it to compete with its neighbours. By supporting growth, it would also contribute towards the Mayor's aspirations for growth in outer London boroughs as set out in the London Plan. The Central Line service would also reduce congestion on the roads and this would enable buses to run faster. The Council supports the view of Transport for London (as set out in a report in February 2009), that there may be a good business case for the Central Line extension to Uxbridge.</u></p>	Page 20, new para. after 3.9
3.9 Mayor of London (466)	<p>Insert two new paragraphs at end of Section 3:</p> <p><u>Crossrail</u></p> <p><u>3.11 Crossrail is a major infrastructure project that will provide a direct rail link from Maidenhead to the City, east London, Essex and Kent, travelling through the southern part of Hillingdon on the route of the existing Paddington line. Work on the project began in 2008 and the main civil engineering construction works are expected to be completed by 2017, with services commencing in 2018. There will be a new station at Heathrow and two existing stations will be upgraded as part of the Crossrail works (Hayes and West Drayton) and it is expected that these works will be undertaken during the period 2015/2016. The Council supports the principle of Crossrail and recognises the associated regeneration benefits for Hillingdon.</u></p> <p><u>3.12 Following public consultation and an Examination in Public in December 2009, alterations to the London Plan were approved in April 2010. Policies 3C.12A, 6A.4 and 6A.5 of the London Plan, together with Supplementary Planning Guidance issued in July 2010, set out how the Mayor will seek to provide funding for Crossrail through the use of planning obligations. The Mayor is also considering introducing a Community Infrastructure Levy (CIL) to raise £300 million towards the cost of the project.</u></p>	Pages 20-21, New paragraphs 3.11 and 3.12
Chapter 4		
4.1 British Waterways (26)	Hillingdon is taking full advantage of its distinctive strengths with regard to its places, communities and heritage: The special character of the borough's natural and	Page 23, The Vision for Hillingdon 2026 first

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	built assets have been protected and enhanced, fewer heritage assets and wildlife habitats are at risk, there are more locally-distinct buildings, and new higher standards of development, integrating renewable energy technology. More residents are accessing the borough's <u>waterways and</u> quality public open spaces, particularly in Harefield and south of the A40.	bullet point
4.2 Text correction	SO1: Conserve and enhance the Borough's heritage and their <u>its</u> settings by ensuring new development, including changes to the public realm, are of high quality design, appropriate to the significance of the heritage asset, and sensitive to the wider environment.	Page 24, SO1
4.3 Internal change to reflect new evidence base and Nathaniel Lichfield & Partners on behalf of Cathedral Group (267)	SO7: Address Hillingdon's housing needs in Hillingdon <u>using appropriate planning measures</u> . by providing affordable housing as identified in Hillingdon's Housing Needs Study (2005).	Page 25, SO7; Page 61 SO7
4.4 Replacement London Plan Panel Report	SO19: Meet the current <u>proposed Replacement</u> London Plan target to provide 365 <u>425</u> new homes per annum. and consider the revised targets in the Replacement London Plan (2009).	Page 26, SO19
4.5 LB Hillingdon Labour Group (518)	SO23: Develop and implement a strategy for the Heathrow Opportunity Area, in order to ensure that local people benefit from economic and employment growth and social and environmental improvements including reductions in noise and <u>poor</u> air quality.	Page 26, SO23
4.6 Sustainability Appraisal recommendation	SO25: Maintain support for operational uses within the existing airport boundary and seek to minimise the <u>that do not increase</u> environmental impacts from the airport wherever possible <u>and continue to reduce existing impacts.</u>	Page 26, SO25
4.7 Update to reflect recent discussions with TfL	Transportation improvements are key to ensuring the future success of Uxbridge as a Metropolitan Centre. An enhanced transport interchange is proposed, including improved underground links to the capital. The exact nature and scale of transportation improvements required to support growth in Uxbridge will be defined through detailed assessment of proposals as they come forward, <u>however long term improvements to the Central and Metropolitan Lines have been discussed with TfL and are supported by the Council.</u>	Page 27, para. 4.8
4.8 Lichfield Planning on behalf of British Airways (193)	Heathrow Airport is not yet at its recognised capacity for a five Terminal airport. The 'Adding Capacity at Heathrow Airport' states that the airport receives €3 <u>67</u> million passengers per annum (mppa).	Page 28, para. 4.14
4.9 Heathrow Airport Ltd. (203 and 207)	This is predicted to rise to 80 <u>75-77</u> mppa by 2015 with the inclusion of a fully operational Terminal 5. The Government has ruled out the development of a third runway, but has committed to looking at a 'better not bigger' approach to the Airport. In 2012, the Airport is likely to see a rise in the number of larger aircraft helping to increase the passenger numbers per year. The continued growth of the airport will be within the existing permissions but it will have an impact on the amount of vehicles on the road, and the supporting infrastructure. More hotels, office space, industrial and commercial uses will all be attracted to the Heathrow Opportunity area. This growth needs to be managed carefully to ensure there are no further adverse impacts on local air quality, and that greenhouse gasses can be minimised to	Page 28, para. 4.14

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	reduce impacts on climate change.	
Chapter 5		
5.1 Sustainability Appraisal Update Feb 2011 recommendation (pg 28)	The Council will manage the release of 17.58ha of surplus industrial land for other uses over the plan period <u>subject to other policies in this Plan</u> (see Map 5.1).	Page 37, Policy E1
5.2 Maddox and Associates on behalf of PRUPIM (419)	Accommodating hotel growth must not be at the expense of employment land around Heathrow Airport, and Policy E1 safeguards Locally Significant Industrial Sites on the Heathrow perimeter. Three key locations for hotel growth are identified by Hillingdon's Tourism Study: <u>Heathrow Bath Road area</u> , Hayes and Uxbridge.	Page 41, para. 5.20
5.3 Sustainability Appraisal Update Feb 2011 recommendation (pgs 29-30)	The Council will accommodate 9,000 new jobs during the plan period. Most of this employment growth will be directed towards suitable sites in the Heathrow Opportunity Area, Strategic Industrial Locations, Locally Significant Employment Locations (LSEL), Locally Significant Industrial Sites (LSIS), Uxbridge town centre and Hayes Town Centre with a particular focus around transport nodes. The Council will promote development in highly accessible locations that <u>supports delivers sustainable travel behaviour patterns and contributes to the improvement of existing networks</u> to reduce <u>s emissions and impacts on climate change air quality</u> . The Council will accommodate a minimum of 3,800 additional hotel bedrooms, and new hotels and visitor facilities will be encouraged in Uxbridge, Hayes, on sites outside of designated employment land on the Heathrow perimeter and in other sustainable locations.	Pages 41-42, Policy E2
5.4 Hayes Town Partnership (363)	Three Crossrail stations are proposed at Heathrow, West Drayton and Hayes and these will help establish the Corridor as a key transportation node in West London. The enhanced stations will act as a driver for market-led investment in Hayes, maximise regeneration and growth opportunities, create new jobs, and generate increased footfall within the town centres which will support their retail and leisure functions <u>and development of a night time economy</u> . Market-led investment will be managed so as not to increase local air pollution for residents.	Page 45, Table 5.3, Hayes West Drayton Corridor, Future Growth
5.5 Sustainability Appraisal Update Feb 2011 recommendation (pgs. 33-34)	Local parades will be protected, <u>enhanced</u> and managed to ensure they meet the needs of the local community and enhance the quality of life for local residents, particularly those without access to a car.	Page 56, Policy E5
5.6 Sustainability Appraisal Update Feb 2011 recommendation (pgs. 34-35)	Hillingdon will encourage the development of affordable accommodation for small and medium-sized businesses in appropriate <u>sustainable</u> locations throughout the borough.	Page 57, Policy E6
5.7 Sustainability Appraisal Update Feb 2011 recommendation (pgs. 36-37)	The Council will ensure training opportunities are linked with the development of major sites for both construction phases and end use occupiers, and through liaising with local colleges and businesses to ensure workforce development initiatives and training programmes reflect skill requirements in the workplace. The Council will engage with local businesses and universities to link high end jobs <u>and green jobs</u> in the borough with higher education courses. The Council will promote Hillingdon as a destination for visitors and tourists and ensure that local residents have access to jobs within related industries.	Page 59, Policy E7
Chapter 6		

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6.1 Internal change to reflect new evidence base	See 4.3 above	Page 61, SO7
6.2 Replacement London Plan Panel Report	See 4.4 above	Page 61, SO19
6.3 Evidence Base update	Source: A) London Borough of Hillingdon Draft Housing Market Assessment (HMA) 2009 , Fordham Research. B and C) The Council's 2007/2008 Housing Strategy Statistical Appendix (HSSA)	Page 61, Table 6.1
6.4 Evidence base update	(Footnote amended) 36 London Borough of Hillingdon Housing Market Assessment, Draft, September 2009 <u>2011</u>	Page 62, footnote 36
6.5 Text updating	Tenure: Hillingdon's draft HMA ⁽³⁶⁾ is considered to be the primary source of evidence for <u>a detailed breakdown of</u> housing needs and indicates that at 72%, levels of owner occupation in the borough are higher than the national and regional (London) average.	Page 62, para. 6.4, Tenure
6.6 Replacement London Plan EIP Panel Report	6.7 The London Plan (2008) set s a target for Hillingdon to provide 365 new dwellings per annum. <u>Following the completion of the Replacement London Plan EIP, the subsequent Panel Report recommends a revised annual monitoring target of 425 units.</u> In accordance with Government guidance, this target has been rolled forward to cover the Core Strategy period up to 2026. At the time of its publication in October 2009 the Replacement London Plan (2009) contained a revised target for Hillingdon to provide 6,200 dwellings up to 2021, based on the GLA's Strategic Housing Land Availability Assessment (SHLAA). 6.8 In August 2010, the Mayor published a Housing Technical Note (37) to assist participants at the Replacement London Plan EIP sessions. This resulted in a proposed reduction in the pan-London target and a proposed reduction in Hillingdon's annual monitoring target from 620 to 470 dwellings per annum. Following representations prepared by the Council as part of the EIP process, a further amendment has been made to Hillingdon's annual monitoring target and the figure now stands at 425 units. 6.9 Notwithstanding recent changes to PPS3 the Mayor proposes to retain borough wide housing targets in the London Plan. The Technical Paper states that the current methodology is not considered to be the most effective way forward and a review of housing targets will be brought forward as an early alteration to the the London Plan. (Footnote 37 deleted) 37 Draft Replacement London Plan Examination in Public Housing Technical Note, August 2010	Page 62-63, paras. 6.7, 6.8 and 6.9
6.7 Change to reflect updated evidence base	For the purposes of the Core Strategy, housing need is defined as <i>'the number of households who lack their own housing, or who live in unsuitable housing and who cannot afford to meet their housing needs in the market.'</i> The following documents are relevant in the assessment of	Page 63, paras. 6.11 and 6.12

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	<p>housing need:</p> <p>In addition to the borough wide and sub regional HMAs the following documents are also relevant:</p> <ul style="list-style-type: none"> • <u>London Borough of Hillingdon Housing Market Assessment:</u> This examines the local housing market and estimates the need for affordable housing in the borough. The results of the HMA will be used to underpin both planning and housing policy. • <u>London Borough of Hillingdon Housing Needs Survey Update (2005):</u> This document is the current assessment of housing needs in the borough. The Council is currently in the process of publishing its updated Housing Market Assessment (HMA) • <u>West London Sub Regional Housing Market Assessment:</u> This study is also in production and will provide a broader picture of housing needs for the seven boroughs in the West London Sub-Region. 	
6.8 Mayor of London (469)	<p>New bullet point:</p> <ul style="list-style-type: none"> • <u>2008 London Strategic Housing Market Assessment:</u> This study provided an assessment of housing needs across London 	Page 63, para. 6.12
6.9 Change to reflect updated evidence base	<p>The draft Hillingdon's HMA indicates an annual requirement to provide 2,623 affordable dwellings, based on the definition of affordable housing contained in Planning Policy Statement 3 (PPS 3). The Sub Regional study <u>used the same methodology as the London-wide HMA and</u> calculates a total housing need (market and affordable properties) for the seven boroughs in the West London Region of 35,924 units. Hillingdon's calculated total annual need of 415 units forms part of this figure.</p> <p>Overall, the draft borough wide Hillingdon's HMA concludes that 50% of all new housing should be affordable and 50% should be provided as market accommodation.</p>	Page 63-64, para. 6.13
6.10 Legal and General Property Partners (Life Fund) Ltd (276); Drivers Jonas Deloitte (326)	<p>Policy H1: Housing Growth</p> <p>The Council will meet and exceed its minimum strategic dwelling requirement, where this can be achieved, in accordance with other Local Development Framework policies.</p> <p>The borough's current target is to provide an additional 3,650 <u>4,250</u> dwellings, annualised as 365 <u>425</u> dwellings per year, for the ten year period between 1 April 2007 <u>2011</u> and 31 March 2017 <u>2021</u>.</p> <p>Rolled forward to 2026, this target equates to a minimum provision of 5,475 <u>6,375</u> dwellings over the period of the Core Strategy. Sites that will contribute to the achievement of this target will be identified in the Site Allocations DPD.</p>	Page 65, Policy H1
6.11 Replacement London Plan EIP	The following documents are relevant to housing growth in	Page 65, paras. 6.17 and 6.18

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Panel Report.	<p>Hillingdon and are examined in this chapter:</p> <ul style="list-style-type: none"> The London Plan (2008) which sets Hillingdon's current annual monitoring target; The Housing Trajectory and 5-year land supply; and The Replacement London Plan EIP Panel Report (May 2011) The Replacement London Plan (2009), which sets a proposed revised annual monitoring target based on the GLA's Strategic Housing Land Availability Assessment (SHLAA). <p>6.18 The London Plan (2008) sets set an annual monitoring target for Hillingdon to provide 365 new homes per annum. The subsequent Replacement London Plan EIP Panel Report has recommended a revised annual monitoring target for Hillingdon of 425 units. This target has been tested through the EIP process and will be carried forward in to the Core Strategy. In accordance with government advice and until the adoption of the Replacement London Plan (2009), this target has been rolled forward over the period of the Core Strategy. Hillingdon's annual monitoring target will be met through the identification of sustainable sites for new housing development in the Site Allocations DPD.</p>	
6.12 Replacement London Plan EIP Panel Report	<p>In addition to meeting its annual monitoring target of 365 units in the London Plan (2008), the revised target of 425 units is split as follows: consideration will be given to emerging targets in the Replacement London Plan (2009) and housing needs in the borough. The Replacement London Plan (2009) target is split as follows:</p>	Page 66, para. 6.20
6.13 Internal change to reflect new evidence base	<p>The Council's Housing Trajectory shows that up to 2014/2015, current and emerging GLA targets will be exceeded. Beyond this period the delivery of new homes is less certain, however the trajectory shows that up to 2021 the target for conventional housing and Hillingdon's annual housing need as defined in the Sub-Regional HMA will generally be met.</p>	Page 66, para. 6.21
6.14 Minor change to reflect new evidence base	<p>Tables 6.4, 6.5 and Map 6.1 use the SHLAA data for large (>0.25 ha) and small (<0.25 ha) sites to provide an indication of when and where new homes could come forward in the borough. The figures in the table should be used with care and it is important to note that:</p> <ul style="list-style-type: none"> The distribution of dwellings shown in Table 6.3 and Map 6.1 only reflect units identified for delivery from large sites (over 0.25 hectares). Figures for small sites are based on trend data and cannot be mapped in Map 6.1. Tables 6.4 and 6.5 exclude predicted completions for non self-contained units (207 47 units per annum) 	Page 66, para. 6.22
6.15 Minor change to reflect new evidence base	<p>Map 6.1 overleaf illustrates the indicative distribution of dwellings across the borough.</p>	Page 67, after Table 6.5
6.16 Hillingdon Inter-faith Network (140)	<p>New fourth bullet point:</p> <ul style="list-style-type: none"> Ensuring that sufficient community infrastructure is provided to support new housing development in 	Page 69, Implementation of Policy H1

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	<u>accordance with policy CI 1</u>	
6.17 Replacement London Plan EIP Panel Report	<p>Flexibility Figures for housing growth in Hillingdon take account of the London Plan (2008). Proposed growth figures in the Replacement London Plan (2009) may change as a result of the London Plan EIP. <u>The proposed annual monitoring target is a minimum figure set by the Mayor and the Council is free to exceed this. A revised annual monitoring target may be set through the production of a revised SHLAA and an early alteration to the Replacement London Plan.</u></p>	Page 69, Flexibility
6.18 Replacement London Plan EIP Panel Report	<ul style="list-style-type: none"> • H2: (Core) Indicator Housing Trajectory: Plan period and housing targets: 440 units per annum from 1997 to 31st March 2007 and 365 units per annum from 1st April 2007 to the end of the plan period as set out in the London Plan. <u>2011</u> • H2: (Core) Indicator: Housing trajectory: 3,650 new net residential units for the period 2007-2016 (365 units per annum as an annual monitoring target) – London Plan Target. <u>425</u> 	Page 70, Monitoring of Policy H1
6.19 Replacement London Plan EIP Panel Report	<p>Increasing the supply of affordable housing is a key priority for this Core Strategy and the Council as a whole. Subject to other planning considerations, measures that increase the supply of affordable housing will be supported. The Council's policy on affordable housing is guided by evidence of housing needs in the borough and the provisions of the current (2008) and Replacement London Plan (2009). The Council's draft HMA recommends that 50% of net new housing provision (supply from all sources) should be affordable housing and that 22% of the total net requirement is for intermediate housing.</p> <p>The London Plan (2008) set a target to provide 50% of all new housing provision as affordable housing and indicates a tenure split of 70% social rented, 30% intermediate tenure. The Replacement London Plan (2009) proposes to remove initially proposed the removal of the 50% affordable target, and states stating that boroughs should agree their affordable housing targets with the GLA. <u>However, the subsequent EIP Panel Report recommends that the boroughs should aspire towards achieving 50% of all new housing as affordable housing across London as a whole.</u></p>	Page 70, paras. 6.25-6.26
6.20 Replacement London Plan EIP Panel Report	<p>New paragraph after 6.26:</p> <p><u>The position regarding the proposed tenure split in the current (2008) and Replacement London Plan (2009) is as follows: was also discussed at the recent Replacement London Plan EIP. The Panel Report continues to seek 60% of affordable housing provision for social rent and 40% for intermediate tenure for sale or rent.</u></p>	Page 70, new para. after 6.26
6.21 Replacement London Plan EIP Panel Report	(Table 6.6 deleted)	Page 70, Table 6.6

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	<p>Table 6.6 London Plan Tenure Split</p> <table border="1" data-bbox="424 327 1137 521"> <thead> <tr> <th data-bbox="424 327 587 398"></th> <th colspan="2" data-bbox="595 327 751 398">The London Plan (2008)</th> <th colspan="2" data-bbox="759 327 1137 398">Replacement London Plan (2009)</th> </tr> <tr> <th data-bbox="424 409 587 472">Tenure Type</th> <th data-bbox="595 409 751 472">Intermediate</th> <th data-bbox="759 409 858 472">Social Rented</th> <th data-bbox="866 409 1023 472">Intermediate</th> <th data-bbox="1031 409 1137 472">Social Rented</th> </tr> <tr> <th data-bbox="424 483 587 521">Percentage</th> <td data-bbox="595 483 751 521">30</td> <td data-bbox="759 483 858 521">70</td> <td data-bbox="866 483 1023 521">40</td> <td data-bbox="1031 483 1137 521">60</td> </tr> </thead> </table>		The London Plan (2008)		Replacement London Plan (2009)		Tenure Type	Intermediate	Social Rented	Intermediate	Social Rented	Percentage	30	70	40	60	
	The London Plan (2008)		Replacement London Plan (2009)														
Tenure Type	Intermediate	Social Rented	Intermediate	Social Rented													
Percentage	30	70	40	60													
6.22 Replacement London Plan EIP Panel Report	<p>The Council is currently preparing has prepared an Economic Viability Assessment (EVA) to inform borough-wide affordable housing targets. The study has tested the deliverability of affordable housing against a range of variables, including the availability of affordable housing grant, density mix and tenure split. Early results of this The study shows that in the current economic circumstances and regardless of needs identified in the draft HMA, a target to provide 50% of all new housing as 'affordable' could not be supported on economic viability grounds. Based on the evidence contained in the EVA and draft HMA the Council will seek to achieve a borough wide affordable housing target of 35%, on the understanding that this may be subject to site specific viability considerations. In addition, the Council is minded to continue to support targets related to tenure split in the London Plan 2008. Proposed targets in policy H2 will be discussed and agreed with the GLA.</p>	Page 71, para. 6.27															
6.23 Boyer Planning for Thorney Farm Development (149), Hayes and Harlington Community Development Forum (439), Mayor of London (467), Royal Brompton and Harefield NHS Trust (439)	<p>Housing provision is expected to include a range of housing to meet the needs of all types of households and the Council will seek to maximise the delivery of affordable housing from all sites over the period of the Core Strategy. For sites with a capacity of 10 or more units the Council will seek to ensure that : <u>the affordable housing mix reflects housing needs in the borough, particularly the need for larger family units.</u></p> <p>i) subject to viability and if appropriate in all the circumstances, 35% of all new units are delivered as affordable housing, with a tenure mix of 70% housing for social rent and 30% intermediate housing; and</p> <p>ii) The affordable housing mix reflects housing needs in the borough, particularly the need for larger social rented family units.</p>	Page 71, Policy H2															
6.24 Boyer Planning for Thorney Farm Developments (149) 6.25 Workspace Group (167); Changes to reflect updated evidence base	<p><u>Subject to viability and if appropriate in all the circumstances, the EVA indicates that 35% of all new units in the borough should be delivered as affordable housing, with an indicative tenure mix of 70% housing for social rent and 30% intermediate housing.(6.24) Housing market conditions in Hillingdon are complex and a one size fits all approach to tenure provision will not be suitable for all areas in the borough. Subject to the provision of robust evidence, the Council will adopt a degree of flexibility in its application of policy H2 to take account of tenure needs in different parts of the borough.(6.25) In accordance with the Replacement London Plan proposed targets in policy H2 will be discussed and agreed with the Mayor.</u></p>	Page 71, new para. after Policy H2															
6.26 Warren Park Residents Association (256)	<p>The Council notes that in setting the proposed tenure split in the Replacement London Plan (2009), the GLA has considered factors other than the needs identified in the</p>	Page 71, para. 6.28															

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	London-wide Strategic Housing Market Assessment. These include an acknowledgement of the role that intermediate housing can play in helping to get Londoners on the first step of the housing ladder and reducing the call on the social rented sector, <u>creating mixed and balanced communities in accordance with the Replacement London Plan.</u>	
6.27 Hayes Town Partnership (357)	The type and size of dwellings that are delivered will be as important as the overall number of units. The HMA indicates that 70% of net need for affordable housing is for two and three bed accommodation, more than a fifth is for four bed accommodation and almost 7% is for one bedroom accommodation. The need relative to supply is greatest for larger <u>family</u> accommodation. Current estimates indicate that less than 10% of the need for four bedroom accommodation is expected to be met compared with almost three quarters of the need for one bedroom accommodation.	Page 72, para. 6.30
6.28 Changes to reflect updated evidence base	<p>Hillingdon's affordable housing targets will evolve as the following evidence base documents emerge and will be subject to conclusions and policies within: <u>have been developed from the following evidence base documents:</u></p> <ul style="list-style-type: none"> • The Replacement London Plan (2009); • The borough-wide draft Housing Market Assessment; • The emerging West London Sub-regional Housing Market Assessment; and • Hillingdon's emerging Affordable Housing <u>Economic Viability Assessment.</u> <p>When applying policy H2 the Council will be flexible in addressing different housing needs across the borough, particularly in relation to affordable housing type and tenure split.</p>	Page 72, Flexibility
6.29 Changes to reflect the Replacement London Plan EIP Panel Report	<p>Policy 3.8 of the Replacement London Plan (2009) contains borough specific gypsy and traveller pitch provision targets, to be met over the period 2007-2017. The proposed minor alteration to policy 3.8 is currently open for public comment and proposes to remove these targets from the Plan. Under the provisions of the proposed policy, boroughs would be required to work with the Mayor to ensure that needs are identified and the accommodation requirements of these groups are addressed locally and in line with national policy.</p> <p><u>The issue of gypsy and traveller pitch provision has been subject to a number of rounds of consultation since the production of the Replacement London Plan Consultation Draft in October 2009. In September 2010 the Mayor consulted on a Minor Alteration to policy 3.8, which proposed the removal of borough specific pitch provision targets. These proposals were considered by the Inspector at the Replacement London Plan EIP and rejected in the subsequent Panel Report. Instead, the Inspector proposed that the Replacement London Plan should contain sub regional pitch provision targets. Hillingdon is located in the North West London sub-region and would be required to accommodate a share of between 40-43 additional pitches over the period 2007 through 2017.</u></p>	Page 73, para. 6.32
6.30 Changes to	In formulating its policy on this issue, <u>consideration will be</u>	Pages 73-74, para.

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reflect the Replacement London Plan EIP Panel Report	<p><u>given to policies in the emerging Replacement London Plan and the Government's consultation paper, Planning for Traveller Sites.</u> the <u>The</u> Council will balance the need for additional pitch provision with the availability of suitable sites. The identification of suitable sites may require the preparation of additional evidence base as part of the production of the subsequent Site Allocations DPD.</p>	6.33
6.31 Changes to reflect the Replacement London Plan EIP Panel Report	<p>Flexibility</p> <p>Figures for gypsy and traveller pitch provision are likely to be refined through the progression of the <u>following the finalisation of the</u> Replacement London Plan (2009).</p> <p>Monitoring of policy H3: how we will measure success</p> <ul style="list-style-type: none"> • H4 (Core) Indicator: Net additional pitches (Gypsy and Traveller). Target to be set by the London Plan • Meeting the needs of the existing travelling community in the borough by protecting and maintaining the site at Colne Park; and • The delivery of pitches in accordance with the outcome of the Replacement London Plan (2009) EIP. Changes to reflect the Replacement London Plan EIP Panel Report. 	Page 74, Flexibility and Monitoring of Policy H3 boxes after para. 6.33
Chapter 7		
7.1 English Heritage (548)	<p>New paragraph added after 7.3:</p> <p><u>There is evidence to confirm that parts of the borough, such as Harmondsworth and Harefield were occupied in prehistoric times. Up until the 20th century, the borough was mainly rural in character; today it is predominantly suburban, with its main urban centre at Uxbridge. This was an important market town that took advantage of the stage coach route between Oxford and London in the 18th century and developed further with the building of the Grand Junction Canal, the Great Western Railway and more recently the Metropolitan and Piccadilly Lines. There are also a number of smaller town centres across the borough, such as Northwood, Ruislip, Eastcote, Hayes, Yiewsley and West Drayton. Most of these were originally villages, some dating back to medieval times, which grew as local transport links developed.</u></p>	Page 76, new para. after 7.3
7.2 English Heritage (548)	<p>The Council has a rolling programme of heritage asset designation. At present the Borough contains:</p> <ul style="list-style-type: none"> • 30 Conservation Areas <u>(with Appraisals for Longford Village, Harmondsworth Village, Ruislip Village, The Glen and Eastcote Park Estate and Management Plans for The Glen and Eastcote Park Estate)</u> 	Page 76, para. 7.4 first bullet point
7.3 Public consultation	<p>Map 7.1 on Hillingdon's Heritage updated to reflect results of public consultation which revealed limited support for the proposed upgrading of Gatehill Farm Area of Special Local Character (ASLC) to a Conservation Area. Notation '1' deleted from the 'Key' and area shown to remain as ASLC.</p>	Pages 77-78, Map 7.1

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7.4 Text update	SO1: Conserve and enhance the Borough's heritage and their <u>its</u> setting s by ensuring new development, including changes to the public realm, are of high quality design, appropriate to the significance of the heritage asset, and sensitive to the wider historic environment.	Pages 79 and 83, SO1
7.5 Mayor of London (474)	The Council will: 1. Conserve and enhance Hillingdon's unique historic environment, including its heritage assets such as statutorily Listed Buildings, Conservation Areas, Scheduled Ancient Monuments, Registered Parks and Gardens, Locally Listed Buildings, Areas of Special Local Character, and Archaeological Priority Zones and Areas, their settings and their <u>the</u> wider historic environment.	Page 79, Policy HE1, criteria 1
7.6 DP9 on behalf of CES Properties (Ickenham) Ltd (407)	2. Actively encourage the regeneration of heritage assets, particularly those which have been included in English Heritage's 'Heritage at Risk' register <u>or are currently vacant</u> .	Page 79, Policy HE1, criteria 2
7.7 Sustainability Appraisal Update Feb 2011 recommendation (pgs 41-42)	4. Address the need to conserve the historic environment when implementing climate change mitigation and adaption measures <u>Encourage the reuse and modification of heritage assets, where appropriate, when considering proposals to mitigate or adapt to the effects of climate change. Where negative impact on a heritage asset is identified, seek alternative approaches to achieve similar climate change mitigation outcomes without damage to the asset.</u>	Page 79, Policy HE1, criteria 3
7.8 English Heritage (555)	6. Where the loss of a heritage asset is justified, ensure that there will be a commitment to making a record to advance <u>recording the structure and to disseminating this information to enable increased</u> understanding of the heritage asset and copies . <u>Copies of these documents</u> will <u>where appropriate</u> need to be deposited with <u>local libraries and</u> the Greater London Historic Environment Record (HER).	Page 80, Implementation of Policy HE1, criteria 6
7.9 Individual (564)	4. In the case of 10 dwellings or over, achieve a Building for Life assessment rating of 'silver' as a minimum <u>(this includes 'good and 'very good' scorings)</u> ;	Page 84, Policy BE1, criteria 4
7.10 Sustainability Appraisal Update Feb 2011 recommendation (pg 42-44)	7. 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 <u>through the inclusion of living walls, roofs and areas for wildlife</u> , encourage physical activity and where appropriate introduce public art;	Page 85, Policy BE1, criteria 7
7.11 Sustainability Appraisal Update Feb 2011 recommendation (pgs 42-44)	9. Not result in the inappropriate development of gardens <u>and green spaces</u> that erode the character and biodiversity of suburban areas <u>and increase the risk of flooding through the loss of permeable areas</u> ;	Page 85, Policy BE1, criteria 9
7.12 Ransome and Company Ltd on behalf of Workspace Group (169); Heathrow Airport Ltd(218); The Planning Bureau on behalf of McCarthy and Stone Retirement Lifestyle Ltd(230)	10. Maximise the opportunities for all new homes to contribute to tackling <u>and adapting</u> to climate change and reducing emissions of local air quality pollutants. All new residential development should achieve at least Code for Sustainable Homes level 4. All new non-residential development should achieve BREEAM Very Good standard. In addition, all new development should be able to demonstrate compliance with the prevailing energy reduction requirements set out in the London Plan. All refurbishment	Page 85, Policy BE1, criteria 10

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<p>7.13 Surrey County Council (321)</p> <p>7.14 Surrey County Council (318)</p>	<p>development should aim to achieve the highest levels of new quality designs appropriate to the work being carried out. <u>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. The Council will seek to merge a suite of sustainable design goals, such as the use of SUDS, water efficiency, lifetime homes, and energy efficiency into a requirement measured against the Code for Sustainable Homes and BREEAM. These will be set out within the Development Management DPD. (7.12). All developments should be designed to make the most efficient use of natural resources whilst safeguarding historic assets, their settings and local amenity (7.13) and include sustainable design and construction techniques to increase the re-use and recycling of construction, demolition and excavation waste and reduce the amount disposed to landfill. (7.14)</u></p>	
<p>7.15 Mayor of London (475), English Heritage(549)</p>	<ul style="list-style-type: none"> Consider the production of Produce a borough-wide Character Study to inform the parameters for appropriate residential and non-residential densities including defining inappropriate locations for tall buildings. 	<p>Page 86, Implementation of Policy BE1, 3rd bullet point</p>
Chapter 8		
<p>8.1 English Heritage (555)</p>	<p>Energy prices in the UK are forecasted to continue to rise making newer more energy efficient buildings more appealing. However, this will result in a gulf in building quality from modern build to those still in use from the past century. The Council will need to work with developers to identify opportunities to help upgrade the existing building stock. In some instances, it might be more appropriate to relax standards to the minimum required for building regulations for new development in order for developers to contribute to upgrading the existing stock. This could help reduce the energy consumption for whole communities whilst still realising a good quality of new development. <u>There will also be a requirement to address the need to conserve the historic environment when implementing climate change mitigation and adaptation measures taking a balanced approach between the extent of the mitigation of climate change involved against the potential harm to the heritage asset or its setting.</u></p>	<p>Page 90, para. 8.9</p>
<p>8.2 Heathrow Airport Limited (224)</p>	<ul style="list-style-type: none"> In addition to the above, there will be a requirement to include the criteria in the development of the <u>Heathrow Area Development Plan Document</u>. Heathrow Opportunity Area Development Management Document. This will ensure that this highly important growth area is fully considerate of the environmental challenges alongside the social and economic matters. 	<p>Page 92, Implementation 3rd bullet point</p>
<p>8.3 Text update</p>	<p>Flexibility</p> <p>Figures for reducing CO2 emissions in Hillingdon take account of national targets and regional targets in the</p>	<p>Page 92, Flexibility box</p>

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	London Plan (2008) (2009). Proposed figures in the Replacement London Plan (2009) have not been agreed and may change as a result of the London Plan EIP.	
8.4 British Waterways (41)	The river and canal corridors and associated hinterlands (also known as the Blue Ribbon Network) link across borough boundaries and also have a strategic function in west London. The Grand Union Canal originated as an arterial freight route that carried materials between sites from London and links all the way to Birmingham. It is therefore a very important link between boroughs <u>and provides much wider opportunities for walking, angling and cycling.</u>	Page 94, para. 8.15
8.5 London Green Belt Council (5)	The main challenge is to protect the borough's Green Belt, Metropolitan Open Land and Green Chains, whilst supporting the balance of continued growth without spreading into these open areas, keeping land permanently open and free from development. In very <u>special</u> exceptional circumstances the Council will consider the release of greenfield sites for schools. The Replacement London Plan (2009) encourages farming and land based sectors in the green belt to allow enough land for food production. A policy on food production will be addressed in the Development Management DPD.	Page 97, para. 8.27
8.6 London Green Belt Council (5), Brunel University (401)	Any proposals for development in Green Belt and Metropolitan Open Land will be assessed against national and London Plan policies, including the <u>very special</u> exceptional circumstances test.	Page 97, policy EM2 para. 4
8.7 Mayor of London (485)	The waterways of Hillingdon and the associated hinterlands form an important <u>green infrastructure</u> open space feature and flood mitigation zone within the borough. Hillingdon has seven rivers and about 20 kms of the Grand Union Canal including the Main Line, Paddington and Slough Arms. The main rivers, the Canals along with the tributaries and smaller streams all form the Blue Ribbon Network.	Page 98, para. 8.28
8.8 Mayor of London (485)	The aim of the Core Strategy is to promote the river and canal corridors as a key part of Hillingdon's strategic <u>green infrastructure</u> open space network. The network will link and connect smaller, more local open spaces with larger and more strategic ones, including the Colne Valley Regional Park and key nationally and locally important habitats	Page 98, para. 8.30
8.9 Sustainability Appraisal Update Feb 2011 recommendation (pgs 48-49)	The Council will <u>work with the Environment Agency and other interested bodies to</u> continue to enhance the local character, visual amenity, ecology, transportation, leisure opportunities and sustainable access to rivers and canals.	Page 101, policy EM3 para. 2
8.10 Sustainability Appraisal Update Feb 2011 recommendation (pgs 49-51)	The Council will safeguard, enhance and extend the network of open spaces, informal recreational and environmental opportunities <u>that operate as carbon sinks and</u> that meet local community needs and facilitate active lifestyles by providing spaces within walking distance of homes. Provision should be made as close as possible to the community it will serve. There will be a presumption against any net loss of open space in the Borough.	Page 106, policy EM4 para. 1
8.11 Sustainability Appraisal Update Feb 2011 recommendation (pgs 49-51)	The Council will require development proposals to address local deficiencies in quality, quantity and accessibility of open spaces. <u>The Council will identify new opportunities for open space through an open space study. Major developments will be expected to make appropriate contributions to the delivery of new opportunities, or to the improvement and enhancements of existing facilities.</u>	Page 106, policy EM4 para. 2
8.12 Sustainability	<u>Identify new opportunities for sport and leisure and measures</u>	Page 110, policy

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Appraisal Update Feb 2011 recommendation (pgs 51-53)	<u>to deliver them. Major development may be required to make contributions in order to minimise the impacts and pressures on the existing resource.</u>	EM5 (new bullet point 8)
8.13 Sustainability Appraisal Update Feb 2011 recommendation (pgs 53-54)	The probability of flooding can be reduced through the management of land, river systems and flood defences, and the impact reduced through influencing the type of development in flood risk areas, flood warning and emergency responses. New development should be designed and located with flood risk in mind and more space provided for water through better management of land for water storage and flood protection. <u>The Council will oppose the increase in impermeable areas where these will have an impact on surface water run-off. The loss of urban greenspaces and gardens can contribute significantly to the reduction of attenuation areas which increases the risk of flooding. The Council will require developers to utilise permeable areas, either through natural filtration or through modern methods of pavement construction.</u>	Page 114, para. 8.86,
8.14 London Geodiversity Partnership (330), Residents (351), (572)	The Council will <u>require all development across the borough to use sustainable urban drainage systems (SUDS) unless demonstrated that it is not viable. The Council will encourage SUDS to be linked to water efficiency methods.</u> encourage the use of sustainable urban drainage systems (SUDS) across the borough in all developments. The Council may require developer contributions to guarantee the long term maintenance and performance of SUDS is to an appropriate standard.	Page 115, policy EM6 para. 3,
8.15 Natural England London Region (90)	<u>The use of sustainable drainage systems that promote ecological connectivity and natural habitats.</u>	Page 119, policy EM7 (new point 7)
8.16 Heathrow Airport Ltd (224)	The London Plan (2008) requires Hillingdon to work with key partners to prepare and implement a spatial planning framework for the Heathrow Opportunity Area. This will take the form of a Development Plan Document (DPD). This DPD will include a Low Emissions Strategy for the area to help tackle the current air quality problems. Specific policies to mitigate negative effects of airport operations such as air pollution has <u>have</u> been addressed in policy E3 and will be delivered through the Heathrow Opportunity Area DPD.	Page 122, para. 8.118
8.17 Heathrow Airport Ltd (224)	Air quality issues in the borough are clearly linked to transportation, including Heathrow Airport, so an integrated approach is proposed to mitigate these issues. Air quality issues caused by transportation are also dealt with in the Transport chapter through policy T3. The planning process presents an opportunity to reduce air quality impacts through section 106 agreements and/or Community Infrastructure Levy (CIL) funding. These opportunities will be specifically investigated within the Heathrow Opportunity Area DPD.	Page 127, para. 8.135
8.18 Mayor of London (471)	<u>Water Resources</u> <u>The Council will require that all new development demonstrates the incorporation of water efficiency measures within new development to reduce the rising demand on potable water. All new development must incorporate water recycling and collection facilities unless it can be demonstrated it is not appropriate. For residential developments, the Council will require applicants to demonstrate that water consumption will not surpass 105 litres per person per day.</u>	Page 129, policy EM8 (new sub-heading)

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8.19 Mineral Products Association (6)	<p>Table 3.1 in Chapter 3 identifies one main challenge relating to minerals:</p> <ul style="list-style-type: none"> The need to meet the London Plan mineral apportionment figures <u>of 250 000 tonnes per annum up to 2031</u> 	Page 131, para 8.146
8.20 Mineral Products Association (13) and Lafarge Aggregates Ltd. (109)	<p>It is important that there is an adequate supply of raw materials to provide the infrastructure, buildings and goods that society, industry and the economy needs and, therefore, it is a key component in sustaining economic prosperity. Aggregates come from a variety of sources, including recycling of construction waste. However, an important source of supply will remain from mineral deposits. <u>Provision for the production and supply of recycled and secondary aggregates will be made through the Site Allocations DPD whereby permanent and long term temporary recycling facilities across the Borough which will make a significant contribution to the production of recycled and secondary aggregates will be identified. Railheads and ancillary facilities will be identified, encouraged and safeguarded to provide for the sustainable transport of minerals.</u></p>	Page 131, para. 8.148
8.21 Mineral Products Association (9) and SITA UK (353)	<p>The Council will safeguard mineral resources in Hillingdon from other forms of development that would prejudice future mineral extraction. The Council will define the 'Preferred Mineral Safeguarding Area' in the Site Allocations DPD to include land west of the present Harmondsworth Quarry, land north of the village of Harmondsworth, and land at Sipson Lane, east of the M4 spur. <u>'Mineral Safeguarding Area' in the Site Allocations DPD based on the geologically mapped sand and gravel resource that is considered to be of current and future economic importance. Major developments in the Area will only be permitted where it has been demonstrated that:</u></p> <p><u>a. the mineral concerned is no longer of any value or potential value, or</u></p> <p><u>b. the mineral can be extracted prior to the development taking place, or</u></p> <p><u>c. the development will not inhibit extraction if required in the future, or</u></p> <p><u>d. there is an overriding need for the development and prior extraction cannot be reasonably undertaken, or</u></p> <p><u>e. the development is allocated in a local development plan document, or</u></p> <p><u>f. the development is not incompatible.</u></p>	Page 133, policy EM9 (para. 1)
8.22 Mineral Products Association (12) and	<p>Hillingdon is required to meet the Borough's apportionment figure 0.5 <u>0.25</u> million tonnes per year of sand and gravel</p>	Page 133, para. 8.155

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Surrey County Council (322)	extraction. To meet these requirements a comparative assessment of all potential sand and gravel-bearing sites in the Borough has been undertaken in order to identify those where mineral extraction is likely to have the least adverse impact.	
8.23 Mineral Products Association (10) and Surrey County Council (322)	<p>The Council will make an appropriate contribution towards the West London apportionment figure in the London Plan of 0.5 million tonnes per annum.</p> <p>The Council will seek to safeguard areas for mineral extraction outside of the Preferred Mineral Safeguarding Area where: <u>in the form of mineral working at the principal Broad Locations and will aim to maintain a minimum land bank equivalent to seven years production for the West London area at a rate of 0.25 million tonnes per annum. The principal Broad Locations for mineral development are land west of the present Harmondsworth Quarry, land north of the village of Harmondsworth, and land at Sipson Lane, east of the M4 spur. Outside the allocated areas identified in this Plan mineral extraction will not be permitted except where:</u></p>	Page 134, policy EM 10 (paras. 1 & 2)
8.24 Sustainability Appraisal Update Feb 2011 recommendation (pgs 60-61)	<p>the mineral workings can be restored to the highest standards using progressive restoration techniques, and secure a beneficial and acceptable after use in line with Green Belt objectives <u>Restoration and aftercare proposals will outweigh the negative impacts caused by extraction. The restoration proposals will result in an overall positive impact on the environment, considering the quality of soils, water, biodiversity and future land uses</u></p>	Page 134, policy EM 10 (point 3)
8.25 Mayor of London (465)	<p>The Council will aim to reduce the amount of waste produced in the Borough and work in conjunction with its partners in West London, to identify and allocate suitable new sites for waste management facilities within the Joint West London Waste Plan to provide sufficient capacity to meet the apportionment requirements of the London Plan <u>which is 382 thousand tonnes per annum for Hillingdon by 2026.</u></p>	Page 136, policy EM11 (para. 1)
8.26 Mayor of London (465)	<p><u>The Council will follow the waste hierarchy by promoting the reduction of waste generation through measures such as bioremediation of soils and best practice in building construction.</u> The Council will promote <u>using</u> waste as a resource and encourage increased <u>encouraging the</u> re-use of materials and recycling and. <u>The Council will also support opportunities for energy recovery from waste and composting where appropriate. The Council will safeguard existing waste sites unless compensatory provision can be made.</u></p>	Page 136, policy EM11 (para. 3)
8.27 Sustainability Appraisal Update Feb 2011 recommendation (pgs. 61-64)	<p><u>The Council will</u> seek to maximise the use of existing waste management sites through intensification or co-location of facilities.</p>	Page 136, Policy EM11 (para. 4)
Chapter 9		
9.1 Mayor of London (479)	<p>Uxbridge is home to a regionally important Underground / bus interchange that cannot accommodate current <u>or</u> future demand without significant improvements.</p>	Page 146, para. 9.19
9.2 Update to reflect recent discussions	<p><u>In addition to improvements to the Metropolitan Line, the Council has an aspiration for securing an extension of the</u></p>	Page 146, new para. after 9.21

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with TfL	<u>Central Line to Uxbridge by means of a spur in the area to the west of Ruislip Gardens. This proposal would contribute towards the Mayor's aspirations for growth in outer London, support growth in the borough and reduce congestion on the road network. The Council supports the view of TfL (as set out in a report in February 2009), that there may be a long term business case for the Central Line extension to Uxbridge and will work to keep this under review.</u>	
9.3 Heathrow Airport Ltd (226)	Crossrail will provide a direct link from Maidenhead via Heathrow Airport to the City, east London, Essex and Kent, travelling through the southern part of Hillingdon on the route of the existing Paddington line.	Page 146, para. 9.23
9.4 Mayor of London (482)	The improved Crossrail stations will provide the catalyst for the regeneration of Hayes and West Drayton (see Table 5.3) <u>and will bring extra travellers through these stations who will need to travel to and from their original destination by feeder mode.</u>	Page 146, para. 9.23
9.5 Heathrow Airport Ltd (225) 9.6 Comments added by the Council to clarify its interpretation of sustainable development at Heathrow	This Core Strategy will support the sustainable <u>development, renewal and (9.4) operation of Heathrow within the existing airport boundary (9.5)</u> and growth in the Heathrow Opportunity Area by facilitating improvements to public transport and cycle links, enhancing the public transport interchange to provide the opportunity for a modal shift from the use of private cars and from short haul air to sustainable transport modes and providing transport infrastructure to accommodate economic and housing growth whilst improving environmental conditions, for example noise and local air quality for local communities.	Page 150, Policy T4
9.7 Hillingdon Primary Care Trust	Health: Primary and acute care, <u>taking account of recent changes to Government policy on Health</u>	Page 151, para. 9.35, third bullet point
9.8 Thames Water Utilities (23)	<u>The Council recognises that delivery of appropriate social, physical and green infrastructure is essential to underpin sustainable development and growth.</u> The SIP has been produced to meet the requirements of PPS 12 and is in accordance with the guidance prepared by the Planning Advisory Service (PAS). As far as possible, the document identifies the needs, costs and timescales for delivery; funding sources and responsibilities for infrastructure development. It also identifies the extent to which infrastructure plans are realistic and where possible identifies a contingency where proposals are uncertain.	Page 152, para. 9.36
9.9 John McDonnell (499)	Social infrastructure is essential in providing people with better life opportunities and creating a sustainable community <u>and the Council will seek to resist the loss of such facilities.</u>	Page 152, para. 9.40
9.10 Northwood Resident's Association (103); Bell Farm Christian Centre (372)	Further social infrastructure provision will be required to meet the needs of Hillingdon's growing population and also to accommodate additional housing growth. The Council's SIP highlights that recent above average birth rates have put particular pressure on school provision. Ensuring that sufficient primary places are available will be a key strategy for the Council going forward to 2026. <u>Policies in forthcoming Development Plan Documents will also address the needs of Hillingdon's ageing population</u>	Page 152, para. 9.42
9.11 Proposed change made to implement recent Council policy	<u>10) Implementing a borough-wide Community Infrastructure Levy (CIL) to fund community infrastructure provision</u>	Page 154, additional criteria added to Policy C11

LBH Reference No.:	Proposed Change	Relevant Page No. / Section / Para.
9.12 Proposed change made to implement recent Council policy	<ul style="list-style-type: none"> Implementation of a borough-wide CIL 	Page 155, Implementation of Policy CI1, additional bullet point
9.13 British Waterways (47)	The Council recognises the borough's green infrastructure network, and in particular the Grand Union Canal, as an important leisure resource.	Page 156, para. 9.54
9.14 Sustainability Appraisal Update Feb 2011 recommendation (pgs. 71-72)	Seeking new and existing developments to promote the need to have inclusive and accessible design, to tackle climate change and to include facilities that promote sustainable transportation.	Page 157, additional criteria added to Policy CI2
9.15 English Heritage (557)	Protecting the historic environment as a cultural resource	Page 158, Policy CI3, new 3 rd bullet
9.16 Sustainability Appraisal Update Feb 2011 recommendation (pgs. 73-74)	Ensuring smaller all facilities are accessible by promote walking and, cycling and sustainable transport measures. The inclusion of cycle storage and electric charging points will be encouraged in new facilities and installed in existing facilities;	Page 159, Policy CI3, 5 th bullet
Appendix 1		
A1.1	Among the key information studies used in the production of the Hillingdon Hillingdon LDF is the Census carried out by the Office of National Statistics every 10 years with regular projection updates, the Annual Business Inquiry, also carried out by the ONS, and the Valuation Office Agency reports.	Page 161, 4 th para.
A1.2 London Geodiversity Partnership (331)	London's Foundations, The London Plan Implementation Report: Protecting the geodiversity of the capital (Greater London Authority, March 2009)	Page 164, Regional reference document added
Appendix 2		
A2.1 Hillingdon Primary Care Trust (75)	Hillingdon PCT Potential development at Eastcote Health Centre Renew and improve existing PCT facilities To be determined through discussion with the PCT To be determined Hillingdon Primary Care Trust / Private Sector Hillingdon PCT Alternative sites. Further discussions with LBH Hillingdon Hospital Trust	Page 169, Social and Community Infrastructure, Health, new row added
A2.2 VRG Planning for Brunel University 404	To enable the University to deliver international standards of academic and teaching facilities. Reason: To recognise the importance high quality facilities to the University's success. To enable the University to deliver international standards of research and teaching facilities, which necessitates continued expansion and improvements to its accommodation	Page 170, Social and Community Infrastructure, Education Learning and Youth Provision
A2.3 VRG Planning for Brunel University (405)	The key outstanding project from the existing masterplan is the Eastern Gateway Building school, which is due for completion in 2012. A number of future projects are being considered for the next masterplanning period from 2014 to 2021. The key outstanding project from the existing masterplan is phase 1 of the Eastern Gateway Building, which is due for completion in 2012 and an extension to the main refectory building, due for completion in 2013/ 2014. A number of	Page 170, Social and Community Infrastructure, Education Learning and Youth Provision

LBH Reference No.:	Proposed Change	Relevant Page No. / Section / Para.
	<u>future projects are being considered for the next masterplanning period from 2014 to 2021</u>	
A2.4 VRG Planning for Brunel University (406)	Current masterplanning period comes to an end in 2014. Production of new masterplan is currently being considered. <u>Current masterplanning period comes to an end in 2014. Production of new masterplan is currently under preparation</u>	Page 170, Social and Community Infrastructure, Education Learning and Youth Provision
A2.5 Update to reflect recent discussions with TfL	<u>Transport for London</u> <u>Extension of the Central Line to Uxbridge</u> <u>Improved transport links</u> <u>Creation of a spur in the area to the west of Ruislip Gardens</u> <u>To be determined</u> (approximate cost) <u>After 2015</u> <u>To be determined</u> (funding) <u>To be determined</u> (contingency planning) <u>To be determined</u> (opportunities for other organizations)	Page 173, Transport and Connectivity, new row added
A2.6 British Waterways (49)	Off-line side residential mooring scheme above Station Road bridge in Hayes	Page 175, Leisure, Recreation and Green Space
A2.7 British Waterways (49)	Delete row British Waterways Waterway wall repairs at Ironbridge Narrows, adjacent to Stockley Park Repair to waterway walls to ensure fit for purpose and not a risk to passing craft/ closing navigation. Scoping of works required, feasibility of possible options for repairs, design and implementation £200,000 2009-2010 British Waterways Emergency works Undisclosed	Page 175, Leisure, Recreation and Green Space delete row
A2.8 British Waterways (49)	Replace entries on row with: <u>British Waterways</u> <u>Grand Union Canal Towpath National Cycle network</u> <u>To extent the National Cycle network</u> <u>Identified in LBH LIP</u> <u>To be determined</u> <u>To be determined</u> <u>TfL LIP funding</u> <u>None</u> <u>LBH and TFL</u>	Page 175, Leisure, Recreation and Green Space add new row
Appendix 3		
	None	
Appendix 4		
A4.1 Heathrow Airport Ltd (217)	<u>Archaeological Priority Areas (APA)</u> <u>Areas of particular archaeological importance or vulnerability in the Borough which have been identified by the Council</u>	Page 180, Glossary

LBH Reference No.:	Proposed Change	Relevant Page No. / Section / Para.
	<u>with the advice of English Heritage. In these areas the Council's policies and proposals for archaeological sites will particularly apply. Planning applications affecting such areas will generate appropriate consultation, which could in turn lead to further processes of site assessment.</u>	
A4.2 Heathrow Airport Ltd (217)	Archaeological Priority Zones (APZ) <u>The boundaries of Archaeological Priority Zones are designated on the Proposals Map. These are areas where there is potential for significant archaeological remains, and planning applications within these areas must be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.</u>	Page 181, Glossary
A4.3 Text update	Building for Life <u>The national standard for well-designed homes and neighbourhoods. A Building for Life assessment scores the design quality of planned or completed housing developments against 20 Building for life criteria. For further information refer to www.buildingforlife.org.</u>	Page 182, Glossary
A4.4 The Theatres Trust (270) A4.5 English Heritage (557)	Culture Culture includes arts, media, sports, libraries, museums, <u>theatres (A4.4)</u> (4.4) parks, and the countryside, built heritage, <u>the historic environment (A4.5)</u> tourism, and the creative industries.	Page 184, Glossary
Appendix 5		
UDP Saved Policies Replacement	New section added listing existing UDP Saved Policies and indicating whether they are retained or replaced by the proposed Core Strategy policies.	Pages 194 - 203

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Hillingdon's Local Development Framework:

Pre-submission draft core strategy

September 2011

Appendix 3 – Text of Draft Core Strategy



HILLINGDON
LONDON



INVESTOR IN PEOPLE

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1 Introduction

The Local Development Framework

1.1 The Core Strategy is the key strategic planning document for Hillingdon and will support the delivery of the spatial elements of the Sustainable Community Strategy. It sets out the long-term vision and objectives for the Borough, what is going to happen, where, and how it will be achieved. While the Core Strategy includes broad policies for steering and shaping development, it does not set out guidelines for decisions about planning applications (this will be done through the Development Management document) and nor does it allocate specific sites (this will be done through the Site Allocations document and Proposals Map).

1.2 The Core Strategy is consistent with the Sustainable Community Strategy, which focuses on three key components that together make up Hillingdon now and in the future, people, place and prosperity. Emerging from these three components are the six priority themes of the Sustainable Community Strategy, i.e. improving health and wellbeing; strong and active communities; protecting and enhancing the environment; making Hillingdon safer; a thriving economy; and improving aspiration through education and learning.

1.3 These themes are taken forward in the Core Strategy, which has an ambition for Hillingdon to be an attractive and sustainable borough. This Strategy encourages sustainable use of land, resources and the natural environment, methods of travel and the design of development that helps to create sustainable communities, and minimises harmful impacts on climate, biodiversity, landscape and neighbourhoods.

This Core Strategy has been produced against a backdrop of challenging economic times and in addition to the Sustainable Community Strategy it also reflects the following priority themes of the Council's wider vision:

- Putting residents first at the heart of everything we do and promoting civic pride;
- Protecting and enhancing the borough's natural environment;
- Improving buildings, roads and footways and ensuring that new buildings fit in with the natural environment; and
- Maintaining the solid approach to financial management that has delivered our success to date and which is vital going forward.

1.4 The Core Strategy is one of the documents that makes up Hillingdon's Local Development Framework (LDF). Together with the London Plan, the LDF comprises the borough wide development plan and sets out the growth that is expected to take place in the borough up to 2026. It covers issues such as the number of new homes to be built and changes in employment land.

1.5 The LDF is made up of the following documents:

- Hillingdon's Core Strategy: A Vision for 2026
- Development Management Policies: Policies that will be used to determine planning applications
- Site Allocations: Specific site proposals for land uses such as housing and employment
- Proposals map: Where site proposals are located
- Heathrow Area DPD: A strategy for growth in the Heathrow Opportunity Area

1.6 A considerable amount of work has been undertaken to ensure that the Core Strategy reflects local issues and is based on sound evidence. It has been developed through discussion with Hillingdon Partners to ensure a close fit with the Sustainable Community Strategy. This version of the Core Strategy has evolved following consultation on the following documents:

- **Issues and Options** (Spring 2005): This document set out the key social, environmental and economic issues facing Hillingdon with a number of strategic alternatives.
- **Preferred Options** (Autumn 2005): This built on the Issues and Options document and identified a preferred option.
- **Revised Preferred Options** (Spring 2007): Refined the process further and identified a series of challenges for Hillingdon with alternative options.
- **A Vision for 2026: Local Development Framework Core Strategy Consultation Draft** (June 2010): Sets out the revised seven point Vision for Hillingdon, based on discussions with its Local Strategic Partnership
- **[A Vision for 2026: Local Development Framework Core Strategy Pre-submission Consultation Draft \(February 2011\): representations were sought on the 'soundness' of the final publication version of the Plan.](#)**

How to get involved – making representations-

~~1.7 You are invited to comment on this 'Pre-Submission Core Strategy' Development Plan Document, February 2011 (Regulation 27 stage) and its 'soundness' and the accompanying documents. The accompanying documents comprise: the Sustainability Appraisal, the Equalities Impact Assessment and a Statement of Consultation. The six-week period for public consultation begins on 9 February 2011 and ends at 5pm on 25 March 2011.~~

[Submission to the Secretary of State](#)

[Following public consultation on the Pre-submission Core Strategy in February/ March 2011, the Council have carefully considered all representations received and incorporated the changes within this final version known as the Submission Core Strategy. The Submission Core Strategy along with the accompanying submission documents have been submitted to the Secretary of State for an independent examination to test its soundness \(or legal compliance with relevant government planning guidance and policies\).](#)

1.8 The documents are available for inspection at the following addresses:

- Council's Website: www.hillingdon.gov.uk under 'Have your say'
- Limehouse Link <http://hillingdon-consult.limehouse.co.uk>
- Planning Information Services: Civic Centre, High Street, Uxbridge, UB8 1UW (Mon, Tue, Wed and Fri 9.00am – 5.00pm, Thursday 9am-7.30pm).
- Hayes One Stop Shop: 49-51 Station Road, Hayes UB3 4BE (Mon, Tue, Thur and Fri 8.30am-4.30pm, Wed 9.30am-4.30pm)
- All Hillingdon Libraries: full details of library opening hours are available at: <http://www.hillingdon.gov.uk/index.jsp?articleid=8911>

Uxbridge, High Street Uxbridge, UB8 1HD	Northwood Hills, Potter Street, Northwood HA6 1QQ
Botwell Green, East Avenue, Hayes UB3 2HW	Oak Farm, Sutton Court Road, Hillingdon UB10 9PB

Charville, Bury Avenue, Hayes UB4 8LF	Ruislip (Manor Farm) - Bury Street, Ruislip HA4 7SU
Eastcote, Field End Road, Eastcote HA5 1RL	Ruislip Manor, Linden Ave, Ruislip Manor HA4 8TW
Harefield, Park Lane, Harefield UB9 6BJ	South Ruislip operating from Learning & Development Centre, Queen's Walk, HA4 0LR
Harlington, Pinkwell Lane, Hayes UB3 1PB	West Drayton, Station Road, West Drayton UB7 7JS
Hayes End, Uxbridge Road, Hayes UB4 8JQ	Yeading, Yeading Lane, Hayes UB4 0EW
Ickenham, Long Lane, Ickenham UB10 8RE	Yiewsley, High Street, Yiewsley UB7 7BE
Northwood, Green Lane Northwood HA6 3AA	

1.9 ~~All comments must be made on a 'representations' form~~ which is available from the venues mentioned above or can be requested by phoning 01895 250230 or e-mailing ldfconsultation@hillington.gov.uk or downloading from Limehouse Link: <http://hillington-consult.limehouse.co.uk>. Representation forms should be completed and can be sent:

- By Email: ldfconsultation@hillington.gov.uk
- Via the Limehouse Link: <http://hillington-consult.limehouse.co.uk>
- By post: LDF Team, Planning, Environment and Community Services, London Borough of Hillingdon, Civic Centre, Uxbridge UB8 1UW
- By fax: 01895 277042 marked for the attention of the LDF Team

1.10 Representations may be accompanied by a request to be notified at a specified address of any of the following:

- that the Core Strategy has been submitted to the Secretary of State for independent examination under section 20 of the above Act,
- the publication of the recommendations of any person appointed to carry out an independent examination of the Core Strategy, and
- the adoption of the Core Strategy.

1.11 ~~All information will be available on request in Braille, large copy print, audio cassette or in a number of different languages other than English. 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 5pm on 25 March 2011. Comments received after the end of the consultation period do not have the right to be considered.~~

Next Steps

1.12 ~~Following the consultation period, the Council will carefully consider all representations received and where appropriate, seek to resolve objections. This document will then be and formally submitted to the Secretary of State, with a statement of all representations submitted during the consultation process and how this influenced the policies and provisions of the document.~~

1.13 ~~All representations received to the submission version will be considered at an Examination to be conducted by an independent Planning Inspector.~~ **The Core Strategy will be subject to an Examination in Public conducted by an Independent Planning Inspector.**

He / she will test the 'soundness' of the plan. The Inspector's report will be binding on the Council. The Core Strategy is ~~scheduled for adoption in December 2011~~ expected to be adopted during 2012. ^(1.1)

Structure of this document

1.14 This document is structured in two parts:

- **Chapters 2-4:** Look at how the Vision has been developed, what it means for Hillingdon and how it will be achieved
- **Chapters 5-9:** Contain the policies that will deliver the Vision through to 2026

End Notes

1.1 Text updating to reflect latest position

2 A Summary of The Vision

2.1 The Core Strategy starts from an overall vision of what the Strategy is trying to achieve. The vision forms the basis of a series of strategic objectives which are the stepping stones to deliver the vision. These strategic objectives provide the overarching framework for the more detailed core policies that set out how the vision will be delivered.

2.2 Taking account of the priorities in the Sustainable Community Strategy, the Core Strategy has a seven point vision, which sets out how the borough will look in 2026.

The Vision for Hillingdon 2026

Hillingdon continues to prosper, through the implementation of the following seven point vision:

- Hillingdon is taking full advantage of its distinctive strengths with regard to its places, communities and heritage.
- The social and economic inequality gaps in Hillingdon are being closed
- Improved environment and infrastructure is supporting healthier living and helping the borough to mitigate and adapt to climate change
- Economic growth has been concentrated in Uxbridge, Heathrow and the Hayes/West Drayton Corridor, without ignoring local centres
- Improved accessibility to local jobs, housing and facilities is improving the quality of life of residents
- Hillingdon has a reliable network of north/south public transport routes and improved public transport interchanges
- Hillingdon has continued to prosper from the presence of Heathrow

3 A Portrait of Hillingdon - where we are now

Hillingdon's Characteristics

3.1 Hillingdon has approximately 260,000 residents and covers an area of 44 square miles. The borough has a strong economy and excellent transport links to/from London, the west of England and the world. As one of the greenest boroughs in London, Hillingdon is in general a healthy place to live and crime rates are falling.

3.2 Notwithstanding the above, Hillingdon is a borough of contrasts. The area to the north of the A40 is semi-rural, with Ruislip as its main district centre. The south of the borough is more densely populated, urban in character and contains the metropolitan centre of Uxbridge and the district centres of Hayes and West Drayton. Most of the area south of the A40 finds itself in the top 40% nationally in terms of deprivation. Parts of West Drayton, Yeading, and Townfield fall into the 20% most deprived category.

3.3 These issues set the scene for the Core Strategy. The starting point for developing a forward looking vision for Hillingdon is to understand where we are now and how the borough's positive attributes can be used to address the key challenges that are expected to arise through to 2026. Key facts that have contributed to the vision are as follows:

Hillingdon's Key Facts

Population

- Hillingdon is home to approximately 260,000 ⁽¹⁾residents and the population is expected to increase by approximately 14% over the period of the Core Strategy
- Under 16 year olds currently represent approximately 20% of Hillingdon's population. This figure is expected to remain relatively unchanged up to 2026
- As a result of a recent increase in birth rates, the population of 0-2 year olds is now significantly higher than in recent years
- Those aged 65 and over currently represent 15% of the borough-wide population. This population group will increase to 17.65% of the population between 2011-2026.
- At a borough-wide level, the proportion of residents from non-white British ethnic groups is below the average for outer London, however the proportion of ethnic groups living in Hayes is well above this average
- Hillingdon is the 11th most deprived borough in outer London. Most of the areas south of the A40 fall into the top 40% of most deprived areas in England
- The average household income is £34,000 per annum. This is nearly £4,000 higher than the national average and just under £3,000 less than the Greater London average
- The borough has a crime rate better than the average for London, but with considerable variations between wards. There has been a gradual fall in the annual crime count from 28,144 in 2006/7, 26,390 in 2007/8 to 25,419 (as of November 2009)

1 Source - Office of National Statistics (2009 mid-year estimate based)

Economy

- Heathrow is a major contributor to the UK economy at all levels; it directly employs over 76,500⁽²⁾ people with around 170,000 indirect jobs generated by the airport
- Around 9,000 of Hillingdon's residents work at Heathrow Airport (which is 1 in 15)
- Each year Heathrow accommodates 480,000 flights and approximately 67m passengers. By 2015 passenger numbers at Heathrow Airport are predicted to rise to 80 75-77^(3.1) mppa; this is under current operating conditions. Although this may have the potential to create more jobs it will also bring added pressures to the road network and public transport capacity which will need to be recognised and addressed.
- Uxbridge is the main urban centre and there are a further 15 town and neighbourhood centres⁽³⁾ and 46 local parades
- Hillingdon is home to around 8,400 registered businesses providing 188,600 jobs
- Hillingdon's resident working age population has below average qualifications of NVQ1-4 or above
- 25.3% of unemployed are 16-24 year olds compared to 14.3% nationally
- 26.9% of working age residents are below NVQ Level 2 standard – above both the London and national average. Residents are also less well qualified at Level 4 and above compared with London as a whole – 26.5% compared with 36.9% for London.⁽⁴⁾
- There is significant commuting out of the borough to central London and the Thames Valley, and significant in-commuting (for example nearly 88% of the workforce at Heathrow Airport live outside the borough and around 68% travel to work by car)
- Hillingdon's manufacturing sector is declining but office-based industries are growing
- Only 37% of local jobs are taken by Hillingdon residents

Housing

- Hillingdon currently has 99,800⁽⁵⁾ households
- By 2028 there will be 113,303 households living in the borough
- Approximately 33% of households in the borough are unable to afford market housing
- The London Plan (2008) sets an annual monitoring target to provide 365 new homes per annum
- The GLA has indicated that the Replacement London Plan (2009) will set an annual monitoring target for Hillingdon to provide 425 new homes per annum.
- The Council seeks to provide 35% of all new housing provision as affordable housing.

2 Heathrow Employment Survey 2008/09:summary report (Heathrow Airport Limited, March 2010)

3 District, Minor and Local Centres are collectively referred to in this Strategy as 'neighbourhood centres'

4 Hillingdon Profile 2008

5 London Borough of Hillingdon Housing Market Assessment, ~~Draft, September 2009~~
[2011, Fordham Research](#)^(3.2) Page 277

Environmental Status

- Hillingdon is one of the greenest London boroughs with over 5,000 acres of open countryside including 4,970 hectares of Green Belt. Hillingdon contains:
 - 200 parks and open spaces that cover approximately 1,800 acres, containing a mixture of habitats with over 11,500 species.
 - Over 8,000 individual trees and woodlands protected by Tree Preservation Orders and over 15,000 highway and Hillingdon Homes trees.
 - 1 National Nature Reserve Ruislip Woods surrounds Ruislip Lido, a 60-acre lake.
 - 6 Sites of Special Scientific Interest (SSSIs), 14 sites of Metropolitan Importance for Nature Conservation, 61 sites of Borough Importance (17 Grade I, 44 Grade II), including parts of Hillingdon House Farm and 9 sites of local importance.
 - Approximately 7% of the borough is covered by Conservation Areas
 - A number of rivers run through the borough, the Colne, Frays, Yeading Brook, Pinn and Wraysbury as well as approximately 20 kms of Grand Union Canal.
 - Approximately 7000 properties (6%) are located in areas of flood risk.
 - Large parts of Hillingdon sit above a Principal Aquifer.
 - Hillingdon is a major producer of minerals compared to other London boroughs.
 - The southern two-thirds of the borough is designated an Air Quality Management Area. This is due to high levels of nitrogen dioxide above recognised national and European Union levels associated with the major road network in the borough and the operation of Heathrow Airport
 - In addition to contributing to poor levels of local air quality, the operation of Heathrow Airport has further significant impacts on local residents in the south of the borough and adjoining areas including traffic congestion, crowded public transport and high noise levels.
- Hillingdon has the fourth highest carbon emissions of the thirty-three London boroughs with:
 - 432,000 tonnes from transport within the borough (aviation fuel and motorway travel are excluded).
 - 8 tonnes of CO₂ per person.
 - 560,000 tonnes of CO₂ from domestic fuel.
 - 1,000,000 tonnes of CO₂ from industrial processes.

Built Environment and Heritage

- Hillingdon is a suburban borough containing areas of 1930s development and typical "Metro land" estates with the most common house type being semi-detached (40.3%) followed by terraced (27.9%)
- Hillingdon's designations include:

- 30 conservation areas and 14 Areas of Special Local Character (ASLC)
- 409 statutory listed buildings and 292 locally listed buildings
- 5 Scheduled Ancient Monuments and 9 Archaeological Priority Areas
- 1 entry in the English Heritage Register of Historic Parks and Gardens (Church Gardens, Harefield, Grade II)
- 1 Article 4 Direction (Daisy Cottages, West Drayton Green).
- The borough includes distinctive building types ranging from timber framed buildings in semi-rural settings to groups of Victorian workers' houses
- There are examples of early concrete and steel industrial buildings
- Hillingdon includes high quality modern buildings such as those at Stockley Park which is internationally renowned for its quality of building and landscape design.

Community Facilities

- Hillingdon maintains 92 educational establishments made up of 65 primary schools, 18 secondary schools, 6 special schools, 1 nursery and 2 pupil referral units.
- Hillingdon's primary and secondary school provision will need to react to Hillingdon's changing demographics. The Core Strategy supports proposals to address any such needs that are identified.
- The borough contains one further educational establishment (Uxbridge College) and two Universities; Brunel and Bucks New University.
- Hillingdon Primary Care Trust owns and manages 25 20^(3.3) health centres, clinics and administrative buildings and manages 51 GP practices.
- Hillingdon Hospital (Acute Care) Trust manages Hillingdon Hospital and Mount Vernon Hospital in the north of the borough.
- There are currently 87 places of worship in Hillingdon.
- Hillingdon contains 5 Metropolitan Police Stations, with additional facilities located at Heathrow. The borough also accommodates 4 London Fire Brigade Stations.

Culture and Leisure

- Hillingdon has Museum collections at Uxbridge Library and Brunel University as well as 17 public libraries and one mobile library
- The borough plays host to the popular BIGfest music and arts festival
- Hillingdon opened the first 50m indoor swimming pool in London for 40 years in March 2010 and the borough boasts a rich collection of sports and leisure facilities, including the new Sport and Leisure Centre in Botwell Green.
- The borough contains 4 public golf courses in Ruislip, Northwood (Haste Hill), Stockley Park and Uxbridge along with 3 public swimming pools and 3 Fitness Zones located in Ruislip and Hayes.

Transport

- The borough is home to Heathrow Airport, a key gateway for the UK, the UK's only hub airport^(3.4) and one of the busiest airports in the world. Heathrow Airport is also the second busiest public transport interchange in the UK, with rail, bus and coach links around the country
- Hillingdon has some of the busiest parts of London's strategic road network including the M4, A40, A312 and the nearby M40 and M25. Whilst providing decent through-access to central London these roads are currently at capacity and bring high levels of congestion and environmental impacts to nearby residential areas and increased journey times for businesses
- North to south road and public transport accessibility within the borough is severely constrained
- 55.6% of residents travel to work by car
- National rail connections are available into central London from Heathrow (via the Heathrow Express and Heathrow Connect service) and West Drayton and Hayes (to Paddington) and West Ruislip and South Ruislip into Marylebone
- The borough contains 13 Underground stations for the Piccadilly, Metropolitan and Central Lines with interchanges at Heathrow, Uxbridge and West Ruislip
- Further enhancements to the rail network are planned, including Crossrail (under construction) and Airtrack^(3.5)
- Northolt Aerodrome provides handling facilities for private flights in addition to Ministry of Defence activities.
- Uxbridge station provides the most significant interchange between the Underground and bus services with 140 bus and 12 train services per peak hour (over 5.4 million trips per year)
- Hayes and Harlington station is the borough's second most important rail interchange with 94 bus and 15 train services per peak hour (over 1.2 million trips per year)
- Heathrow Terminals 1,2 and 3 have over 8,000,000 trips per year and Eastcote station has over 2,000,000 trips per year
- Walking trips have declined whilst cycle trips have marginally increased in recent years
- The borough has a strong school travel plan programme in place

Main Challenges

3.4 The main challenges to be addressed in the Core Strategy are set out in Table 3.1. These have been identified from the key facts outlined above and also from evidence of the changes that will take place in the borough up to 2026. Further information on each of the main challenges and how these are addressed is contained in Chapters 5-9.

Table 3.1 Main Planning Challenges for Hillingdon

Topic	Issue	Policy
The Economy	London Plan requirement to accommodate a proportion of 9-11,000 12,000 new jobs and 9,000 new homes ^(3,6) in the Heathrow Opportunity Area ⁽⁶⁾	E1, E2
	London Plan requirement to adopt a 'Limited Approach' to the transfer of industrial sites to other uses ⁽⁷⁾	E1
	London Plan requirement to deliver a proportion of new hotel growth ⁽⁸⁾	E2
	Resident working age population has below average qualifications and a low number of adult learners	E7
	Pockets of deprivation within the borough	E7
	Low level of business start ups and small affordable business units	E6
	Continued pressure for expansion at Heathrow Airport with economic benefits at a national level but significant adverse local impacts	E3
	Pressure on employment land for other uses	E1
	Threat to market position of Uxbridge through increased competition from other major retail centres	E5
	Threats to the viability and vitality of town and neighbourhood centres	E4

6 See Table 5.1 for further details

7 Industrial Capacity: London Plan (Consolidated with Alterations since 2004) Supplementary Planning Guidance (Greater London Authority, March 2008)

8 See Table 5.2 for further details Page 281

Topic	Issue	Policy
Housing	Overall housing needs and affordable housing in the borough	H1, H2
	Insufficient appropriate forms of affordable tenure, particularly intermediate housing	H2
	A proposed significant increase in Hillingdon's London Plan annual housing monitoring target	H1
	The need to agree a borough affordable housing target	H2
	The requirement in the London Plan for an increased number of gypsy and traveller pitches	H3
	Retention of indicative housing density targets contained in Table 3.2 of the Replacement London Plan	H1
	Delivery of energy efficient housing	BE 1
Community Facilities	Need to provide sufficient community infrastructure to underpin growth, as defined in the Strategic Infrastructure Plan (SIP).	CI 1
	Opportunity to improve access to community infrastructure, particularly for residents in areas of identified need.	CI 1
Environmental Improvement	The need to improve the quality of and access to open spaces, rivers and canals for all groups of people in the community	EM2, EM3, EM4, EM5
	Pressure to balance the demands of growth and the impacts of flood risk with minimal harm on the environment	EM1, EM6
	The need to maintain and improve the current water resources and quality	EM8
	Pressure for release of green belt land, Metropolitan Open Land and Green Chains for other uses	EM2
	The need to control, reduce and mitigate noise, especially around Heathrow and the major road network	EM1, EM8

Topic	Issue	Policy
	The need to mitigate air quality impacts especially around the strategic road network and Heathrow Airport, in order to work towards achievement of both national and European Union standards at relevant locations and improve the local air quality for communities.	EM1, EM8
	National and EU requirements to meet climate change and carbon dioxide emission targets	EM1, EM8
	Threats to the biological and geological interests of the borough from development pressures and climate change	EM1, EM7
	The need to meet the London Plan mineral apportionment figures	EM9, EM10
	The need to minimise waste	EM11
Historic and Built Environment	The need to maintain the historic character, identity, suburban qualities of the Borough's places, buildings and spaces	BE1, HE1
	The need to conserve and enhance the historic significance of the Borough's heritage assets and settings	BE1, HE1
	Pressure for high density residential developments	BE1
	Loss of local characteristics through unsympathetic design	BE1, HE1
	Balancing new sustainability requirements to combat climate change whilst protecting the existing character of places, in particular within conservation areas	EM1
	Demand for large scale commercial/ mixed use developments particularly in the southern part of the Borough on the fringe of Green Belt and/ or Conservation Areas.	BE1, HE1
Transport	Poor north/south public transport links	T2
	Slow and deficient public transport access between Uxbridge and central London and other key centres.	T1, T2

Topic	Issue	Policy
	Delivery of planned public transport improvements at Heathrow, Hayes, West Drayton Uxbridge and West Ruislip.	T2, T3
	Congestion causing traffic delays, particularly in the 30 identified congestion hotspots ⁽⁹⁾	T4
	Pressures on the road and public transport network from the high volume of vehicles associated with Heathrow Airport	T3
	Poor and unsustainable access to and from local destinations, including shopping centres, employment and leisure concentrations/areas	T4
	High dependency on private vehicles and low proportion of trips made by cycling, walking and public transport.	T1, T2, T4

Major Infrastructure Projects

Heathrow Expansion

3.5 In March 2010 the High Court ruled that the previous Government's decision on the proposed third runway at Heathrow does not hold any weight⁽¹⁰⁾. As such, this proposal is not considered further in this Core Strategy.

3.6 Currently, aircraft at Heathrow are only permitted to take off from one runway and land on the other except in certain circumstances. This action helps to regulate noise impacts on the surrounding area. The Council strongly opposes any further capacity increase at Heathrow, including mixed mode⁽¹¹⁾ and any further runway expansion. In light of the above, the Council is taking a common sense approach to dealing with Heathrow Airport in the Core Strategy. Consistent with our Community Strategy, the Core Strategy policies seek to maximise the economic benefits of Heathrow, reduce any negative environmental impacts of the airport and secure improvements for local communities. Detailed policy for the airport will form part of the Heathrow Area DPD (see Policy E3 in Chapter 5 of this Core Strategy).

9 Identified in Hillingdon's Local Implementation Plan 2006/6-2010/11 (London Borough of Hillingdon, March 2006): Appendix 9

10 London Borough of Hillingdon & ORS v Secretary of State for Transport [2010] EWHC 626

11 Mixed mode is defined as "A method of operating two runways allowing for a mix of both take-offs and landings on each" in Adding Capacity at Heathrow: Consultation Document (Department for Transport, 2007): Appendix F Glossary and Abbreviations. Currently, aircraft at Heathrow are only allowed to take off from one runway and land on the other (spreading the noise burden). While Mixed Mode would allow for additional aircraft capacity for the airport, it would see increases in aircraft noise and pollution over a large area of West London and the South East.

High Speed 2

3.7 The High Speed 2 (HS2) Company was set up in January 2009 to work with the then Government on the feasibility of a new rail route between London and the West Midlands. The Department of Transport issued a paper on 11th March 2010 which sets out the then Government's proposed strategy for High Speed Rail⁽¹²⁾. The proposed London-Birmingham route will run from London Euston via Old Oak Common (near Wormwood Scrubs prison) then via Ruislip, through the Chilterns to Birmingham. A connection to Heathrow will be provided by an interchange with Crossrail at a new Old Oak Common station.

3.8 In principle, the Council is supportive of a high speed rail network, although it does not support the preferred route (Chiltern line option). It considers that there is still a considerable amount of work to be undertaken on reviewing possible route options and that the review be dealt with in a way that fully takes into account more strategic and environmental issues, such as climate change objectives, as well as the impacts on residents and local community aspirations. However, this support will be very much conditional upon climate change objectives and local community aspirations being met. The Council will not support any proposals that could lead to an increase in demand for flights from Heathrow, an increase in road congestion or significant adverse local environmental impacts.

3.9 The Coalition Government ~~intends to begin~~ **carried out** an extensive public consultation on HS2 ~~early~~ in 2011.^(3.7) The proposal is to start pre-construction works in 2015 and begin construction in 2017. Given the uncertainty about HS2, particularly in terms of the preferred route and timescales for implementation, the implications of the proposal have not been fully considered in the Core Strategy at this stage.

Central Line

3.10 Hillingdon Council has an aspiration for securing an extension of the Central Line to Uxbridge by means of a spur in the area to the west of Ruislip Gardens, with the route to West Ruislip also being retained. The extension to Uxbridge would support growth in the Uxbridge area, which is needed to maintain its Metropolitan town centre status to enable it to compete with its neighbours. By supporting growth, it would also contribute towards the Mayor's aspirations for growth in outer London boroughs as set out in the London Plan. The Central Line service would also reduce congestion on the roads and this would enable buses to run faster. The Council supports the view of Transport for London (as set out in a report in February 2009), that there may be a good business case for the Central Line extension to Uxbridge.^(3.8)

Crossrail

3.11 Crossrail is a major infrastructure project that will provide a direct rail link from Maidenhead to the City, east London, Essex and Kent, travelling through the southern part of Hillingdon on the route of the existing Paddington line. Work on the project began in 2008 and the main civil engineering construction works are expected to be completed by 2017, with services commencing in 2018. There will be a new station at Heathrow and two existing stations will be upgraded as part of the Crossrail works (Hayes and West Drayton) and it is

expected that these works will be undertaken during the period 2015/2016. The Council supports the principle of Crossrail and recognises the associated regeneration benefits for Hillingdon.

3.12 Following public consultation and an Examination in Public in December 2009, alterations to the London Plan were approved in April 2010. Policies 3C.12A, 6A.4 and 6A.5 of the London Plan, together with Supplementary Planning Guidance issued in July 2010, set out how the Mayor will seek to provide funding for Crossrail through the use of planning obligations. The Mayor is also considering introducing a Community Infrastructure Levy (CIL) to raise £300 million towards the cost of the project.^(3.9)

End Notes

- 3.1 Heathrow Airport Ltd. (203)
- 3.2 Evidence Base update
- 3.3 Hillingdon Primary Care Trust (72)
- 3.4 Heathrow Airport Ltd. (204)
- 3.5 Lichfield Planning on behalf of British Airways (193), Text update
- 3.6 Mayor of London (464)
- 3.7 Text updating to reflect latest position
- 3.8 Update to reflect recent discussions with Transport for London
- 3.9 Mayor of London (466)

4 The Vision - where we want to be

4.1 This chapter examines the Vision for Hillingdon in more detail and provides further explanation of how the borough will look in 2026, if the challenges identified in Table 3.1 are successfully addressed. It goes on to identify a series of Strategic Objectives to deliver the Vision, which form the basis of strategic policies in the document. The Vision was developed through discussion with Hillingdon's Local Strategic Partnership (Hillingdon Partners) and reflects the key priorities of the Sustainable Community Strategy.

The Vision for Hillingdon 2026

Hillingdon continues to prosper, through the implementation of the following seven point vision:

- **Hillingdon is taking full advantage of its distinctive strengths with regard to its places, communities and heritage:** The special character of the borough's natural and built assets have been protected and enhanced, fewer heritage assets and wildlife habitats are at risk, there are more locally-distinct buildings, and new higher standards of development, integrating renewable energy technology. More residents are accessing the borough's **waterways and**^(4.1) quality public open spaces, particularly in Harefield and south of the A40.
- **The social and economic inequality gaps in Hillingdon are being closed:** The social and economic contrast between different parts of the borough have been improved. Hillingdon residents are benefiting from safer and more inclusive communities. Successful strategies have identified and addressed the particular reasons for inequalities in areas of identified need.
- **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. Improved building design and less reliance on cars has helped the borough to reduce its carbon footprint. Generation of energy from renewable sources is common practice and older housing stock is also benefiting from climate change initiatives. Town and neighbourhood centres are the focus for community activities and have a diverse range of uses including health clinics, cultural activities, local and business services, as well as retail and office uses.
- **Economic growth has been concentrated in Uxbridge, Heathrow and the Hayes/West Drayton Corridor, without ignoring local centres:** Sustainable growth around Heathrow and the Hayes/West Drayton corridor (Heathrow Opportunity Area) is being managed through the Heathrow Opportunity Area Framework. Hillingdon has maximised the potential of its heritage assets and continues to retain viable mineral resources within the Opportunity Area. Regeneration in Hayes and West Drayton town centres is under way through new high quality mixed-use development and Crossrail stations. The best use will have been made of the Grand Union Canal. Uxbridge has expanded its role as the main urban centre in the borough

through the development of RAF Uxbridge, an improved public transport interchange, and fast Underground links into central London. Development in Uxbridge and the Heathrow Opportunity Area have led by example in setting standards for new quality development that meets the challenges of climate change. Local centres in the north of the borough continue to flourish as a result of improved community infrastructure.

- **Improved accessibility to local jobs, housing and facilities is improving the quality of life of residents:** More residents are enjoying the benefits of an improved quality of life. There is a wider choice of housing, and workplaces are located where they are accessible by a range of transport options and neighbourhoods that lack adequate facilities and services have been addressed. Low emissions strategies are helping to improve air quality with associated health benefits.
- **Hillingdon has a reliable network of north/south public transport routes and improved public transport interchanges:** Previously poor north south public transport access in the borough has been addressed. New services link Heathrow and the Hayes/West Drayton corridor through Uxbridge to Northwood, Ruislip, Eastcote and Harefield. Improved public transport interchanges have been created at Heathrow, Hayes, West Drayton, Uxbridge and West Ruislip and more people are using public transport, reducing the dependence on cars which has eased congestion throughout the borough. As a whole the borough is benefiting from Crossrail.
- **Hillingdon has continued to prosper from the presence of Heathrow:** The economic benefits of Heathrow Airport are being harnessed by local people through access to jobs and links to training to create greater prosperity, whilst securing improved local air quality, reductions in noise and other benefits to the environment for the local communities.

Strategic Objectives to deliver The Vision

4.2 The following Strategic Objectives are the stepping stones to deliver the Vision and form the basis of policies contained in chapter 5-9.

Hillingdon is taking full advantage of its distinctive strengths with regard to its places, communities and heritage:

- SO1: Conserve and enhance the Borough's heritage and ~~their~~ **its**^(4.2) settings by ensuring new development, including changes to the public realm, are of high quality design, appropriate to the significance of the heritage asset, and sensitive to the wider historic environment.
- SO2: Create neighbourhoods that are of a high quality sustainable design, that have regard for their historic context and use sustainability principles which are sensitive and responsive to the significance of the historic environment, are distinctive, safe, functional and accessible and which reinforce the identity and suburban qualities of the borough's streets and public places, introduce public art to celebrate civic pride and serve the long-term needs of all residents. Page 289

- 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, bio-diversity, education, health and well being. In addition, address open space needs by providing new spaces identified in Hillingdon's Open Space Study.
- SO4: Ensure that development contributes to a reduction in crime and disorder, is resilient to terrorism, and delivers safe and secure buildings, spaces and inclusive communities.
- SO5: Safeguard and promote areas of geological importance and make a proportionate contribution to West London's target to extract 0.5 million tonnes of minerals.

The social and economic inequality gaps in Hillingdon are being closed:

- SO6: Promote social inclusion through equality of opportunity and equality of access to social, educational, health, employment, recreational, green space and cultural facilities for all in the borough, particularly for residents living in areas of identified need.
- SO7: Address Hillingdon's housing needs in Hillingdon [using appropriate planning measures](#). by providing affordable housing as identified in Hillingdon's Housing Needs Study (2005). ^(4.3)

Improved environment and infrastructure is supporting healthier living and helping the borough to mitigate and adapt to climate change:

- SO8: Protect and enhance biodiversity to support the necessary changes to adapt to climate change. Where possible, encourage the development of wildlife corridors.
- SO9: Promote healthier and more active lifestyles through the provision of access to a range of sport, recreation, health and leisure facilities.
- SO10: Improve and protect air and water quality, reduce adverse impacts from noise including the safeguarding of quiet areas and reduce the impacts of contaminated land.
- SO11: Address the impacts of climate change, and minimise emissions of carbon and local air quality pollutants from new development and transport.
- SO12: Reduce the reliance on the use of the car by promoting safe and sustainable forms of transport, such as improved walking and cycling routes and encouraging travel plans.
- SO13: Support the objectives of sustainable waste management.

Economic growth has been concentrated in Uxbridge, and the Heathrow and Hayes/West Drayton Corridor without ignoring local centres:

- SO14: Provide 9,000 new jobs and accommodate most economic growth in Uxbridge and the Heathrow Opportunity Area.
- SO15: Protect land for employment uses to meet the needs of different sectors of the economy. Manage the release of surplus employment land for other uses.
- SO16: Manage appropriate growth, viability and regeneration of town and neighbourhood centres.

Improved accessibility to local jobs, housing and facilities is improving the quality of life of residents:

- SO17: Link deprived areas with employment benefits arising from the development of major sites and existing key locations.

- SO18: Improve access to local services and facilities, including health, education, employment and training, local shopping, community, cultural, sport and leisure facilities, especially for those without a car and for those in more remote parts of the borough through well planned routes and integrated public transport.
- SO19: Meet the ~~current~~ **proposed Replacement** London Plan target to provide 365 ~~425~~ new homes per annum ~~and consider the revised targets in the Replacement London Plan (2009).~~ ^(4.4)
- SO20: Improve facilities at bus and underground/rail interchanges to promote sustainable growth in Uxbridge, Heathrow, the Hayes/West Drayton corridor and accessibility to other town centres.

Hillingdon has a reliable network of north/south public transport routes and improved public transport interchanges:

- SO21: Improve public transport services between the north and the south of the borough to ensure easier access between residential areas such as Northwood and South Ruislip, Hillingdon Hospital, Brunel University, Stockley Park and Heathrow Airport.
- SO22: Promote efficient use of public transport and in particular the enhancement of Underground services to Uxbridge and faster services to central London.

Hillingdon has prospered from the presence of Heathrow:

- SO23: Develop and implement a strategy for the Heathrow Opportunity Area, in order to ensure that local people benefit from economic and employment growth and social and environmental improvements including reductions in noise and **poor** ^(4.5) air quality.
- SO24: Optimise the potential employment and educational benefits of Heathrow airport for local residents.
- SO25: Maintain support for operational uses within the existing airport boundary ~~and seek to minimise the~~ **that do not increase** environmental impacts ~~from the airport wherever possible~~ **and continue to reduce existing impacts.** ^(4.6)

The Spatial Strategy

4.3 Hillingdon's places and spaces are what makes the borough unique. The following section explains what the proposals shown on the Key Diagram and the policies contained in chapters 5-9 will mean for key places in Hillingdon.

Summary of growth in the borough 2011-2026

Table 4.1 Summary of Growth in Hillingdon 2011-2026

Proposed growth during plan period	Growth figure
Total new jobs	9,000-11,000
Total new homes	5,475 - 6,375 dwellings
New office-based jobs	6,400
New jobs in Heathrow Opportunity Area	A proportion of 9-11,000

Proposed growth during plan period	Growth figure
New jobs in RAF Uxbridge town centre extension	Estimated 1,160 permanent direct jobs (175 indirect jobs)
New homes at RAF Uxbridge	Approximately 1340
Total designated employment land	358ha
Industrial and employment land release	17.58ha
Newly designated industrial and employment land	13.63ha
Additional hotel bedrooms	3,800-5,600
New retail floorspace in Uxbridge	18,855 sq.m

Uxbridge

4.4 The status of Uxbridge as the main urban centre in Hillingdon and a Metropolitan Centre in London will be strengthened. The town centre currently supports 100,000 sq metres of retail floorspace and the growth of retail, leisure and employment uses in Uxbridge town centre will be encouraged to support its Metropolitan status. Uxbridge requires 18,855 sq.m net of comparison goods floorspace between 2011 and 2026 and it will be promoted as a key location for offices and hotel development.

4.5 Uxbridge town centre will be expanded to include the office component of the North Uxbridge Industrial Estate to the north west of Fassnidge Park and the RAF Uxbridge site. RAF Uxbridge is identified for high quality residential-led mixed-use development, accommodating up to 1600 homes, around 14,000 sq.m of office space, a 90 bed hotel and it will deliver an estimated 1,160 permanent jobs.

4.6 The growth in employment, housing and leisure within Uxbridge will ensure new development is delivered in an area with existing transport and community infrastructure. This will help encourage sustainable modes of transportation and help to minimise carbon emissions.

4.7 The Uxbridge industrial estates are strategic employment areas that will be protected from release for other uses.

4.8 Transportation improvements are key to ensuring the future success of Uxbridge as a Metropolitan Centre. An enhanced transport interchange is proposed, including improved underground links to the capital. The exact nature and scale of transportation improvements required to support growth in Uxbridge will be defined through detailed assessment of proposals as they come forward. however long term improvements to the Central and Metropolitan Lines have been discussed with TfL and are supported by the Council. ^(4.7)

4.9 The Replacement London Plan (2009) estimates that 754 new homes will be delivered from large sites in Uxbridge north and Uxbridge south. These figures will be clarified through the London Plan EiP process.

Heathrow Airport

4.10 The role of Heathrow Airport as a key employment area will be strengthened, whilst ensuring that only airport-related development will be located on the airport and the continuing demand for associated freight handling and commercial floorspace within the airport boundary will only be met as long as environmental conditions are improved and maintained. The aim is to maximise the economic benefits of Heathrow whilst mitigating the negative environmental and social impacts.

4.11 Subject to protecting local amenity, the Council will optimise its mineral resources and prevent their sterilisation.

4.12 The Heathrow Opportunity Area (OA) is identified in the current London Plan (2008) as being capable of accommodating a proportion of 11,000 new jobs and over 10,000 new homes. The area covers 821ha of land both inside and outside the borough. The Draft Replacement London Plan (2009) proposes a revised 700 ha Opportunity Area providing 9,000 new jobs to 2026 and 9,000 new homes. Further capacity testing is required by Hillingdon and Hounslow to establish what proportion of jobs and new homes in the Opportunity Area will be provided by each borough. However, the GLA's SHLAA identifies that a total of 318 dwellings could be accommodated in the Heathrow area, excluding Hayes and West Drayton. These figures will be discussed and clarified through the London Plan EiP process.

4.13 Heathrow Airport is a major source of adverse air quality emissions in the borough through aviation activities and associated infrastructure and transport. These emissions include nitrogen dioxide which can be harmful to human health, as well as greenhouse gases that are now accepted as contributing to climate change. The growth of employment and housing in this area will be carefully managed so it does not have a detrimental impact on climate change initiatives.

4.14 Heathrow Airport is not yet at its recognised capacity for a five Terminal airport. The 'Adding Capacity at Heathrow Airport' states that the airport receives ~~63~~ **67**^(4.8) million passengers per annum (mppa). This is predicted to rise to ~~80~~ **75-77**^(4.9) mppa by 2015 with the inclusion of a fully operational Terminal 5. The Government has ruled out the development of a third runway, but has committed to looking at a 'better not bigger' approach to the Airport. In 2012, the Airport is likely to see a rise in the number of larger aircraft helping to increase the passenger numbers per year. The continued growth of the airport will be within the existing permissions but it will have an impact on the amount of vehicles on the road, and the supporting infrastructure. More hotels, office space, industrial and commercial uses will all be attracted to the Heathrow Opportunity area. This growth needs to be managed carefully to ensure there are no further adverse impacts on local air quality, and that greenhouse gasses can be minimised to reduce impacts on climate change.

4.15 A clearer definition of the Heathrow Opportunity Area boundary and specific growth figures for Hillingdon will be identified in a Heathrow Area Development Plan Document, to be developed with the Greater London Authority and London Borough of Hounslow.

Hayes/West Drayton

- 4.16** The Hayes and West Drayton corridor will be a key location for employment growth in the Heathrow Opportunity Area.
- 4.17** While traditional manufacturing has declined, the logistics and distribution sector has strengthened and the area contains a good mix of units to accommodate a variety of businesses.
- 4.18** Stockley Park will continue to be a strategic employment site that could contribute a significant proportion of the new employment proposed as part of the Heathrow Opportunity Area. The park will need to deliver sustainable transportation opportunities alongside any further growth. The area contains a number of locally significant employment sites with potential for growth which will be protected from release for other uses.
- 4.19** Some employment sites in the Hayes/West Drayton corridor will be partially released for mixed use development. A subsequent Site Allocations DPD will identify specific sites in Hayes, West Drayton and Yiewsley for mixed use development.
- 4.20** Crossrail will be a catalyst for growth and regeneration in the corridor, particularly around Hayes town centre where the station will be modernised as a public transport interchange.
- 4.21** The Grand Union Canal will be a key open space and blue/ green corridor with improved public access, strong biodiversity habitats, and increased opportunities for recreation and leisure activities.
- 4.22** The Replacement London Plan estimates that 483 new homes will be delivered in the Hayes/West Drayton Corridor from sites over 0.25 hectares. These figures clarified through the London Plan Examination In Public (EiP).

Yeading

- 4.23** Parts of Hayes End and Yeading are within the 20% most deprived areas of England. The Council will develop strategies to address the complex reasons for this deprivation.
- 4.24** A key part of this Core Strategy will be improving access to open spaces, key employment areas and community facilities.
- 4.25** The Replacement London Plan (2009) estimates that in the Yeading area to the north of the Uxbridge Road, 144 new homes will be delivered from large sites over 0.25 hectares. These figures will be clarified through the London Plan EiP process.

North of the A40

- 4.26** The green and open character of the area to the north of the A40 will be enhanced and access to public open space will be improved.

4.27 Fray's Farm Meadows, Harefield Pit and the Gravel Pit will be protected and enhanced where possible. The natural environment north of the A40 represents an important part of Hillingdon's fight to tackle climate change. The natural environment will be protected and enhanced with further opportunities for nature conservation identified through the Biodiversity Action Plan.

4.28 Public transport links will be improved to increase access to employment areas, shops and services in the south.

4.29 An improved transport interchange is proposed at West Ruislip.

4.30 With the exception of Harefield, levels of deprivation to the north of the A40 are relatively low. Residents of Harefield will benefit from improved access to jobs and community services.

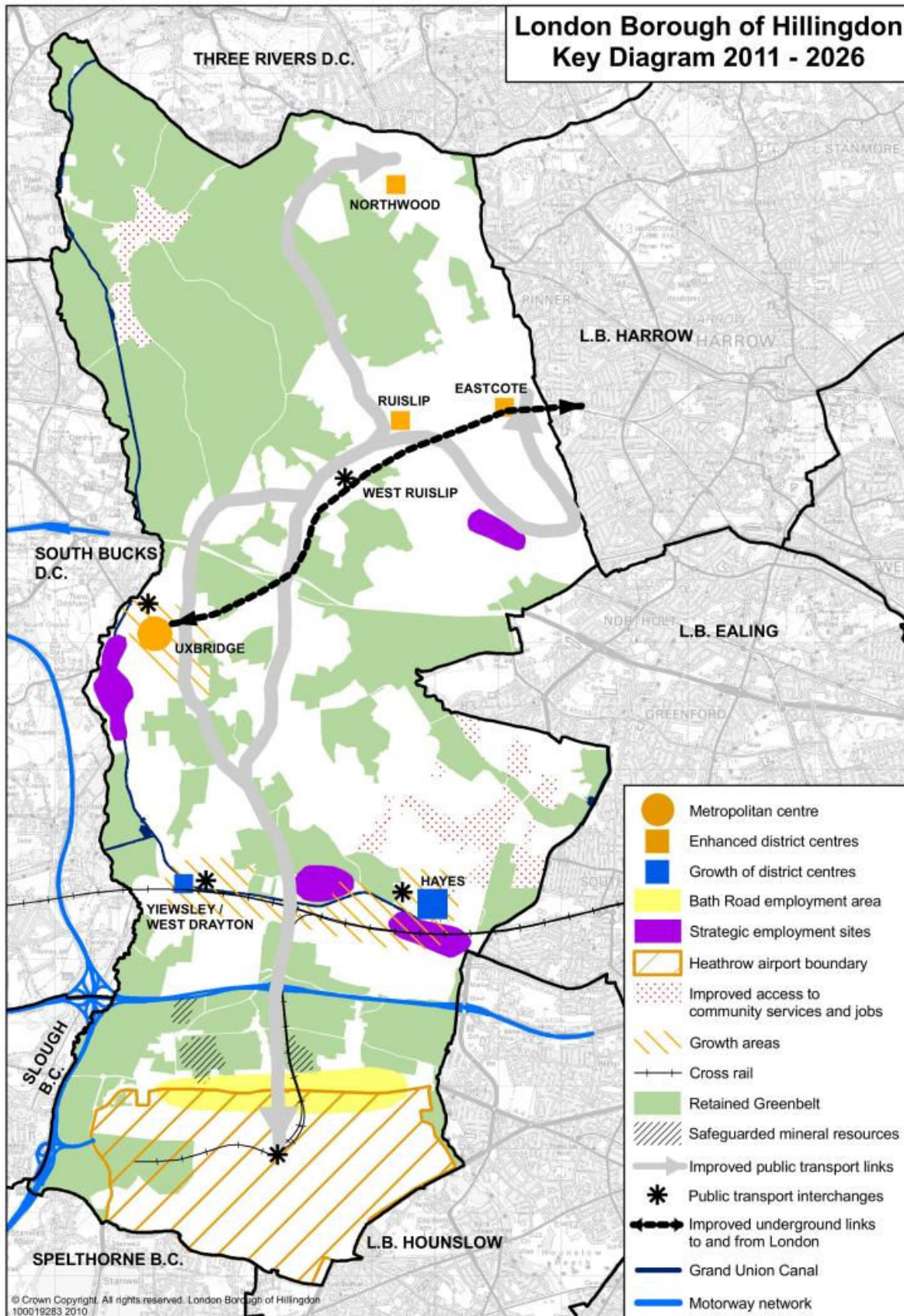
4.31 Strategies will be developed to ensure that local centres, particularly the district centres of Northwood, Ruislip and Eastcote respond to changes in shopping patterns.

4.32 The Replacement London Plan (2009) estimates that 863 dwellings will be delivered to the north of the A40 from large sites over 0.25 hectares. These figures will be clarified through the London Plan EiP process.

The Key Diagram

4.33 The key diagram shows how the borough will look in 2026 after the vision and strategic objectives have been implemented.

Map 4.1 Key Diagram



4 The Vision - where we want to be

Core Policies

4.34 The following sections explain how the Spatial Strategy for Hillingdon will be implemented. Chapters 5-9 contain a series of Core Policies on economic growth, housing, historic and built environment, environmental management, transport and infrastructure. It is through the delivery and monitoring of these policies that the Vision and Objectives of this Core Strategy will be achieved.

End Notes

- 4.1 British Waterways (26)
- 4.2 Text update
- 4.3 Internal change to reflect new evidence base; Nathaniel Lichfield & Partners on behalf of Cathedral Group (267)
- 4.4 Replacement London Plan Panel Report
- 4.5 LB Hillingdon Labour Group (518)
- 4.6 Sustainability Appraisal recommendation
- 4.7 Update to reflect recent discussions with TfL
- 4.8 Lichfield Planning on behalf of British Airways (193)
- 4.9 Heathrow Airport Ltd. (203 and 207)

5 Core Policies - The Economy

5.1 This chapter looks at Hillingdon's economic future; how many new jobs the borough will accommodate, where that growth should go to best support sustainable communities, and how to maintain the viability of our town and neighbourhood centres. While the impact of the current economic downturn is well known, this document looks beyond this economic cycle to a longer term growth strategy for the borough.

Supply of Employment Land

Strategic Objective

- SO15: Protect land for employment uses to meet the needs of different sectors of the economy. Manage the release of surplus employment land for other uses.

Related Policy: E1

5.2 Table 3.1 in Chapter 3 identifies two main challenges relating to the supply of employment land:

- Pressure on employment land for other uses
- The London Plan requirement to adopt a 'Limited Approach' to the transfer of industrial sites to other uses

5.3 Hillingdon has 358ha of designated employment land which is focused on the industrial areas of the Hayes - West Drayton Corridor, Uxbridge, Heathrow and South Ruislip. While historically much of this area was industrial and reliant on the Grand Union Canal, employment has become increasingly office based with many office parks located on former industrial sites. Uxbridge, Stockley Park and the Heathrow perimeter are the principal office locations, and there are increasing development opportunities in Hayes following the introduction of the Heathrow Connect service and the prospect of Crossrail. The transport sector, including Heathrow Airport, accounts for about a third of jobs in the borough ⁽¹³⁾.

5.4 There has been a steady decline in industrial and warehousing floorspace in Hillingdon but an increase in office floorspace. The Council maintains an effective employment land supply, and any release of land over the past 10-20 years has not harmed employment or business functions within the borough. Hillingdon remains a key industrial, warehousing and office location. To sustain a strong supply of office, factory and warehouse floorspace, this Core Strategy will provide appropriate sites and premises for different business needs and protect employment land in the long term from redevelopment for other uses.

5.5 A key consideration for businesses locating in Hillingdon is the proximity of other businesses and therefore established employment areas are an important factor in attracting new investment. This Core Strategy will protect Hillingdon's future prosperity and employment generation through employment land designations.

13 GLA Economics Working Paper 38: Employment projections for London by sector and trend-based projections by borough (Greater London Authority, November 2009)

5.6 Hillingdon has four regionally important Strategic Industrial Locations totalling around 270ha. These are designated through the London Plan and shown on Map 5.1. These include three Preferred Industrial Locations (PIL); Uxbridge Industrial Estate, Victoria Road/Stonefield Way in South Ruislip and Hayes Industrial Area which are suitable for general industrial, wholesale distribution, waste management and recycling. They also include the Industrial Business Park (IBP) at North Uxbridge which is more suitable for activities that need better quality surroundings including research and development and light industrial.

5.7 To complement the Strategic Industrial Locations, this Core Strategy proposes designations for two types of employment land; Locally Significant Industrial Sites (LSIS) where industrial and warehousing activities can operate, and Locally Significant Employment Locations (LSEL) that have a light industrial, office and research role. The purpose of this is to ensure that new office development, which has a high trip generating capacity, is located where public transport accessibility is strongest, thereby reducing the need for car trip generation. It will also help ensure that the function of industrial areas are not compromised by 'sensitive' neighbouring uses. Locations of proposed LSIS and LSEL are shown on Map 5.1 below with specific boundaries brought forward through the Site Allocations Development Plan Document.

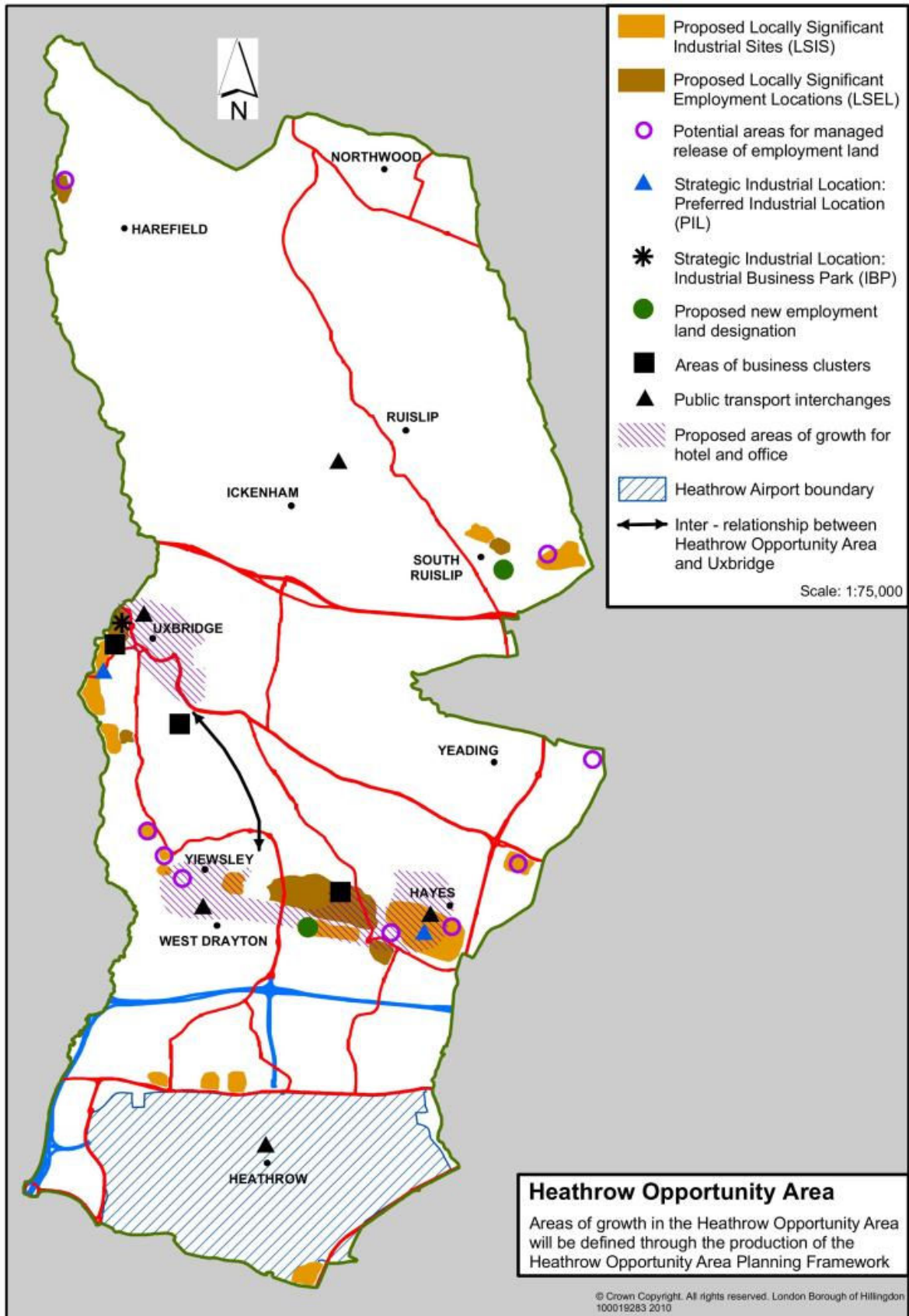
5.8 It is proposed that Prologis Logistics Park in Stockley is included in the LSIS designations, given that it is a major employment area. In addition the Odyssey Business Park in South Ruislip is identified as a LSEL given that it is a modern office park of significant size. These two new employment sites provide a total of 13.63ha of new employment land.

5.9 In general, economic growth has been identified for areas that already benefit from good transport infrastructure and that will not harm the environment. The Heathrow Opportunity Area is seen as an important economic growth area, but has already been identified as an Air Quality Management Area (see Map 8.5). The Business Park at Stockley is also highly valuable to the Borough, but does not benefit from the same level of sustainable transport links as other areas for growth. Growth in areas without good infrastructure will reduce car dependency and harmful emissions through policies EM8, T3 and T4.

5.10 There is more employment land than currently needed, and any release of surplus industrial land will be carefully managed to support Hillingdon's employment generation whilst creating opportunities for regeneration and release to other uses including much needed housing. The London Plan requires Hillingdon to adopt a 'Limited Approach' to the transfer of industrial sites to other uses⁽¹⁴⁾.

14 Industrial Capacity: London Plan (Consolidated with Alterations since 2004) Supplementary Planning Guidance (Greater London Authority, March 2008)

Map 5.1 Locations for Employment Growth



5.11 Hillingdon's Position Statement on Employment Land and Retail Capacity (2010)⁽¹⁵⁾, which updates the Employment Land Study (London Borough of Hillingdon, July 2009), reveals that 17.58ha of surplus industrial and warehousing land (4ha net from SIL) could be released from 2011-2026. This is equivalent to 4.9% of the total current designated employment land in the borough and 1.5% of Strategic Industrial Land. Designated employment areas will be reviewed as part of the Site Allocations DPD which will take account of sites which have already been released for other uses and boundaries will be consolidated where appropriate. Notwithstanding this, sustainable growth around Hayes is a key part of the Council's Vision for Hillingdon. Table 5.3 notes that Crossrail and the Grand Union Canal have an important role to play in the regeneration of this area. In accordance with Strategic Objective 15, the Council proposes a review of employment sites in Hayes, specifically those alongside the Grand Union canal. Where appropriate, sites in Hayes along the canal frontage will be identified through a review of the Council's Employment Land Study and brought forward for residential led mixed use development as part of the production of the Site Allocations DPD. Locations proposed for the managed release of employment land are shown in Map 5.1 above and may include:

- Part of Summerhouse Lane/ Royal Quay/ Salamander Quay, Harefield
- Part of Uxbridge Industrial Estate
- Part of Braintree Road area, South Ruislip
- Part of Trout Road area, Yiewsley
- Part of Pump Lane area, Hayes
- Warwick Road/ Kingston Lane area, West Drayton
- Part of Blyth Road area, Hayes
- Hayes Bridge area

Policy E1: Managing the Supply of Employment Land

The Council will accommodate growth by protecting Strategic Industrial Locations and the designation of Locally Significant Industrial Sites (LSIS) and Locally Significant Employment Locations (LSEL) including the designation of 13.63ha of new employment land.

The Council will manage the release of 17.58ha of surplus industrial land for other uses over the plan period [subject to other policies in this Plan](#)^(5.1) (see Map 5.1).

Implementation of Policy E1: how we will achieve this

Policy E1 will be delivered through the Site Allocations and Development Management Development Plan Documents.

Monitoring of Policy E1: how we will measure success

Policy E1 will be monitored through the Council's Annual Monitoring Report, with specific links to:

- **BD1 (Core) Indicator:** Total amount of additional employment floorspace – by type. **Target:** Minimum of 20,000 sq.m per annum of new/replacement B1c/ B2/B8.
- **BD3 (Core) Indicator:** Employment land available - by type. **Target:** To maintain an appropriate supply of employment sites, premises and floorspace to meet the needs of business.

Regular monitoring of the take up and availability of employment sites and premises will continue to be used in order to assess whether there are shortfalls or surpluses of sites and floorspace.

Location of Employment Growth**Strategic Objective**

- SO14: Provide 9,000 new jobs and accommodate most economic growth in Uxbridge and the Heathrow Opportunity Area.

Related Policy: E2

Regionally Significant Areas

5.12 West London is fundamental to London's economic growth as a whole due to its accessibility and links to existing businesses and infrastructure. In particular, the presence of Heathrow is considered to be a key driver for economic growth in the sub-region and in London as a whole. Hillingdon has benefited from the strength of West London as a primary office location with a history of occupiers moving westwards from Central London to sites like Stockley Park. Typically these have been technology, engineering, manufacturing, and consumer goods companies looking for business clusters or cost reductions.

5.13 Hillingdon is part of the Thames Valley market, which attracts global investment, and the Western Wedge, which is a development corridor of regional importance. The corridor extends from Paddington to Hillingdon where it includes the area from Uxbridge southwards to Heathrow Airport. Hillingdon has sources of economic growth which function above the sub-regional level, including logistics, transport-related sectors, leisure/tourism, and education. The growth of these sectors is encouraged in the replacement London Plan (2009) through strategic outer London development centres. The London Plan requires most of west London's employment growth to be located within the Western Wedge and this Core Strategy will help direct new economic development to this area.

5.14 Table 3.1 in Chapter 3 identifies two main challenges relating to the location of employment growth:

- The London Plan requirement to accommodate a proportion of 9-11,000 new jobs in the Heathrow Opportunity Area
- A requirement to deliver a proportion of new hotel growth

This Core Strategy notes that the majority of new jobs are expected to be delivered through office based employment growth. However, the contribution of other sectors to economic prosperity, such as retail, tourism and education, should not be underestimated.

Office Based Employment Growth

5.15 Hillingdon's employment is estimated to grow from 201,000 in 2011 to 210,000 in 2026⁽¹⁶⁾ with much of this growth based in offices. Table 5.1 shows Greater London Authority (GLA) forecasts for employment growth. Hillingdon is part of both the Outer London economy and the strategically important West London sub-region, and is forecast to be the largest outer London growth borough⁽¹⁷⁾. The 2009 GLA estimate for new jobs in the London Borough of Hillingdon is a total of 9,000 during the period 2011-2026, including around 6,400 office jobs. The London Plan (2008) requires a proportion of 11,000 new jobs to be accommodated within the Heathrow Opportunity Area (which extends beyond the borough boundary) up to 2026, while the replacement London Plan (2009) requires 9,000 new jobs up to 2026.

Table 5.1 GLA Projected Office Based Employment Growth

Source	Location	Number of new jobs	Period
London Plan (2008)	Heathrow Opportunity Area (821ha)	Proportion of 11,000	2001-2026
Replacement London Plan (2009)	Heathrow Opportunity Area (700ha)	Proportion of 12,000 (9,000)	2011-2031 (2011-2026)
GLA Working Paper 39 (2009) Table 9: triangulated employment projections	Hillingdon	9,000	2011-2026
GLA London Office Policy Review (2009)	Hillingdon	6,413 (office jobs)	2011-2026

5.16 In the short term (2009 -2016) it is estimated that there will be only limited need for further office space in Hillingdon based on current vacancies and allowing for a third of outstanding planning applications to be built. However from 2016, additional office floorspace will be required to meet the need through to 2026/7⁽¹⁸⁾. GLA studies⁽¹⁹⁾ estimate a total of

16 GLA Economics Working Paper 39: Borough employment projections to 2031 (Greater London Authority, November 2009); Table 9

17 London Office Policy Review 2009 (Greater London Authority, November 2009)

18 Local Development Framework Background Technical Report: Employment Land Study (London Borough of Hillingdon, July 2009)

19 London Office Policy Review 2009 (Greater London Authority, November 2009)

83,100 sq.m of new office space will be needed over the plan period. This Core Strategy will ensure further land is available for additional office development through to 2026 through Policies E1 and E4.

5.17 The London Office Policy Review 2009 ⁽²⁰⁾ identifies three core office locations of Uxbridge, Stockley Park and Heathrow Perimeter for office growth. These and other established employment areas suitable for new office development are shown on map 5.1 above as Locally Significant Employment Locations. Hayes town centre is a suitable location for smaller-scale office development, particularly as part of mixed-use regeneration schemes. Business parks are important locations for specialist industry clusters, such as Research & Development at Brunel University, and IT and pharmaceuticals at Uxbridge and Stockley Park. Locations for office growth and business clusters are identified on Map 5.1. Future demand for office floorspace may be influenced by factors such as the growing importance of mobile technologies, reducing the amount of office space required to accommodate staff. It will therefore be reviewed regularly.

Hotel and Visitor Facilities

5.18 Hillingdon received an estimated total of £697 million in tourism spending in 2007 ⁽²¹⁾. Jobs in tourism accounts for over 8% of the borough's total employment, which is higher than the London-wide average. This is due in part to the interaction with Heathrow Airport which is a gateway to London and the UK for many overseas visitors. Tourism is therefore a significant contributor to the borough's economy and meeting the needs of visitors, including provision of hotels, conference facilities and cultural activities, is an important consideration for Hillingdon. Visitors include tourists, business visitors, and friends/family of people living in the area, such as university students. Hillingdon benefits from tourism through employment and training opportunities, wealth creation and support for the local economy and culture. This Core Strategy will help link tourism development with regeneration in Hayes and the wider Heathrow Opportunity Area, and provide access to training and new jobs for local people (Policy E7).

5.19 Table 5.2 below summarises projected hotel growth targets. Hillingdon is the fourth most significant London borough in terms of visitor accommodation ⁽²²⁾ and can therefore expect to accommodate a proportionate share of the London-wide figure of 40,000 additional hotel bedrooms. The GLA's Hotel Demand Study ⁽²³⁾ allocates a requirement of 3,800 new hotel rooms to the borough. However Hillingdon's Tourism Study concludes that this figure underestimates long term future growth based on recent trends, and suggests a need for 5,600 rooms by 2026. This estimated figure will be closely monitored, for example in light of any changes in operations at Heathrow or other significant developments. Hotel development in Hillingdon will help meet targets for both visitor accommodation and the Heathrow Opportunity Area employment growth target.

20 London Office Policy Review 2009 (Greater London Authority, November 2009)

21 Local Area Tourism Impact Model: Hillingdon borough report (London Development Agency, July 2009)

22 Hotel Demand Study (Greater London Authority, June 2006)

23 Hotel Demand Study (Greater London Authority, June 2006)

Table 5.2 Projected Hotel Growth

Source	Location	Number	Period
The London Plan (2008)	London-wide	40,000 additional hotel bedrooms	By 2026
GLA Hotel Demand Study (2006)	Hillingdon	3,800 additional hotel bedrooms	2007-2026
Hillingdon's Tourism Study (2007)	Hillingdon	5,600 additional hotel bedrooms	2012-2026

Flexibility

The figures for employment and hotel growth are taken from reports published before the current economic downturn using pre-recession data and trends to calculate future growth. The estimates therefore need to be treated with caution. The Council will monitor these targets through the Annual Monitoring Report and will review the targets if they are not met for two consecutive years.

5.20 Accommodating hotel growth must not be at the expense of employment land around Heathrow Airport, and Policy E1 safeguards Locally Significant Industrial Sites on the Heathrow perimeter. Three key locations for hotel growth are identified by Hillingdon's Tourism Study; Heathrow [Bath Road area](#),^(5.2) Hayes and Uxbridge.

5.21 Emissions from transportation are much higher in Hillingdon than the London average⁽²⁴⁾ which has led to poor air quality, in certain parts of the Borough. In particular, the activities associated with Heathrow Airport and the surrounding development of hotels, offices, industrial and commercial uses have resulted in the designation of an Air Quality Management Area. Further development is required around the airport to enhance this economic and employment hub. However, this must not be at the expense of further adverse impacts on air quality. The Development Management Document will set out policies that ensure new development in areas of poorer air quality will be as close to air quality neutral as possible with an aim to provide positive impacts where appropriate.

Policy E2: Location of Employment Growth

The Council will accommodate 9,000 new jobs during the plan period. Most of this employment growth will be directed towards suitable sites in the Heathrow Opportunity Area, Strategic Industrial Locations, Locally Significant Employment Locations (LSEL), Locally Significant Industrial Sites (LSIS), Uxbridge town centre and Hayes Town Centre with a particular focus around transport nodes. The Council will promote development in highly accessible locations that ~~supports~~ [delivers](#) sustainable travel ~~behaviour~~ [patterns](#)

and contributes to the improvement of existing networks to reduce emissions and impacts on climate change air quality^(5.3). The Council will accommodate a minimum of 3,800 additional hotel bedrooms, and new hotels and visitor facilities will be encouraged in Uxbridge, Hayes, on sites outside of designated employment land on the Heathrow perimeter and in other sustainable locations.

Implementation of Policy E2: how we will achieve this

Policy E2 will be delivered through partnership working with key stakeholder like TfL, land owners and private developers. Inward investment opportunities will be identified in partnership with Think London. The Council will apply national, regional and local policies when considering development growth and set out area-specific policies through the Site Allocations and Heathrow Area Development Plan Documents.

Monitoring of Policy E2: how we will measure success

Policy E2 will be monitored through the Council's Annual Monitoring Report, with specific links to:

- **BD1 (Core) Indicator:** Total amount of additional employment floorspace – by type. **Target:** Minimum of 20,000 sq.m per annum of new/replacement B1c/ B2/B8.
- **LO1 (Local) Indicator:** Amount of floorspace developed for employment by type, in a designated employment area. **Target:** Min of 10,000 sq.m per annum.
- **LO3 (Local) Indicator:** Number of hotel and visitor accommodation rooms in the borough. **Target:** 3,800 new rooms between 2007 – 2026.

Business registrations and failures will be regularly monitored using ONS *Business Demography: Enterprise Births and Deaths* statistics.

Strategy for the Heathrow Opportunity Area

Strategic Objectives

- SO23: Develop and implement a strategy for the Heathrow Opportunity Area, in order to ensure that local people benefit from economic and employment growth and social and environmental improvements including reductions in noise and air quality
- SO24: Optimise the potential employment and educational benefits of Heathrow airport for local residents.
- SO25: Maintain support for operational uses within the existing airport boundary and seek to minimise the environmental impacts from the airport wherever possible

5.22 Table 3.1 in Chapter 3 identifies one main challenge relating to the Heathrow Opportunity Area:

- Continued pressure for expansion at Heathrow Airport with economic benefits at a national level but significant local impacts

5.23 Heathrow Opportunity Area (OA) is a London Plan growth area and currently includes Hayes, West Drayton, Feltham, Bedfont Lakes, Hounslow and Southall, although the replacement London Plan (2009) proposes to separate the latter into an Opportunity Area of its own. This Core Strategy defines the Hillingdon Heathrow OA as an area including the Hayes/West Drayton Corridor, Stockley Park and the area within and around Heathrow Airport. This is shown on Map 5.1.

5.24 Table 5.3 sets out the current position and future growth of the key Heathrow OA sub-areas. Growth in the Heathrow OA will be focused on sustainable locations such as town centres and areas with good access to public transport.

Table 5.3 Heathrow Opportunity Area - Future of Key Sub-Areas

Area	Direction
Stockley Park	<p>Current Position</p> <p>Stockley Park is an important contributor to the local economy and prestige of the borough through its high quality offices. With 175,000 sqm of office stock, it is the largest concentration of office space in Outer London. It is described by the London Office Policy Review 2009 as "perhaps the most iconic business park in the UK" and has a particular draw for prestigious national and European headquarters. The Park is home to IT, pharmaceutical and communications sector businesses as well as many other blue chip companies.</p> <p>Future Growth</p> <p>Stockley Park has a significant role in the delivery of jobs in the Heathrow Opportunity area, and has an estimated capacity of around 5,000 new jobs⁽²⁵⁾. There are opportunities to extend the business park and to include a hotel which could further add to the Park's offer. However, its out of town location means improved public transport links, in particular north-south links and connections with Hayes and West Drayton town centres is essential for a sustainable future for the Park. Stockley Park also provides an opportunity to use its prestigious status to help deliver high quality and innovative approaches to design and transportation. The Park is situated out of town which promotes car dependency and increases impacts on air quality. This Core Strategy will help deliver better connections to Stockley Park through policy T2</p>

Area	Direction
	<p>and make the best use of the Grand Union Canal. There are opportunities to link these high end jobs with university courses to help retain the local graduate population after university through Policy E7.</p>
<p>Heathrow Airport and Perimeter</p>	<p>Current Position</p> <p>Heathrow Airport is the UK's biggest airport and has a substantial impact on the economy of Hillingdon, particularly in the south of the borough. Just under 9,000 Hillingdon residents work at Heathrow which 12% of all airport employees⁽²⁶⁾. Activities related to the operation of Heathrow, such as passenger terminals and maintenance facilities, take place inside the airport boundary while many associated businesses, such as freight handling and hotels, are located around the perimeter just outside the airport boundary. Many businesses are reliant on the airport and proximity is a key driver for the continued demand for freight handling facilities and commercial floorspace near Heathrow. There is a wide variety of office space from small to very large operators which include government, aviation, logistic and distribution.</p> <p>Future Growth</p> <p>Heathrow is a crucial influence in attracting new investment to the area and this Core Strategy will ensure that land within the airport boundary continues to be protected for activity directly related to the airport. Outside the boundary there is a requirement to balance demand for hotel and employment uses in order to manage economic growth. The designated employment areas along Bath Road will be protected as Locally Significant Industrial Locations, while the Heathrow perimeter, specifically Bath Road, BA Waterside, Harmondsworth and along the South West Road, will continue to be a key location for offices. There is particular pressure on employment land for hotel uses in the Heathrow area and hotel development will be directed to locations outside the airport boundary and outside of designated employment areas.</p> <p>Transport infrastructure to support the function of Heathrow Airport and growth in the Heathrow Opportunity Area will be delivered through policy T4. The economic benefits of Heathrow will be maximised while mitigating the negative environmental impacts through policies such as EM8.</p> <p>The Council is aware of the particular issues associated with employment growth in the 'Heathrow Villages' of Sipson and Harmondsworth and will seek to address these in the forthcoming Heathrow Area DPD.</p>

Area	Direction
	<p>Following the coalition government’s decision to cancel a third runway at Heathrow, the emphasis of the Government’s new South East Airports Taskforce are to investigate the options “to make best use of the existing airport infrastructure” to ensure “improving efficiency and reliability and reducing delay” (source: South East Airports Taskforce, Draft Terms of Reference and Membership, 15 June 2010). The Taskforce is due to report in July 2011. As such, in line with this policy the Council are broadly supportive of the aspirations to deliver a programme of renewal at Heathrow. Detailed projects are set out in Appendix 2 (draft infrastructure schedule).</p>
<p>Hayes West Drayton Corridor</p>	<p>Current Position</p> <p>The Hayes West Drayton Corridor extends from West Drayton to Hayes Town Centre through to the A312 to Springfield Road. Where traditional manufacturing has left the area, logistics and distribution activities have increased, benefiting from its proximity to Heathrow Airport. There is a good mix of different size units to accommodate a variety of businesses, with smaller units adjacent to Hayes Town Centre and along Horton Road, West Drayton.</p> <p>Future Growth</p> <p>Three Crossrail stations are proposed at Heathrow, West Drayton and Hayes and these will help establish the Corridor as a key transportation node in West London. The enhanced stations will act as a driver for market-led investment in Hayes, maximise regeneration and growth opportunities, create new jobs, and generate increased footfall within the town centres which will support their retail and leisure functions <u>and development of a night time economy</u>.^(5.4) Market-led investment will be managed so as not to increase local air pollution for residents.</p> <p>The Grand Union canal runs through the corridor and will have a role to play in the regeneration of the area. The canal has the potential to provide an attractive waterfront setting, and regeneration projects will deliver enhancements to this important natural environment as well benefiting from its presence. These opportunities will be delivered through Policy EM3 as well as specific requirements in the Development Management and Heathrow Area Development Plan Documents.</p>
<p>Hayes Town Centre</p>	<p>Current Position</p> <p>Hayes grew up as a manufacturing centre located on the Bristol-Paddington railway line and Grand Union Canal. With the demise of manufacturing there are opportunities to diversify the area. Hayes is classified as a District Centre and supports approximately 200</p>

Area	Direction
	<p>retailers, 30,900 sq m gross of retail floorspace and 40,000 sq.m. of office space. The introduction of the Heathrow Connect Service has created greater links and attracted investment. While there have been successes in recent years with the arrival of businesses associated with Heathrow and the entertainment sectors, there remains a significant supply of high quality office space.</p> <p>Future Growth</p> <p>There has already been significant developer interest in Hayes with major new investment at London Gate (Blyth Road) and Hyde Park (Millington Road). Ballymore's <i>High Point</i> development is a mixed-use scheme with a range of affordable housing provision aimed at housing local families. The introduction of Crossrail will create further regeneration opportunities through an improved transport interchange and help the town centre develop a new identity as the location for small and emerging businesses, suitable for business start-up units, small-scale offices and mixed use development. The Council will also seek to make the best use of the Grand Union Canal in the regeneration process. Hayes is identified as having capacity for an additional 3,350 sq.m of comparison retail floorspace for the plan period ⁽²⁷⁾ which will be accommodated within the existing town centre. The Grand Union Canal offers an attractive and sustainable alternative for pedestrian and cycle routes through the area.</p> <p>Development in Hayes is likely to provide opportunities for employment for those in nearby areas of deprivation. It is important that Hayes and nearby Yeading prosper from the considerable economic influence of Heathrow. It is also vital to monitor threats to Hayes, such as the impact of other centres, including the potential extension to Southall in neighbouring Ealing, and the impact on local jobs from in-commuting via new Crossrail links. The Heathrow Opportunity Area is shown on Map 5.1 and specific policies for economic growth and regeneration of Hayes and improvements to community infrastructure at Yeading will be developed in partnership with stakeholders through the Heathrow Area DPD.</p>
Yiewsley & West Drayton Town Centre	<p>Current Position</p> <p>Yiewsley & West Drayton serves a localised catchment area and is classified as a District Centre. The town grew up as an industrial/manufacturing centre located on the Bristol-Paddington Railway line (West Drayton Station) and Grand Union Canal, although many of the area's manufacturing and industrial jobs have now gone.</p>

27 Consumer Expenditure and Comparison Goods Retail Floorspace Need in London (Greater London Authority, March 2009) 311

Area	Direction
	<p>The centre supports 29,336 sq m gross of retail floorspace, the majority of which is located in a linear fashion along High Street/Station Road. There are two designated Primary Shopping Areas and four Secondary Shopping Areas within the defined town centre. The majority of these are located along High Street/ Station Road. Both the primary and secondary frontages contain a high number of takeaway and service uses.</p> <p>The centre also supports over 12,000 sq.m. of office space, although much of the stock is ageing. Whilst there are a number of single occupiers, much of the remaining space for larger units has been converted into smaller units and serviced suites. Turnover of businesses is high but the offices continue to meet local need and provide employment for local people.</p> <p>Future Growth</p> <p>The planned Crossrail station at West Drayton will create further regeneration opportunities. Improved connections to Stockley Park, through transport policy T2 will create better access to jobs and help support an additional retail capacity of 1,650 sq.m⁽²⁸⁾. Yiewsley & West Drayton is a suitable location for mixed-use development with modern business accommodation, including affordable units. The Grand Union Canal will also have a role to play in the regeneration of the area. Economic growth opportunities for Yiewsley & West Drayton will be developed in more detail through the Heathrow Area DPD and Site Allocations DPD.</p>

Flexibility

The figures for additional retail capacity in Hayes and Yiewsley & West Drayton are taken from a report published by the Greater London Authority in March 2009. The report uses pre-recession data and trends to calculate future growth and therefore estimates need to be treated with caution. The Council will monitor these targets through the Annual Monitoring Report and will review the targets if they are not met for two consecutive years.

5.25 The London Plan requires Hillingdon to work with key partners to prepare and implement a spatial planning framework for the Heathrow OA. This will take the form of a Development Plan Document (DPD) and the Council will work with neighbouring local

authorities like Hounslow to set out a sustainable and coordinated development programme. Further capacity testing is required by Hillingdon and Hounslow to establish what proportion of jobs and new homes in the Opportunity Area will be provided by each Borough.

It is not possible to provide substantial detail on what the Heathrow Area DPD will cover; however it will include strategies to deliver economic growth, housing growth and mineral apportionment. It will include requirements to deliver high quality sustainable development and the need to incorporate innovative approaches to sustainable transportation as well as needing to address the climate change criteria set out in policy EM1, and will contain specific strategies for areas such as Hayes town centre, Bath Road and the Heathrow Villages.

Policy E3: Strategy for Heathrow Opportunity Area

The Council will prepare a Development Plan Document (DPD) for the Heathrow area to achieve the future growth set out in Table 5.3, in consultation with the GLA and London Borough of Hounslow. This DPD will help manage development and protect land within Heathrow for airport-related activities. It will balance demand for hotel and employment uses, and ensure that local people benefit from sustainable economic growth. The DPD will also set requirements for climate change mitigation and adaptation through a low carbon emission strategy and measures to improve local air quality.

Implementation of Policy E3: how we will achieve this

Policy E3 will be delivered through cross-boundary and regional partnership working, and local stakeholder partnerships.

Monitoring of Policy E3: how we will measure success

Policy E3 will be monitored through the Council's Local Development Scheme and subsequent targets will be set out in the Annual Monitoring Report.

Uxbridge

Strategic Objectives

- SO16: Manage appropriate growth, viability and regeneration of town and neighbourhood centres.
- SO20: Improve facilities at bus and underground/rail interchanges to promote sustainable growth in Uxbridge, Heathrow, the Hayes/West Drayton corridor and accessibility to other town centres.

Related Policy: E4

5.26 Table 3.1 in Chapter 3 identifies one main challenge relating to Uxbridge:

- Threat to market position of Uxbridge through increased competition from other major retail centres

5.27 Hillingdon's town centre network comprises a hierarchy of centres which are shown on Map 5.3. Uxbridge is the main urban centre in Hillingdon and is classified as a Metropolitan Centre, serving a wide catchment area and offering a high level and range of shopping, employment, service and leisure functions. The town centre supports around 100,000 sq m of retail floorspace, of which 33,000 sq m is located in the Mall Pavilions shopping centre and 30,000 sq m in the Chimes centre. The centre has a night-time economy of regional/sub-regional importance and has the potential to accommodate a wider leisure and cultural offer⁽²⁹⁾. Uxbridge has a very small number of hotels which support the visitor economy, and Policy E2 seeks to improve the hotel offer in Uxbridge. Table 5.4 and Policy E2 set out the future direction of Uxbridge as an office location for medium growth and business clusters of pharmaceuticals, IT, business support services and food sectors. Improvements to the public transport interchange is set out in the Transport chapter.

Table 5.4 Future of Uxbridge Town Centre

Area	Direction
Uxbridge	<p>Current Position</p> <p>Uxbridge has an office stock of around 205,000 sq.m, the fourth largest concentration in outer London, and is a key centre for the office market in west London. A number of operators have their headquarters or European headquarters in Uxbridge which has cluster strengths of pharmaceuticals and IT companies, business support services and food sectors. Businesses are attracted by good road access, the quality of the townscape and service provision, availability of suitable premises, Brunel University and the local skills base. While the centre is accessible by both public and private transport, there is restricted parking ratios when compared with competing centres outside Greater London. Building owners are reluctant to give up the historic parking ratios attached to existing buildings in Uxbridge and this actively discourages stock renewal in the town centre. Uxbridge both competes with and benefits from Uxbridge Business Park, which is situated just over the border in South Bucks. There is a shortage of good quality office stock in Uxbridge, although it is still considered as a viable office location⁽³⁰⁾.</p>

29 The London Plan Spatial Development Strategy for Greater London Consolidated with Alterations since 2004 (Greater London Authority, February 2008)

30 London Office Policy Review (Greater London Authority, November 2009)

Area	Direction
	<p data-bbox="481 344 702 380">Future Growth</p> <p data-bbox="481 416 1461 831">The replacement London Plan (2009) identifies Uxbridge for medium growth and for promotion as a commercial location. The London Office Policy Review 2009 describes the local economy of Uxbridge as robust and expected to grow, although it highlights a lack of opportunity for new development in the existing centre. This Core Strategy will therefore extend the town centre to include the office component of the North Uxbridge IBA and the town centre quarter of the proposed RAF Uxbridge site (Policy E4). The RAF Uxbridge town centre extension is estimated to include approximately 14,000 sq.m B1a offices, a 90 bed hotel and deliver an estimated 1160 permanent jobs. Further details will emerge through the planning application process.</p> <p data-bbox="481 866 1461 1093">Uxbridge Business Park has more generous parking allowances for new office development than Hillingdon which adheres to London-wide ratios. In order to ensure the future of Uxbridge as a commercially competitive location, this Core Strategy will improve public transport links and interchanges and encourage a more sustainable approach to transportation through Policy T1 and T2.</p> <p data-bbox="481 1128 1461 1240">Uxbridge requires an estimated 18,855 sq.m net of comparison goods floorspace between 2011 and 2026⁽³¹⁾ in order to maintain its market position in the area.</p>

5.28 The market position of Uxbridge is under pressure through competition from other major retail centres such as Westfield, High Wycombe and Brent Cross. In order to maintain its Metropolitan status, Uxbridge requires 18,855 sq.m net of comparison goods floorspace between 2011 and 2026⁽³²⁾. This is a net growth of around 20% and equates to 1,260 sq.m of additional comparison floorspace per annum for the plan period of the Core Strategy. Hillingdon's Position Statement on Employment Land and Retail Capacity (2010)⁽³³⁾ shows that this new retail provision can be accommodated within Uxbridge for the medium-term.

31 Consumer Expenditure and Comparison Goods Retail Floorspace Need in London (Greater London Authority, March 2009) Table 6

32 Consumer Expenditure and Comparison Goods Retail Floorspace Need in London (Greater London Authority 2009). Table 6)

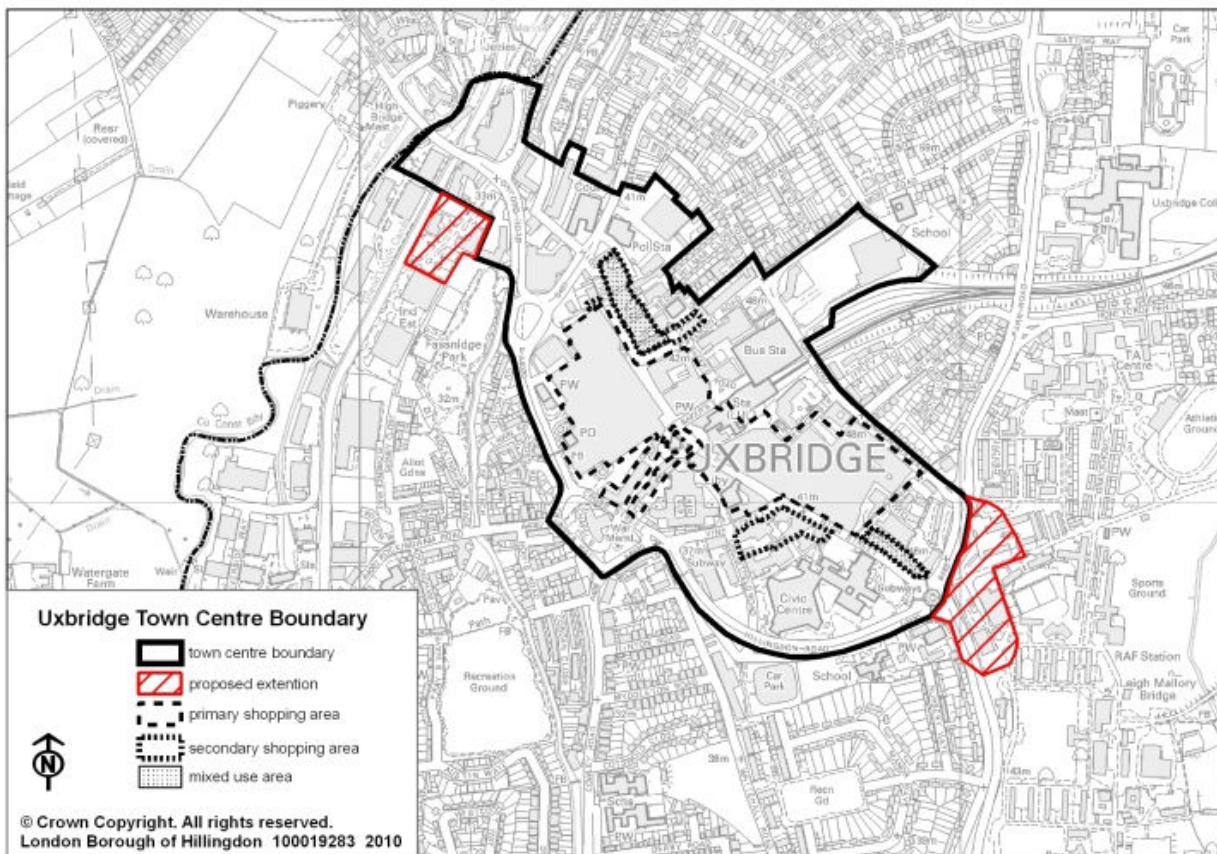
33 Position Statement on Employment Land and Retail Capacity (London Borough of Hillingdon, March 2010) Page 315

Flexibility

The figure for additional comparison floorspace capacity in Uxbridge is taken from a report published by the Greater London Authority in March 2009. The report uses pre-recession data and trends to calculate future growth and therefore estimates need to be treated with caution. The Council will monitor this target through the Annual Monitoring Report and will review the target if it is not met for two consecutive years.

5.29 This Core Strategy will accommodate new growth and strengthen the Metropolitan status of Uxbridge town centre by expanding the town centre boundary to include the office component of the North Uxbridge Industrial Estate (former Highbridge Estate) and the town centre quarter of the proposed RAF Uxbridge site. This is shown on Map 5.2 which will remain indicative until the commercial element of the town centre extension can be defined through the planning application process. The extension of the town centre will maximise opportunities for employment, retail and leisure growth in a sustainable location which reduces the need to develop further out of town business and retail parks. The inclusion of the former Highbridge estate will help stimulate further investment in the office sector and contribute to employment generation in Hillingdon. The RAF Uxbridge extension will include commercial floor space, limited retail uses, restaurants and cafés, and will enhance the arts and cultural offer in Uxbridge, alongside improved links to the town centre.

Map 5.2 Strategic Site (indicative): Boundary Changes to Uxbridge Town Centre



Policy E4: Uxbridge

The Council will strengthen the status of Uxbridge town centre as a Metropolitan Centre by delivering growth set out in Table 5.4 and promoting Uxbridge as a suitable location for retail, offices, hotels, recreation and leisure, entertainment and culture, evening and night-time economy, education, community services, and mixed-use development. The Council will secure improvements to Uxbridge public transport interchange and the town centre boundary will be expanded as shown on Map 5.2.

Implementation of Policy E4: how we will achieve this

Policy E4 will be delivered through the planning application process, including implementing the existing RAF Uxbridge SPD, through the Site Allocations DPD, by co-ordinating and developing a strategy for tourism and visitor attractions in Uxbridge Town Centre, and through partnership working with TfL.

Monitoring of Policy E4: how we will measure success

Policy E4 will be monitored through the Council's Annual Monitoring Report, with specific links to:

- **BD4 (Core) Indicator:** Total amount of completed floorspace for 'town centre uses' (A1, A2, B1a, and D2 uses) within (i) town centre areas and (ii) the local authority area. **Target:** (i) 800 square metres of retail development per annum. (ii) Up to 8,100 sq.m of comparison goods floorspace and 1,300 sq.m of additional convenience goods floorspace by 2016.
- **LO2 (Local) Indicator:** Amount of secured and implemented developer contributions towards the provision and improvement of town centres. **Target:** The revised SPD on Planning Obligations will lead to discussions about an appropriate target.

Town and Neighbourhood Centres

Strategic Objectives

- SO16: Manage appropriate growth, viability and regeneration of town and neighbourhood centres.
- SO18: Improve access to local services and facilities, including health, education, employment and training, local shopping, community, cultural, sport and leisure

facilities, especially for those without a car and for those in more remote parts of the borough through well planned routes and integrated public transport.

- SO20: Improve facilities at bus and underground/rail interchanges to promote sustainable growth in Uxbridge, Heathrow, the Hayes/West Drayton corridor and accessibility to other town centres.

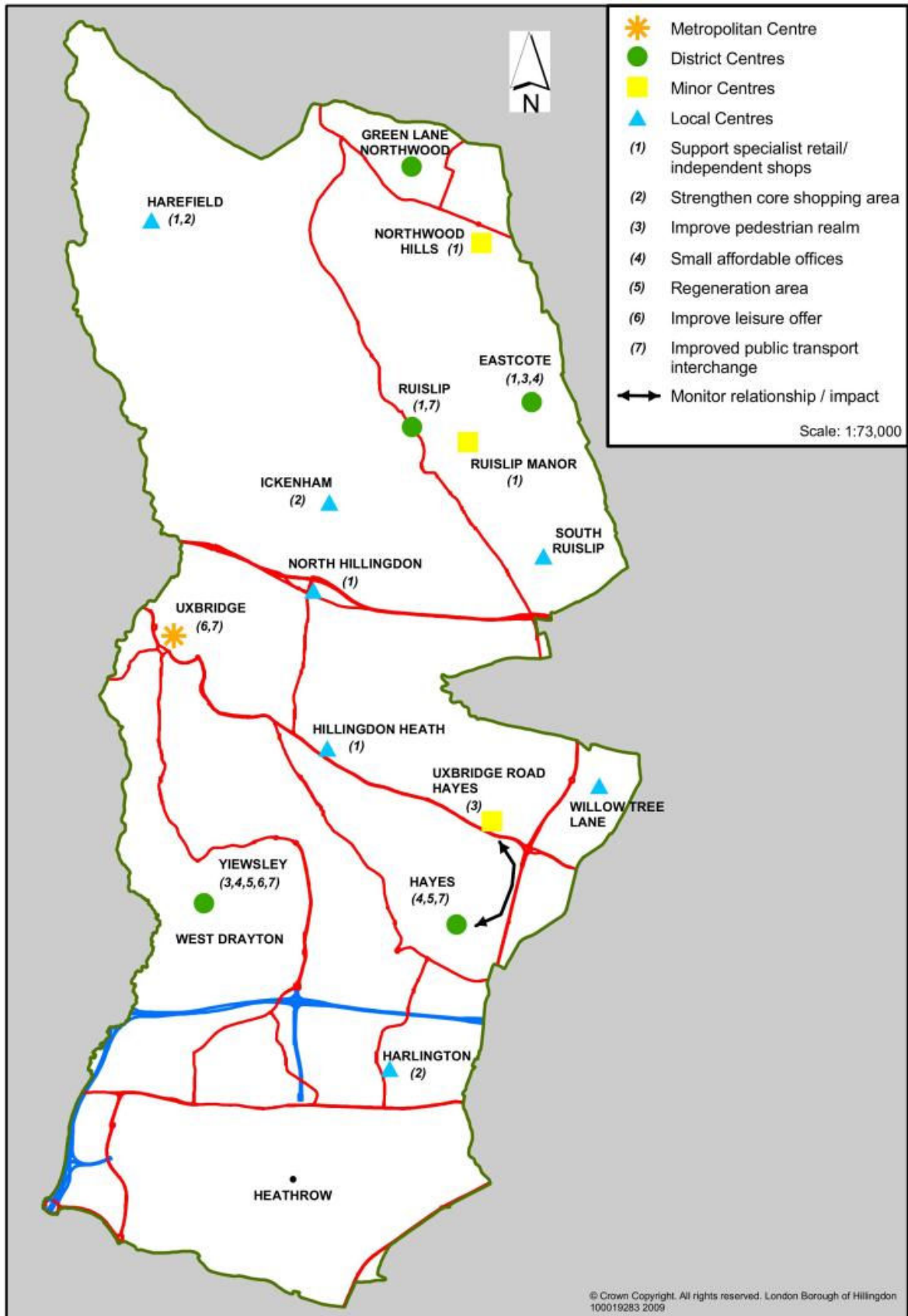
Related Policy: E5

5.30 Table 3.1 in Chapter 3 identifies one main challenge relating to town and local centres:

- Threats to the viability and vitality of town and neighbourhood centres

5.31 District, Minor and Local Centres (collectively referred to in this Strategy as 'neighbourhood centres') provide convenience goods and services for more local communities and some have developed specialist shopping functions. They are drivers of the local economy and also play a role in fostering social inclusion. The Council is already investing in local centres, for example through the library modernisation programme which has not only increased learning and local employment opportunities, but has generated increased footfall to support the sustainability of town centres.

Map 5.3 Town Centre Improvements



5.32 Hillingdon's neighbourhood centres are vulnerable to the impact of larger town centres and new out-of-borough town centre regeneration schemes which can draw trade away from smaller centres. There are a number of other threats to the viability and vitality of town and neighbourhood centres influenced by changing consumer demand as well as economic factors. Among these are the growing e-economy, the popularity of one-stop supermarkets in out of centre locations, and car parking issues. Through Policy E5, this Core Strategy will help diversify the future role of Hillingdon's local centres and build on their unique advantages like specialist retail and service offer, historic environment, access to public transport, affordable small office units and opportunities for social interaction. In Hayes and Yiewsley & West Drayton the Council will allocate land for mixed-use employment, residential and transport-led regeneration schemes. Map 5.3 shows how the Council will improve the borough's centres.

5.33 The Council's Position Statement: Employment Land and Comparison Retail Floorspace (June 2010) provides a comparison goods floorspace requirement for the entire borough of 44,961sqm net for the period 2006-2026. Table 5.5 identifies additional comparison retail floorspace capacity for Hillingdon's District Centres during the plan period ⁽³⁴⁾. Additional retail floorspace will be accommodated within the existing town centre boundaries.

Table 5.5 Net Additional Comparison Goods Floorspace Requirement (sq.m)

District Centre	2011	2016	2021	2026
Eastcote	20	133	512	1,143
Hayes	135	547	1,594	3,345
Ickenham	16	96	322	661
Northwood	35	136	394	770
Ruislip	65	353	1,188	2,503
Yiewsley & West Drayton	69	284	843	1,650

Flexibility

The figures for additional comparison goods floorspace requirement in Hillingdon's District Centres are taken from a report published by the Greater London Authority in March 2009. The report uses a broad strategic model to distribute future growth and therefore estimates need to be treated with caution. The Council will monitor these targets through the Annual Monitoring Report and will keep the targets under review.

34 Consumer Expenditure and Comparison Goods Retail Floorspace Need in London (Greater London Authority, March 2009): Extract from Table 14: Net additional comparison goods floorspace requirements by town centre (2011 - 2031) using 2.2% growth

5.34 Parades are a smaller entity than neighbourhood centres but perform an important function in terms of meeting the daily needs of local communities. The viability of local parades is threatened by competition from supermarkets and retail warehouses. Hillingdon's Retail Study assessed the borough's convenience floorspace requirements and concluded 415 sq m would be needed across the borough up to 2016 and that local shops are particularly susceptible to closure and pressure for change of use. For some local shopping areas the closure of just one essential shop may be so significant as to precipitate the closure of other shops and ultimately the demise of the centre. Through Policy E5, this Core Strategy will ensure that local parades continue to perform a role in providing essential goods and services, as well as social contact.

Policy E5: Town and Local Centres

The Council will accommodate additional retail growth in District Centres as set out in Table 5.5 and will promote uses appropriate to their size and location in accordance with the retail hierarchy. The Council will improve town and neighbourhood centres across Hillingdon as set out in Map 5.3, and improve public transport, walking and cycling connections to town and neighbourhood centres whilst ensuring an appropriate level of parking provision is provided for accessibility to local services and amenities. Public transport will be improved to strengthen the viability and vitality of all town centres including Uxbridge, Eastcote, Hayes, Northwood, Ruislip, Yiewsley and West Drayton.

Local parades will be protected, enhanced^(5.5) and managed to ensure they meet the needs of the local community and enhance the quality of life for local residents, particularly those without access to a car.

Implementation of Policy E5: how we will achieve this

Policy E5 will be delivered by applying national, regional and local policies including the Site Allocations and Development Management DPDs, and working in partnership with town centre managers.

In addition to the expansion of town centre boundaries proposed in this plan, increases in retail floor space identified in Table 5.5 will be achieved through the redevelopment of existing sites, refurbishment of existing units or the intensification of floorspace. Sites to be redeveloped will be identified in the Site Allocations DPD as appropriate.

Monitoring of Policy E5: how we will measure success

Policy E5 will be monitored through the Council's Annual Monitoring Report, with specific links to:

- **BD4 (Core) Indicator:** Total amount of completed floorspace for 'town centre uses' (A1, A2, B1a, and D2 uses) within (i) town centre areas and (ii) the local authority area. **Target:** (i) 800 square metres of retail development per annum. (ii) Up to 8,100 sq.m of comparison goods floorspace and 1,300 sq.m of additional convenience goods floorspace by 2016.
- **LO2 (Local) Indicator:** Amount of secured and implemented developer contributions towards the provision and improvement of town centres. **Target:** The revised SPD on Planning Obligations will lead to discussions about an appropriate target.

Small and Medium-Sized Enterprises (SME)

Strategic Objectives

- SO15: Protect land for employment uses to meet the needs of different sectors of the economy. Manage the release of surplus employment land for other uses.

Related Policy: E6

5.35 Table 3.1 in Chapter 3 identifies one main challenge relating to small and medium-sized enterprises:

- Low level of business start ups and small affordable business units

5.36 New occupiers are attracted by the availability of high quality, modern stock in attractive town centres or sites close to Heathrow or the M25 with good access. There is also a local demand for small office units, and affordable work spaces for small and medium-sized enterprises (SME). The London Plan (2008) and the replacement London Plan (2009) contain policies to support local SMEs as being of particular importance for local regeneration and especially important in suburban areas. Hillingdon Council is already engaged with local SME businesses through initiatives such as supply chain intervention and brokerage.

5.37 Council initiatives will continue to link universities with affordable research space, through schemes like the business incubation studios at Uxbridge College Hayes campus, and support for industry clusters. The principal reasons why businesses in Hillingdon choose their current location are the suitability of their premises and affordability. This Core Strategy will therefore help to ensure the right mix of new office units is available in the borough, including an adequate supply of modern affordable units⁽³⁵⁾.

Policy E6: Small and Medium-Sized Enterprises (SME)

Hillingdon will encourage the development of affordable accommodation for small and medium-sized businesses in appropriate **sustainable**^(5,6) locations throughout the borough.

Implementation of Policy E6: how we will achieve this

Policy E6 will be delivered through the Development Management DPD, the allocation of a sufficient of employment sites in the Site Allocations DPD, implementing the provisions of the Planning Obligations SPD and through partnerships with the private sector.

Monitoring of Policy E6: how we will measure success

Policy E6 will be monitored through the Council's Annual Monitoring Report, with specific links to:

- **BD1 (Core) Indicator:** Total amount of additional employment floorspace – by type. **Target:** Minimum of 20,000 sq.m per annum of new/replacement B1c/ B2/B8.
- **LO1 (Local) Indicator:** Amount of floorspace developed for employment by type, in a designated employment area. **Target:** Min of 10,000 sq.m per annum.

Raising Skills**Strategic Objectives**

- SO6: Promote social inclusion through equality of opportunity and equality of access to social, educational, health, employment, recreational, green space and cultural facilities for all in the borough, particularly for residents living in areas of identified need.
- SO17: Link deprived areas with employment benefits arising from the development of major sites and existing key locations.

Related Policy: E7

5.38 Table 3.1 in Chapter 3 identifies two main challenges relating to raising skills:

- Resident working age population has below average qualifications and low number of adult learners
- Pockets of deprivation within the borough

5.39 There are a number of challenges relating to skills and access to employment in Hillingdon. Firstly, a significant proportion of workers in the borough have a low level of qualifications or job skills, typically in pockets of deprivation. There is a need to raise the aspirations and job mobility of these residents by increasing skills so they can maximise employment opportunities. This Core Strategy will help ensure that local skills match employment growth in the borough and that employment helps address pockets of deprivation within the borough by linking training and employment needs. Inequalities can be reduced

by increasing employability and promoting businesses that can create job opportunities for local residents. Jobs in tourism account for over 8% of the borough's total employment, and this Core Strategy will help local people benefit from this through access to employment and training opportunities in the tourism industry. The Council will also harness opportunities to link high end jobs, for example at Stockley Park, with university courses to help retain local graduates after university.

5.40 There is significant commuting out of the borough to central London and the Thames Valley and approximately two-thirds of employees in-commute from outside the borough. This Core Strategy will also help to ensure that local people can physically access jobs, particularly at Heathrow, by a range of transport modes. This is dealt with in the Transport chapter through policies T2, T3 and T4.

Policy E7: Raising Skills

The Council will ensure training opportunities are linked with the development of major sites for both construction phases and end use occupiers, and through liaising with local colleges and businesses to ensure workforce development initiatives and training programmes reflect skill requirements in the workplace. The Council will engage with local businesses and universities to link high end jobs **and green jobs**^(5.7) in the borough with higher education courses. The Council will promote Hillingdon as a destination for visitors and tourists and ensure that local residents have access to jobs within related industries.

Implementation of Policy E7: how we will achieve this

Policy E7 will be delivered through preparing and implementing the Local Economic Assessment, and by means of partnership working with businesses, Adult Education services, universities and FE colleges, Jobcentre Plus, Chamber of Commerce, West London Working, Visit London and private developers. Delivery will also be through implementing the Planning Obligations DPD, the economic development strategy, strategy for tourism and visitor attractions, and the Subregional Employment and Skills Plan.

Initiatives such as the Chief Executives working contacts with local 'Big Hitters' in the business community, Gateway Heathrow 2012, 14-19 diplomas and 16-19 Commissioning will also help deliver Policy E7. Further initiatives will be developed to encourage active travel within the borough and information will be provided dynamically and responsively to encourage modal change to reduce car commuting on key corridors.

Monitoring of Policy E7: how we will measure success

Policy E7 will be monitored through NOMIS data for skills/employment. Internal monitoring will be through the Local Strategic Partnership Theme Group responsible for measuring skills targets within the Local Area Agreement.

End Notes

- 5.1 Sustainability Appraisal Update Feb 2011 recommendation (pg 28)
- 5.2 PRUPIM (419)
- 5.3 Sustainability Appraisal Update Feb 2011 recommendation (pgs 29-30)
- 5.4 Hayes Town Partnership (363)
- 5.5 Sustainability Appraisal Update Feb 2011 recommendation (pgs 33-34)
- 5.6 Sustainability Appraisal Update Feb 2011 recommendation (pgs 34-35)
- 5.7 Sustainability Appraisal Update Feb 2011 recommendation (pgs 36-37)

6 Core Policies - New Homes

Strategic Objectives

SO7: Address Hillingdon's housing needs in Hillingdon using appropriate planning measures. ~~by providing affordable housing as identified in Hillingdon's Housing Needs Study (2005).~~^(6.1)

SO19: Meet the current proposed Replacement London Plan target to provide 365 ~~425~~ new homes per annum ~~and consider the revised targets in the Replacement London Plan (2009).~~^(6.2)

Related Policies: H1, H2, H3

6.1 Ensuring the delivery of a sufficient level of housing is a key challenge for this Core Strategy and the Council as a whole. The delivery of, in particular, more affordable housing is a priority identified in the Council's Sustainable Community Strategy.

6.2 This chapter sets out the minimum number of new homes that Hillingdon will provide over the period of the Core Strategy and the steps that will be taken to demonstrate the viability of revised housing targets contained in the Replacement London Plan (2009). It also identifies key housing needs in the borough and the extent to which these can be met.

6.3 The starting point for assessing housing issues in Hillingdon is to look at the number of existing homes and households in the borough. This is summarised in Table 6.1:

Table 6.1 : Existing Housing

A) Total number of households	99,800
B) Number of homes in the borough	102,500 units
C) Total number of existing affordable homes in the borough	17,044 units

Source: A) London Borough of Hillingdon Draft Housing Market Assessment (HMA) 2011^(6.3) 2009, Fordham Research. B and C) The Council's 2007/2008 Housing Strategy Statistical Appendix (HSSA)

6.4 The key points relating to the figures in Table 6.1 are:

Housing Type: Of the total number of homes in the borough, the 2001 census data indicates that almost a quarter are flats, approximately one third are semi detached and a quarter are terraced properties.

Tenure: Hillingdon's draft HMA ⁽³⁶⁾ is considered to be the primary source of evidence for [a detailed breakdown of](#) ^(6.5) housing needs and indicates that at 72%, levels of owner occupation in the borough are higher than the national and regional (London) average. Approximately 8.4% of all households live in private rented accommodation and a sixth are housed in the social rented sector. There continues to be a need for both intermediate and social rented forms of affordable housing, particularly larger family units.

Size and Price: The draft HMA indicates that homes in Hillingdon have more rooms than the regional average. Less than 1% of properties fall into the lowest Council Tax band, well below the national and regional average. Notwithstanding the current economic downturn, this indicates that house prices in the borough are relatively high.

Vacancies and Property Condition: A certain number of vacant properties are required to ensure a dynamic housing market and the proportion of vacant market properties in Hillingdon is about the same as the regional average. The majority of vacancies (of all tenures) are located to the south of the A40. Further information on the number of vacant properties in the borough will be contained in the draft HMA. The recent Private Sector Stock Condition Survey concluded that in general terms, the overall condition of housing in Hillingdon is better than average.

Main Challenges

6.5 The challenges for housing provision over the period of the Core Strategy fall into two categories: to, as far as possible, meet housing supply targets contained in the London Plan and to address housing needs in Hillingdon.

The London Plan

6.6 The main challenges for the Core Strategy in relation to meeting London Plan targets are:

1. A proposed increase in Hillingdon's annual housing monitoring target;
2. The need to agree a borough-wide affordable housing target;
3. Addressing proposed changes in the policy on gypsy and traveller pitch provision; and
4. The retention of indicative density targets in the Replacement London Plan (2009).

6.7 The London Plan (2008) sets a target for Hillingdon to provide 365 new dwellings per annum. [Following the completion of the Replacement London Plan EIP, the subsequent Panel Report recommends a revised annual monitoring target of 425 units.](#) In accordance with Government guidance, this target has been rolled forward to cover the Core Strategy period up to 2026. ~~At the time of its publication in October 2009 the Replacement London Plan (2009) contained a revised target for Hillingdon to provide 6,200 dwellings up to 2021, based on the GLA's Strategic Housing Land Availability Assessment (SHLAA).~~

6.8 In August 2010, the Mayor published a Housing Technical Note⁽³⁷⁾ to assist participants at the Replacement London Plan EiP sessions. This resulted in a proposed reduction in the pan-London target and a proposed reduction in Hillingdon's annual monitoring target from 620 to 470 dwellings per annum. Following representations prepared by the Council as part of the EiP process, a further amendment has been made to Hillingdon's annual monitoring target and the figure now stands at 425 units.

6.9 Notwithstanding recent changes to PPS3 the Mayor proposes to retain borough wide housing targets in the London Plan. The Technical Paper states that the current methodology is not considered to be the most effective way forward and a review of housing targets will be brought forward as an early alteration to the the London Plan.^(6.6)

Housing Needs in Hillingdon

6.10 The main challenges in relation to meeting housing needs in the borough are:

1. Meeting the requirements for affordable housing;
2. The lack of appropriate forms of affordable type and tenure, particularly intermediate housing; and
3. The particular needs of the travelling community in the borough.

Overall Housing Need

6.11 For the purposes of the Core Strategy, housing need is defined as '*the number of households who lack their own housing, or who live in unsuitable housing and who cannot afford to meet their housing needs in the market.*' The following documents are relevant in the assessment of housing need:

6.12 In addition to the borough wide and sub-regional HMAs the following documents are also relevant:

- **London Borough of Hillingdon Housing Market Assessment:** This examines the local housing market and estimates the need for affordable housing in the borough. The results of the HMA will be used to underpin both planning and housing policy.
- **London Borough of Hillingdon Housing Needs Survey Update (2005):** This document is the current assessment of housing needs in the borough. The Council is currently in the process of publishing its updated Housing Market Assessment (HMA)
- **West London Sub Regional Housing Market Assessment:** This study is also in production and will provide a broader picture of housing needs for the seven boroughs in the West London Sub-Region.^(6.7)
- **2008 London Strategic Housing Market Assessment:** This study provided an assessment of housing needs across London^(6.8)

6.13 The draft Hillingdon's HMA indicates an annual requirement to provide 2,623 affordable dwellings, based on the definition of affordable housing contained in Planning Policy Statement 3 (PPS 3). The Sub Regional study used the same methodology as the London-wide HMA

and^(6.9) calculates a total housing need (market and affordable properties) for the seven boroughs in the West London Region of 35,924 units. Hillingdon's calculated total annual need of 415 units forms part of this figure.

6.14 Overall, ~~the draft borough-wide~~ Hillingdon's HMA concludes that 50% of all new housing should be affordable and 50% should be provided as market accommodation. Within the affordable sector, about 78% should be provided as social rented accommodation and the remaining 22% as intermediate housing, if the latter is priced at the usefully affordable point.⁽³⁸⁾ Notwithstanding these conclusions, the study makes clear that HMAs are part of the wider evidence base for policy and do not form part of policy itself. It recommends that the outputs should be viewed alongside the latest information on the viability of housing development when determining policy. Accordingly, Hillingdon has undertaken an Economic Viability Study to support policy H2 on affordable housing.

38 This is the mid-point range where the cost of intermediate property will be affordable to a reasonable proportion of households unable to access the market, thereby providing a genuine step on the housing ladder.

Dwelling Type

6.15 ~~The draft~~ Hillingdon's HMA notes that the Council may wish to pursue a split of 40% smaller one and two bed dwellings and 60% larger three and four bed dwellings. It makes the following comments on the type of properties required to meet housing needs in Hillingdon:

- Around half of the requirement for new housing is for market accommodation;
- Almost all new market housing should have three or more bedrooms;
- Almost 45% of new intermediate housing should have three bedrooms; and
- Almost three quarters of social rented dwellings should have three or more bedrooms.

Housing Growth

6.16 The following policies have been developed to deliver the key objectives for housing and to address the main challenges outlined in Table 3.1 of this Core Strategy.

Policy H1: Housing Growth

The Council will meet and exceed its minimum strategic dwelling requirement, where this can be achieved, in accordance with other Local Development Framework policies.

The borough's current target is to provide an additional ~~3,650~~ **4,250** dwellings, annualised as ~~365~~ **425** dwellings per year, for the ten year period between ~~1 April 2007~~ **2011** and ~~31 March 2017~~ **2021**.

Rolled forward to 2026, this target equates to a minimum provision of ~~5,475~~ **6,375** dwellings over the period of the Core Strategy. Sites that will contribute to the achievement of this target will be identified in the Site Allocations DPD. ^(6.10)

6.17 The following documents are relevant to housing growth in Hillingdon and are examined in this chapter:

- The London Plan (2008) which sets Hillingdon's current annual monitoring target;
- The Housing Trajectory ~~and 5-year land supply~~; and
- [The Replacement London Plan EIP Panel Report \(May 2011\)](#)
- ~~The Replacement London Plan (2009), which sets a proposed revised annual monitoring target based on the GLA's Strategic Housing Land Availability Assessment (SHLAA).~~

6.18 The London Plan (2008) ~~sets~~ **set** an annual monitoring target for Hillingdon to provide 365 new homes per annum. [The subsequent Replacement London Plan EIP Panel Report has recommended a revised annual monitoring target for Hillingdon of 425 units. This target has been tested through the EIP process and will be carried forward in to the Core Strategy.](#) In accordance with government advice ~~and until the adoption of the Replacement London Plan (2009)~~, this target has been rolled forward over the period of the Core Strategy. Hillingdon's annual monitoring target will be met through the identification of sustainable sites for new housing development in the Site Allocations DPD. ^(6.11)

6.19 The Council's Housing Trajectory is contained in the Annual Monitoring Report and at Appendix 3 of this document. Table 6.2 summarises the number of completions expected to come forward in the next five year period. The infrastructure required to deliver the sites in the housing trajectory is outlined in the Strategic Infrastructure Plan.

Table 6.2 : Hillingdon's Five Year Land Supply for Housing

Year	Residential Completion (Units)
2010/2011	391
2011/2012	527
2012/2013	497
2013/2014	533
2014/2015	523
TOTAL UNITS	2,471

6.20 In addition to meeting its annual monitoring target of 365 units in the London Plan (2008), the revised target of 425 units is split as follows:^(6.12) consideration will be given to emerging targets in the Replacement London Plan (2009) and housing needs in the borough. The Replacement London Plan (2009) target is split as follows:

Table 6.3 : Proposed Annual Target for the Provision of Housing

Conventional Housing	Non Self Contained	Total (Adjusted)
380	47	425

6.21 The Council's Housing Trajectory shows that up to 2014/2015, current and emerging GLA targets will be exceeded. Beyond this period the delivery of new homes is less certain, however the trajectory shows that up to 2021 the target for conventional housing and Hillingdon's annual housing need as defined in the Sub-Regional HMA will generally be met.^(6.13)

Indicative Distribution and Delivery of New Homes

6.22 Tables 6.4, 6.5 and Map 6.1 use the SHLAA data for large (>0.25 ha) and small (<0.25 ha) sites to provide an indication of when and where new homes could come forward in the borough. The figures in the table should be used with care and it is important to note that:

- The distribution of dwellings shown in Table 6.3 and Map 6.1 only reflect units identified for delivery from large sites (over 0.25 hectares).
- Figures for small sites are based on trend data and cannot be mapped in Map 6.1.
- Tables 6.4 and 6.5 exclude predicted completions for non self-contained units (207 47^(6.14) units per annum)

- Tables 6.4 and 6.5 are based on the 10 year timeframe for the London Plan and the SHLAA data cannot be used to show the distribution of new dwellings beyond 2021.
- Figures for the Heathrow Opportunity Area are inclusive of identified completions in the Hayes/West Drayton Corridor.

Table 6.4 : Proposed units to be delivered from large and small SHLAA sites

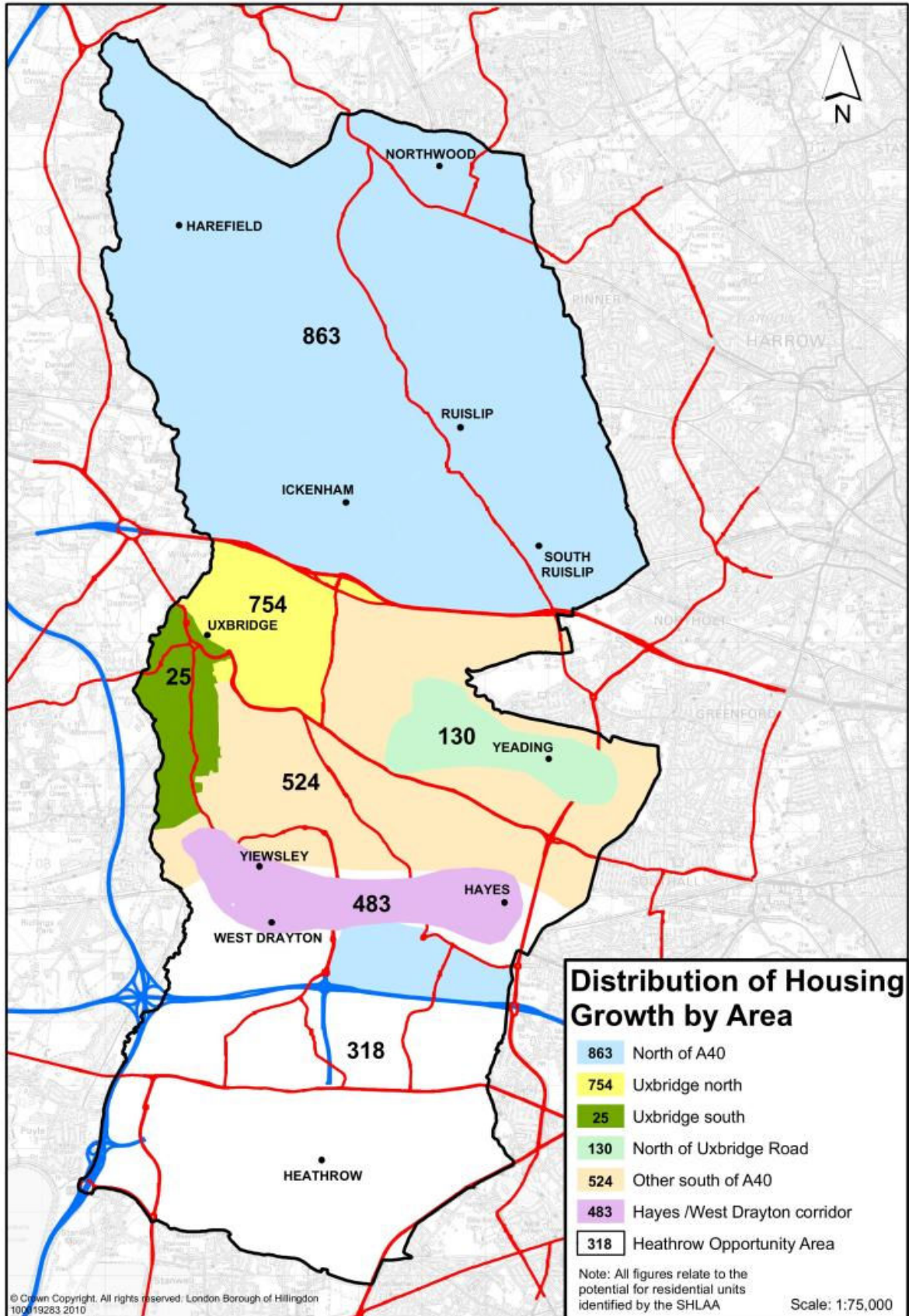
	Number of units 2011-2021
Units predicted from large sites (>0.25 ha)	3,097
Units predicted from small sites (<0.25 ha)	700
Subtotal	3,797
Total number of units to be delivered per annum (Predicted)	380

Table 6.5 : Proposed delivery of units from large SHLAA sites, by area

Area		Number of units 2011- 2021
South of the A40	Heathrow Opportunity Area (excluding the Hayes/West Drayton corridor)	318
	Hayes/West Drayton Corridor	483
	Uxbridge North	754
	Uxbridge South	25
	Hayes End/North of Uxbridge Road	130
	Other Areas south of the A40	524
North of the A40		863
Total		3,097

Map 6.1 overleaf illustrates the indicative^(6.15) distribution of dwellings across the borough.

Map 6.1 Distribution of units from large SHLAA sites (2011-2021)



6.23 The specific locations for new housing contained in the Site Allocations DPD will be subject to an assessment of impacts on flood risk, ecology and conservation, the ability to deliver decentralised energy, sustainable transportation, access to green infrastructure and social quality.

Design and Density

6.24 High quality design for new homes will continue to be a priority for the Council and the type of dwellings provided should reflect housing needs identified in the borough, particularly the need to provide more family homes with adequate garden space. Further policy guidance on the type of dwellings required in Hillingdon will be contained in the Development Management DPD. The density of residential development should take account of the need to optimise the potential of sites compatible with local context, while respecting the quality, character and amenity of surrounding uses. The density and design of residential development will be addressed through the provision of appropriate policies in the emerging Development Management DPD. Higher densities will be most appropriate in sustainable locations with high levels of public transport accessibility.

Implementation of Policy H1: how we will achieve this

- Promoting the design and density of new homes to reflect the specific and different land use characteristics in the north and south of the borough;
- Ensuring development makes the most efficient use of brownfield land;
- Promoting high quality mixed use developments;
- Ensuring that sufficient community infrastructure is provided to support new housing development in accordance with policy CI1 ^(6.16)
- Managing development to resist the loss of housing;
- Considering the potential for additional housing on sites in the Site Allocations DPD;
- Implementing the Council's Empty Property initiatives;
- Encouraging the conversion of suitable properties;
- The release of sites in non residential use, subject to other policies of the plan; and
- Preparing site specific planning briefs for larger sites.

Flexibility

Figures for housing growth in Hillingdon take account of the London Plan (2008). Proposed growth figures in the Replacement London Plan (2009) may change as a result of the London Plan EIP. The proposed annual monitoring target is a minimum figure set by the Mayor. A revised annual monitoring target may be set through the production of a revised SHLAA and an early alteration to the Replacement London Plan. ^(6.17)

Monitoring of Policy H1: how we will measure success

- ~~H2: (Core) Indicator **Housing Trajectory**: Plan period and housing targets: 440 units per annum from 1997 to 31st March 2007 and 365 **425** units per annum from 1st April 2007 **2011** to the end of the plan period as set out in the London Plan.~~
- ~~H2: (Core) Indicator: Housing trajectory. 3,650 new net residential units for the period 2007-2016 (365 units per annum as an annual monitoring target) – London Plan Target.^(6.18)~~
- Percentage of new homes built on brownfield land.
- Number of 'conventional new homes' delivered in the borough each year between 2011-2026;
- Number of non self-contained units delivered in the borough between 2011-2026; and
- The achievement of a reduction in overall housing need in the borough.

Affordable Housing

6.25 Increasing the supply of affordable housing ⁽³⁹⁾ is a key priority for this Core Strategy and the Council as a whole. Subject to other planning considerations, measures that increase the supply of affordable housing will be supported. The Council's policy on affordable housing is guided by evidence of housing needs in the borough and the provisions of the ~~current (2008) and Replacement London Plan (2009)~~. The Council's ~~draft HMA~~ recommends that 50% of net new housing provision (supply from all sources) should be affordable housing and that 22% of the total net requirement is for intermediate housing.

6.26 The London Plan (2008) sets a target to provide 50% of all new housing provision as affordable housing and indicates a tenure split of 70% social rented, 30% intermediate tenure. The Replacement London Plan (2009) ~~proposes to remove~~ initially proposed the removal of the 50% affordable target, and states stating that boroughs should agree their affordable housing targets with the GLA. However, the subsequent EIP Panel Report recommends that the boroughs should aspire towards achieving 50% of all new housing as affordable housing across London as a whole. ^(6.19)

The position regarding the proposed tenure split in the current (2008) and Replacement London Plan (2009) is as follows: was also discussed at the recent Replacement London Plan EIP. The Panel Report continues to seek 60% of affordable housing provision for social rent and 40% for intermediate tenure for sale or rent. ^(6.20)

Table 6.6 London Plan Tenure Split

-	The London Plan (2008)		Replacement London Plan (2009)	
	Intermediate	Social Rented	Intermediate	Social Rented
Tenure Type				
Percentage	30	70	40	60 ^(6.21)

39 The definition of affordable housing, as contained in PPS 3, is contained in the glossary.

6.27 The Council is ~~currently preparing~~ has prepared an Economic Viability Assessment (EVA) to inform borough-wide affordable housing targets. The study has tested the deliverability of affordable housing against a range of variables, including the availability of affordable housing grant, density mix and tenure split. ~~Early results of this~~ The study shows that in the current economic circumstances and regardless of needs identified in the draft HMA, a target to provide 50% of all new housing as 'affordable' could not be supported on economic viability grounds. ~~Based on the evidence contained in the EVA and draft HMA the Council will seek to achieve a borough wide affordable housing target of 35%, on the understanding that this may be subject to site specific viability considerations. In addition, the Council is minded to continue to support targets related to tenure split in the London Plan 2008. Proposed targets in policy H2 will be discussed and agreed with the GLA.~~ ^(6.22)

Policy H2: Affordable Housing

Housing provision is expected to include a range of housing to meet the needs of all types of households and the Council will seek to maximise the delivery of affordable housing from all sites over the period of the Core Strategy. 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.

i) ~~subject to viability and if appropriate in all the circumstances, 35% of all new units are delivered as affordable housing, with a tenure mix of 70% housing for social rent and 30% intermediate housing; and~~

ii) ~~The affordable housing mix reflects housing needs in the borough, particularly the need for larger social rented family units.~~ ^(6.23)

Subject to viability and if appropriate in all the circumstances, the EVA indicates that 35% of all new units in the borough should be delivered as affordable housing, with an indicative tenure mix of 70% housing for social rent and 30% intermediate housing. ^(6.24) Housing market conditions in Hillingdon are complex and a one size fits all approach to tenure provision will not be suitable for all areas in the borough. Subject to the provision of robust evidence, the Council will adopt a degree of flexibility in its application of policy H2 to take account of tenure needs in different parts of the borough. ^(6.25) In accordance with the Replacement London Plan proposed targets in policy H2 will be discussed and agreed with the Mayor.

6.28 The Council notes that in setting the proposed tenure split in the Replacement London Plan (2009), the GLA has considered factors other than the needs identified in the London-wide Strategic Housing Market Assessment. These include an acknowledgement of the role that intermediate housing can play in helping to get Londoners on the first step of the housing ladder and reducing the call on the social rented sector, creating mixed and balanced communities in accordance with the Replacement London Plan. ^(6.26)

6.29 Affordable housing achieved across the borough should reflect the distinct needs of different sections of the community. It should include provision for older people and for other groups in need of supported housing, specifically people with mental health needs and people with physical and sensory disabilities or learning difficulties. The council's aim is to maximise independence and provide self-contained accommodation with appropriate support.

6.30 The type and size of dwellings that are delivered will be as important as the overall number of units. The HMA indicates that 70% of net need for affordable housing is for two and three bed accommodation, more than a fifth is for four bed accommodation and almost 7% is for one bedroom accommodation. The need relative to supply is greatest for larger **family** accommodation. Current estimates indicate that less than 10% of the need for four bedroom accommodation is expected to be met compared with almost three quarters of the need for one bedroom accommodation. ^(6.27)

Implementation of Policy H2: how we will achieve this

- Direct provision of affordable housing by Registered Social Landlords (RSLs), who will be responsible for managing affordable housing in conjunction with the Council's Housing Department;
- Including sites in the Site Allocations DPD from which a percentage of affordable housing will be delivered; including specific sites for affordable and special needs housing; and
- Setting out the mechanisms for providing affordable housing and for determining applications in the Development Management DPD.

Flexibility

Hillingdon's affordable housing targets ~~will evolve as the following evidence base documents emerge and will be subject to conclusions and policies within:~~ **have been developed from the following evidence base documents:**

- The Replacement London Plan (2009);
- The borough-wide ~~draft~~ Housing Market Assessment;
- The ~~emerging~~ West London Sub-regional Housing Market Assessment; and
- Hillingdon's ~~emerging~~ Affordable Housing **Economic** Viability Assessment.

When applying policy H2 the Council will be flexible in addressing different housing needs across the borough, particularly in relation to affordable housing type and tenure split. ^(6.28)

Monitoring of Policy H2: how we will measure success

- H5 (Core) indicator: Gross affordable housing completions. National Indicator (NI) 155 target
- Agreement of an appropriate affordable housing target with the GLA;
- Delivery of the agreed affordable housing target;
- Agreement and delivery of an appropriate tenure split; and
- Achieving a reduction in overall housing needs in the borough.

Gypsy and Traveller Pitch Provision

6.31 Circular 1/2006 states that the Core Strategy should set out criteria for the location of gypsy and traveller sites, which will be used to guide the allocation of sites in the relevant Development Plan Document. Criteria based policies must be fair, reasonable, realistic and effective in delivering sites.

Policy H3: Gypsy and Traveller Pitch Provision

The Council will ensure that:

- a) The existing Colne Park site will be protected for its current use
- b) Targets for additional pitch provision take account of need and the availability of suitable sites; and
- c) Proposals for sites to accommodate the specific needs of Travellers (Irish and Scottish), Gypsies, Roma, Sinti and Travelling Show People should:
 - i) Be located on a site and in an area that is environmentally acceptable for residential occupation;
 - ii) Have no significant adverse effects on the amenity of occupiers of adjoining land;
 - iii) Have acceptable road and pedestrian access and be accessible to local services and public transport; and
 - iv) Be consistent with other relevant LDF policies.

6.32 ~~Policy 3.8 of the Replacement London Plan (2009) contains borough specific gypsy and traveller pitch provision targets, to be met over the period 2007-2017. The proposed minor alteration to policy 3.8 is currently open for public comment and proposes to remove these targets from the Plan. Under the provisions of the proposed policy, boroughs would be required to work with the Mayor to ensure that needs are identified and the accommodation requirements of these groups are addressed locally and in line with national policy. The issue of gypsy and traveller pitch provision has been subject to a number of rounds of consultation since the production of the Replacement London Plan Consultation Draft in October 2009. In September 2010 the Mayor consulted on a Minor Alteration to policy 3.8, which proposed the removal of borough specific pitch provision targets. These proposals were considered by the Inspector at the Replacement London Plan EIP and rejected in the subsequent Panel Report. Instead, the Inspector proposed that the Replacement London Plan should contain sub regional pitch provision targets. Hillingdon is located in the North West London sub-region and would be required to accommodate a share of between 40-43 additional pitches over the period 2007 through 2017.^(6.29)~~

6.33 In formulating its policy on this issue, consideration will be given to policies in the emerging Replacement London Plan and the Government's consultation paper, Planning for Traveller Sites. ~~the~~The Council will balance the need for additional pitch provision with the

availability of suitable sites. The identification of suitable sites may require the preparation of additional evidence base as part of the production of the subsequent Site Allocations DPD.^(6.30)

Implementation of Policy H3: how we will achieve this

- Retention of the existing site at Colne Park; and
- Taking account of the West London Housing Partnership research on gypsy and traveller pitch provision to guide the provisions of policy CP3.

Flexibility

Figures for gypsy and traveller pitch provision are likely to be refined through the progression of the [following the finalisation of the](#) Replacement London Plan (2009).

Monitoring of policy H3: how we will measure success

- H4 (Core) Indicator: Net additional pitches (Gypsy and Traveller). Target to be set by the London Plan
- Meeting the needs of the existing travelling community in the borough by protecting and maintaining the site at Colne Park; and
- The delivery of pitches in accordance with the ~~outcome of the~~ Replacement London Plan (2009) EIP.^(6.31)

End Notes

- 6.1 Internal change to reflect new evidence base
- 6.2 Replacement London Plan Panel Report
- 6.3 Evidence Base update
- 6.4 Evidence Base update
- 6.5 Text updating
- 6.6 Replacement London Plan EIP Panel Report
- 6.7 Change to reflect updated evidence base
- 6.8 Mayor of London (469)
- 6.9 Change to reflect updated evidence base
- 6.10 Legal and General Property Partners (Life Fund) Ltd (276); Drivers Jonas Deloitte (326)
- 6.11 Replacement London Plan EIP Panel Report.
- 6.12 Replacement London Plan EIP Panel Report
- 6.13 Internal change to reflect new evidence base
- 6.14 Minor change to reflect new evidence base
- 6.15 Minor change to reflect new evidence base
- 6.16 Hillingdon Inter-faith Network (140)
- 6.17 Replacement London Plan EIP Panel Report
- 6.18 Replacement London Plan EIP Panel Report
- 6.19 Replacement London Plan EIP Panel Report
- 6.20 Replacement London Plan EIP Panel Report
- 6.21 Replacement London Plan EIP Panel Report
- 6.22 Replacement London Plan EIP Panel Report
- 6.23 Boyer Planning for Thorney Farm Development (149), Hayes and Harlington Community Development Forum (439), Mayor of London (467), Royal Brompton and Harefield NHS Trust (439)
- 6.24 Boyer Planning for Thorney Farm Developments (149)
- 6.25 Workspace Group (167); Changes to reflect updated evidence base
- 6.26 Warren Park Residents Association (256)
- 6.27 Hayes Town Partnership (357)
- 6.28 Changes to reflect updated evidence base
- 6.29 Changes to reflect the Replacement London Plan EIP Panel Report
- 6.30 Changes to reflect the Replacement London Plan EIP Panel Report
- 6.31 Changes to reflect the Replacement London Plan EIP Panel Report

7 Core Policies - Historic and Built Environment

7.1 The Borough has a diverse and in some parts distinct character and the Council will seek to protect and enhance its best features. Important buildings, townscape, open areas and waterside environments will be protected and improvements sought to those areas where the environment is poor. The Council will strive to ensure that all new development is of a high design quality, that it is sustainable and contributes positively to the local environment, creating attractive, safe and vibrant places to live and work.

Main Challenges

7.2 Table 3.1 in Chapter 3 identifies six main challenges relating to the historic and built environment:

- The need to maintain the historic character, identity, suburban qualities of the Borough's places, buildings and spaces;
- The need to conserve and enhance the historic significance of the Borough's heritage assets and settings;
- Pressure for high density residential developments;
- Loss of local characteristics through unsympathetic design;
- Balancing new sustainability requirements to combat climate change whilst protecting the existing character of places, in particular within conservation areas; and
- Demand for large scale commercial/ mixed use developments particularly in the southern part of the Borough on the fringe of Green Belt and/ or Conservation Areas.

Heritage

7.3 Hillingdon has a wide variety of historic assets; these include archaeological sites, traditional village centres, canals, historic buildings and landscapes. There are also extensive areas of good quality "Metro-land" suburbs, which are an important feature of the Borough.

There is evidence to confirm that parts of the borough, such as Harmondsworth and Harefield were occupied in prehistoric times. Up until the 20th century, the borough was mainly rural in character; today it is predominantly suburban, with its main urban centre at Uxbridge. This was an important market town that took advantage of the stage coach route between Oxford and London in the 18th century and developed further with the building of the Grand Junction Canal, the Great Western Railway and more recently the Metropolitan and Piccadilly Lines. There are also a number of smaller town centres across the borough, such as Northwood, Ruislip, Eastcote, Hayes, Yiewsley and West Drayton. Most of these were originally villages, some dating back to medieval times, which grew as local transport links developed.^(7.1)

7.4 The Council has a rolling programme of heritage asset designation. At present the Borough contains:

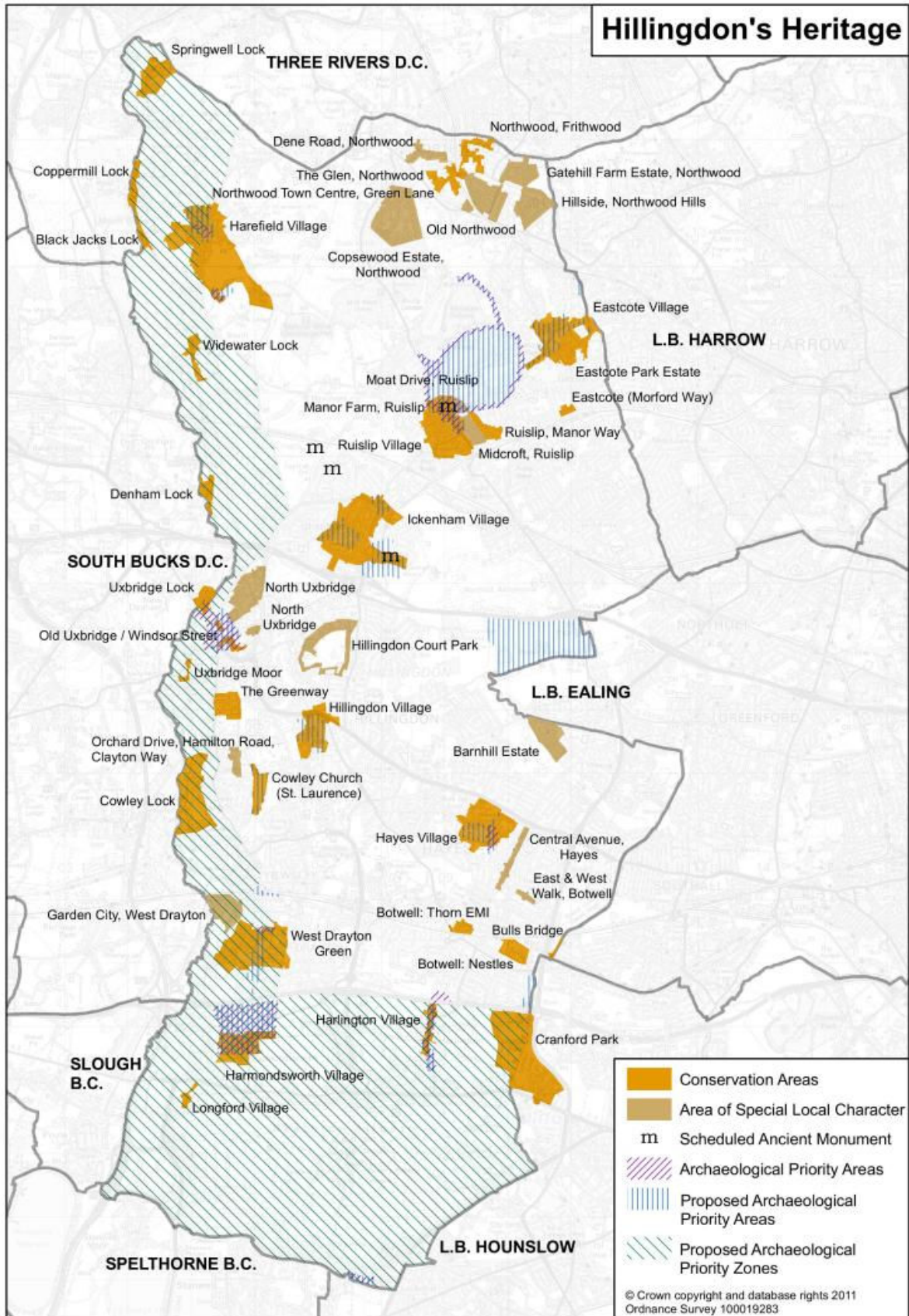
- 30 Conservation Areas (with Appraisals for Longford Village, Harmondsworth Village, Ruislip Village, The Glen and Eastcote Park Estate and Management Plans for The Glen and Eastcote Park Estate)^(7.2)
- 14 Areas of Special Local Character (ASLC)
- 409 Statutory Listed Buildings Page 341

- 292 Locally Listed Buildings
- 5 Scheduled Ancient Monuments (SAMs)
- 9 Archaeological Priority Areas, totalling approximately 210 hectares and forming 1.8% of the Borough
- There are 35 entries in English Heritage's 'Heritage at Risk' Register of which 24 are buildings, 9 are conservation areas and 2 are Scheduled Ancient Monuments
- 1 entry in the English Heritage Register of Historic Parks and Gardens (Church Gardens, Harefield, Grade II)
- 1 Article 4 Direction (Daisy Cottages, West Drayton Green).

7.5 A further 10 Archaeological Priority Areas (APAs) have been identified for designation and in addition, 2 new Archaeological Priority Zones (APZs) will be designated. The latter have been designed to allow wider areas of archaeological potential to be considered. The new designations shown on Map 7.1 will be defined in the Proposals Map and Site Allocations DPD.

[Note: Map 7.1 Hillingdon's Heritage updated](#) ^(7.3)

Map 7.1 Hillingdon's Heritage



Strategic Objectives:

- SO1: Conserve and enhance the Borough's heritage and ~~their~~ its^(7.4) settings by ensuring new development, including changes to the public realm, are of high quality design, appropriate to the significance of the heritage asset, and sensitive to the wider historic environment.

Related Policy: BE1

Policy HE1: Heritage

The Council will:

1. Conserve and enhance Hillingdon's unique historic environment, including its heritage assets such as statutorily Listed Buildings, Conservation Areas, Scheduled Ancient Monuments, Registered Parks and Gardens, Locally Listed Buildings, Areas of Special Local Character, and Archaeological Priority Zones and Areas, their settings and ~~their~~ the^(7.5) wider historic environment.
2. Actively encourage the regeneration of heritage assets, particularly those which have been included in English Heritage's 'Heritage at Risk' register or are currently vacant^(7.6).
3. Promote increased public awareness, understanding of and access to the Borough's heritage assets and wider historic environment, through Section 106 agreements and via community engagement and outreach activities.
4. ~~Address the need to conserve the historic environment when implementing climate change mitigation and adaption measures~~ Encourage the reuse and modification of heritage assets, where appropriate, when considering proposals to mitigate or adapt to the effects of climate change. Where negative impact on a heritage asset is identified, seek alternative approaches to achieve similar climate change mitigation outcomes without damage to the asset^(7.7)

Implementation of Policy HE1- how we will achieve this

The Council will seek to:

1. Ensure appropriate specialist advice and guidance is available, by preparing character appraisals, management plans and design guidance for its designated areas and historic assets, in partnership with the local community, guided by the Conservation Forum and where possible, aided by English Heritage.
2. Regularly review its Historic Environment Record (HER) and designations, and update character appraisals and management plans for conservation areas, ensuring national and local interest groups, and residents are consulted.
3. Pro-actively manage heritage assets, including those considered "At Risk" by English Heritage, working with heritage groups and partners where appropriate, to ensure

buildings and structures such as those at Eastcote House Gardens, RAF Uxbridge and Breakspear House are repaired and reused.

4. Promote the Borough's heritage by continuing to ensure that it is included in the London Open House event; to improve the interpretation of historic assets, such as Manor Farm, Ruislip; and to recognise local schemes of exceptional quality or innovation by, for example, applying for Civic Trust and Green Apple Awards.
5. Include more specific guidance relating to historic buildings and other conservation matters, in the Development Management Policies and supporting guidance contained within the forthcoming Heritage Strategy Supplementary Planning Document, together with the relevant Area Action Plans.
6. Where the loss of a heritage asset is justified, ensure that there will be a commitment to ~~making a record to advance~~ recording the structure and to disseminating this information to enable increased understanding of the heritage asset ~~and copies~~. Copies of these documents will where appropriate need to be deposited with local libraries and the Greater London Historic Environment Record (HER).^(7.8)

Monitoring - how we will measure success of Policy HE1

- The number of listed buildings removed from English Heritage's 'Heritage at Risk Register' will be monitored under Local Indicator LO20 of the AMR.
- The percentage of conservation areas with appraisals and management plans will be monitored under Local Indicator LO19 of the AMR and BV219b.
- The numbers of historic buildings open to the public on a regular basis.
- The number of applications refused on listed building or conservation grounds and upheld at appeal.

Built Environment

Design

7.6 Maintaining and improving the quality of the built environment is of critical importance if the attractive character and identity of Hillingdon is to be retained. There is a need to reinforce the importance of ensuring that development is designed having regard to, and responding positively to its context, whilst contributing positively to the environment. This ensures that elements of local character and distinctiveness are reinforced that the environment is protected and enhanced and that design quality is a priority.

7.7 The quality, functionality and condition of the public realm have a direct bearing on the image of Hillingdon, how well neighbourhoods function, and how people interact and enjoy open spaces. The Council will seek to promote high-quality streets and public spaces and introduce public art to celebrate civic pride.

7.8 Although Hillingdon is committed to increase housing provision, quantity will not be provided at the expense of quality. The Council considers that any higher density development in the Borough should not compromise the ability to achieve a sustainable layout, high quality

design and an attractive appearance. The Borough endorses the government's agenda for mixed communities and seeks to provide spatial guidance for its delivery. The Council's adopted 'Accessible Hillingdon' Supplementary Planning Document (SPD) provides guidance on design of new development to achieve integrated, sustainable developments of lifetime home standards. The 'Hillingdon Design and Accessibility Statement' (HDAS) SPD promotes good practice guidance on high quality design for all new developments in the Borough, as well as shopfronts, transport interchanges and the public realm.

7.9 The LDF is required to monitor the design performance of development through 'Building for Life', the national standard for well designed homes and neighbourhoods. The criteria have been designed so as to establish an objective set of principles by which the judgement of applications and the built quality of housing can be undertaken consistently. Each housing development scheme is awarded a score out of 20, based on the proportion of Building for Life questions that are answered positively. Scores include the Gold Standard (16 or more out of 20) and Silver Standard (14 or more out of 20). For residential schemes, all new developments of 10 dwellings or over should achieve a Building for Life assessment rating of silver standard as a minimum.

7.10 The Code for Sustainable Homes (Communities and Local Government) is a new national standard for sustainable design and construction of new homes. It measures the sustainability against design categories, rating the 'whole home' as a complete package. The design categories included within the Code are energy/ carbon dioxide, surface water run-off, health and well-being, water, waste management, materials, pollution and ecology. The Council will encourage all new build residential development to meet Code level 4.

7.11 Large parts of the Borough are sensitive to the impact of taller buildings by virtue of the high environmental quality that currently exists, with heritage and open space constraints and their lower density character and development patterns in some parts of the boroughs. In general, a tall building is defined by CABI and English Heritage as one that is substantially taller than its neighbours or significantly changes the skyline. While tall buildings offer the opportunity for intensive use, their siting, design, effect on views, impact on local micro-climate and provision of communal and private amenity spaces should be carefully considered in order to not detract from the nature of surrounding places and the quality of life for those living and working around them.

7.12 Tall buildings may be acceptable in a limited number of suitable locations where the Council considers that they will not seriously harm the surrounding area and its heritage assets, and will also deliver wider benefits to the proposed Opportunity Area. Appropriate locations for tall buildings are parts of Uxbridge and Hayes, subject to considering the Obstacle Limitation Surfaces for Heathrow Airport. The height of buildings should be appropriate to the surrounding townscape. All such proposals will require appropriate accompanying urban design assessments and will be assessed using the criteria for evaluation identified by CABI and English Heritage in 'Guidance on Tall Buildings' and local guidance.

Accessibility

7.13 The Council will seek to provide robust neighbourhoods which are attractive and capable of being used for many purposes, by different people and with the potential for change and adaptation. The Borough recognises that 15% of the population have an impairment, mobility or otherwise, and provision should be made to allow equal, easy and

dignified access to buildings, places and spaces. Furthermore, the Council recognises that neighbourhoods should ensure adequate accessibility to housing, employment and public amenities to permit equal opportunities for the whole community (see Policy T4).

7.14 Accessibility for disabled people is legislated under the Disability Discrimination Act (DDA) 1995 (amendment) Regulations 2003, and is included within the London Plan. The requirement is for new and existing buildings to be accessible. New housing should be designed to ensure that it can easily be modified to meet the needs of people with disabilities. It should also incorporate the principles of "Lifetime Homes" so that as people become less mobile it continues to meet their needs. The percentage of local authority buildings suitable for and accessible by disabled people is measured using BVPI 156. At present 15.2% of buildings in the borough are accessible (London Development Database, 2008/9). A comparison to Greater London (21.5%) and the national figure (36.5%) shows that Hillingdon, although improving, can make improvements.

7.15 The Council will seek to encourage inclusive access at the neighbourhood level ensuring that places of work and leisure, streets, neighbourhoods, parks and open spaces are designed to meet the needs of the community at all stages of people's lives in line with the emerging replacement London Plan.

Crime and safety

7.16 The Council's 'Place Survey 2008/9' identified that the three top priority areas which residents felt were important to making a good place to live were the level of crime (63%), clean streets (47%) and health services (44%). 71% of residents felt very or fairly satisfied with their local area as a place to live. In the Hillingdon Crime and Disorder Survey 2009, 70% of respondents felt safe in their local neighbourhood (compared with 75% in 2007) and 54% of respondents felt that crime/ anti-social behaviour did not restrict their lives.

7.17 Fear of crime and anti-social behaviour is an issue highlighted by Hillingdon residents and making Hillingdon safer is one of the Council's corporate priorities. The Safer Hillingdon Partnership Plan for 2009/10 identifies five priorities:

1. Reducing violence
2. Reducing serious acquisitive crime
3. Tackling anti-social behaviour
4. Reduce harm caused by fire and road accidents
5. Community engagement & increasing public confidence

7.18 The challenge we face is to make the borough a safer place while ensuring it maintains the vibrancy that makes it such a popular place to live, work in and visit. The LDF can contribute to these priorities by helping to reduce the opportunity for and incidence of crime and help to reduce the fear of crime and anti-social behaviour. Crime Prevention Design Advisors can provide advice on safe and secure environments and Secured by Design Standards.

7.19 In addition, the Borough is home to Heathrow Airport and with the on-going threat from international terrorism there is a need for the Council and developers to give appropriate weight to counter terrorism design measures in new development schemes which are likely

to attract large numbers of people. The Council's forthcoming 'Crowded Places Supplementary Planning Document' will provide design principles and practical approaches on how to reduce the vulnerability of crowded places to terrorist attacks.

Health

7.20 The Council recognises the role of design of housing, the wider built environment and the public realm in promoting good mental and physical health. Depression and anxiety pose significant health problems in the UK and high quality and well thought out design can reduce the incidence of these problems. Key factors associated with poor mental well-being include a lack of 'escape facilities' such as green space and social infrastructure, a sense of overcrowding, fear of crime and dissatisfaction with existing living conditions and the local area (for example noise problems from neighbours, high rise buildings, poor quality housing and a lack of privacy).

7.21 Good physical health can be promoted by ensuring provision of adequate space for sport and recreation, and by designing environments to facilitate physical activity by walking and cycling (see Policy T4). This can reduce the incidence of obesity and cardiovascular disease. Additionally, any reduction in the use of the private car for transport would help to improve air quality in the borough thereby resulting in positive effects on the incidence of respiratory ailments. The Council seeks to ensure that new developments and regeneration schemes are designed to facilitate good mental health as well as good physical health.

Biodiversity

7.22 Biodiversity should be promoted and increased in urban as well as rural locations, in small scale as well as large-scale projects. Targeted green initiatives to enhance urban streets and places with, for example, pocket parks, the planting of street trees or green roof gardens, have a strong impact on the appearance of the area, and also contribute to a greener and healthier environment by removing some pollutants and greenhouse gases from the environment.

7.23 The Development Management DPD will address issues in relation to the detailed application of Core Strategy policy on the quality of the built environment and public realm.

Strategic Objectives:

- SO1: Conserve and enhance the Borough's heritage and ~~their~~ its settings by ensuring new development, including changes to the public realm, are of high quality design, appropriate to the significance of the heritage asset, and sensitive to the wider historic environment.
- SO2: Create neighbourhoods that are of a high quality sustainable design, that have regard for their historic context and use sustainability principles which are sensitive and responsive to the significance of the historic environment, are distinctive, safe, functional and accessible and which reinforce the identity and suburban qualities of the borough's streets and public places, introduce public art to celebrate civic pride and serve the long-term needs of all residents.
- 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 bio-diversity, education, health and well being. In addition, address open space needs by providing new spaces identified in Hillingdon's Open Space Study.

- SO4: Ensure that development contributes to a reduction in crime and disorder, is resilient to terrorism, and delivers safe and secure buildings, spaces and inclusive communities.
- SO6: Promote social inclusion through equality of opportunity and equality of access to social, educational, health, employment, recreational, green space and cultural facilities for all in the borough, particularly for residents living in areas of identified need.
- SO8: Protect and enhance biodiversity to support the necessary changes to adapt to climate change. Where possible, encourage the development of wildlife corridors.
- SO11: Address the impacts of climate change, minimise emissions of carbon and local air quality pollutants from new development and transport.

Related Policy: HE1

Policy BE1: Built Environment

The Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents. All new developments should:

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;
3. Be designed to include "Lifetime Homes" principles so that they can be readily adapted to meet the needs of those with disabilities and the elderly, 10% of these should be wheelchair accessible or easily adaptable to wheelchair accessibility encouraging places of work and leisure, streets, neighbourhoods, parks and open spaces to be designed to meet the needs of the community at all stages of people's lives;
4. In the case of 10 dwellings or over, achieve a Building for Life assessment rating of 'silver' as a minimum (this includes 'good and 'very good' scorings)^(7.9);
5. Improve areas of poorer environmental quality, including within the areas of relative disadvantage of Hayes, Yiewsley and West Drayton. All regeneration schemes should ensure that they are appropriate to their historic context, make use of heritage assets and reinforce their significance;

6. Incorporate a clear network of routes that are easy to understand, inclusive, safe, secure and connect positively with interchanges, public transport, community facilities and services;
7. 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 ^(7.10), encourage physical activity and where appropriate introduce public art;
8. Create safe and secure environments that reduce crime and fear of crime, anti-social behaviour and risks from fire and arson having regard to Secure by Design standards and address resilience to terrorism in major development proposals.
9. 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 ^(7.11);
10. Maximise the opportunities for all new homes to contribute to tackling and adapting to climate change and reducing emissions of local air quality pollutants. ~~All new residential development should achieve at least Code for Sustainable Homes level 4. All new non-residential development should achieve BREEAM Very Good standard. In addition, all new development should be able to demonstrate compliance with the prevailing energy reduction requirements set out in the London Plan. All refurbishment development should aim to achieve the highest levels of new quality designs appropriate to the work being carried out.~~ 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. The Council will seek to merge a suite of sustainable design goals, such as the use of SUDS, water efficiency, lifetime homes, and energy efficiency into a requirement measured against the Code for Sustainable Homes and BREEAM. These will be set out within the Development Management DPD. ^(7.12) All developments should be designed to make the most efficient use of natural resources whilst safeguarding historic assets, their settings and local amenity ^(7.13) and include sustainable design and construction techniques to increase the re-use and recycling of construction, demolition and excavation waste and reduce the amount disposed to landfill. ^(7.14)
11. In the case of tall buildings, not adversely affect their surroundings or impact on important local views. Appropriate locations for tall buildings will be defined in a Character Study and include parts of Uxbridge and Hayes subject to considering the Obstacle Limitation Surfaces for Heathrow Airport. The height of buildings should be appropriate to the surrounding townscape.

Support will be given for proposals that are consistent with local strategies, guidelines, supplementary planning documents and development management policies.

Implementation of Policy BE1- how we will achieve this

This policy will be operated through the Council's and Hillingdon Partners development programmes in relation to both buildings and the public realm. The Council will:

- Identify in the Site Allocations DPD, LDF sites where redevelopment would provide an opportunity to improve the local environment;
- Adopt the Draft Public Realm SPD to ensure that all works within the public realm contribute to maintaining and improving the quality of the local environment.
- ~~Consider the production of~~ **Produce**^(7.15) a borough-wide Character Study to inform the parameters for appropriate residential and non-residential densities including defining inappropriate locations for tall buildings.

In relation to new development, developers will have to justify their design decisions within a Design and Access Statement for each application. For residential schemes of over 10 units, developers will need to demonstrate how the 'Building for Life' criteria are met and how the proposal will meet at least a 'silver' standard. There will be more detailed policies within the Development Management Development Plan document and Supplementary Planning Documents on specific design and public realm issues.

This policy will be implemented, in conjunction with the other policies in the plan, through the determination of planning applications and the preparation of the Development Management and Site Allocations DPDs and Supplementary Planning Documents which could include Design Briefs.

Monitoring - how we will measure success of policy BE1

1. Public satisfaction with visual character of the built environment (Local);
2. Amenity space standards (Local);
3. Public art provision (Local); and
4. The AMR (Core Indicator H6 on Housing Quality) will monitor the number and proportion of total new build completions on housing sites reaching 'very good' (16 points or more/ Gold Standard) and 'good' (14 -15 points/ Silver Standard), 'average' (10-14 points) and 'poor' (10 points or less) ratings against the Building for Life Criteria.
5. All new housing proposals are required to meet Lifetime Home Standards and 10% of all housing units on major planning applications (10 units or more) are also required to be wheelchair accessible and these will be monitored under BVPI 156.

End Notes

- 7.1 English Heritage (548)
- 7.2 English Heritage (548)
- 7.3 Public consultation revealed limited support for the proposed upgrading of Gatehill Farm Area of Special Local Character (ASLC) to a Conservation Area. Notation '1' deleted on key and area shown to remain as ASLC
- 7.4 Text update
- 7.5 Mayor of London (474)
- 7.6 DP9 on behalf of CES Properties (Ickenham) Ltd (407)
- 7.7 Sustainability Appraisal Update Feb 2011 recommendation (pgs 41-42)
- 7.8 English Heritage (555)
- 7.9 Individual (564)
- 7.10 Sustainability Appraisal Update Feb 2011 recommendation (pg 42-44)
- 7.11 Sustainability Appraisal Update Feb 2011 recommendation (pgs 42-44)
- 7.12 Ransome and Company Ltd on behalf of Workspace Group (169); Heathrow Airport Ltd (218); The Planning Bureau on behalf of McCarthy and Stone Retirement Lifestyle Ltd (230)
- 7.13 Surrey County Council (321)
- 7.14 Surrey County Council (318)
- 7.15 Mayor of London (475), English Heritage(549)

8 Core Policies - Environmental Improvement

8.1 Managing Hillingdon's natural environment and improving local air quality especially in areas currently above both national and European limits is one of the main challenges for this Core Strategy. Hillingdon has a considerable network of green spaces as well as rivers and canals. These natural environments are essential to the diversity of the borough as well as promoting a healthy way of life and helping to mitigate the effects of climate change.

8.2 Hillingdon's population is expected to grow over the life of this Core Strategy, and there will be increasing pressure on the natural environment to accommodate growth, and to manage the increasing human impacts.

8.3 Hillingdon's natural environment is highly important to the attractiveness and performance of the Borough and its protection and enhancement is an essential element of the Core Strategy. This chapter sets out the way that Hillingdon will protect and enhance the environment over the period of the Core Strategy. The Environmental Improvement chapter is organised into five parts: 1) climate change adaptation and mitigation; 2) open spaces, rivers and canal corridors; 3) biodiversity and geological conservation; 4) land, water, air and noise; and 5) minerals and waste management.

Climate Change Adaptation and Mitigation

Strategic Objectives

- SO8: Protect and enhance biodiversity to support the necessary changes to adapt to climate change. Where possible, encourage the development of wildlife corridors.
- SO10: Improve and protect air and water quality, reduce adverse impacts from noise including the safeguarding of quiet areas and reduce the impacts of contaminated land.
- SO11: Address the impacts of climate change and minimise emissions of carbon and local air quality pollutants from new development and transport.
- SO12: Reduce the reliance on the use of the car by promoting safe and sustainable forms of transport, such as improved walking and cycling routes and encouraging travel plans.

Related policies: EM1, EM7, EM8, CP2, T1

8.4 Climate change is a global problem that requires local action as well as national. The Climate Change supplement to PPS1 acknowledges that the UK is likely to see more extreme weather events, including hotter and drier summers, flooding and rising sea-levels. The 2006 Stern Review assessed the impacts of climate change on the UK population and concluded that there will be profound and rising costs for global and national prosperity as well as severe effects on people's health and the natural environment. Responding to this challenge, the Government has set a legally binding target of reducing CO₂ emissions by 80% by 2050 with the Mayor of London setting a regional target of 60% for London by 2025⁽⁴⁰⁾.

8.5 However, reducing emissions is only part of the climate change challenge and we also have to ensure that we can adapt to the changing climate. The more extreme changes in weather pattern could lead to water shortages and conversely, an increased risk of flooding and hotter summers will require greater consideration of urban heat islands and the need for cooling in new development. In addition, the natural environment will come under threat from the changing climate as well as from increasing development pressures.

Main Challenges

8.6 Table 3.1 in Chapter 3 identifies six main challenges relating to climate change adaptation and mitigation:

- Pressure to balance the demands of growth and the impacts of flood risk with minimal harm on the environment.
- The need to maintain and improve the current water resources and quality.
- The need to control, reduce and mitigate noise, especially around Heathrow and the major road network.
- The need to mitigate air quality impacts especially around the strategic road network and Heathrow Airport, in order to work towards achievement of both national and European Union standards at relevant locations and improve the local air quality for communities.
- National and EU requirements to meet Climate Change and Carbon Dioxide emission targets.
- Threats to the biological and geological interests of the borough from development pressures and climate change.

8.7 The Borough is committed to ensuring that new development will address the climate change challenge. However, this challenge should not be seen as a radical change in an approach with new demands being placed on developers, instead it should be viewed as an opportunity to help deliver against a number of Borough wide aspirations. Responding to the challenge should result in a higher quality development for the Borough that as well as mitigating and adapting to climate change has the added benefit of:

- Reducing annual energy consumption and costs for existing and future generations.
- Reducing the pressures on water resources.
- Providing a greater interaction between built and natural environment and making more space for wildlife.
- Promoting a healthier way of life.
- Improving local air quality.
- Exploiting the opportunities from the 'green economy' and associated employment prospects.
- Helping development to be ready for future changes now, and not locking in the need for future generations to alter buildings to address climate change.

8.8 Many of the buildings that will be in use at the end of the plan period and beyond are already built. The LDF will be able to set standards for new development that are far more advanced than have been seen in recent years, but a more innovative approach is required to ensure the existing building stock can be upgraded.

8.9 Energy prices in the UK are forecasted to continue to rise making newer more energy efficient buildings more appealing. However, this will result in a gulf in building quality from modern build to those still in use from the past century. The Council will need to work with developers to identify opportunities to help upgrade the existing building stock. In some instances, it might be more appropriate to relax standards to the minimum required for building regulations for new development in order for developers to contribute to upgrading the existing stock. This could help reduce the energy consumption for whole communities whilst still realising a good quality of new development. There will also be a requirement to address the need to conserve the historic environment when implementing climate change mitigation and adaptation measures taking a balanced approach between the extent of the mitigation of climate change involved against the potential harm to the heritage asset or its setting.^(8.1)

8.10 The London Heat Mapping exercise revealed several areas within the Borough have concentrated areas of high heat demand. These areas represent opportunities to deliver district heating networks that can provide an efficient form of delivering the heating demands of large areas. Heating networks are developed around a central location that produces heat, either directly through gas fired heat and power, or from waste heat from large scale power stations. These networks can provide a resource efficient method of supplying heat to residential and commercial units. This saves energy, money and importantly helps to reduce carbon emissions. The PPS1 Climate Change Supplement consultation includes requirements for Councils to investigate potential for district heating networks. The Borough intends to complete a heat mapping exercise similar to the London wide approach. Developers will be required to follow the policies that emerge from the exercise and these will be laid out in the development management document.

8.11 Climate change is a very broad subject and cannot be tackled by an isolated policy issue. For example, a policy on reducing the reliance on private car use is included within the transport section (see policies T1, T2, T3 and T4), and matters for sustainable design are included within the built environment section (see policy CP2). Climate change is not a separate topic that needs addressing but is integrated within the Core Strategy framework. Policy EM1 below includes criteria that need to be considered throughout the development of the LDF. The subsequent Site Allocations DPD and Development Management DPD along with any future SPD's must accord with the overarching principles of this policy.

Policy EM1: Climate Change Adaptation and Mitigation

The Council will ensure that climate change mitigation is addressed at every stage of the development process by:

1. Prioritising higher density development in urban and town centres that are well served by sustainable forms of transport.
2. Promoting a modal shift away from private car use and requiring new development to include innovative initiatives to reduce car dependency.
3. Ensuring development meets the highest possible design standards whilst still retaining competitiveness within the market.
4. Working with developers of major schemes to identify the opportunities to help provide efficiency initiatives that can benefit the existing building stock.

5. Promoting the use of decentralised energy within large scale development whilst improving local air quality levels.
6. Targeting areas with high carbon emissions for additional reductions through low carbon strategies. These strategies will also have an objective to minimise other pollutants that impact on local air quality. Targeting areas of poor air quality for additional emissions reductions.
7. Encouraging sustainable techniques to land remediation to reduce the need to transport waste to landfill. In particular developers should consider bioremediation⁽⁴¹⁾ as part of their proposals.
8. Encouraging the installation of renewable energy for all new development in meeting the carbon reduction targets savings set out in the London Plan. Identify opportunities for new sources of electricity generation including anaerobic digestion, hydroelectricity and a greater use of waste as a resource.
9. Promoting new development to contribute to the upgrading of existing housing stock where appropriate.

The Borough will ensure that climate change adaptation is addressed at every stage of the development process by:

10. Locating and designing development to minimise the probability and impacts of flooding.
11. Requiring major development proposals to consider the whole water cycle impact which includes flood risk management, foul and surface water drainage and water consumption.
12. Giving preference to development of previously developed land to avoid the loss of further green areas.
13. Promoting the use of living walls and roofs, alongside sustainable forms of drainage to manage surface water run-off and increase the amount of carbon sinks⁽⁴²⁾.
14. Promoting the inclusion of passive design⁽⁴³⁾ measures to reduce the impacts of urban heat effects.

Implementation - how we will achieve this

- The Council will implement policy EM1 through the topic policies in the Core Strategy.

41 Bioremediation can be defined as any process that uses microorganisms or their enzymes to return the environment altered by contaminants to its original condition. Source: http://www.bionewsonline.com/w/what_is_bioremediation.htm

42 A carbon sink is a natural or manmade reservoir that accumulates and stores some carbon-containing chemical compound for an indefinite period. The natural environment works as a carbon sink absorbing Carbon Dioxide and generating oxygen.

43 Passive design is about ensuring that the fabric of the building and the spaces within it respond effectively to local climate and site conditions in order to maximise comfort for the occupants. Source: <http://www.liverpool.gov.uk/passive-design/>

- The above criteria are essential to ensure that this Core Strategy and future LDF plans and programmes can help the Borough respond positively to climate change. The implementation of the criteria is embedded within most of the Core Strategy policies.
- In addition to the above, there will be a requirement to include the criteria in the development of the [Heathrow Area Development Plan Document](#) ^(8.2) ~~Heathrow Opportunity Area Development Management Document~~. This will ensure that this highly important growth area is fully considerate of the environmental challenges alongside the social and economic matters.
- All the above criteria will be fed into the preparation of the Development Management Development Plan Document (DM DPD). This DPD will provide further details which development proposals must follow.
- A separate Heat Mapping Exercise will be undertaken by the Council in accordance with the emerging Planning Policy Statement Climate Change Supplement. This will build on the work in the London Heat Mapping exercise which has revealed possible opportunities for district heat networking to provide a more efficient approach to community heating needs. Policies in the DM DPD will require developers to investigate and link into identified networks.

Flexibility

Figures for reducing CO2 emissions in Hillingdon take account of national targets and regional targets in the London Plan [\(2008\)](#) ~~(2009)~~ ^(8.3). Proposed figures in the Replacement London Plan (2009) have not been agreed and may change as a result of the London Plan EIP.

Monitoring - how we will measure success

Monitoring of the policy EM1 will be through the AMR with specific links to:

- **E1 (Core) Indicator:** Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality. **Target:** No planning permission will be granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality (or any other targets set by Government).
- **E2 (Core) Indicator:** Change in areas of biodiversity importance. **Target:** i) Preserve the area of wildlife habitats; and ii) Minimise loss of designated areas to development (or any other targets set by Government).

- **E3 (Core) Indicator:** Renewable energy generation. Target: 20% of energy needs from renewable sources for larger applications (or any other targets set by Government).
- **LO16 (Local) Indicator:** The average standard assessment procedure (SAP) rating of local authority owned dwellings. **Target:** BV63 Increase energy efficiency of local authority owned dwellings. Target for 2006/07 was 71.5. Targets for, 2007/08, 2008/09 and 2009/10 are 67.5, 68 and 68.5 respectively.
- **LO17 (Local) Indicator:** Annual average concentrations of nitrogen dioxide (NO₂) in specific parts of the Borough. **Target:** 40 µg/m³.
- National Indicators 186: Per Capita CO₂ emissions in the local area.
- National Indicator 188: Planning to adapt to climate change.
- National Indicator 197: Improved local biodiversity – active management of local sites.

Open Spaces, Rivers and Canal Corridors

Strategic Objectives

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, bio-diversity, education, health and well being. In addition, address open space needs by providing new spaces identified in Hillingdon's Open Space Study.

SO9: Promote healthier and more active lifestyles through the provision of access to a range of sport, recreation, health and leisure facilities.

Related policies: EM2, EM3, EM4, EM5

8.12 Open spaces, including its network of green spaces, woodlands, river and canal corridors are among the borough's most valuable assets and a fundamental part to the borough's character that is appreciated by residents and visitors alike.

8.13 The borough is characterised by an extensive network of open spaces, from the large expanse of Green Belt land, countryside and woodlands in the north, Colne Valley Regional Park stretching north to south along the western edge of the borough, and a network of Metropolitan Open Land, Green Chains, smaller parks and open spaces, playing fields both public and private, river and canal corridors in between.

8.14 Green Belt, Metropolitan Open Land and Green Chains have an important role to play as part of Hillingdon's multi-functional green infrastructure and are a strategic feature of the borough.

8.15 The river and canal corridors and associated hinterlands (also known as the Blue Ribbon Network) link across borough boundaries and also have a strategic function in west London. The Grand Union Canal originated as an arterial freight route that carried materials between sites from London and links all the way to Birmingham. It is therefore a very important link between boroughs and provides much wider opportunities for walking, angling and cycling. (8.4)

8.16 Other types of open spaces are also important in the context of a suburban and densely built-up area, such as roof terraces, front and back gardens including trees, wildlife gardens, allotments and amenity areas around housing estates.

8.17 Hillingdon's open spaces, rivers and canals play an important role in helping to tackle climate change. The natural environment works as a carbon sink absorbing Carbon Dioxide and generating oxygen. Climate change is a major global challenge and loss of carbon sinks, particularly on a large scale, is detrimental to tackling this problem. In addition, the green and blue networks of open space, rivers and canals, are integral to the delivery of sustainable development. They also promote a healthy way of life, encourage social cohesion, and provide an attractive alternative environment to an urban setting. The Grand Union Canal also promotes education and sustainable transport.

8.18 For the purpose of the Core Strategy, the network of open space is organised into three categories: 1) Green Belt, Metropolitan Open Land and Green Chains; 2) blue ribbon network and 3) open spaces, sport and leisure.

Green Belt, Metropolitan Open Land and Green Chains

8.19 Green Belt: The Borough has 4,970 hectares of Green Belt ⁽⁴⁴⁾. In physical and perceptual terms the borough is the western edge and gateway to London. The Green Belt extends westwards from the Colne Valley and covers much of the northern third of the Borough with large tracts through Stockley Park and through Harmondsworth and Harlington to the north of Heathrow Airport.

8.20 The most important attribute of green belts is their openness. The main purpose of Hillingdon's Green Belt is to keep land open and free from development, to maintain the character and identity of individual settlements and to make a clear distinction between rural and urban environments, in support of strategic objective SO3. The Core Strategy aims to create sustainable communities by concentrating new development in urban areas and local town centres. The Green Belt's role is to help reinforce this strategy by strictly controlling development in the open countryside.

8.21 Metropolitan Open Land (MOL): The borough contains 10 areas designated as Metropolitan Open Land. This designation is given to areas of open land that have a London-wide significance and that are considered to perform the following three functions:

44 Strategic Environmental Assessment Environmental Report May 2005 (Amendments made – 20 April 2006) Page 359

providing a clear break in the urban fabric and contributing to the green character of London; including open air facilities serving the leisure, recreational, sports, arts and cultural needs of Londoners outside their local area; and containing a feature or landscape of historic, recreational or biodiversity value of national or regional significance.

8.22 Green Chains: Hillingdon is fortunate to have a diversity of habitats, linked by natural and man made corridors that enable flora and fauna to migrate into the centre of London. The green links between sites, both for recreation and wildlife, include public footpaths, bridleways, canals, rivers, streams and tree lined streets and road verges, all of which contribute to the green network within the Borough.

8.23 Green Belt, Metropolitan Open Land and Green Chains are included on Map 8.1.

8.24 The Green Belt Study (2006) is being reviewed and recommendations for minor adjustments to address boundary anomalies to the Green Belt, Metropolitan Open Land and Green Chains will be contained in the emerging Study. Minor adjustments will be undertaken in the Site Allocations DPD with more detailed policies in the Development Management DPD.

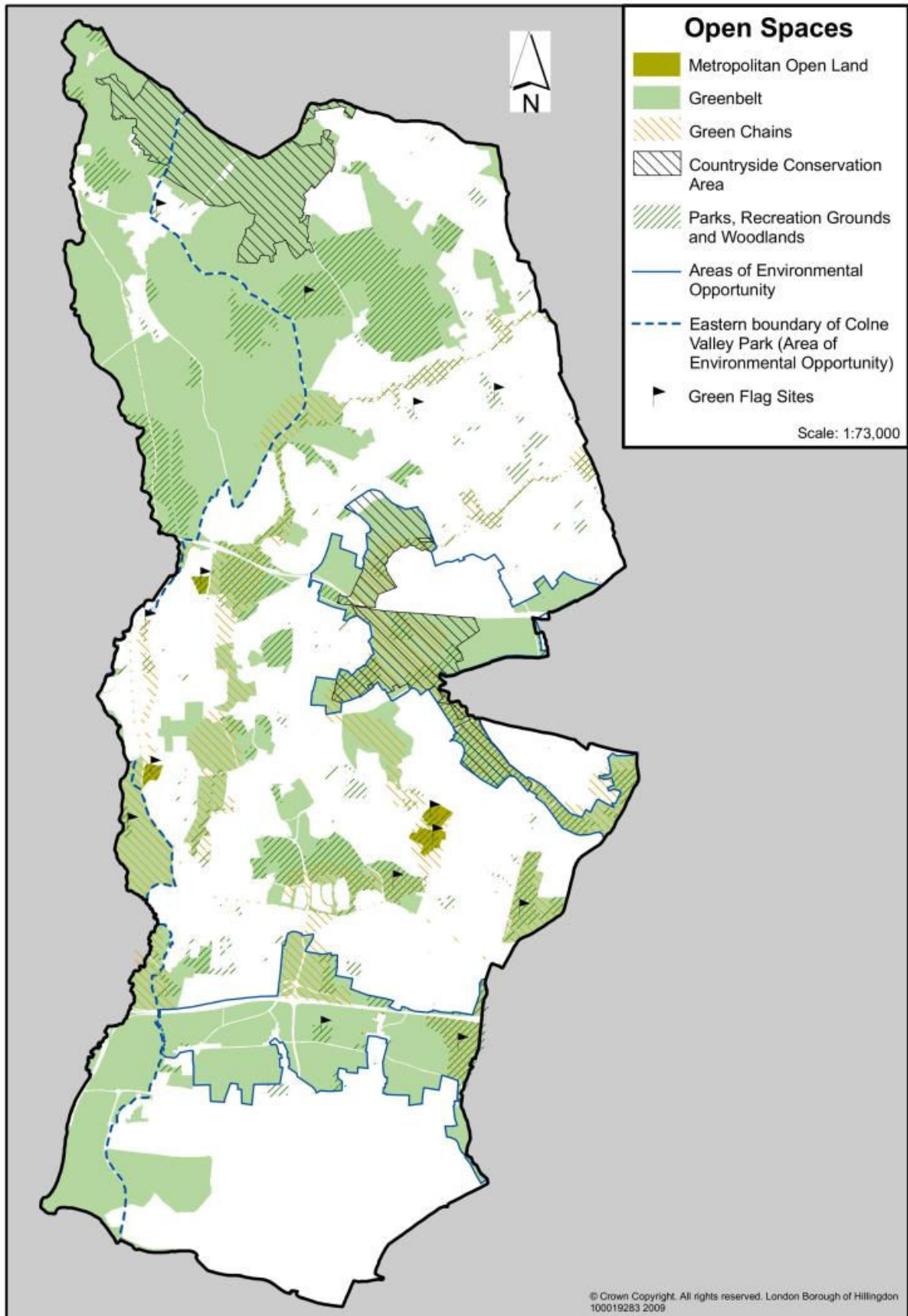
Main Challenges

8.25 Table 3.1 in Chapter 3 identifies one main challenge relating to Green Belt, Metropolitan Open Land and Green Chains:

- Pressure on the retention of Green Belt, Metropolitan Open Land and Green Chains for other uses

8.26 The largest Green Belt in the United Kingdom is around London ⁽⁴⁵⁾. As Hillingdon is the western wedge of London, and experiences significant development pressures, it is committed to protect the character of these open areas from urban sprawl.

Map 8.1 Open Spaces



8.27 The main challenge is to protect the borough's Green Belt, Metropolitan Open Land and Green Chains, whilst supporting the balance of continued growth without spreading into these open areas, keeping land permanently open and free from development. In very **special** exceptional^(8.5) circumstances the Council will consider the release of greenfield sites for schools. The Replacement London Plan (2009) encourages farming and land based sectors in the green belt to allow enough land for food production. A policy on food production will be addressed in the Development Management DPD.

Policy EM2: Green Belt, Metropolitan Open Land and Green Chains

The Council will seek to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains. Notwithstanding this, Green chains will be reviewed for designation as Metropolitan Open Land in the Site Allocations DPD and in accordance with the London Plan policies.

Minor adjustments to Green Belt and Metropolitan Open Land will be undertaken in the Site Allocations DPD.

Land at Brunel University, Harefield Hospital and Mount Vernon Hospital is identified as Major Developed Sites in the Green Belt.

Any proposals for development in Green Belt and Metropolitan Open Land will be assessed against national and London Plan policies, including the **very special** exceptional^(8.6) circumstances test.

Any proposals for development in Green Chains will be firmly resisted unless they maintain the positive contribution of the Green Chain in providing a visual and physical break in the built-up area; conserve and enhance the visual amenity and nature conservation value of the landscape; encourage appropriate public access and recreational facilities where they are compatible with the conservation value of the area, and retain the openness of the green chain.

Implementation - how we will achieve this

The Council will implement Policy EM2:

Through the development management process, in accordance with national policy for Green Belts and Metropolitan Open Land. Anomalies in local boundaries will be rectified through Development Plan Documents in accordance with Planning Policy Guidance Note 2.

Green Chains will be reviewed for designation as Metropolitan Open Land and designated through Development Plan Documents as appropriate, in accordance with the London Plan policies.

Monitoring - how we will measure success

- Number of planning applications refused on Green Belt, Metropolitan Open Land or Green Chains grounds
- Number of appropriate developments approved on Green Belt and Metropolitan Open Land
- Net change in hectares of Green Belt, Metropolitan Open Land or Green Chains lost to development

Blue Ribbon Network

8.28 The waterways of Hillingdon and the associated hinterlands form an important **green infrastructure** ^(8.7) ~~open space~~ feature and flood mitigation zone within the borough. Hillingdon has seven rivers and about 20 kms of the Grand Union Canal including the Main Line, Paddington and Slough Arms. The main rivers, the Canals along with the tributaries and smaller streams all form the Blue Ribbon Network.

8.29 Rivers, streams, canals, lakes and their banks, provide habitat for a wide range of flora and fauna. They are often significant in the context of settings and provide a sense of tranquillity. They also have the benefit of being a good source of education from a historic and wildlife perspective as well as providing the opportunity for transport and water based leisure and recreation.

8.30 The aim of the Core Strategy is to promote the river and canal corridors as a key part of Hillingdon's strategic **green infrastructure** ^(8.8) ~~open space~~ network. The network will link and connect smaller, more local open spaces with larger and more strategic ones, including the Colne Valley Regional Park and key nationally and locally important habitats.

For the purpose of the Core Strategy, Hillingdon's waterways consist of six strategic river and canal corridors. They can be given a hierarchy of importance as follows:

- Regional importance - The Grand Union Canal Corridor crosses several local authority boundaries and includes many multi-functional sites
- Sub regional importance - The River Colne Corridor crosses more than 2 local authority boundaries and includes a significant number of multi-functional sites
- District importance - The River Pinn Corridor, Yeading Brook Corridor and the River Crane Corridor. These three corridors are mostly contained within Hillingdon but have potential connections with other local authority areas and contain a number of multi-functional sites with the potential for further additions.
- Local Importance – Tributaries and smaller watercourses that provide a distinct role in a local setting.

Main Challenges

8.31 Table 3.1 in Chapter 3 identifies three main challenges relating to rivers and canal corridors:

- The need to improve the quality of and access to open spaces, rivers and canals for all groups of people in the community;
- Pressure to balance the demands of growth and the impacts of flood risk with minimal harm on the blue ribbon environment;
- The need to maintain and improve the current water resources and quality.

8.32 Consideration must also be given to the impact of development on flood risk both within and downstream of the plan area (see policy EM6).

8.33 The Blue Ribbon Network also plays important roles in transport, recreation and education. It can provide a much needed respite from the built-up nature of the towns, and also provides important linear walking and cycling routes. They are also important for providing habitat and wildlife corridors and fulfil other environmental functions such as drainage.

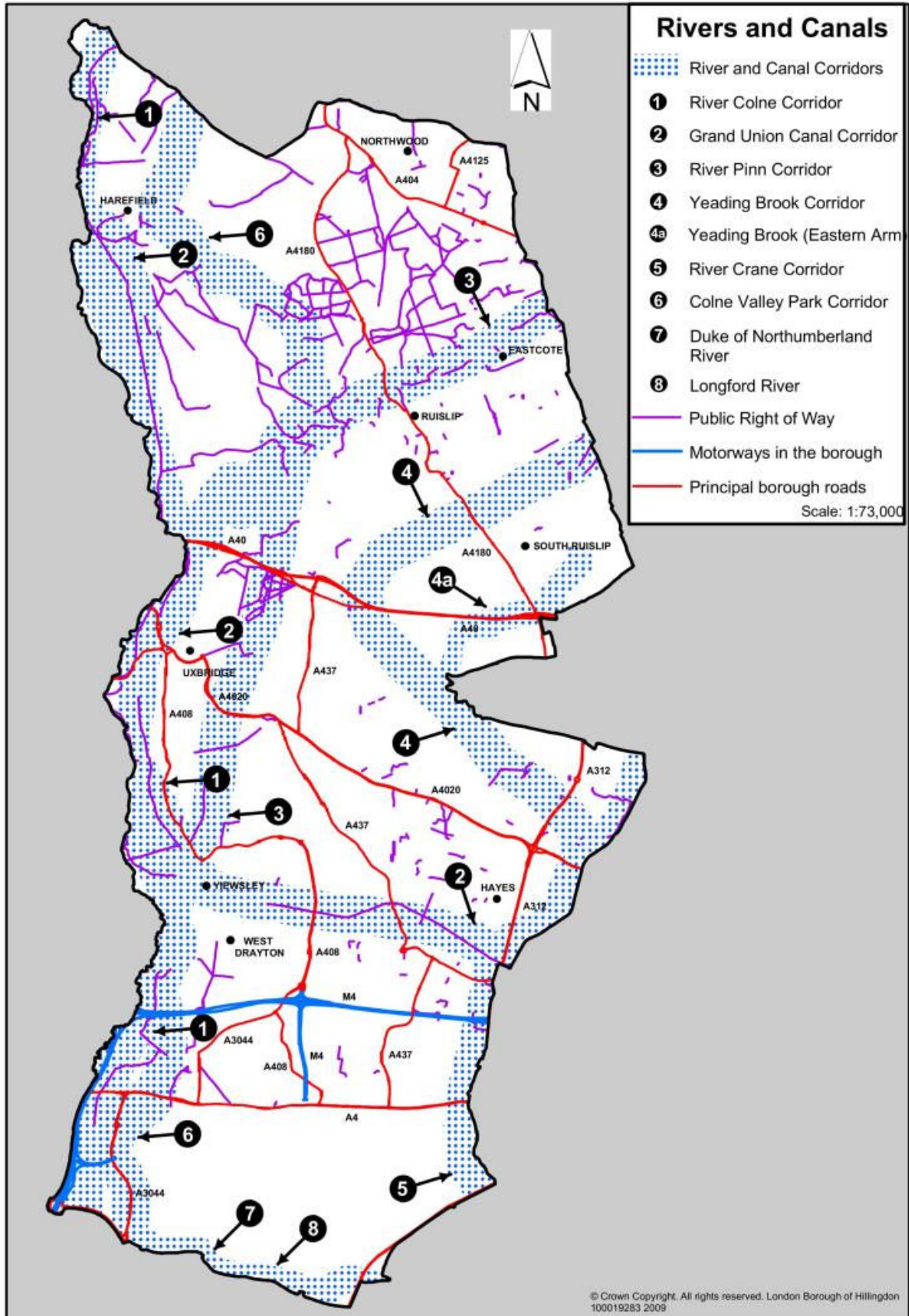
8.34 It is recognised that there are conflicts between the different roles and uses of the Blue Ribbon Network. For example, there may be instances where the provision of greater access and more activity would conflict with the aim to safeguard flood mitigation, ecological value or water quality. Development proposals adjacent to these routes would need to take account of these issues.

8.35 The multi-functional nature of strategic river and canal corridors means that a number of development plan policies can support its implementation (e.g. landscape policy, flood risk policy, open space policy, sport and leisure policy and sustainable transport policy). This overarching policy EM3 will ensure these corridors are prioritised in planning decisions, and features are identified on Map 8.2.

8.36 There are also opportunities to enhance the water quality and environmental performance of the river and canal corridors. The Environment Agency have published the Thames River Basin Management Plan which covers the pressures facing all water bodies within London and the actions that will address them.

8.37 Waterfront development remains a popular interest for developers. The Council is keen to ensure the river or canal benefits from any proposed development. The Council will therefore set criteria within the subsequent Development Management DPD to require developers to make a positive contribution to the river or canal.

Map 8.2 River and Canal Corridors



Policy EM3: Blue Ribbon Network

The Council will continue to promote and contribute to the positive enhancement of the strategic river and canal corridors and the associated wildlife and habitats through the Biodiversity Action Plan and the Thames River Basin Management Plan, and developer contributions where appropriate.

The Council will work with the Environment Agency and other interested bodies to^(8.9) continue to enhance the local character, visual amenity, ecology, transportation, leisure opportunities and sustainable access to rivers and canals.

The Council will collaborate with adjacent local authorities to ensure that Hillingdon's river and canal corridors complement and link with cross boundary corridors.

Implementation - how we will achieve this

The Council will implement policy EM3 by:

- Working with the Environment Agency, British Waterways, Natural England, English Heritage and other partners to develop a strategy for the Grand Union Canal and other blue ribbon networks where they are not currently in place.
- Working with partners to achieve environmental and habitat improvements in the Colne Valley Regional Park.
- Conserving and enhancing biodiversity, paying particular regard to priority species and habitats identified in Hillingdon's Biodiversity Action Plan.
- Improving access to and the quality of Hillingdon's river and canal corridors, thereby providing a healthier lifestyle accessible to all.

Monitoring - how we will measure success

- Monitoring of the above policy EM3 will be through the AMR with a specific link to:
 - E2 (Core) Change in areas of biodiversity importance - i) Preserve the area of wildlife habitats; and ii) Minimise loss of designated areas to development (or any other targets set by Government).
- NI 189 - Flood risk management indicator.
- Number of new and improved access points to the river and canal network.
- Promote biodiversity benchmarking.

Open Spaces, Sport and Leisure

8.38 As Hillingdon is one of the least densely populated of all the London boroughs, it contains large areas of public open space comprising of the following:

- Green Belt land
- Metropolitan Open Land (MOL)
- Countryside Conservation Areas
- trees and woodlands
- nature conservation
- amenity green spaces
- outdoor sports facilities
- natural and semi-natural areas
- parks and gardens
- green corridors
- blue ribbon network
- allotments

8.39 These all contribute towards an image of an outer London Borough that is relatively well endowed with open spaces, green network and biodiversity.

8.40 Public open space: For the purpose of the Core Strategy, public open space is defined as all open spaces of public value, including not just land, but also areas of water such as rivers and canals which offer important opportunities for sport and recreation and can also act as a visual amenity. The definition covers a broad range of types of open spaces within the borough, whether in public or private ownership and whether public access is unrestricted, limited or restricted.

8.41 Private open space: Private open space such as front and back gardens and trees, green roofs and living walls add value in terms of visual amenity and can play a significant role in reducing surface water run off rates thereby reducing the risk and effects of flooding as well as supporting biodiversity.

8.42 Trees and woodlands: Hillingdon's trees and woodlands are one of the borough's key assets. They support local ecosystems and help to tackle climate change by reducing carbon dioxide levels and providing shade in the hotter summers. They are a key component to the character of Hillingdon's neighbourhoods and are a significant contributor to helping to define a sense of place for many communities. It is for these reasons that Hillingdon has over 600 Tree Preservation Orders and has nationally protected woodlands.

8.43 The Council is preparing a Tree and Landscape Strategy to identify such areas for future protection and enhancement and ensure sustainable management of tree and landscape features for the benefit of the community as a whole. All the street trees in the borough have been mapped and are part of a regular maintenance programme including replacement planting where necessary.

8.44 Informal recreation: Open space more generally, whether part of a strategic open space network or not, can serve as a vital focal point for community activities, bringing together members of communities and providing opportunities for informal recreation and social

interaction, thereby contributing to the quality of life and and wellbeing of the community. It plays a vital role in promoting healthy living and in the social development of children through play, sporting activities and interaction with others.

8.45 Public Rights of Way Network: The borough contains a Public Rights of Way Network that is approximately 112km long and encompasses both urban and rural routes. Urban paths are mainly used for convenient short cuts to schools, shops, public transport and other local amenities. Other public footpaths follow and cut through farmland, parks and open spaces, woodland, nature reserves, golf courses, river banks and canal towpaths.

Main Challenges

8.46 Table 3.1 in Chapter 3 identifies three main challenges relating to open spaces:

- The need to improve the quality of and access to open spaces, rivers and canals for all groups of people in the community
- Pressure to balance the demands of growth and the impacts of flood risk with minimal harm on the blue ribbon environment
- The need to mitigate noise and air quality impacts, especially around Heathrow and the road network

8.47 Open spaces for active recreation - Developing the potential for open spaces to provide and accommodate an expanding range of outdoor pursuits that will increase the appeal and draw of using green spaces. This will enable green spaces to have a wider draw by recognising changing and developing trends in demand for alternative opportunities in active recreation. There is opportunity for Hillingdon's green spaces to provide a unique offer in West London for both developing formal and informal opportunities to be physically active to increase use while also recognising potential conflict with the need to adequately protect the local environment.

8.48 Visual amenity: The ways in which parks, open spaces, trees and woodlands contribute to the visual amenity of Hillingdon are influenced by the amount of open space in the area and the contribution it makes to the street scene and the wider landscape. Hillingdon has over 200 open spaces that contribute towards creating a visually attractive area and providing a break in the built up townscape.

8.49 Countryside Conservation Areas: The traditional agricultural landscape is made up of small fields, hedges, copses, woods and farm ponds, all of which contribute to the visual amenity of the borough. As agricultural practises change, the elements that make up the character of such a landscape often comes under threat. There are three Countryside Conservation Areas in the borough (see map 8.1). The Core Strategy will need to ensure protection of the borough's open spaces and landscape.

8.50 Quiet areas: The Borough is situated within close proximity of two motorways and one major international airport. These pressures can have a detrimental impact on the tranquillity of open space and reduce the enjoyment of those using it. The Environmental

Noise (England) Regulations 2006⁽⁴⁶⁾ requires quiet or 'tranquil' areas to be identified and protected from increases in environment noise. The Council will work with the Department of Environment, Food and Rural Affairs (DEFRA) to address this. In addition, consideration will be given to 'relative tranquillity' to accord with the the Mayor's London's Ambient Noise Strategy and intentions in the Draft Replacement London Plan.

8.51 Population growth: The population is expected to increase by approximately 14% over the period of the Core Strategy⁽⁴⁷⁾, which will present more pressure on open space provision. In reality, these pressures will affect some areas more than others as provision levels vary across the Borough, with the south being far more built up than the north.

8.52 According to Hillingdon's Green Space Survey (2010), 60 - 78% of Hillingdon residents are very or fairly satisfied with the borough's parks and green spaces. This is 9% higher than the London average⁽⁴⁸⁾. The Core Strategy will need to ensure public satisfaction of the borough's parks and green spaces improves over the plan period.

8.53 Public Rights of Way Network: The Council has prepared a Rights of Way and Permissive Routes Improvement Plan (2009-2019), which proposes improvements to public access routes, including connecting open spaces in the borough. The improvements will be secured through policy T1 of the transport chapter (chapter 9), the Local Implementation Plan proposals or through other funding opportunities. The Local Implementation Plan is addressed in paragraph 9.1 of chapter 9.

8.54 Areas of Environmental Opportunity: The former Greater London Development Plan identified four strategic linear features of the borough as areas for environmental opportunity:

- the Colne Valley
- the M4/Brent Wedge Corridor (the "A4/M4 Linear Park")
- the area around Heathrow, and
- the Western Avenue, A40

These are identified on Map 8.1.

8.55 A large part of the authority lies within the Colne Valley, a regional park located to the immediate west of Greater London. The Park, which was established in 1967, includes parts of Surrey, Berkshire, Buckinghamshire, Hertfordshire and the London Borough of Hillingdon. Former gravel workings are a specific characteristic of the area and this has provided a reason for the creation of recreational lakes. It also has other areas of landscape and nature conservation value, and provides countryside recreation for adjacent urban populations. An association of local authorities known as the Colne Valley Partnership

46 Source: <http://www.opsi.gov.uk/si/si2006/20062238.htm>

47 Source: Hillingdon Profile 2008

48 Source: CABE Space Urban Green Nation -
<http://www.cabe.org.uk/files/urban-green-nation-summary.pdf>

co-ordinates the overall management of the Park. This is achieved primarily through a Vision and Action Plan ⁽⁴⁹⁾ agreed by the partnership. The implementation of the Plan is undertaken by a wide range of partners, with Groundwork Thames Valley playing a major role.

8.56 The Council considers that strong development pressures on Areas of Environmental Opportunity and the risk that land may be allowed to deteriorate in the hope of securing development could undermine these important strategic concepts. The protection and enhancement of these areas will be secured through policy EM4 with a more detailed policy in the Development Management DPD.

8.57 The Core Strategy will bring about improvements in this figure by setting out a requirement for open spaces, both old and new, to be of high quality, attractive to users, accessible, well maintained and managed as part of the wider open space network.

Open space provision

8.58 The borough's Open Space Study is currently being revised and is due for publication in early in 2011. It will provide a qualitative and quantitative audit of each site and an assessment of current and future needs of the borough.

8.59 The Study sets quantity standards to provide a guideline as to how much open space, sport and recreation provision per 1,000 people is needed to strategically serve the borough over the plan period. Standards for each type of provision are created in relation to demand, access and future population growth.

8.60 A quality standard is provided based on the audit and assessment of sites and provides a minimum level of quality (percentage score), which sites should achieve.

8.61 An accessibility standard is also provided based on catchment areas and how far people should be expected to travel to visit each type of provision. The recommendations will be adopted in the Core Strategy with more detailed policies in the Development Management DPD.

8.62 Hillingdon has sixteen Green Flag sites. namely Barra Hall Park, Churchfield Gardens, Cowley Recreation Ground, Cranford Park, Countryside Park, Fassnidge Park, Harefield Village Green, Lake Farm Country Park, Little Britain Lake, Little Harlington Playing Fields, Minet Country Park, Norman Leddy Memorial Gardens, Ruislip Woods, Uxbridge Common, Warrender Park, Hillingdon Court Park and Yiewsley Recreation Ground. The Council reviews the status of the borough's parks annually and aspires to achieve Green flag status on all of the boroughs parks over the plan period.

8.63 The Replacement London Plan (2009) sets a hierarchy of public open spaces which have been applied to the Open Space Study. The areas that currently have little or no access to local parks or open spaces within 400m (or 5 minutes walking time) will be identified as priority areas for the creation of new public open space.

49 Colne Valley Regional Park Action Plan 2009-2012 -
<http://www.colnevalleypark.org.uk/uploads/documents/document55.pdf>

8.64 The creation of new open space is to be encouraged wherever practical, although it is recognised that creation of new open spaces may be limited due to densely populated areas and financial constraints.

Policy EM4: Open Space and Informal Recreation

The Council will safeguard, enhance and extend the network of open spaces, informal recreational and environmental opportunities that operate as carbon sinks and^(8.10) that meet local community needs and facilitate active lifestyles by providing spaces within walking distance of homes. Provision should be made as close as possible to the community it will serve. There will be a presumption against any net loss of open space in the Borough.

~~The Council will require development proposals to address local deficiencies in quality, quantity and accessibility of open spaces.~~ The Council will identify new opportunities for open space through an open space study. Major developments will be expected to make appropriate contributions to the delivery of new opportunities, or to the improvement and enhancements of existing facilities.^(8.11)

The Council will seek to protect existing tree and landscape features and enhance open spaces with new areas of vegetation cover (including the linking of existing fragmented areas) including front and back gardens for the benefit of wildlife and a healthier lifestyle, mitigating climate change.

The Council will work with DEFRA to identify and protect open spaces that provide quiet areas and will also consider whether other areas merit protection of relative tranquillity.

The Council will work with other local authorities and agencies to pursue the key aims of the Colne Valley Park.

Implementation - how we will achieve this:

The Council will implement Policy EM4 by:

- Improving the quality of accessible open space and provision of new open space through developer contributions.
- Protecting informal recreational spaces including allotments and promoting participation in food growing opportunities.
- Protecting and improving habitats and ecosystems throughout the Borough and to areas beyond, by maintaining existing trees and native vegetation (adaptable to climate change) and open spaces and creating new areas of tree and woodland cover (including the linking of existing fragmented areas) for the benefit of wildlife and in accordance with the local Biodiversity Action Plan.
- Managing development to resist the loss of open spaces, trees and woodlands.

- Implementing policy T4.
- Improving the Public Rights of Way network secured through the Public Rights of Way Improvement Plan and Local Implementation Plan proposals or through other funding opportunities.
- Developing a policy for Areas of Environmental Opportunity in the Development Management DPD.
- Joint working with other local authorities and agencies in the implementation of the Colne Valley Vision and Action Plan 2009-2012.
- Environmental improvement schemes undertaken or funded by the Council

Monitoring - how we will measure success:

- Monitoring of the policy EM4 will be through the AMR with a specific link to:
 - **LO18 Indicator:** Amount of open spaces with Green Flag Awards. **Target:** Increase the number of parks gaining Green Flag Status.
- Improve public satisfaction with the quality, accessibility and number of open spaces in the borough.
- Review the quality of information in the Open Space Assessment submitted with planning applications.
- Increase the area of land of new open space, including informal recreation space, in areas identified as deficient in the Open Space Study.
- Number of applications refused on open space grounds.
- Increase the length of the Public Rights of Way network.
- BV178 - Hillingdon's Public Rights of Way performance indicator.
- Implementation of the Colne Valley Vision and Action Plan.
- Amount of inappropriate development permitted in the Colne Valley Park.

Sport and Leisure

Strategic Objective

SO18: Improve access to local services and facilities, including health, education, employment and training, local shopping, community, cultural, sport and leisure facilities, especially for those without a car and for those in more remote parts of the borough through well planned routes and integrated public transport.

Related policy: EM5

Main Challenges

8.65 Table 3.1 in Chapter 3 identifies three main challenges relating to sport and leisure:

- Pressure for release of green belt land, Metropolitan Open Land and Green Chains for other uses
- The need to improve the quality of and access to open spaces, rivers and canals for all groups of people in the community

8.66 Sport and physical activity give people opportunities to learn skills, to express their identities, and to share experiences. It gives them a sense of community and a stake in the places where they live, contributing to a feeling of civic pride.

8.67 The borough's Open Space Study is currently being revised and is due for publication in spring 2010. It will provide data on outdoor sports facilities, which includes grass and synthetic playing pitches, tennis courts, multi-use game areas (MUGAs) and bowling greens. The recommendations will be adopted in the Core Strategy with more detailed policies in the Development Management DPD.

8.68 As part of the assessment of playing pitch provision, this should include both grass pitches and artificial surfaces that can cater for year round participation of outdoor facilities. In addition, there is an aspiration to undertake a similar appraisal of indoor facilities, identifying opportunities to improve access through schools and other facilities including specialist facilities for specific sports that will support higher level participation to excellence standard.

8.69 Through local forums such as the Community Sport & Physical Activity Network (CSPAN), local Sports Partnership and Cricket Alliance, sports clubs have expressed the need to develop certain facilities that are particular to the development of their sport as current provision is either at capacity or not at the standard needed to fulfil local needs. This presently includes velodrome facilities to sustain talent development in cycling, indoor tennis courts and cricket facilities to complement outdoor facilities and ensure year round provision is available.

8.70 Developing the sporting and the health benefits of an active lifestyle is a priority for the Council. Sport and leisure is a high profile service area to ensure that "Hillingdon is a more active, healthy, successful sporting Borough". The Council with its very clear commitment

to sport and physical activity has matched its aspiration to provide high quality sports facilities with increasing programmes of community based sports development, as well as supporting athletes to achieve their full potential as elite performers.

8.71 The Mayor of London has recently published 'A Sporting Future for London' ⁽⁵⁰⁾ that is about increasing participation in sport and physical activity to encourage more people to play sport in London in the run up to the 2012 Olympic Games. The plan, which aligns with Sport England's strategy to create sporting opportunities in every community, is designed to capitalise on the once in a lifetime opportunity for the host city to create a lasting sporting legacy.

8.72 The Council is committed to providing excellent opportunities for sport and leisure through its 'Active Hillingdon'- A Sport and Physical Activity Strategy, 2007-2012 (revised July 2009). This includes enhancing the borough's cultural offer (including sport and leisure) as well as making further improvements to sports provision, increasing the participation of residents in active recreation and using the 2012 Olympics as a springboard to encourage the uptake of healthy lifestyles. Local facilities include the new Hillingdon Sport and Leisure Complex with the first new 50m pool in London for 40 years and the Sports and Leisure Centre at Botwell Green.

8.73 Attendance at leisure facilities in the borough has shown an upward trend over the last 10 years with 802,595 in 2008/09. With the construction of Botwell Green Leisure Centre in Hayes to replace other ageing facilities in the area and new additional facilities at Hillingdon Sports & Leisure Complex, this figure is expected to continue to increase during the next few years. The Mori residents satisfaction survey in 2009/10 shows a significant increase with sports/leisure facilities. At 59%, around six in ten surveyed were satisfied which is a 14% increase on the previous survey.

8.74 The National Active People 3 Survey results (October 2008 - October 2009) show that 18.9% of the adult population took part in regular sport and active recreation which although statistically insignificant is slightly down on the previous year (20.7%). The average for London in 2008/9 was 21.2%. However, the number of people that took part in organised sport has increased from 34.6% in 2007/8 to 39.5% which is slightly above the London average of 38%.

8.75 This Core Strategy will meet future demand by improving access to sport and leisure facilities, encouraging more people to take part in sport and active recreation and providing new facilities to address local deficiencies.

Policy EM5: Sport and Leisure

The Council will:

- safeguard, enhance and extend the network of sport and leisure spaces that meet local community needs and facilitate active lifestyles by providing active sport and leisure spaces within walking distance of home.

- ensure that the overall Borough-wide target, identified in the Open Space Study, of active sport and leisure facilities with unrestricted access is maintained. There will be a presumption against any net loss of active sport and leisure facilities in the Borough
- ensure that future development includes features that designs activity into areas, providing opportunities for improved cycle ways, formal and/or informal local sports facilities, to encourage participation in a more active lifestyle
- adopt a flexible approach to the provision of facilities that recognises changing demographics in the population and trends in sports participation
- ensure that sufficient children's play space is provided to support proposals for new residential development, in accordance with national and local guidance
- promote Hillingdon's sport and leisure facilities to achieve more integrated public accessibility and active lifestyles
- Identify new opportunities for sport and leisure and measures to deliver them. Major development may be required to make contributions in order to minimise the impacts and pressures on the existing resource. ^(8.12)

Implementation - how we will achieve this

The Council will implement Policy EM5 by:

- Identifying areas deficient of sport, recreation and leisure space, where new developments will be expected to make contributions towards new or improved facilities, or to secure public access to private facilities within the locality of the development.
- Protecting playing fields and recreational spaces and promoting opportunities for participation in outdoor sport and leisure.
- Protecting and improving habitats and ecosystems throughout the Borough and to areas beyond, by maintaining existing trees and native vegetation (adaptable to climate change) and open spaces and providing new areas of tree and woodland cover (including the linking of existing fragmented areas) for the benefit of wildlife in accordance with the local Biodiversity Action Plan.
- Managing development to resist the loss of sport and leisure facilities

Monitoring - how we will measure success

- Increase in the area of land open for sport and leisure
- Increase in the area of new sport and leisure space, in areas identified in the Open Space Study as deficient
- Review quality and accessibility of sport and leisure facilities borough-wide
- Review the quality of sport and leisure information in the Open Space Assessment submitted with planning applications
- Number of applications refused on play, sport or leisure grounds

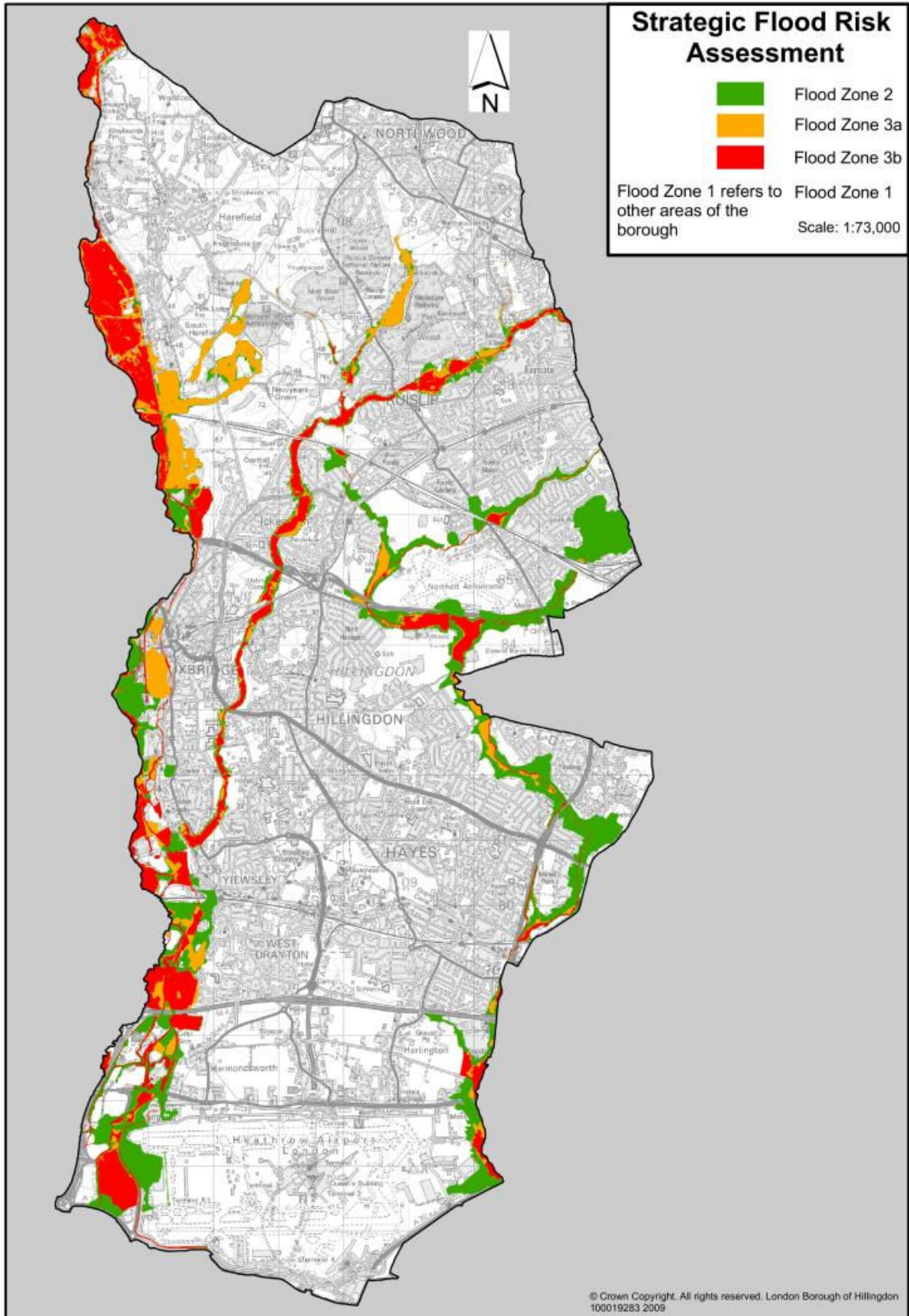
- Active People KPI 1 (NI8) - At least 3 days a week x 30 minutes moderate participation (all adults)
- Active People KPI 2 - At least 1 hour a week volunteering to support sport (all adults)
- NI6 Participation in regular volunteering
- NI57 Participation in School PE & Sport and the take up and range of opportunities developed that contribute to the 5 hour offer.

Flood Risk Management

8.76 There are approximately 7000 properties (6%) at risk of flooding within Hillingdon ⁽⁵¹⁾. However, this is just a broad statistic; what this does not describe is the cost of flood defences, the possible impacts on businesses due to flooding, or the required responses on emergency services.

51 Source: Environment Agency Hillingdon Borough: Environment summary:
http://www.ea-transactions.net/static/documents/Research/HILLINGDON_factsheet.pdf

Map 8.3 Flood Risk Assessment



8.77 Due to the extensive network of waterways in Hillingdon, flooding is a significant consideration in local planning matters. The Council has produced a Strategic Flood Risk Assessment (SFRA)(2008)⁽⁵²⁾ incorporating the floodplain maps produced by the Environment Agency.

8.78 Map 8.3 illustrates Hillingdon's flood zone areas. These are separated into:

- Flood Zone 1 – Low probability of flooding
- Flood Zone 2 – Medium probability of flooding
- Flood Zone 3a – High probability of flooding
- Flood Zone 3b - Functional Floodplain

New development and Flood Risk

8.79 The Local Development Framework has a role to play in reducing future levels of flood risk. Detailed policies to address the location of new development, design and layout will be developed through the Development Management DPD.

Main Challenges

8.80 Table 3.1 in Chapter 3 identifies one main challenge relating to flood risk management:

- Pressure to balance the demands of growth and the impacts of flood risk with minimal harm on the blue ribbon environment

8.81 The key challenge is to balance the demands on growth with the impacts of flood risk. These impacts will become greater in a changing climate with more extreme weather events. In particular rainfall intensity is expected to increase resulting in a greater likelihood of flooding. Furthermore, waterfront development continues to attract developers. These types of development can provide a diverse setting, allowing access to some of the Borough's most attractive natural assets. However, it is also likely to increase the conflict between new development and increasing flood risk.

8.82 The Core Strategy will need to have regard to the approach of the London Plan to flooding. It will be necessary to ensure that new development takes into account the increased risks of flooding as a result of changes to the climate, and how this affects Hillingdon and to protect vulnerable areas from river flooding. When assessing development sites and allocations, flood risk should also be considered alongside other spatial planning issues such as transport, economic growth, natural resources, regeneration, biodiversity and the historic environment.

8.83 The Council will aim to avoid development in areas of flood risk in the first instance and only seek to manage the risk once it can be demonstrated that there is no alternative option.

8.84 Development proposed in flood zones 2 or 3 (medium and high probability) will need to provide evidence of the Sequential Test outlined in Planning Policy Statement 25 (PPS25): Development and Flood Risk. The Sequential Test will need to be applied to the subsequent

Site Allocations DPD. Development that is proposed in accordance with the Site Allocations DPD and the Sequential Test will not be required to submit further evidence justifying why it is proposed in flood zone 2 or 3. Where development is not in line with the Site Allocations DPD, it will need to submit clear evidence and justification that there are no other reasonably available sites in a lower risk flood zone.

8.85 All development proposals in flood zones 2, 3a and 3b (medium and high probability) should be accompanied by a Flood Risk assessment (FRA) in accordance with PPS25. Development of over 1 hectare or identified as being within a problem surface water area should also be accompanied by a FRA. The flood risk assessment should also provide evidence of the Exception Test where appropriate as outlined in PPS25; however, the Sequential Test should be undertaken prior to the Exception Test for all new development proposed in flood zones 2 and 3, and areas identified as having surface water management problems.

8.86 The probability of flooding can be reduced through the management of land, river systems and flood defences, and the impact reduced through influencing the type of development in flood risk areas, flood warning and emergency responses. New development should be designed and located with flood risk in mind and more space provided for water through better management of land for water storage and flood protection. The Council will oppose the increase in impermeable areas where these will have an impact on surface water run-off. The loss of urban greenspaces and gardens can contribute significantly to the reduction of attenuation areas which increases the risk of flooding. The Council will require developers to utilise permeable areas, either through natural filtration or through modern methods of pavement construction.^(8.13)

Surface and Foul Water Drainage

8.87 The mismanagement of surface water flooding can also result in the increased risk of flooding. Sewage and drainage systems struggle to keep pace with the rate of development. The unchecked loss of natural drainage areas through increased hardstanding puts significant pressure on drainage systems, particularly in times of heavy rain. As development progresses and/or urban areas expand these systems become inadequate for the volumes and rates of storm water they receive, resulting in increased flood risk and/or pollution of watercourses. Allied to this are the implications of climate change on rainfall intensities, leading to flashier catchment/site responses and surcharging of piped systems.

8.88 The impacts of climate change will add to the pressure on the drainage systems and it is therefore essential that all new development is managed to minimise the problems.

8.89 The management of surface water drainage for new development comes in the form of Sustainable Urban Drainage Systems (SUDS). These seek to manage storm water as close to its source as possible, mimicking storm water flows arising from the site, prior to the proposed development. Typically this approach involves a move away from piped systems to softer engineering solutions inspired by natural drainage processes.

8.90 SuDS should be designed to take into account the surface run-off quantity, rates and also water quality ensuring their effective operation up to and including the 1 in 100 year design standard flood including an increase in peak rainfall of up to 30% to account for climate change.

8.91 SUDS come in a variety of different types, from infiltration techniques through to water harvesting. Wherever possible, a SuDS technique should seek to contribute to each of the three goals identified below with the favoured system contributing significantly to each objective. Where possible SuDS solutions for a site should seek to:

- Reduce flood risk (to the site and neighbouring areas);
- Reduce pollution; and
- Provide landscape and wildlife benefits.

8.92 Foul water flooding is also a problem that occurs where there is a lack of capacity or blockages within the receiving system. The Council will continue to work with the water authorities to identify problem drainage areas, particularly where new development could worsen the impacts.

8.93 Further surface and foul water studies will complement the existing strategic flood risk assessment and will be a material consideration in formulating planning decisions.

Policy EM6: Flood Risk Management

The Council will require new development to be directed away from away from flood zones 2 and 3 in accordance with the principles of Planning Policy Statement 25.

The subsequent Site Allocations DPD will be subjected to the Sequential Test in accordance with PPS25. Sites will only be allocated within flood zones 2 or 3 where there are overriding issues that outweigh flood risk. In these instances, policy criteria will be set requiring future applicants of these sites to demonstrate that flood risk can be suitably mitigated.

The Council will require all development across the borough to use sustainable urban drainage systems (SUDS) unless demonstrated that it is not viable. The Council will encourage SUDS to be linked to water efficiency methods.^(8.14) ~~encourage the use of sustainable urban drainage systems (SUDS) across the borough in all developments.~~ The Council may require developer contributions to guarantee the long term maintenance and performance of SUDS is to an appropriate standard.

Implementation - how we will achieve this

The Council will implement policy EM6 by:

- Working with the Environment Agency, British Waterways, Natural England and other partners to develop a management plan for the Grand Union Canal and other blue ribbon networks where they are not currently in place.
- Developing flood risk policies including SUDs in the Development Management DPD

Monitoring - how we will measure success

- Monitoring of policy EM6 will be through the AMR with a specific link to:
 - **E1 (Core) Indicator:** Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality. **Target:** No planning permission will be granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality.
- NI 189 - Flood risk management indicator.
- Number of planning permissions granted contrary to the advice of the Environment Agency.
- Number of new homes built in medium and high flood risk areas.

Biodiversity and Geological Conservation**Strategic Objectives**

SO5: Safeguard and promote areas of geological importance and make a proportionate contribution to West London's target to extract 0.5 million tonnes of minerals.

SO8: Protect and enhance biodiversity to support the necessary changes to adapt to climate change. Where possible, encourage the development of wildlife corridors.

Related policies: EM1, EM7

8.94 Biodiversity: Hillingdon is one of the most biodiverse boroughs in London. It has a rich mixture of habitats including trees and woodlands, scrubs, grasslands, wetlands, rivers, gardens and parklands, which are home to a vast range of species, both common and protected.

8.95 Hillingdon has a number of designated nature conservation sites to aid the protection of the most important areas. These are as follows:

- 6 Sites of Special Scientific Interest (SSSI) – National designation
- 1 is a Site of National Nature Reserve (NNR) (Ruislip Woods, the largest block of ancient, semi-natural woodland in Greater London)
- 4 Sites of Local Nature Reserve - Local designation
- 12 Sites of other Nature Reserves - Local designation
- 12 Sites of Metropolitan Grade Importance – London wide designation
- 15 Sites of Borough Grade 1 Importance – Hillingdon borough designation
- 25 Sites of Borough Grade II Importance – Hillingdon borough designation
- 7 Sites of Local Importance - Local designation
- 3 Sites of Countryside Conservation Area - Local designation

8.96 Geodiversity: Although there are no natural outcrops of rocks in Hillingdon, there are exposures from human activity and one site has been recognised as a Regionally Important Geological and Geomorphological Site (RIGS) - the Gravel Pits, Harefield. RIGS are selected on a regional basis using four nationally agreed criteria and are considered the most important places for geology and geomorphology outside statutorily protected land such as Sites of Special Scientific Interest.

Main Challenges

8.97 Table 3.1 in Chapter 3 identifies one main challenge relating to biodiversity and geological conservation:

- Threat to biological and geological interests of the borough from development pressures and climate change

8.98 Hillingdon's biodiversity and geological interest is under threat from extensive economic and social activity. The biggest threat comes from the direct competition for land between wildlife habitats and the need to provide new development to deliver economic and social growth. Even if spatial policies could protect areas of wildlife importance from development pressures, there would be a residual threat from human interaction, air quality impacts and pollution. A key challenge for this Strategy is to maintain and strengthen our networks of natural habitats and green and open spaces.

8.99 Policies in the London Plan go some way to ensure that biodiversity and geological conservation are taken into account in decision making and provide a commitment to protect important habitat, species and sites of geological interest. The Borough's NNR and SSSI's are the most important areas of nature conservation, and the Gravel Pits, the only RIGS in the borough, are generally in good condition. However, two of the SSSI's, the Fray's Farm Meadows and Harefield Pit are considered to be declining (see map 8.4)⁽⁵³⁾.

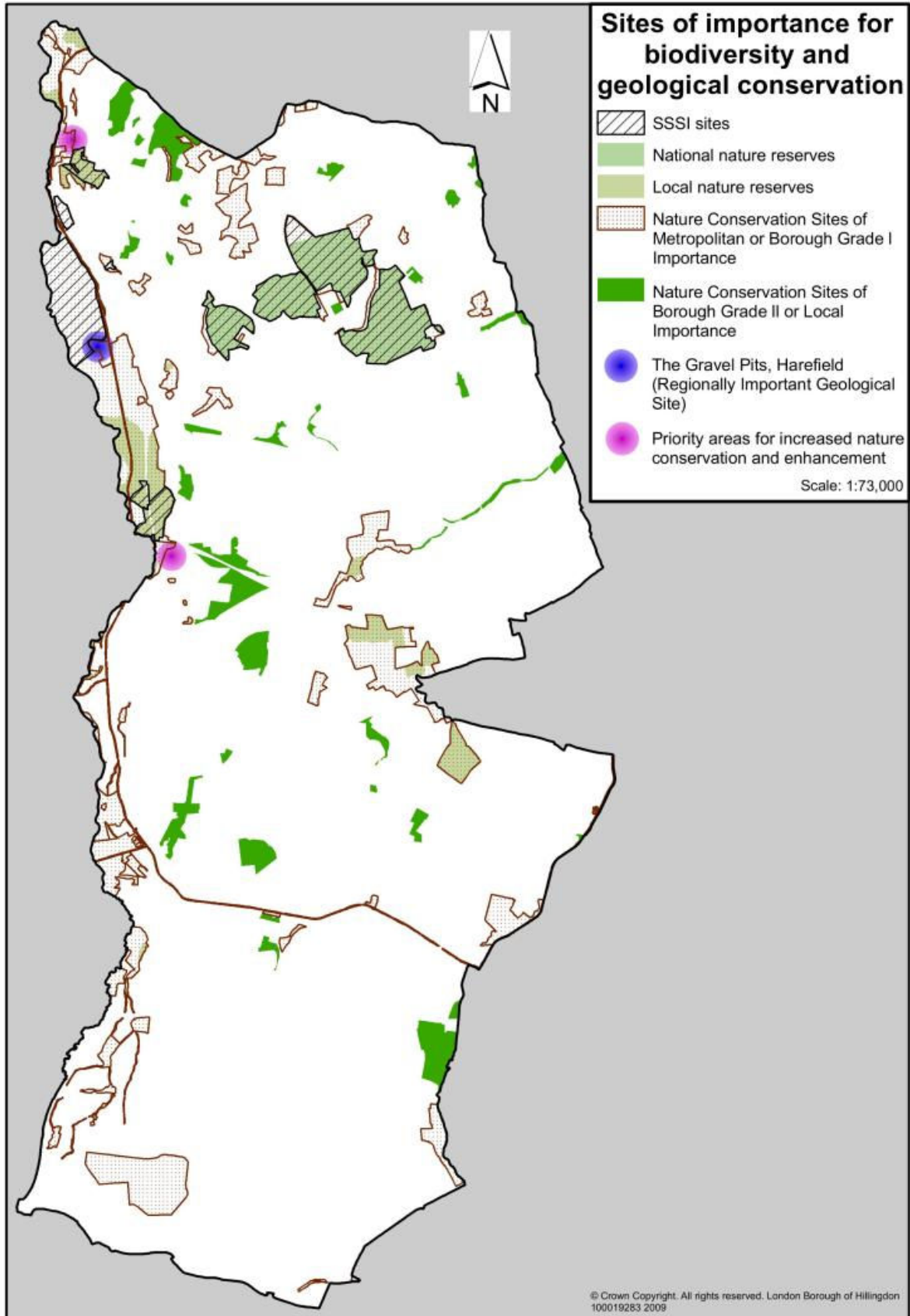
8.100 However, the areas with least important or no designations are not eligible to receive the level of protection to ensure they remain vital to the borough. Furthermore, there is no requirement to reduce the indirect effects of development, such as increased access. As a result, active management is required within nature conservation areas to maintain appropriate standards.

8.101 The Core Strategy will encourage greater access to some of these biodiversity and geological conservation areas, where greater pressures on them can be accommodated. The challenge is to balance continued growth, with a need to protect and more importantly enhance the conservation and geological interests of the borough.

8.102 The Core Strategy will also ensure that biodiversity measures will be integrated into either the boundary of a development or the fabric of a building. Living roofs and walls can provide valuable natural habitat in an urban environment and can also help with the improvement of air quality. They will also act as natural carbon sinks that will help to tackle climate change.

53 Source: Environment Agency Hillingdon Borough: Environment Summary: http://www.ea-transactions.net/static/documents/Research/HILLINGDON_factsheet.pdf

Map 8.4 Sites of Importance for Biodiversity and Geological Conservation



Policy EM7: Biodiversity and Geological Conservation

The Council will seek to designate further Borough Sites of Important Nature Conservation with grade 1, 2 and local designations in the Site Allocations Document. These designations will be based on previous recommendations made in discussions with the Greater London Authority.

Hillingdon's biodiversity and geological conservation will be preserved and enhanced with particular attention given to:

1. The conservation and enhancement of the natural state of:
 - Harefield Gravel Pits
 - Colne Valley Regional Park
 - Fray's Farm Meadows
 - Harefield Pit
2. The protection and enhancement of all Sites of Importance for Nature Conservation. Sites with Metropolitan and Borough Grade 1 importance will be protected from any adverse impacts and loss. Borough Grade 2 and Sites of Local Importance will be protected from loss with harmful impacts mitigated through appropriate compensation.
3. The protection and enhancement of populations of protected species as well as priority species and habitats identified within the UK, London and the Hillingdon Biodiversity Action Plans.
4. Appropriate contributions from developers to help enhance Sites of Importance for Nature Conservation (SINCs) in close proximity to development and to deliver/ assist in the delivery of actions within the Biodiversity Action Plan.
5. The provision of biodiversity improvements from all development, where feasible.
6. The provision of green roofs and living walls which contribute to biodiversity and help tackle climate change.
7. The use of sustainable drainage systems that promote ecological connectivity and natural habitats. ^(8.15)

Implementation - how we will achieve this

The Council will implement policy EM7 by:

- Raising the profile of the biodiversity and geological interests both locally, regionally and nationally
- Supporting, improving and managing biodiversity interests and local geological sites through the planning process
- Protecting and where feasible extend habitat and improve ecosystems throughout the Borough and to areas beyond, by maintaining existing trees, native vegetation (adaptable to climate change) and open space and provide new areas of such vegetation (including the linking of existing fragmented areas) for the benefit of wildlife in accordance with the local Biodiversity Action Plan.

- Seeking and pooling contributions in accordance with the Planning Obligations Supplementary Planning Document towards the implementation of actions contained within Hillingdon's Biodiversity Action Plan.
- Working with partners, private landowners and other utility providers to achieve multi-functional use of land use that promotes and enhances biodiversity, adds to the green grid or achieves other open space outcomes, including improved accessibility.

Monitoring - how we will measure success

- Monitoring of policy EM7 will be through the AMR with a specific link to:
 - E2 (Core) Indicator: Change in areas of biodiversity importance including; change in areas designated for their intrinsic environmental value including sites of international, national, regional, sub-regional or local significance. Target: i) Preserve the area of wildlife habitats ii) Minimise loss of designated areas to development (or any other target set by Government).
- Number of biodiversity and geological conservation sites lost to development
- Number of applications refused on biodiversity or geological interest grounds
- Number of local sites actively managed
- Number of additional nature conservation sites designated.
- Implementation of Hillingdon's Biodiversity Action Plan.

Land, Water, Air and Noise

Strategic Objectives

SO10: Improve and protect air and water quality, reduce noise levels, reduce the impacts of contaminated land and safeguard quiet areas from noise pollution.

SO11: Address the impacts of climate change, and minimise emissions of carbon and local air quality pollutants from new development and transport.

Related policies: EM1, EM8

8.103 Water quality: Water quality does not directly impact on human health in the same way as air quality. Nonetheless, water quality is integral to a healthy environment. Good quality water in rivers and streams feed the wider surroundings and plays a part in ensuring there is a diverse variety of wildlife within the borough.

8.104 Industrial processes and human interference have a negative impact on the quality of water. Illegal dumping, the proliferation of poor quality discharges and urban diffuse pollution all undermine the quality of water, and in turn have impacts on wildlife and the natural setting.

Diffuse water pollution can arise from many sources, which may be small individually, but their collective impact can be damaging. Diffuse pollution can be caused by current and past land use in agricultural and urban environments.⁽⁵⁴⁾

8.105 The Grand Union Canal has good overall ecological (biological and chemical) potential in the Thames River Basin Management Plan. The River Colne, River Pinn and Yeading Brook (West and East arm) have all been classified as having moderate overall ecological (biological and chemical) potential. The River Crane has been classified as having poor overall ecological (biological and chemical) potential⁽⁵⁵⁾. All these water-bodies currently at moderate or poor should reach good overall ecological (biological and chemical) potential by 2027 under the Water Framework Directive. These are indicated on Map 8.5.

8.106 Groundwater provides a third of our drinking water in England and Wales, and it also maintains the flow in many of our rivers. Groundwater quality is also important in food production and agricultural processes. It is crucial that these sources are protected and that potable water is completely safe to drink and to use in the production of food and that surface water features are fed by clean, uncontaminated water.

8.107 There are also a number of water abstraction points in the Borough which are fed from the underlying aquifers. These points are licensed by the Environment Agency and are responsible for providing potable water amongst other uses. The Environment Agency has established zones around these important abstraction points which are separated into three levels:

- Source Protection Zone 1: Inner Zone with a 50 day travel time to source
- Source Protection Zone 2: Outer Zone with a 400 day travel time to source
- Source Protection Zone 3: Whole catchment area.

8.108 All development within Source Protection Zones must be able to demonstrate there will be a minimal impact on the abstraction point. Development proposed in Zones 1 and 2 will need to be of a use that is appropriate to the level of protection required.

8.109 Large parts of the Borough are situated on Principal Aquifers which are particularly sensitive to pollutants. The water quality of aquifers must be guaranteed and development that could result in significant harm will be opposed; development will only be able to proceed once a developer can demonstrate the quality of the aquifer will not be harmed.

8.110 The Development Management DPD will include policies that reflect the importance of maintaining and improving groundwater quality. The site allocations DPD will be assessed in accordance with the Source Protection Zones and Principal Aquifers.

8.111 Water Resources: The Environment Agency states that London has been classified as under serious water stress. Population density is high and water is scarcer than anywhere else in England and Wales. London has a comparatively high water consumption rate of 161 litres per person per day.

54 <http://www.environment-agency.gov.uk/business/topics/pollution/32220.aspx>

55 <http://wfdconsultation.environment-agency.gov.uk/wfdcms/en/thames/Intro.aspx>

8.112 Climate change is acknowledged as having a significant threat to existing water resources, with the draft London Water Strategy suggesting an 18% decrease in summer rainfall. London is already one of the driest parts of the Country and this further reduction in rainfall will only exacerbate the risk of droughts.

8.113 Declining water resources are cross boundary problems. Impacts on Principal Aquifers in Hillingdon could have far reaching impacts. However, Hillingdon needs to be take a lead in ensuring the increasing population will not further increase the risks from a diminishing water supply.

8.114 Air Quality: North of the A40 the borough is largely rural, with an abundance of green areas and open space. There are fewer major road routes, and industrial activity is relatively light. Overall, this has a positive impact on air quality where people can reap the benefits of good clean air. Nonetheless it is important to ensure that air quality impacts are still carefully considered in the north of the borough as they are in the south, particularly in the urban areas around Ruislip and Northwood.

8.115 The situation is considerably different in the south of the borough, with more industry, commercial activity and the main gateways into and out of London impacting adversely on air quality. In addition, the presence of Heathrow, the world's busiest international airport, adds to the poor air quality burden in this area and contributes to levels in air quality exceeding European standards.

8.116 The southern two-thirds of the borough was designated an Air Quality Management Area (AQMA) in September 2003⁽⁵⁶⁾. The boundary of the AQMA is shown in Map 8.5. It is clear that the road network in the AQMA carries a very high volume of traffic and congestion which are major contributors to poor air quality in the area. In addition, the operation of the diesel trains on the Great Western Mainline adds a source of emissions in the southern part of the borough. Along with the operation of Heathrow Airport, all these different activities result in areas in the south of the borough subject to levels of pollution worse than many other UK towns and cities.

8.117 Poor air quality leads to adverse impacts on health and can undermine incentives to increase sustainable modes of travel, such as walking and cycling. The borough needs to continue to promote sustainable forms of transportation which also consider the impacts of poor air quality.

8.118 The London Plan (2008) requires Hillingdon to work with key partners to prepare and implement a spatial planning framework for the Heathrow Opportunity Area. This will take the form of a Development Plan Document (DPD). This DPD will include a Low Emissions Strategy for the area to help tackle the current air quality problems. Specific policies to mitigate negative effects of airport operations such as air pollution ~~has~~ **have** been addressed in policy E3 and will be delivered through the Heathrow Opportunity ^(8.16) Area DPD.

8.119 The production of the Local Implementation Plan will further address some of the causes of air pollution, particularly in the Air Quality Management Area. This will set out the strategy for reducing traffic, and will be completed in partnership with surrounding boroughs

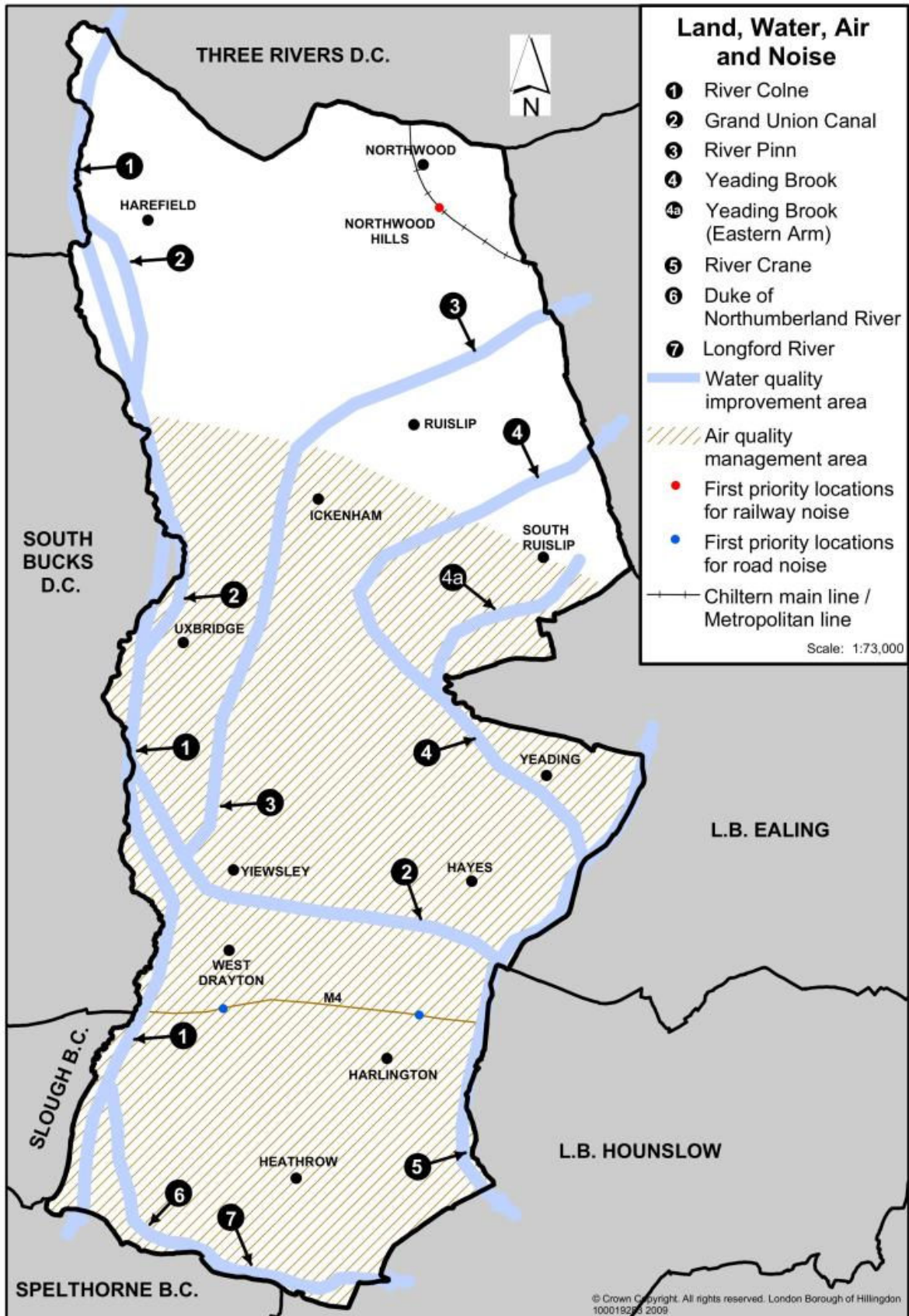
56 Source: London borough of Hillingdon Environment Act 1995 Part IV Section 83 (1)
London borough of Hillingdon Air Quality Management Area Order 2003

and the GLA to provide a collective approach to managing transportation from outside of the Borough. Furthermore, the use of planning conditions and agreements will be used to realise air quality benefits, either on site or in the immediate surrounding area.

8.120 Noise: For the purpose of the Core Strategy, noise (including vibration) means:

- "environmental noise" which includes noise from transportation sources;
- "neighbour noise" which includes noise from inside and outside peoples homes; and
- "neighbourhood noise" which includes noise arising from within the community such as industrial and entertainment premises, trade and business premises, construction sites and noise in the street.

Map 8.5 Land, Water, Air and Noise



8.121 Noise can have a significant effect on the environment and on the quality of life enjoyed by individuals and communities. In Hillingdon, environmental noise arises from a variety of different sources, in particular aircraft (Heathrow Airport & RAF Northolt), major roads (M4, A4 and A40) and railways (London Underground, the Paddington, Marylebone and Heathrow Express lines).

8.122 The GLA forecasts Hillingdon to be the largest outer London growth borough ⁽⁵⁷⁾ and estimates that a large proportion of new jobs will be accommodated within the Heathrow Opportunity Area. These uses play a vital role in promoting a successful and vibrant economy in the borough, creating jobs and attracting business, though it is also important to note that such uses can create neighbourhood noise impacts.

8.123 As such, noise remains a main challenge in the borough. The impact of existing noise and the possible impact of future noise remains a challenge to be considered as part of the Core Strategy.

8.124 Land Contamination: Land affected by contamination due to the presence of metals, liquid chemicals, gases and/or vapours, that remains untreated can present a risk to users of the land, cause damage to building and infrastructure and restrict development potential in the developed area of the Borough or prevent the introduction of uses involving public access, where it is left untreated. Contaminants may also migrate to and affect nearby land by polluting ground and surface water or areas of ecological value.

8.125 The Borough has a number of former industrial sites and landfill sites that are potentially contaminated. Land can also become contaminated as a result of accidental spills and leaks, unauthorised disposal of contaminated wastes and offsite migration and atmospheric deposition of contaminants.

8.126 The prevention of further contamination of land and remediation of land affected by contamination plays a key role in sustainable development by reducing damage to land and by bringing damaged land back into beneficial use. This contributes towards improving land and environmental quality and the quality of life in general the borough.

Main Challenges

8.127 Table 3.1 in Chapter 3 identifies four main challenges relating to land, water, air and noise management:

- National and European Union (EU) requirements to meet climate change and carbon dioxide emission targets
- The need to maintain and improve the current water resources and quality
- The need to control, reduce and mitigate noise, especially around Heathrow and the major road network
- The need to mitigate air quality impacts especially around the strategic road network and Heathrow Airport, in order to work towards achievement of both national and European Union standards at relevant locations and improve the local air quality for communities.

8.128 Water quality: New development near to watercourses is likely to have an adverse impact on water quality unless proper measures are put in place to mitigate this. The rivers outlined above that are not meeting good ecological potential under the Water Framework Directive ⁽⁵⁸⁾ are particularly vulnerable from uncontrolled new development. New development near these rivers will need to be delivered so as not to harm these important water features, and should actively contribute to their revival.

8.129 Water Resources: Accommodating a growing population and new development will be a major challenge for safeguarding water resources. All new development must be able to demonstrate that its impacts on water resources are minimised. The Council will be requiring that new residential development can achieve 105 litres per person per day in accordance with the London Plan.

8.130 In addition, the Council will work with the Environment Agency and water authorities to help manage and plan for future uses.

8.131 Air quality: Maintaining, promoting, and distributing growth is a primary goal of the Core Strategy. A growing population and the need to deliver more jobs puts pressure on areas already badly affected by poor air quality.

8.132 Heathrow Airport remains an economic hub and cannot be ignored in the continued growth of the borough. The Heathrow Opportunity Area is a strategic growth point within the borough. It is also home to the main road corridors where air quality impacts generate from. These corridors are used by those entering London from the west of England, and some of the emissions will derive from vehicles that will not even stop within the borough.

8.133 Increasing development and commercial activity around Heathrow is required to sustain the economic competitiveness of the borough; however, this will invariably lead to greater impacts on air quality through increased traffic and usage of existing services. This poses a significant challenge for the borough. The borough has limited control over vehicles using the strategic road network to travel throughout the borough. The Council can set higher standards for buildings but cannot control the type and number of vehicles that utilise them. The airport has its own emission targets, but there is no easy solution to redressing the existing air quality problems, nor is there a solution to delivering growth without adding to the impacts.

8.134 Airports are a major source of emissions that can have a damaging impact on local air quality as well as contributing to climate change. These impacts can be generated directly by aircraft, as well as the associated activities that occur on the ground. Heathrow is the busiest international airport and attracts a significant amount of visitors each year. It also attracts significant amounts of associated office and commercial uses. All development exploiting the benefits of Heathrow contribute to the poor air quality in the area. Further growth will exacerbate the problem. All new development associated with Heathrow should be challenged to minimise its impacts on air quality as far as possible.

58 Source: Environment Agency River Basin Management Plan, Thames River Basin District Annex A Current state of waters December 2009

8.135 Air quality issues in the borough are clearly linked to transportation, including Heathrow Airport, so an integrated approach is proposed to mitigate these issues. Air quality issues caused by transportation are also dealt with in the Transport chapter through policy T3. The planning process presents an opportunity to reduce air quality impacts through section 106 agreements and/or Community Infrastructure Levy (CIL) funding. These opportunities will be specifically investigated within the Heathrow Opportunity^(8.17) Area DPD.

8.136 The use of certain renewable technologies also poses a threat to local air quality. In particular biomass units that operate by burning fuel may be considered to be a more sustainable form of energy generation, but the emissions can have an adverse impact on local air quality. The use of biomass cannot easily be constrained by planning policy as new technology and fuel types may result in improved systems that do not have the same level of air quality impacts. Accordingly, the Council will continue to promote the use of all renewable energy technologies providing it can be demonstrated they can show a neutral impact on air quality. The subsequent Development Management DPD will include policies on the use of biomass, particularly in areas designated as an air quality management area.

8.137 Climate Change: Water and air quality in Hillingdon is likely to decline with climate change as a result of increased temperatures and extreme weather events including flooding as predicted in the borough's Climate Change Strategy. The Core Strategy will need to include measures to protect and improve the quality of the borough's water and air.

8.138 Noise: Guidance has already been set out at the national level by Planning Policy Guidance 24: Planning and Noise. This guidance sets out a clear rationale as to where sensitive development should be located in relation to existing noise/pollution sources, and also provides guidance on where potentially noise polluting development should be located.

8.139 The Secretary of State for Environment, Food and Rural Affairs formally adopted Noise Action Plans for 23 agglomerations (large urban areas), major roads, and major railways in England on 15 March 2010⁽⁵⁹⁾. The Plans identify several target areas in Hillingdon including 'First Priority Areas' through a series of noise maps for noise reduction measures. Hillingdon will investigate these areas to see what further noise mitigation can be carried out. The 'First Priority Areas' for road and rail noise are shown on Map 8.5.

8.140 The Environmental Noise (England) Regulations 2006 require identification of Quiet Areas, which Noise Action Plans should aim to protect. The Replacement London Plan (2009) also requires borough's to identify and protect Quiet Areas. The Mayor's Ambient Noise Strategy contains a number of policies for minimising the adverse impacts of noise on people living and working in, and visiting London and will be reflected in the Development Management DPD.

8.141 Operators of civil airports are required to produce their own Action Plans under the terms of the Environmental Noise (England) Regulations 2006. A draft Noise Action Plan was prepared in 2009 for Heathrow. In Heathrow, policy for issues such as noise levels and flight paths are set by the Department for Transport.

59 Source: Noise Action Plan London Agglomeration Environmental Noise (England) Regulations 2006, as amended March 2010 392

8.142 The Council will prepare a strategy for the Heathrow Opportunity Area that will mitigate negative effects of airport operations such as air and noise pollution (see policy E3 and transport policy T4).

8.143 Land contamination: New development is normally directed to Brownfield land in the first instance. This removes pressure on the Greenbelt, and minimises the impacts on natural habitats. However, it does increase the chance of developing land that is in a contaminated state. New development can mobilise dormant pollutants and provide a pathway to sensitive receptors such as people using the site or the water environment.

8.144 New development also provides the opportunity to clean up land that is contaminated from historic uses which helps to improve environmental quality significantly.

8.145 PPS23 sets the framework for assessing land contamination in new development and the requirements for mitigation, although developers should be seeking more innovative ways to treat contamination. Historically, contaminated land may be sent to landfill sites but this may not be the most sustainable solution. Developers will be required to assess contamination to a level where a planning application can be determined with all the impacts known. Major development proposals will also be required to demonstrate sustainable forms of managing contaminated land which reduces the need to landfill, and minimises the impacts on climate change.

Policy EM8: Land, Water, Air and Noise

Water Quality

The Council will seek to safeguard and improve all water quality, both ground and surface. Principal Aquifers, and Source Protection Zones will be given priority along with the:

- River Colne
- Grand Union Canal
- River Pinn
- Yeading Brook
- Porter Land Brook
- River Crane
- Ruislip Lido

Air Quality

All development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors.

All major development within the Air Quality Management Area (AQMA) should demonstrate air quality neutrality (no worsening of impacts) where appropriate; actively contribute to the promotion of sustainable transport measures such as vehicle charging points and the increased provision for vehicles with cleaner transport fuels; deliver increased planting through soft landscaping and living walls and roofs; and provide a management plan for ensuring air quality impacts can be kept to a minimum.

The Council seeks to reduce the levels of pollutants referred to in the Government's National Air Quality Strategy and will have regard to the Mayor's Air Quality Strategy. London Boroughs should also take account of the findings of the Air Quality Review and Assessments and Actions plans, in particular where Air Quality Management Areas have been designated.

Noise

The Council will investigate Hillingdon's target areas identified in the Defra Noise Action Plans, promote the maximum possible reduction in noise levels and will minimise the number of people potentially affected.

The Council will seek to identify and protect Quiet Areas in accordance with Government Policy on sustainable development and other Local Development Framework policies.

The Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.

Land Contamination

The Council will expect proposals for development on contaminated land to provide mitigation strategies that reduce the impacts on surrounding land uses. Major development proposals will be expected to demonstrate a sustainable approach to remediation that includes techniques to reduce the need to landfill.

Water Resources

The Council will require that all new development demonstrates the incorporation of water efficiency measures within new development to reduce the rising demand on potable water. All new development must incorporate water recycling and collection facilities unless it can be demonstrated it is not appropriate. For residential developments, the Council will require applicants to demonstrate that water consumption will not surpass 105 litres per person per day. ^(8.18)

Implementation - how we will achieve this

The Council will implement Policy EM8 by:

- Setting high standards for reducing land, water, air and noise pollution and resisting amenity and environmental impacts that affect how we enjoy the environment in which we live and work. This includes making sure developments are designed to cope with climate conditions as they change during the development's lifetime.
- Preparing a Development Plan Document for the Heathrow area set out in policy E3 and paragraph 5.25 of Chapter 5.
- Requiring developments to minimise water use and use local sources of water where possible.
- Revising the existing Air Quality SPG into an updated Air Quality SPD.

- Using planning conditions and Section 106 agreements to improve air quality and where appropriate, apply a Community Infrastructure Levy (CIL) on new developments.
- Implementing the Climate Change Strategy to secure reductions in local air pollutants and mitigate climate change.
- Implementing the borough Transport Strategy to ensure reductions in emissions from transport within the borough.

Flexibility

Figures for reducing CO2 emissions in Hillingdon take account of national targets and regional targets in the London Plan (2009). Proposed figures in the Replacement London Plan (2009) have not been agreed and may change as a result of the London Plan EIP.

Monitoring - how we will measure success

- Monitoring of policy EM8 will be through AMR with a specific link to:
 - **E1 (Core) Indicator:** Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality. **Target:** No planning permission will be granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality (or any other target set by Government).
- Number of planning applications refused on noise grounds
- Number of Section 106 agreements for improvements to air quality
- Number of electric vehicle charging points established in the borough
- On-going air quality monitoring throughout the borough to identify trends in the air quality concentrations
- On-going traffic count monitoring to identify trends in flow volumes and vehicle types
- Number of new developments with sustainable forms of transport

Minerals and Waste

Minerals

Strategic Objective

SO5: Safeguard and promote areas of geological importance and make a proportionate contribution to West London's target to extract 0.5 million tonnes of minerals.

Related policies: EM9, EM10

Main Challenges

8.146 Table 3.1 in Chapter 3 identifies one main challenge relating to minerals:

- The need to meet the London Plan mineral apportionment figures of 250 000 tonnes per annum upto 2031 ^(8.19)

8.147 The Core Strategy sets in place a framework to contribute to the apportionment figure for west London of 0.5 million tonnes of land won aggregates per year, whilst ensuring that any mineral extraction in Hillingdon does not have an unacceptable impact on the environment or human health.

8.148 It is important that there is an adequate supply of raw materials to provide the infrastructure, buildings and goods that society, industry and the economy needs and, therefore, it is a key component in sustaining economic prosperity. Aggregates come from a variety of sources, including recycling of construction waste. However, an important source of supply will remain from mineral deposits. Provision for the production and supply of recycled and secondary aggregates will be made through the Site Allocations DPD whereby permanent and long term temporary recycling facilities across the Borough which will make a significant contribution to the production of recycled and secondary aggregates will be identified. Railheads and ancillary facilities will be identified, encouraged and safeguarded to provide for the sustainable transport of minerals. ^(8.20)

Safeguarding mineral resources

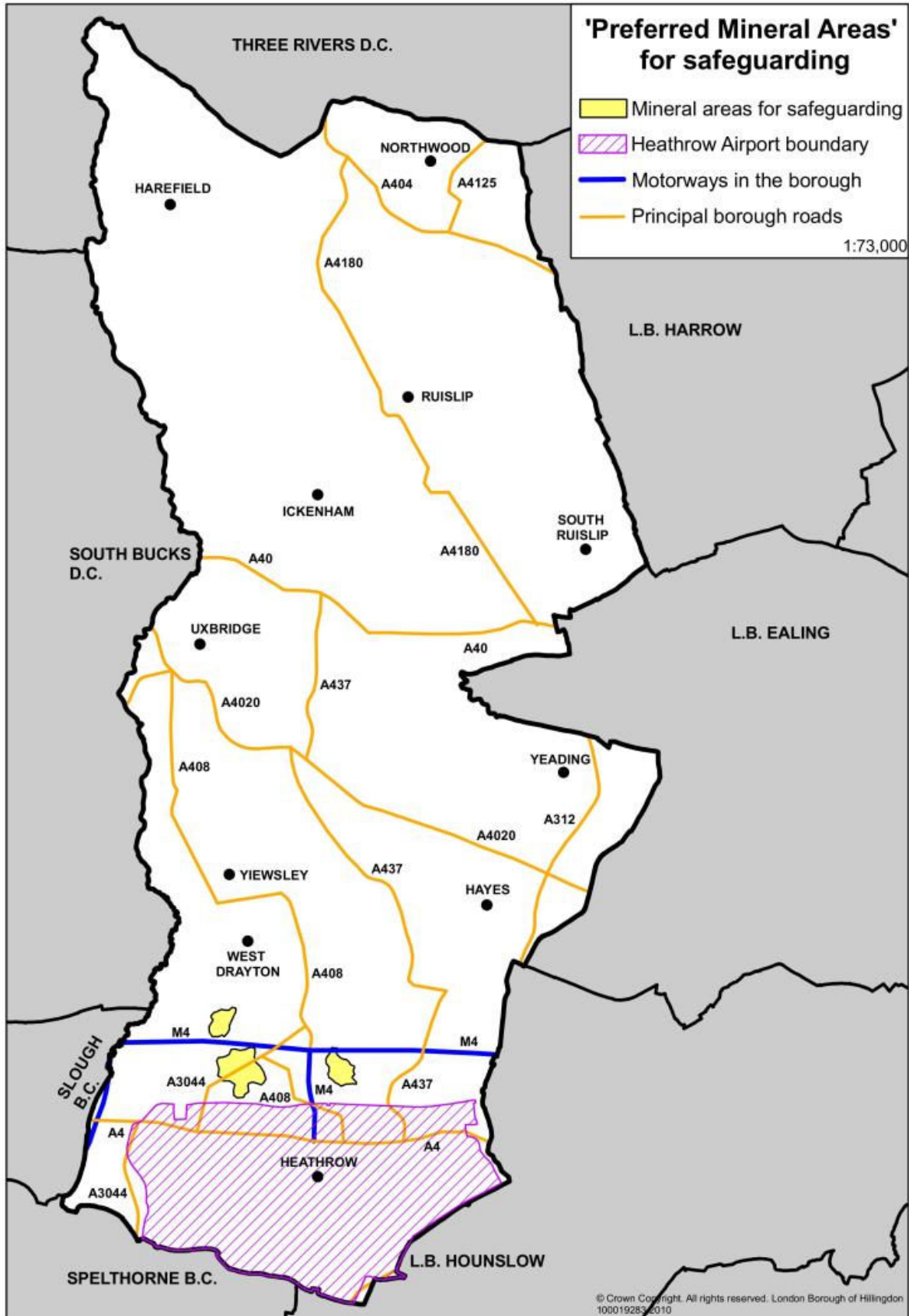
8.149 It is clear that Hillingdon could not make a significant contribution to meeting future aggregates demand without using sites in the Green Belt and sites in relative close proximity to housing. Extraction in such locations has already taken place in the Borough in the past, and continues to do so.

8.150 Government advice in PPG2 is that mineral extraction need not be inappropriate in the Green Belt provided that high environmental standards are maintained and the site is well restored. Judgements about the acceptability of extraction in the vicinity of houses have to be taken case-by-case, based on the likely specific impacts of individual schemes.

8.151 The Minerals Technical Background Report (2008) ⁽⁶⁰⁾ concludes there are three sites able to provide the defined aggregates requirement for the borough over the Plan period:

- Land west of the present Harmondsworth Quarry
- Land north of the village of Harmondsworth, and
- Land at Sipson Lane, east of the M4 spur.

Map 8.6 Mineral Areas for Safeguarding



8.152 The above three sites are defined as 'Preferred Mineral Safeguarding Area', indicated on Map 8.6.

8.153 To safeguard the mineral resource in its entirety, and to account for the inexact nature of mapped geological boundaries, it may be necessary to extend the Preferred Mineral Safeguarding Area beyond the resource boundary. This approach is intended to safeguard the resource from the impact of 'proximal development'.

Policy EM9: Safeguarding Mineral Resources

The Council will safeguard mineral resources in Hillingdon from other forms of development that would prejudice future mineral extraction. The Council will define the ~~'Preferred Mineral Safeguarding Area' in the Site Allocations DPD to include land west of the present Harmondsworth Quarry, land north of the village of Harmondsworth, and land at Sipson Lane, east of the M4 spur.~~ 'Mineral Safeguarding Area' in the Site Allocations DPD based on the geologically mapped sand and gravel resource that is considered to be of current and future economic importance. Major developments in the Area will only be permitted where it has been demonstrated that:

- a. the mineral concerned is no longer of any value or potential value, or
- b. the mineral can be extracted prior to the development taking place, or
- c. the development will not inhibit extraction if required in the future, or
- d. there is an overriding need for the development and prior extraction cannot be reasonably undertaken, or
- e. the development is allocated in a local development plan document, or
- f. the development is not incompatible. ^(8.21)

The Council will also safeguard areas within 250m of the Preferred Mineral Safeguarding Area as a buffer for the future extraction of the sand and gravel reserve, to safeguard the resource from the impact of 'proximal development'.

Mineral extraction

8.154 Over the years the main concentrations of sand and gravel working have been in the area between the A40 and the northern boundary of Heathrow, and in the Colne Valley west of Harefield. Currently the main area of activity is between the M4 and the A4 north of Heathrow.

8.155 Hillingdon is required to meet the Borough's apportionment figure 0.5 0.25 ^(8.22) million tonnes per year of sand and gravel extraction. To meet these requirements a comparative assessment of all potential sand and gravel-bearing sites in the Borough has been undertaken in order to identify those where mineral extraction is likely to have the least adverse impact.

Policy EM10: Mineral Extraction

The Council will make an appropriate contribution towards the West London apportionment figure in the London Plan of 0.5 million tonnes per annum:

The Council will seek to safeguard areas for mineral extraction outside of the Preferred Mineral Safeguarding Area where: in the form of mineral working at the principal Broad Locations and will aim to maintain a minimum land bank equivalent to seven years production for the West London area at a rate of 0.25 million tonnes per annum. The principal Broad Locations for mineral development are land west of the present Harmondsworth Quarry, land north of the village of Harmondsworth, and land at Sipson Lane, east of the M4 spur. Outside the allocated areas identified in this Plan mineral extraction will not be permitted except where: ^(8.23)

- it is demonstrated that the proposal is sustainable, essential to maintain the West London land bank in accordance with national policy, and necessary to maintain apportioned provision for West London as set out in the London Plan
- suitable measures and controls can be put in place to ensure there is not an unacceptable adverse impact on the environment or human health
- ~~the mineral workings can be restored to the highest standards using progressive restoration techniques, and secure a beneficial and acceptable after use in line with Green Belt objectives~~ Restoration and aftercare proposals will outweigh the negative impacts caused by extraction. The restoration proposals will result in an overall positive impact on the environment, considering the quality of soils, water, biodiversity and future land uses ^(8.24).

Implementation - how we will achieve this

The Council will implement policies EM9 and EM10 by:

- Reviewing the Site Specific Allocations DPD.
- Determining individual planning applications. This will include the use of conditions and Section 106 legal agreements as appropriate.
- Monitoring the west London land bank of at least 7 years in the Annual Monitoring Report (AMR) and, if necessary maintaining it.
- Promoting the restoration of the site to the highest standards.

Flexibility

Figures for mineral apportionment in Hillingdon take account of targets set in the London Plan (2008). Proposed figures in the Replacement London Plan (2009) have not been agreed and may change as a result of the London Plan EIP.

Monitoring - how we will measure success

- Monitoring of policies EM9 and EM10 will be through AMR with specific links to:
 - **M1 (Core) Indicator:** Production of primary land won aggregates by mineral planning authority. **Target:** To contribute to West London's apportionment to produce 500,000 tonnes of land-won aggregates per year until 2016 (or any other target set by Government).
 - **M2 (Core) Indicator:** Production of secondary/recycle aggregates by mineral planning authority. **Target:** To contribute to West London's apportionment to produce 500,000 tonnes of land-won aggregates per year until 2016 (or any other target set by Government).
- The number of preferred sites for mineral working being brought forward
- The volume of sand and gravel being worked
- The number of planning applications approved for mineral workings

Waste Management**Strategic Objective**

SO13: Support the objectives of sustainable waste management.

Related policy: EM11

Main Challenges

8.156 Table 3.1 in Chapter 3 identifies one main challenge relating to waste management:

- The need to minimise waste.

8.157 The Council supports the objectives of sustainable waste management set out in Planning Policy Statement 10 (PPS10), the London Plan and through the implementation of the 'Waste Hierarchy'. The London Plan sets out targets for recycling and composting for waste from households, businesses and industry. The London Plan requires that the majority of waste generated in London is managed in London to enable the capital to move towards self-sufficiency. Overall, the target states that 85% of London's waste must be managed within London by 2020.

8.158 In response to the need to address the future management of waste arisings, the West London Waste Plan (WLWP) is being prepared jointly by the six west London boroughs of Harrow, Brent, Ealing, Hillingdon, Hounslow and Richmond upon Thames. The WLWP is being prepared in accordance with the national planning policy in PPS10, and will take account of the London Plan waste apportionment figures and targets for self-sufficiency and recycling up to 2026. This will identify locations suitable for waste management facilities to meet the London Plan apportionment and land use policies to support these.

8.159 With regard to the location of sites, the Council will be guided by the locational criteria provided in PPS10 and the broad locations of Strategic Employment Locations, Local Employment Areas provided within the London Plan and existing waste management sites. To support this, the Council will safeguard existing waste sites unless compensatory provision is made and it will support the redevelopment of existing sites to maximise their throughput.

Policy EM11: Sustainable Waste Management

The Council will aim to reduce the amount of waste produced in the Borough and work in conjunction with its partners in West London, to identify and allocate suitable new sites for waste management facilities within the West London Waste Plan to provide sufficient capacity to meet the apportionment requirements of the London Plan which is 382 thousand tonnes per annum for Hillingdon by 2026.^(8.25)

The Council will require all new development to address waste management at all stages of a development's life from design and construction through to the end use and activity on site, ensuring that all waste is managed towards the upper end of the waste hierarchy.

The Council will follow the waste hierarchy by promoting the reduction of waste generation through measures such as bioremediation of soils and best practice in building construction. The Council will promote using waste as a resource and encourage increased the re-use of materials and recycling and. The Council will also support opportunities for energy recovery from waste and composting where appropriate.^(8.26)
The Council will safeguard existing waste sites unless compensatory provision can be made.^(8.27)

The Council will seek to maximise the use of existing waste management sites through intensification or co-location of facilities.

Implementation - how we will achieve this

The Council will implement Policy EM11 by:

- Coordinating with the other Borough members of the West London Waste Authority and the Council's Waste Minimisation Strategy.
- Working with west London Boroughs to produce the Waste DPD, and this will reflect the provisions of The London Plan (2008) and Mayor's Municipal Waste Management Strategy.
- Developing detailed development control policies in the Development Management DPD to ensure that new development makes sufficient provision for waste management facilities on sites that promote increased recycling.

Flexibility

Figures for waste apportionment in Hillingdon take account of targets set in the London Plan (2008) and the Mayor's Municipal Waste Management Strategy. Proposed figures in the Replacement London Plan (2009) have not been agreed and may change as a result of the London Plan EIP.

Monitoring - how we will measure success

Monitoring of policy EM11 will be through the AMR with specific links to:

- **W1 (Core) Indicator:** Capacity of new waste management facilities by waste planning authority. **Target:** Specific monitoring details will be included in the Joint West London Waste Plan that will cover the monitoring of changes in the stock of waste management facilities, waste arisings, and the amount of waste recycled, recovered and going for disposal. It is premature at this stage to include these in the Hillingdon's Core Strategy, however, the timing for preparing both documents will allow for this at a later stage.
- **W2 (Core) Indicator:** Amount of municipal waste arising, and managed by management type by waste planning authority. **Target:** BV82a & BV82b.

End Notes

- 8.1 English Heritage (550)
- 8.2 Heathrow Airport Limited (224)
- 8.3 Text update
- 8.4 British Waterways (41)
- 8.5 London Green Belt Council (5)
- 8.6 London Green Belt Council (5), Brunel University (401)
- 8.7 Mayor of London (485)
- 8.8 Mayor of London (485)
- 8.9 Sustainability Appraisal Update Feb 2011 recommendation (pgs 48-49)
- 8.10 Sustainability Appraisal Update Feb 2011 recommendation (pgs 49-51)
- 8.11 Sustainability Appraisal Update Feb 2011 recommendation (pgs 49-51)
- 8.12 Sustainability Appraisal Update Feb 2011 recommendation (pgs 51-53)
- 8.13 Sustainability Appraisal Update Feb 2011 recommendation (pgs 53-54)
- 8.14 London Geodiversity Partnership (330), Residents (351), (572)
- 8.15 Natural England London Region (90)
- 8.16 Heathrow Airport Ltd (224)
- 8.17 Heathrow Airport Ltd (224)
- 8.18 Mayor of London (471)
- 8.19 Mineral Products Association (6)
- 8.20 Mineral Products Association (13) and Lafarge Aggregates Ltd. (109)
- 8.21 Mineral Products Association (9) and SITA UK (353)
- 8.22 Mineral Products Association (12) and Surrey County Council (322)
- 8.23 Mineral Products Association (10) and Surrey County Council (322)
- 8.24 Sustainability Appraisal Update Feb 2011 recommendation (pgs 60-61)
- 8.25 Mayor of London (465)
- 8.26 Sustainability Appraisal Update Feb 2011 recommendation (pgs 61-64)
- 8.27 Mayor of London (465)

9 Core Policies - Transport and Infrastructure

9.1 The transport policies set out in this chapter promote sustainable forms of transport with an overall aim of improving quality of life and reducing private car dependency. This chapter considers where links and connections can be improved, how public transport can support growth and regeneration, what transport measures are needed for Heathrow Airport, and how the Council can improve accessibility to services and encourage active travel.

9.2 The delivery of a sufficient amount of physical, social and green infrastructure to underpin planned growth in Hillingdon is also a key priority for this Core Strategy. The provision of community infrastructure is central to the delivery of key objectives in the Sustainable Community Strategy, such as 'improving health and wellbeing' and 'strong and active communities'. This chapter will outline the findings of Hillingdon's infrastructure planning process and identify the key infrastructure proposals that will enable delivery of growth.

Main challenges

9.3 The principal challenge is to enable access to 9,000 new jobs and an average of 620 new homes per annum within the Heathrow Opportunity Area during the plan period. Access will have to be provided within the context of a congested road network and crowded public transport system. In order to accommodate this growth, high trip generating uses will only be located where they have good access to public transport. Uses that have to rely on the road network, for example distribution, will be located only at sites with good existing road access. New developments will be steered towards locations with minimal impact on the transport system and all developments will have good cycling and pedestrian provision.

9.4 The current public transport provision in Hillingdon has an east-west orientation while the borough has a distinct north-south shape, as shown on the key diagram (Map 4.1). It is vital that this Core Strategy addresses the challenge of poor north-south links in Hillingdon.

9.5 Hillingdon's carbon emissions from transportation are much higher than the London average⁽⁶¹⁾. The number of people travelling into and out of Hillingdon is major contributing factor. It has also led to impacts on air quality, particularly around Heathrow where hotels and office accommodation have been developed.

9.6 Uxbridge is a Metropolitan town centre, shown on the key diagram (Map 4.1), but is deficient in good public transport links despite being the terminus of the Metropolitan and Piccadilly Underground Lines and numerous bus routes. Uxbridge lacks direct and fast connections with its neighbouring Metropolitan town centres and does not compare favourably with other equivalent urban centres in terms of journey time to central London by public transport⁽⁶²⁾.

9.7 The aim of the transport policies in this section is to provide a sustainable transport system that addresses whole length journeys, reduces car dependency, supports the economy, encourages active travel and improves quality of life. The policies also aim to reduce congestion and smooth traffic flow. These aims reflect the six goals set out in the draft Mayor's

61 National Indicator 186 Local and Regional CO2 Emissions Estimates for 2005-2007 (Department of Energy and Climate Change, November 2009)

62 Comparisons from journey planners at www.tf.gov.uk and www.nationalrail.co.uk

Transport Strategy (MTS)⁽⁶³⁾. The Core Strategy supports sustainable travel by locating new growth including housing, retail, commercial, leisure and community facilities near public transport interchanges.

9.8 The cycling and walking networks form part of a comprehensive transport network. Journeys by foot have reduced in recent years, while there has been only a slight increase in cycle journeys. These modes of transportation have an important role in helping to create healthier lifestyles and reduce the level of harmful emissions from vehicles.

9.9 The quantity, quality and accessibility of social and community infrastructure, such as schools, culture and leisure facilities, make a direct contribution to the quality of life in Hillingdon. Further social infrastructure provision will be required to meet the needs of Hillingdon's growing population and also to accommodate additional housing and employment growth

9.10 The Infrastructure planning process has also identified the importance of other forms of physical infrastructure to the delivery of the Core Strategy objectives. The Development Management Development Plan Document (DMDPD) will need to contain appropriate policies to ensure this is delivered in support of planned growth and individual development proposals.

Accessible Local Destinations

Strategic Objectives

- SO3: Improve the quality of and accessibility to, the borough's open spaces, including rivers and canals as areas for sports, recreation, visual interest and bio-diversity. In addition, address open space needs by providing new space identified in Hillingdon's Open Space Study.
- SO6: Promote social inclusion through equality of opportunity and equality of access to social, educational, health, employment, recreational, green space and cultural facilities for all in the borough, particularly for residents living in areas of identified need.
- SO12: Reduce the reliance on the use of the car by promoting safe and sustainable forms of transport, such as improved walking and cycling routes and encouraging travel plans.
- SO17: Link deprived areas with employment benefits arising from the development of major sites and existing key locations.
- SO18: Improve access to local services and facilities, including health, education, employment and training, local shopping, community, cultural, sport and leisure

63 Mayor's Transport Strategy: Public Draft (Greater London Authority, October 2009). The goals are: Support economic development and population growth; Enhance the quality of life for all Londoners; Improve the safety and security of all Londoners; Improve transport opportunities for all Londoners; Reduce transport's contribution to climate change and improve its resilience; Support delivery of the London 2012 Olympic and Paralympic Games and its legacy. Page 405

facilities, especially for those without a car and for those in more remote parts of the borough through well planned routes and integrated public transport.

- SO25: Maintain support for operational uses within the existing airport boundary and seek to minimise the environmental impacts from the airport wherever possible.

Related Policy: T1

9.11 Table 3.1 in Chapter 3 identifies three main challenges relating to accessible local destinations:

- Congestion causing traffic delays, particularly in the 30 identified congestion hotspots;
- Poor and unsustainable access to and from local destinations, including shopping centres, employment and leisure concentrations/areas; and
- High dependency on private vehicles and low proportion of trips made by cycling, walking and public transport.

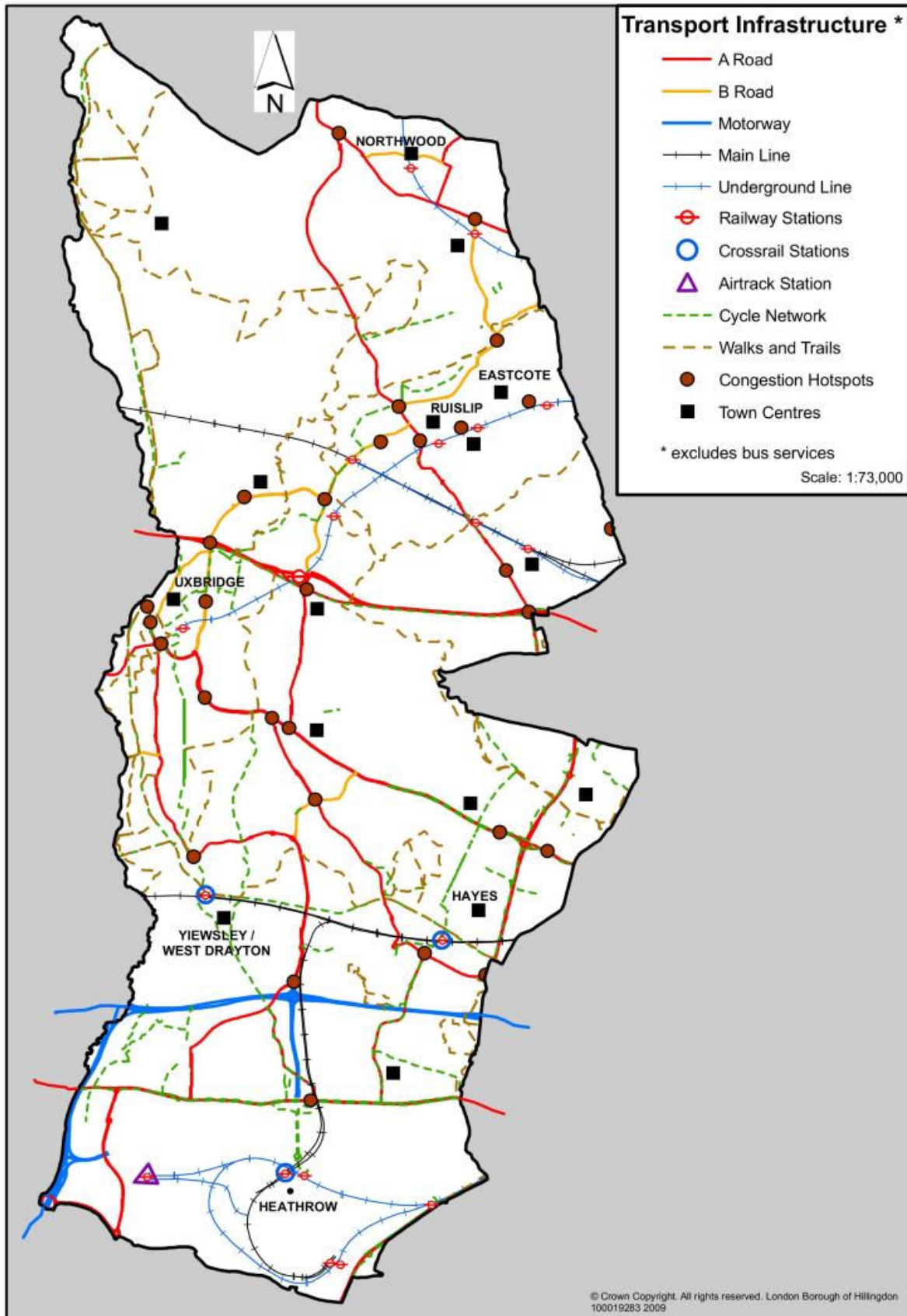
9.12 Ensuring that local destinations are accessible by good quality, safe and convenient transport is essential to achieving sustainable development. 'Local destinations' are locations which provide services and amenities including health, education, employment and training, local shopping, community, culture, sport and leisure facilities. It is vital for people to be able to access these types of destinations through well planned routes and integrated public transport, especially for those without a car and for those in more remote parts of the borough.

9.13 A central aim of national, regional and local transport plans, programmes and strategies is to meet an increasing proportion of travel demand by walking and cycling, both for short journeys and as part of longer journeys by public transport. If more people switch from cars to cycling and walking this would make a major contribution to meeting targets for reducing climate change emissions. This Core Strategy plans for sustainable and active travel which means services and amenities will be more accessible by walking, cycling and public transport. Many services are located in existing town and neighbourhood centres which are shown on Map 9.1. The river and canal network in Hillingdon provide opportunities for sustainable transport, including walking and cycling, and water based leisure and recreation (see policy EM3 and Map 9.1). The Council is working with schools to introduce sustainable means of transport to and from school through engineering works, education and encouragement of walking and cycling. Schools are encouraged to prepare and implement Travel Plans to reduce congestion and improve safety. Further details of community infrastructure can be found at Appendix 2 and Policy CI1.

9.14 The Council will encourage walking and cycling through initiatives such as improved street signage showing distances and likely journey times between major destinations. Provision for cyclists include the integration of facilities at either end of the journey in both new developments and through retrofitting, for example at interchanges and business parks. New development can contribute to these much needed provisions through developer contributions or other initiatives. The Council will also require developers to think about more forms of sustainable transportation methods beyond cycling, walking and public transport. The installation of electric vehicle charging points can help those who are car-dependant to

reduce their emissions and in turn their contribution to climate change. Other initiatives as prioritising car parking for low emissions vehicles and car clubs are simple measures that can also contribute to the reduction of harmful emissions. Developers will be expected to demonstrate the integration of some or all of these sustainable transport measures through the submission of travel plans.

Map 9.1 Transport infrastructure



9.15 The Core Strategy growth areas of Uxbridge and the Heathrow Opportunity Area, including the Hayes/West Drayton Corridor, are important destinations for employment and services. A number of these are located in proximity to existing congestion hotspots on Hillingdon's road network⁽⁶⁴⁾ which are shown on Map 9.1. The options for addressing congestion on the road network do not include new road construction and the extent of new growth will depend on the implementation of other measures, such as highway improvements and more efficient public transport services.

Policy T1: Accessible Local Destinations

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

The Council will ensure access to local destinations which provide services and amenities.

The Council will promote active travel through improvements to Hillingdon's public rights of way.

Implementation of Policy T1: how we will achieve this

- Policy T1 will be delivered through the Local Implementation Plan which includes targets for cycling, provides the basis for considering all highway, maintenance and cycling schemes, as well as the allocation of resources.
- Providing demand-responsive transport to link deprived areas with employment benefits arising from the development of major sites and existing key locations.
- Through the Rights of Way and Permissive Routes Improvement Plan (2009-2019).
- Travel planning, implementing policies T2 and T3.
- Working with TfL, Highways Agency, transport providers and other partners.
- Developer contributions, TfL funding.
- Encouraging freight road transport to use the highest order roads wherever possible.

Monitoring of Policy T1: how we will measure success

- Policy T1 will be monitored through regular travel and congestion surveys of road users, public transport users, pedestrians and cyclists.
- BV178 - Hillingdon's Public Rights of Way performance indicator.

64 Congestion hotspots are identified in Hillingdon's Local Implementation Plan 2006/6-2010/11 (London Borough of Hillingdon, March 2006): Appendix 9

Public Transport Network

Strategic Objectives

- SO18: Improve access to local services and facilities, including health, education, employment and training, local shopping, community, cultural, sport and leisure facilities, especially for those without a car and for those in more remote parts of the borough through well planned routes and integrated public transport.
- SO20: Improve facilities at bus and underground/rail interchanges to promote sustainable growth in Uxbridge, Heathrow, the Hayes/West Drayton corridor and accessibility to other town centres.
- SO21: Improve public transport services between the north and the south of the borough to ensure easier access between residential areas such as Northwood and South Ruislip, Hillingdon Hospital, Brunel University, Stockley Park and Heathrow Airport.
- SO22: Promote efficient use of public transport and particular, the enhancement of Underground services to Uxbridge and faster services to central London.

Related Policies: T2, T3

9.16 Table 3.1 in Chapter 3 identifies four main challenges relating to public transport:

- Poor north/south public transport links
- Slow and deficient public transport access between Uxbridge and central London and other key centres.
- Delivery of planned public transport improvements at Heathrow, Hayes, West Drayton Uxbridge and West Ruislip.
- High dependency on private vehicles and low proportion of trips made by cycling, walking and public transport.

Public Transport Interchanges

9.17 The development of an efficient, integrated public transport network is a key factor in ensuring sustainable growth in Hillingdon over the period of the Core Strategy. Should proposed housing and employment growth take place without such improvements, the resulting levels of private car use would place considerable pressure on Hillingdon's road network, particularly around congestion hotspots.

9.18 There are opportunities to enhance public transport interchanges at five key locations in the borough; Uxbridge, Heathrow, Hayes, West Drayton and West Ruislip. Heathrow is well connected to the rest of the country, with five rail stations and the UK's second busiest coach station. There is substantial potential for improved transport interchanges, both between Airtrack and Crossrail, and between the UK's busiest bus and coach station and the rest of the borough in general, and Uxbridge in particular.

Uxbridge

9.19 Uxbridge is home to a regionally important Underground / bus interchange that cannot accommodate current or^(9.1) future demand without significant improvements. The bus station has inadequate capacity for the number of vehicles which currently use it. The surrounding area is in need of upgrading to improve accessibility for people with restricted mobility.

9.20 Uxbridge town centre has, despite its attractive geographic position, deficient rail connections with its neighbouring Metropolitan and out of London town centres, central London, counties to the west and even Heathrow Airport. Public transport and cycle access to its catchment area is very deficient in general and to the villages located to the west and north-west of the M25 in particular.

9.21 This Core Strategy 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 (see Policy E4). 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.

In addition to improvements to the Metropolitan Line, the Council has an aspiration for securing an extension of the Central Line to Uxbridge by means of a spur in the area to the west of Ruislip Gardens. This proposal would contribute towards the Mayor's aspirations for growth in outer London, support growth in the borough and reduce congestion on the road network. The Council supports the view of TfL (as set out in a report in February 2009), that there may be a long term business case for the Central Line extension to Uxbridge and will work to keep this under review.^(9.2)

9.22 The Core Strategy provides opportunities to encourage more active forms of transportation, particularly for shorter journeys. New development will be required to promote cycling and walking, and the Council will seek developer contributions where appropriate. There is limited cycle parking at Uxbridge underground station and addressing this issue could help facilitate an increase in cycling.

Hayes and West Drayton

9.23 Crossrail will provide a direct link from Maidenhead ~~via Heathrow Airport~~^(9.3) to the City, east London, Essex and Kent, travelling through the southern part of Hillingdon on the route of the existing Paddington line. Two existing stations (Hayes and West Drayton) will be upgraded as part of the Crossrail works. It is envisaged that these works will take place during the period 2015/ 2016. The improved Crossrail stations will provide the catalyst for the regeneration of Hayes and West Drayton (see Table 5.3) and will bring extra travellers through these stations who will need to travel to and from their original destination by feeder mode.^(9.4)

9.24 Proposed public transport improvements, such as improved interchanges, are located in close proximity to growth areas (see Map 5.1). The location of public transport interchanges and Crossrail stations are shown in Map 9.1.

9.25 As noted elsewhere in this Core Strategy, the Council will seek to make the most of the Grand Union Canal as a regeneration opportunity. Projects that help to meet this objective, such as the upgrade of the canal towpath as a pedestrian cycle link, will be supported.

West Ruislip

9.26 West Ruislip station offers good access to central London from the north of the Borough (via the Underground Central Line and Chiltern Railway to Marylebone). This station serves a substantial and expanding residential catchment and also acts as a railhead/park and ride facility to cyclists and car users. West Ruislip station needs to be enhanced to maximise its potential, particularly to facilitate more feeder trips by public transport, walking and cycling. The option of a new station close to the current location will be investigated to offer direct access to the Central, Metropolitan and Piccadilly Underground lines and the Chiltern Railway.

Policy T2: Public Transport Interchanges

The Council will facilitate improved public transport interchanges at Uxbridge, Hayes, West Drayton, Heathrow Airport, West Ruislip and other locations as appropriate in the future. These interchanges will accommodate measures to encourage subsequent shorter journeys to be completed on foot or by cycle.

Implementation of Policy T2: how we will achieve this

Policy T2 will be delivered through the Local Implementation Plan (LIP) and partnership working with TfL, transport providers and other partners. Land will be safeguarded through the Site Allocations DPD. Developer contributions will be required where appropriate.

Monitoring of Policy T2: how we will measure success

Policy T2 will be monitored through regular travel and congestion surveys of road users, public transport users, pedestrians and cyclists, and through analysis of third party reports.

North-south sustainable transport links

9.27 Whilst there are strong east-west public transport links to and from the borough, north-south journeys are usually slow and often indirect. Road traffic pressures across the A40 create a major barrier severing the north from the south. There is a need for better orbital bus and rail routes to supplement the radial corridors and to create a more effective total network across the whole Borough. There is insufficient bus capacity in parts of the Borough, with passengers having to stand up on buses or not able to board at all, especially

at peak times. Equally important is the need to achieve reliable and reasonably frequent services as the norm. Greater integration of transport modes through improved interchanges at key locations in the borough would also benefit the network.

9.28 Poor accessibility impacts heavily on the capacity of the borough to deliver jobs⁽⁶⁵⁾. Better north-south links will help connect local people with jobs in the borough, for example connecting Stockley Park to Hayes and West Drayton will make it a more accessible and sustainable office location. Routes for improved north-south public transport links are shown on the key diagram (Map 4.1).

9.29 The proposed preferred London-Birmingham route for HS2 would run from London Euston via Old Oak Common (near Wormwood Scrubs prison) then via Ruislip, through the Chilterns to Birmingham. A connection to Heathrow is proposed to be provided by an interchange with Crossrail at a new Old Oak Common station. The proposal is to start pre-construction works in 2015 and begin construction in 2017. Given the uncertainty about HS2, particularly in terms of the preferred route and timescales for implementation, the implications of the proposal have not been fully considered in the Core Strategy at this stage.

Policy T3: North-South Sustainable Transport Links

The Council will improve north-south public transport links in the borough and link residential areas directly with employment areas and transport interchanges.

Implementation of Policy T3: how we will achieve this

Policy T3 will be delivered through the Local Implementation Plan and partnership working with TfL, transport providers and other partners, making effective use of the most up to date intelligent transport systems to promote increasingly sustainable travel, and implementation of Policies T1, and T4.

Monitoring of Policy T3: how we will measure success

Policy T3 will be monitored through regular travel and congestion surveys of road users, public transport users, pedestrians and cyclists.

Heathrow Airport

Strategic Objectives

- SO18: Improve access to local services and facilities, including health, education, employment and training, local shopping, community, cultural, sport and leisure facilities, especially for those without a car and for those in more remote parts of the borough through well planned routes and integrated public transport.
- SO21: Improve public transport services between the north and the south of the borough to ensure easier access between residential areas such as Northwood and South Ruislip, Hillingdon Hospital, Brunel University, Stockley Park and Heathrow Airport.
- SO24: Optimise the potential employment and educational benefits of Heathrow airport for local residents.
- SO25: Maintain support for operational uses within the existing airport boundary and seek to minimise the environmental impacts from the airport wherever possible.

Related Policy: T4

9.30 Table 3.1 in Chapter 3 identifies four main challenges relating to Heathrow:

- Delivery of planned public transport improvements at Heathrow, Hayes, West Drayton Uxbridge and West Ruislip.
- Pressures on the road and public transport network from the high volume of vehicles associated with Heathrow Airport
- Poor and unsustainable access to and from local destinations, including shopping centres, employment and leisure concentrations/areas
- High dependency on private vehicles and low proportion of trips made by cycling, walking and public transport.

9.31 Heathrow is the largest and busiest airport in the United Kingdom and has a significant impact on the London Borough of Hillingdon, particularly as the largest single generator of traffic in the UK⁽⁶⁶⁾. There are currently over 76,500 people directly employed at the airport and just under 9,000 of these are Hillingdon residents⁽⁶⁷⁾. The airport also has a significant impact on travel patterns in the borough. A high proportion of Heathrow employees travel to the airport by car (61.4% lone, 6.9% car share), including nearly 50% of Hillingdon residents⁽⁶⁸⁾. Parking at the airport has been regulated and bus services have been extensively improved in recent years. A network of cycle routes has been created on the airport and there is an ongoing effort to raise awareness of travel options. Single occupancy car use

66 The Heathrow Airtrack Order, Heathrow Airtrack Environmental Statement, Volume 6: Transport Assessment (Heathrow Airport Ltd and Temple Group Ltd, June 2009)

67 Heathrow Employment Survey 2008/09: summary report (Heathrow Airport Limited, March 2010)

68 Heathrow Employment Survey 2008/09: summary report (Heathrow Airport Limited, March 2010)

has reduced by 10 percentage points since 2004⁽⁶⁹⁾. The target will be revisited as the next Surface Access Strategy for Heathrow is developed and will undoubtedly strive for a further improvement on these figures. However, this still means a very high number of trips being taken by car which impact on air quality and the capacity of road networks, particularly in the Air Quality Management Area (see Map 8.4 and Policy EM8). Activities related to the operation of Heathrow, and associated businesses such as logistics and distribution, also impact on the capacity of road networks.

9.32 Heathrow is a major public transport interchange, and includes air, rail, underground, coach, bus, cycle and road links to London and the UK. The airport and transport interchange will play an essential part in delivering the 2012 Olympic and Paralympic Games as both an international gateway to London and by enabling participants and spectators to continue their journey to the Games. This Core Strategy will increase the number of journeys to the airport by public transport, for both employees and passengers.

9.33 Heathrow Airport makes an important contribution to the economy in Hillingdon (see Chapter 5 and Policy E3). The Heathrow Opportunity Area (see Key Diagram and Map 5.1) is one of the key areas for employment growth in this Core Strategy and the Council will support access to 9,000 new jobs and 620 new homes per annum in the Heathrow Opportunity Area during the plan period. The infrastructure required to support this level of growth is identified in the schedule contained in Appendix 2 of this document. Where appropriate, Hillingdon will work and consult with adjoining authorities on improved cross boundary sustainable transport links.

Policy T4: Heathrow Airport

This Core Strategy will support the sustainable development, renewal and^(9.5) operation of Heathrow within the existing airport boundary^(9.6) and growth in the Heathrow Opportunity Area by facilitating improvements to public transport and cycle links, enhancing the public transport interchange to provide the opportunity for a modal shift from the use of private cars and from short haul air to sustainable transport modes and providing transport infrastructure to accommodate economic and housing growth whilst improving environmental conditions, for example noise and local air quality for local communities.

Implementation of Policy T4: how we will achieve this

Policy T4 will be delivered through the Local Implementation Plan, partnership working with TfL, transport providers and other partners, including the Heathrow Transport Forum. The Council will continue to work with BAA who have identified a significant on-going capital programme to ensure the operational capacity of the airport.

The Council will require developers within the Heathrow Opportunity Area to develop a sustainable transport solution that includes public transportation, walking, cycling and as well the use of electric vehicles, low emission vehicles and car clubs.

Monitoring of Policy T4: how we will measure success

Policy T4 will be monitored through regular travel and congestion surveys of road users, public transport users, pedestrians and cyclists.

Community Infrastructure

Strategic Objectives

- SO6: Promote social inclusion through equality of opportunity and equality of access to social, educational, health, employment, recreational, green space and cultural facilities for all in the borough, particularly for residents living in areas of identified need.
- SO8: Promote healthier and more active lifestyles through the provision of access to a range of sport, recreation, health and leisure facilities.

Related policies: CI1, CI2 and CI3.

Hillingdon's Strategic Infrastructure Plan

9.34 Hillingdon's infrastructure planning process has been undertaken through the production of a Strategic Infrastructure Plan (SIP). This document is currently being prepared in support of the Core Strategy to identify:

- Existing provision of physical, social and green infrastructure in the borough;
- Current shortfalls in infrastructure provision based on current standards of provision; and
- Additional infrastructure required to accommodate future population growth and deliver the policies and proposals contained in the Core Strategy.

9.35 The following aspects of infrastructure provision will be addressed in the SIP: :

- **Transport and Connectivity:** Roads, public transport provision, walking, air
- **Energy, Utilities and Waste:** Electricity, gas, water, waste
- **Health:** Primary and acute care, [taking account of recent changes to Government policy on Health](#)^(9.7)
- **Education and Learning:** Primary, secondary, further, higher
- **Recreation:** Provision of green spaces and water resources
- **Other Community Infrastructure:** such as emergency services and affordable housing provision

9.36 The Council recognises that delivery of appropriate social, physical and green infrastructure is essential to underpin sustainable development and growth. ^(9.8) The SIP has been produced to meet the requirements of PPS 12 and is in accordance with the guidance prepared by the Planning Advisory Service (PAS). As far as possible, the document identifies the needs, costs and timescales for delivery; funding sources and responsibilities for infrastructure development. It also identifies the extent to which infrastructure plans are realistic and where possible identifies a contingency where proposals are uncertain.

9.37 The production of the SIP has highlighted the high level of uncertainty associated with the infrastructure planning process. Infrastructure providers work to different timescales and many have not identified considered long term plans up to 2026. Many providers have not identified the cost of provision or an appropriate contingency should proposals not go ahead.

9.38 The SIP recognises the above challenges and will be refined over the period of the Core Strategy as more information on the infrastructure planning process becomes available.

Social and Community Infrastructure Provision

9.39 The quantity, quality and accessibility of social infrastructure such as libraries, health facilities, community and faith centres, cultural facilities, emergency services and educational services, make a direct contribution to the quality of life in Hillingdon.

9.40 Social infrastructure is essential in providing people with better life opportunities and creating a sustainable community and the Council will seek to resist the loss of such facilities ^(9.9). Hillingdon has benefited from significant capital spend on social infrastructure provision. New library, sport and leisure facilities are currently being delivered and further improvements are expected to come on stream over the period of the Core Strategy.

9.41 Chapter 3 of this Core Strategy notes the contrasts that exist in Hillingdon. Improved access to social infrastructure will form a key part of the Council's Strategy to address deprivation, particularly in and around areas of identified need. Further work will be undertaken to clearly identify the extent deficiencies and the measures to address this issue.

9.42 Further social infrastructure provision will be required to meet the needs of Hillingdon's growing population and also to accommodate additional housing growth. The Council's SIP highlights that recent above average birth rates have put particular pressure on school provision. Ensuring that sufficient primary places are available will be a key strategy for the Council going forward to 2026. Policies in forthcoming Development Plan Documents will also address the needs of Hillingdon's ageing population. ^(9.10)

9.43 It is essential that the capacity of social infrastructure should be increased to reflect the inevitable increase in demand as new people move into the borough. In the case of expansion of existing facilities required to meet the needs of additional housing, this will be negotiated through planning obligations, where appropriate. The provision of social infrastructure will need to reflect the changing needs of the population over the period of the Core Strategy. Policies in subsequent DPDs will need to make provision for the facilities required by an ageing population.

9.44 It will be important to safeguard sites for future education, health and community service needs and also to protect existing sites and premises. Furthermore, community facilities and services should be located so they have maximum accessibility for potential users. Some may be best located in a town centre or key local centre. The Council recognises key services will have an important role to play in protecting the vitality and viability of town and local centres over the period of the Core Strategy.

9.45 Birth rates in Hillingdon have risen for several consecutive years with record highs in 2006, 2007 and 2008. Births in 2008 were exceptionally high at 4,126 children and demographic projections indicate a prolonged period of births at or around this level. Hillingdon's primary and secondary school provision will need to react to changing demographics and this Core Strategy supports proposals to address the needs arising from an increase in the school age population. In the short term the most pressing need is to provide an estimated 18 new forms of entry in Hillingdon's primary schools. The Council recognises that the capacity of existing school sites is becoming increasingly limited and that these exceptional circumstances may necessitate the release of greenfield sites through the production of the Site Allocations DPD.

9.46 In addition to primary and secondary provision, Hillingdon contains highly respected places of further and higher education. Policies will be developed in subsequent DPDs to ensure that a high standard of teaching can continue to be provided in these establishments over the period of the Core Strategy.

Policy CI1: Community Infrastructure Provision

The Council will ensure that community and social infrastructure is provided in Hillingdon to cater for the needs of the existing community and future populations by:

- 1) Resisting of the loss of community facilities, and where the loss of these facilities is justified it will seek to ensure that resulting development compensates these uses to ensure no net loss;
- 2) Supporting the retention and enhancement of existing community facilities;
- 3) Supporting extensions to existing schools and the development of new schools and youth facilities;
- 4) Encouraging the development of multi-purpose facilities that can provide a range of services and facilities to the community at one accessible location;
- 5) Promoting innovation in service provision and recognising that there are a range of modes appropriate for providing for all sections of the community;
- 6) Requiring development to contribute towards the provision of community facilities to meet the needs of new communities and mitigate impacts on existing communities;
- 7) Locating libraries, health facilities, police facilities, leisure facilities and community centres in town centres or other accessible locations to maximise community access, sustainable transport and build a sense of local community identity;

8) Ensuring new facilities demonstrate how they will tackle climate change, in line with Policy EM1; and

9) Providing facilities and services that are accessible and inclusive to all potential users regardless of age, ability, gender or socio-economic status.

10) Implementing a borough-wide Community Infrastructure Levy (CIL) to fund community infrastructure provision ^(9.11)

Implementation of Policy CI1: how we will achieve this

- Provide school places to accommodate an additional 400 children by 2012, through the expansion of existing schools and the development of new schools.
- The development of integrated health centres in areas to be agreed in areas to be agreed with the Primary Care Trust.
- Delivery of appropriate social infrastructure through the consideration of planning applications for new housing development.
- [Implementation of a borough-wide CIL](#) ^(9.12)

Monitoring of Policy CI1: how we will measure success

- Addressing the issues in identified in Hillingdon's Joint Strategic Needs Assessment
- Completion of the refurbishment of libraries

Leisure, Recreation and Culture

9.47 The focus on delivering a sporting and cultural legacy is significant. In order to deliver real legacy for residents in Hillingdon, the focus is on expanding much of the creative and dynamic work that is already beginning to happen within local communities around sports, arts and culture as well as maximising opportunities to create new and innovative events, activities and projects.

9.48 Sport and cultural activities can also make a real and lasting contribution towards developing civic pride within local communities and a sense of being part of and proud of their local environment. The importance of these issues is reflected in priority two of the Council's Sustainable Community Strategy: A borough where communities are strong and cohesive, and local people have a real opportunity to take an active part in local life, leisure and culture.

9.49 Sport and physical activity are a means to achieve outcomes across a number of crosscutting themes, both in terms of promoting healthy, active lifestyles, promoting community participation and improving general health and well-being. This work can also contribute to providing sustainable communities, reducing levels of obesity and providing positive activities for young people that can in turn aid community safety work by providing diversionary activities.

9.50 Sport and physical activity gives people opportunities to learn skills, to express their identities, and to share experiences. It gives them a sense of community and a stake in the places where they live, contributing to a feeling of Civic Pride.

9.51 'Active Hillingdon'- A Sport and Physical Activity Strategy, 2007-2012 (revised July 2009) reinforces the Council's commitment to becoming a more active, healthy successful sporting borough. This includes enhancing the borough's cultural offer (including sport and leisure) as well as making further improvements to sports provision, increasing the participation of residents in active recreation and using the 2012 Olympics as a springboard to encourage the uptake of healthy lifestyles.

Securing the legacy of 2012

9.52 Although the regeneration legacy of the London 2012 Olympic and Paralympic Games will focus on east London, the benefit of the Games themselves should be felt throughout the capital.

9.53 Hillingdon intends to use the Games to inspire young people, residents and businesses, using this as a vehicle to encourage volunteering and community engagement. A part of this will be to ensure the borough continues to have good access to sports and recreational facilities. The Games also offers the opportunity to raise the profile of Hillingdon as a place to stay within London and to stimulate local tourism.

Assets

9.54 The Borough has a wide range of leisure and recreational facilities and hosts a variety of different events across the Borough each year. These include 6 swimming pools (including the open air-pool at Hillingdon Sports & Leisure complex), 3 sports centres, an athletics stadium and a separate stand alone fitness centre. The new flagship leisure centres in Uxbridge and Hayes. Hillingdon Sports and Leisure Complex in Uxbridge includes not only the refurbished lido but also the first new 50m, 8 lane pool in London for over 40 years. Botwell Green Sports and Leisure Centre provides new and extended facilities including a dedicated gymnastics facility to replace ageing and inefficient buildings in the Hayes area. [The Council recognises the borough's green infrastructure network, and in particular the Grand Union Canal, as an important leisure resource.](#) ^(9.13)

Policy CI2: Leisure and Recreation

The Council will, in partnership with other bodies, seek to secure good quality, well maintained leisure and recreation facilities to address identified deficiencies and meet the needs of local communities, particularly deprived groups, by:

- Safeguarding the existing viable leisure and recreational facilities and supporting proposals for new and improved facilities;
- Seeking to improve the geographical spread of leisure and recreational facilities across the borough by:
 - Promoting 'community sport hubs'
 - Improving and upgrading facilities to both modernise and maximise their capacity to meet current leisure trends and demands including refurbishment of Highgrove Pool, extension of facilities at Minet cycle track and Hillingdon Sports & Leisure Complex.
 - Increased and improved facilities for specialist sports facilities to accommodate year round provision and standard of competition where local need can be identified. Such potential opportunities currently include indoor tennis courts, velodrome facilities and indoor bowls.
 - Encouraging cultural and sporting facilities for schools and other institutions which can be shared with the community through new facilities provided by

existing providers (at Brunel University and Uxbridge College) and sports club facilities (such as Eastcote Hockey Club).

- Opening up formal pay and play community access to school facilities.
- Increasing the provision of indoor facilities to address the needs of older people;
- Ensuring that development proposals will not result in the loss of existing leisure and recreational facilities unless satisfactory alternative provision is made or it can be demonstrated that the asset is no longer needed;
- Encouraging shared use of private leisure and recreational facilities;
- Capitalising on opportunities to supply new sporting and associated facilities in the Borough to support the legacy of the 2012 Olympics; and
- Seeking developer contributions towards improvements to the quality and quantity of leisure and recreational facilities.
- Seeking new and existing developments to promote the need to have inclusive and accessible design, to tackle climate change and to include facilities that promote sustainable transportation. ^(9.14)

Implementation of Policy CI2: How we will achieve this

- Through the criteria contained in policy CR2
- Development of new sport and leisure facilities outlined in the SIP
- The promotion of 'community sport hubs' across the borough.

Monitoring of Policy CI2: how we will measure success

- Provision and protection of leisure and recreational facilities will be considered in determining planning applications. Individual allocations of land relating to leisure and recreation will be set out in the Site Allocations document.
- The performance measure by which the Council will be judged is through the new National Indicator 8. This measures the percentage of adults (16+) taking part in 30 minutes of moderate sport and physical activity on at least 3 occasions per week. Data will come from the Active People survey that Sport England will continue to co-ordinate. Local Authorities will be expected to co-ordinate efforts to meet a 1% annual increase in participation. Active People will also measure volunteering and satisfaction with local sports and leisure provision.
- In addition, national indicator 157 measures the increase in participation in sport of all young people (5-19 year olds).
- Reporting on progress in implementing the 'Active Hillingdon' Strategy will provide information which will be included in the Annual Monitoring Report, when available.

Culture

9.55 Hillingdon is relatively well served by cultural facilities such as libraries. Some existing facilities need to be upgraded to provide shared facilities to reflect the varying cultural interests of different communities. Where there is a recognised need for new facilities, these will be encouraged.

9.56 All libraries are being upgraded as part of the 'Libraries Refurbishment Plan'. Libraries at Ickenham, Yiewsley, Charville, Northwood, Manor Farm, Harefield and West Drayton have been completely refurbished and a brand new library at Ruislip Manor has been built. Policy CI 1 notes that further refurbishment projects will come forward over the period of the Core Strategy. The aim is to transform the borough's local libraries as local 'community hubs' that are accessible to all members of the community offering a range of facilities from reading materials, free access to electronic information and increasing opportunities for informal learning that can lead to qualifications and employment.

9.57 Data from the 'Culture Map London' indicates that the highest numbers of visitors to arts facilities live in the north-east of the borough which is not well served by cultural facilities. In addition, new cultural facilities will need to be provided in the proposed Heathrow Opportunity Area particularly Yiewsley/ West Drayton. Uxbridge Town Centre has been identified as a night-time economy cluster of sub-regional importance in the London Plan (2008). The development of a 'cultural quarter' within the RAF Uxbridge site would mean that Uxbridge has the potential to become a cultural 'hub' with national quality facilities.

9.58 Limited access to cultural opportunities is one of the key barriers to broadening cultural experience and enhancing people's quality of life. Understanding the needs of Hillingdon's existing and future communities will assist in removing some of these barriers and increase participation levels.

9.59 Protection and enhancement of existing facilities will remain a key aspect of future strategy and opportunities to maximise the historic environment as a cultural resource will be identified wherever possible. More emphasis will be placed upon their improved and more flexible use to meet the needs of local communities, particularly the needs of young and older people. Opportunities will be created through new development, particularly in towns, to improve the range of facilities on offer.

Policy CI3: Culture

To ensure that cultural uses help improve the quality of life of residents and visitors, a strong and well-developed cultural provision will be established by:

- Safeguarding the quality of existing viable cultural facilities and supporting proposals for new and improved cultural facilities;
- Identifying the need for new culture and arts facilities in the north of the borough and in the identified Opportunity Areas of Yiewsley/ West Drayton;
- [Protecting the historic environment as a cultural resource](#)^(9.15)
- Promoting Uxbridge Town Centre, Compass Theatre (Ickenham), Manor Farm (Ruislip) and Beck Theatre (Hayes) as key cultural centres for the arts serving Hillingdon and the wider sub-region;

- Ensuring ~~smaller~~ all facilities ~~are accessible by~~ promote walking and cycling and sustainable transport measures. The inclusion of cycle storage and electric charging points will be encouraged in new facilities and installed in existing facilities ^(9.16);
- In locations where new development needs access to cultural facilities, developer contributions will be sought to provide for new and expanded services.

Implementation of Policy CI3: How we will achieve this

The Council will support the implementation of Council's strategies which help to identify current and future needs for culture and arts facilities in the Borough, including:

- Cultural Strategy (to be implemented in 2011);
- Library Improvement Plan (2002-06).

As this work progresses, the outcomes will continue to be fed into the Local Development Framework, via the Development Management Document and Supplementary Planning Documents.

Monitoring of Policy CI3: how we will measure success

Provision and protection of leisure and recreational facilities will be considered in determining planning applications. Individual allocations of land relating to leisure and recreation will be set out in the Site Allocations document.

The Annual Monitoring Report will review the progress of Policy CI3 against the objectives of the Council's Cultural Strategy, which incorporates the main provisions of National Indicator 11.

End Notes

- 9.1 Mayor of London (479)
- 9.2 Update to reflect recent discussions with TfL
- 9.3 Heathrow Airport Ltd (226)
- 9.4 Mayor of London (482)
- 9.5 Heathrow Airport Ltd (225)
- 9.6 Comments added by the Council to clarify its interpretation of sustainable development at Heathrow
- 9.7 Hillingdon Primary Care Trust
- 9.8 Thames Water Utilities (23)
- 9.9 John McDonnell (499)
- 9.10 Northwood Resident's Association (103); Bell Farm Christian Centre (372)
- 9.11 Proposed change made to implement recent Council policy
- 9.12 Proposed change made to implement recent Council policy
- 9.13 British Waterways (47)
- 9.14 Sustainability Appraisal Update Feb 2011 recommendation (pgs 71-72)
- 9.15 English Heritage (557)
- 9.16 Sustainability Appraisal Update Feb 2011 recommendation (pgs 73-74)

Appendix 1 Evidence Base

Studies

A requirement of the LDF process is that the policies are based on a robust evidence base. As the LDF is required to last a minimum of 15 years, the evidence base is subject to a continual revision process with regular updates.

Sustainability Appraisal

All development plan documents must contribute to the delivery of sustainable development. Sustainability Appraisals are required to assess each policy in the Local Development Framework on the environment and on social and economic considerations. The SA considers the full range of policy strategies that have been considered as realistic alternatives and their likely effects, and sets out the reasoned justification for the preferred option in favour of the rejected alternatives. The Sustainability Appraisal Report for this document is available separately and can be viewed on the Council's website.

Appropriate Assessment

The Appropriate Assessment report is an assessment of the potential effects of the plan on European Sites (Special Areas of Conservation). Only plans which will not adversely affect the integrity of such sites can be approved. The Appropriate Assessment Report is available as a background document to the LDF evidence base and can be viewed on the Council's website.

Other Information Sources

Among the key information studies used in the production of the Hillingdon [Hillingdon](#) ^(1.1) LDF is the Census carried out by the Office of National Statistics every 10 years with regular projection updates, the Annual Business Inquiry, also carried out by the ONS, and the Valuation Office Agency reports. The GLA produce a range of reports and information on such topics as Retail Expenditure/Needs, Employment Land Floorspace, and tourism, whilst the LDA consider among other considerations business and employment trends. The Council also use the London Development Database record of planning permissions and the National Land Use Database.

Annual Monitoring Report

Local Planning Authorities are required to produce an Annual Monitoring Report (AMR) containing information on the implementation of the Local Development Scheme and the extent to which the policies contained in the Development Plan Documents are being implemented. The AMR contains key indicators which are used to assess the progress of the plan's objectives.

Surveys

Surveys are a key part of assessing the implementation of local policies and to provide a picture of how the Borough is changing. As part of the Annual Town Centre Health Checks, all the retail and employment uses are surveyed. Similarly all designated employment areas are recorded, as are hotel developments and housing development. These surveys are

normally carried out during the summer. There are also other studies undertaken by other Council departments and Local Strategic Partners which further help to add clarity to the Hillingdon picture, such as the Joint Area Need Assessment carried out jointly by the Council and Hillingdon Primary Care Trust and Air Quality and Noise Data collected by the Council's Environment Protection Unit.

Additional evidence base

In developing Hillingdon's Core Strategy, the following sources of evidence have been used. These include work undertaken by the Council, studies undertaken by consultants on behalf of the Council, GLA research published as part of the London Plan evidence base and demographic data and Government/ Census information.

Evidence Base

London Borough of Hillingdon LDF Background Technical Reports:

- Annual Town Centre Health Checks
- Development Plan Annual Monitoring Report 2008/2009 (December 2009)
- Eastcote Park Estate Conservation Appraisal (2007)
- Eastcote Park Estate Conservation Area Management Plan (2008)
- Employment Land Study (July 2009)
- Evidence Base for Joint West London Waste Plan (Mouchel, September 2008);
- The Glen, Northwood Conservation Appraisal (2008)
- The Glen, Northwood Conservation Area Management Plan (2008)
- Green Belt Land Review (LBH, 2006)
- Habitats Regulation Assessment of the Core Planning Strategy (LBH with Scott Wilson 2007)
- Harmondsworth Conservation Appraisal (2007)
- Housing Needs Survey (2005)
- Local Parades (September 2006)
- Longford Conservation Appraisal (2007)
- Minerals Background Paper (Jacobs Babbie 2008)
- Open Space Assessment (LBH, Community First Partnership 2010)
- PPS25 Sequential Test based on joint Strategic Flood Risk Assessment (LBH, November 2008)
- Ruislip Village Conservation Appraisal (2010)
- SA Report on 'Joint West London Waste Plan: Issues and Options' (LB Hillingdon in partnership with LB Brent, LB Ealing, LB Harrow, LB Hounslow, LB Richmond upon Thames)
- Strategic Flood Risk Assessment Level 1 (LBH/Scott Wilson 2008)
- Tourism Study (January 2007)
- Town Centres and Retail Study 2006 (January 2007)
- West London Waste Plan DPD

London Borough of Hillingdon Planning Policy and Guidance

- Affordable Housing SPD (adopted May 2006)
- Air Quality SPG (adopted May 2006)

- Biodiversity Action Plan (awaiting publication)
- Botwell Green Planning Brief (adopted April 2002)
- Community Safety By Design (adopted July 2004)
- Former NATS site, Porters Way, West Drayton SPD (September 2009)
- Hillingdon Design and Accessibility Statement: Accessible Hillingdon (2009)
- Hillingdon Design and Accessibility Statement: Public Realm Draft (April 2006)
- Hillingdon Design and Accessibility Statement: Residential Extensions (adopted 2006, updated December 2008)
- Hillingdon Design and Accessibility Statement: Residential Layouts (adopted 2006)
- Hillingdon Design and Accessibility Statement: Shopfronts (adopted 2006)
- Hillingdon Design and Accessibility Statement: Transport Interchanges (adopted 2006)
- Hillingdon House Farm Planning Brief (adopted May 2003)
- Houses in Multiple Occupation and Other Non-self Contained Housing SPG (adopted August 2004)
- Land Contamination SPG (adopted January 2004)
- Live/ Work SPD (adopted May 2006)
- Local Development Framework Core Strategy 'Preferred Options' DPD 2005
- Local Development Framework Core Strategy Revised core strategy preferred options (March 2007)
- Noise SPD (adopted May 2006)
- Planning Obligations SPD (adopted July 2008), Revised Chapter 4: Education Facilities of the Planning Obligations SPD (adopted September 2010)
- Porters Way Planning Brief SPD (adopted December 2005)
- RAF Uxbridge Supplementary Planning Document (January 2009)
- Unitary Development (adopted 1998) Saved Policies (27th September 2007)

London Borough of Hillingdon Strategies

- A Prosperous Borough: Hillingdon's strategy for a sustainable economy 2005-2015 (June 2005)
- Active Hillingdon - A Sport and Physical Activity Strategy, 2007-2012 (revised July 2009)
- Air Quality Action Plan 2004-2010
- Children's and Families Trust Plan 2008-11
- Climate Change Strategy 2008 –2011
- Community Cohesion Framework 2007-2010
- Contaminated Land Inspection Strategy (2001, 2005, 2007)
- Cultural Strategy (to be implemented in 2011)
- Green Spaces Strategy 2002
- Hillingdon's Children and Families Trust – Needs Assessment (Emerging 2010)
- Hillingdon's Disabled People's Plan 2009 – 2012
- Housing Market Assessment 2009 (Emerging)
- Joint Allotments Strategy 2003-8
- Joint Municipal Waste Management Strategy 2005-2020
- Joint Draft Strategic Needs Assessment 2008-2013
- LB Hillingdon Housing Strategy 2007-2010
- Library Improvement Plan (2002-06)
- Local Implementation Plan 2006-2011 (March 2006)

- Plan for Older People 2008-2011
- Safer Hillingdon Partnership Plan 2008-11 (2009/10 edition)
- Strategic Infrastructure Plan (Emerging)
- Strategy for Sports and Physical Activity 2007-2012
- Supporting People Priorities 2008-2010
- Supporting People Strategy 2005-2010
- Sustainable Community Strategy 2008-2018 (Hillingdon Partners, 2008)
- The Council Plan 'Fast Forward to 2010'

Regional

- 2009 London Town Centre Health Check Analysis Report (Greater London Authority, December 2009)
- Consumer Expenditure and Comparison Goods Retail Floorspace Need in London (Greater London Authority, March 2009)
- Cultural Metropolis: The Mayor's Priorities for Culture 2009-12 (Greater London Authority, November 2008)
- Economic Development Strategy: Sustaining Success: Developing London's Economy (London Development Agency, 2005)
- Draft Mayor's Transport Strategy (Greater London Authority, October 2009)
- Draft Regional Flood Risk Appraisal (Greater London Authority, 2007);
- Evidence Base: Climate Change in the FALP (Greater London Authority, 2007)
- GLA Economics Working Paper 38: Employment projections for London by sector and trend-based projections by borough (Greater London Authority, November 2009)
- GLA Economics Working Paper 39: Borough employment projections to 2031 (Greater London Authority, November 2009)
- Industrial Capacity: London Plan (Consolidated with Alterations since 2004) Supplementary Planning Guidance (Greater London Authority, March 2008)
- Local Area Tourism Impact Model: Hillingdon borough report (London Development Agency, July 2009)
- London Carbon Scenarios to 2026 (Greater London Authority, 2006)
- [London's Foundations. The London Plan Implementation Report: Protecting the geodiversity of the capital \(Greater London Authority, March 2009\)](#)^(1,2)
- London Office Policy Review 2009 (Greater London Authority, November 2009)
- The London Plan Consolidated with Alterations since 2004 (Greater London Authority, February 2008)
- The London Plan: Interim Housing Supplementary Planning Guidance (Greater London Authority, April 2009)
- The London Plan Spatial Development Strategy for Greater London Consultation draft replacement plan (Greater London Authority, October 2009)
- The London Plan Sub-Regional Development Framework West London (Greater London Authority, May 2006)
- The London Plan Supplementary Planning Guidance: Housing (Greater London Authority, November 2005)
- London Plan Supplementary Planning Guidance: Providing for Children and Young People's Play and Informal Recreation (2007)
- London Plan Supplementary Planning Guidance: Sustainable Design and Construction; Greater London Authority (May 2006)

- The London Strategic Housing Land Availability Assessment and Housing Capacity Study (SHLAA/ HCS) (2009)
- London Waste Apportionment Study (Greater London Authority, 2006);
- Mayor's Air Quality Strategy 'Cleaning London's Air' (Greater London Authority, 2002);
- Mayor's Ambient Noise Strategy (Greater London Authority, March 2007);
- Mayor's Biodiversity Strategy: Connecting with London's Nature (Greater London Authority, 2002);
- Mayor's Climate Change Action Plan (February 2007);
- Mayor's Draft Municipal Waste Management Strategy London's Wasted Resource (Greater London Authority, January 2010);
- Mayor's Energy Strategy: Green Light to Clean Power (Greater London Authority, 2004);
- Mayor's Transport Strategy (Greater London Authority, 2001)
- Rising to the challenge: The Mayor's Economic Development Strategy for Greater London Public Consultation Draft (Greater London Authority, October 2009)
- Tomorrow's Suburbs: Tools for Making London's Suburbs More Sustainable (June 2006) (URBED, 2006)
- West London: Developing a Sub-regional Transport Plan: Interim report on challenges and opportunities (Greater London Authority, February 2010)

National

- Air Quality Strategy for England: Working Together for Clean Air (DEFRA, 2007)
- Be Active, Be Healthy: A plan for getting the nation moving (Department of Health in partnership with other Government Departments, 2009)
- Biodiversity: UK Action Plan (DEFRA 1994)
- Building a Greener Future: Towards Zero Carbon Development (CLG, 2006)
- Building in Context (English Heritage/CABE, 2001)
- By Design: Urban Design in the Planning System - Towards Better Practice - (May 2000)
- Climate Change Bill (2008)
- Code for Sustainable Homes: Setting the Standard in Sustainability for New Homes (CLG, Feb 2008)
- DEFRA Circular 01/2006 Environmental Protection Act 1990: Part IIA Contaminated Land (September 2006)
- Draft Planning Policy Statement: Planning for a Natural and Healthy Environment (Department for Communities and Local Government, March 2010)
- Energy White Paper 2003: Our Energy Future: creating a low carbon economy (DEFRA, 2003)
- Environmental Noise (England) Regulations 2006
- Environmental Quality in Spatial Planning: An Environmental Vision (jointly prepared by Countryside Agency, English Heritage, English Nature and the EA, 2005)
- The Future of Air Transport: Cm 6046 (Department of Transport, December 2003)
- Good Practice Guide on Planning for Tourism (Department for Communities and Local Government, May 2006)
- Government's Statement on the Historic Environment in England (2010) (Department for Culture, Media and Sport, March 2010)
- Homes for the future: more affordable, more sustainable. Green Paper Cm 7191 (TSO, July 2007)
- Household Waste Recycling Act 2003 Page 430

- Indicative Flood Plain Map (Environment Agency, 2009)
- Landfill (England and Wales) Regulations 2002
- Looking after our town centres (Department for Communities and Local Government, April 2009)
- Minerals Policy Statement 1: Planning and Minerals (2006)
- Minerals Policy Statement 2: Controlling and mitigating the environmental effects of mineral extraction in England (2006)
- National Waste Strategy 2007
- The Planning Act 2008 Chapter 29 (OPSI, November 2008)
- The Planning and Compulsory Purchase Act Chapter 5 (OPSI, May 2004)
- Planning for a Sustainable Future. White Paper Cm 7120 (TSO, May 2007)
- Planning for Town Centres: Guidance on Design and Implementation tools (ODPM, March 2005)
- Planning Policy Statement 1: Delivering Sustainable Development (ODPM, January 2005)
- Planning Policy Statement 1: Planning and Climate Change – Supplement to Planning Policy Statement 1 (Department for Communities and Local Government, December 2007)
- Planning Policy Guidance 2: Green Belts (DOE, January 1995, amended March 2001)
- Planning Policy Statement 3: Housing ((Department for Communities and Local Government, November 2006)
- Planning Policy Statement 4: Planning for Sustainable Economic Growth (Department for Communities and Local Government, December 2009)
- Planning for Town Centres: Practice guidance on need, impact and the sequential approach (Department for Communities and Local Government, December 2009)
- PPS4 Impact Assessment (Department for Communities and Local Government, December 2009)
- Planning Policy Statement 5: Planning for the Historic Environment (Department for Communities and Local Government, March 2010)
- PPS5: Planning for the Historic Environment: Historic Environment Planning Practice Guide (Department for Communities and Local Government, March 2010)
- Planning Policy Statement 7: Sustainable Development in Rural Areas (ODPM, August 2004)
- Planning Policy Guidance 8: Telecommunications (ODPM, August 2001)
- Planning Policy Statement 9: Biodiversity and Geological Conservation (ODPM, August 2005)
- Planning for Biodiversity and Geological Conservation: A Guide to Good Practice (2006);
- Planning Policy Statement 10: Planning for Sustainable Waste Management (ODPM, July 2005)
- Planning for Sustainable Waste Management: A Companion Guide to Planning Policy Statement 10 (2006)
- Planning Policy Statement 12: Local Spatial Planning (Department for Communities and Local Government, June 2008)
- Planning Policy Guidance 13: Transport (ODPM, March 2001)
- Planning Policy Guidance 17: Planning for Open Space, Sport and Recreation (ODPM, July 2002)
- Planning Policy Statement 22: Renewable Energy (ODPM, August 2004)

- Planning for Renewable Energy: A Companion Guide to PPS22 (2004);
- Planning Policy Statement 23: Planning and Pollution Control (ODPM, November 2004)
- Planning Policy Guidance 24: Planning and Noise (DoE, September 1994)
- Planning Policy Statement 25: Development and Flood Risk (Department for Communities and Local Government, March 2010)
- Safer Places: The Planning System and Crime Prevention (ODPM, 2004)
- Securing the Future: UK Sustainable Development Strategy (DEFRA, 2005)
- Sustainable Communities Plan: Building for the Future (ODPM, 2003)
- Thames Catchment Flood Management Plan: Thames Region (Environment Agency, July 2008)
- Thames Water Draft Business Plan (August 2008)
- Thames Water: Draft Water Resources Management Plan 'Water - Planning for the future' (2008)
- The Town and Country Planning (Local Development) (England) Regulations 2004 (Statutory Instrument 2204)
- The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 (Statutory Instrument 1371)
- The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2009 (Statutory Instrument 401)
- UK Climate Change Programme (DEFRA)
- Understanding Place: An Introduction (English Heritage, 2010)
- Waste and Emissions and Trading Act 2003
- The Waste Management (England and Wales) Regulations 2006
- White Paper: Planning for a Sustainable Future (DEFRA, 2007)
- White Paper: A Future for Transport: A network for 2030 (July 2004)
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International

- Directive on Ambient Air Quality and Management (1996/62/EC)
- Directive on the Assessment and Management of Environmental Noise (2002/49/EC)
- Directive on the Conservation of Natural Habitats of Wild Fauna and Flora (92/43/EEC)
- Directive on the Conservation of Wild Birds (79/409/EEC)
- Directive on Hazardous Substances in Electrical and Electronic Equipment (2002/95/EC)
- Directive on Packaging and Packaging Waste (1994/62/EC)
- Directive on the Management of Waste from Extractive Industries (2006/21/EC)
- Directive on Waste Electrical and Electronic equipment or 'WEEE Directive' (2002/96/EC)
- European Directive 2001/42/EC on Strategic Environmental Assessment or 'SEA Directive'
- European Spatial Development Perspective (1999)
- European Sustainable Development Strategy (2001)
- Johannesburg Declaration on Sustainable Development (United Nations 2002)
- Kyoto Agreement 1997
- Landfill Directive 1999/31/EC
- Waste Framework Directive (2006/12/EC)
- Water Framework Directive (2000/60/EC)

End Notes

- 1.1 Text update
- 1.2 London Geodiversity Partnership (331)

Appendix 2 Infrastructure Schedule

LONDON BOROUGH OF HILLINGDON DRAFT INFRASTRUCTURE SCHEDULE

January 2011

The projects, programmes and schemes in this schedule have been identified through discussion with and the investigation of key documents from infrastructure providers. Many of the projects, programmes or schemes will require further approval, either from the London Borough of Hillingdon or other statutory bodies. Inclusion of a project, programme or scheme in this schedule does not constitute an indication that such approval will be granted, either in principal or otherwise.

SOCIAL AND COMMUNITY INFRASTRUCTURE								
Lead Development Agency	Scheme	Need for Scheme	Requirements of Scheme	Approximate Cost	Indicative Delivery/ Phasing	Funding Arrangements	Contingency Planning Required	Opportunities for other Organisations
Health								
Hillingdon PCT	New centralised PCT facility in Yiewsley	Renew and improve existing PCT facilities	Identify site of approximately 2,500 sqm floor space & parking.	£6 million	Hillingdon Primary Care Trust / London Borough of Hillingdon/Private Sector	Hillingdon PCT	Alternative sites. Further discussions with LBH.	Hillingdon Hospital Trust
Hillingdon PCT	New centralised PCT facility in Hayes	To develop out of hospital services and improved access	New building of approximately 3,000 sqm	£9 million	Hillingdon Primary Care Trust / London Borough of Hillingdon/Private Sector	Hillingdon PCT	Alternative sites. Further discussions with LBH	Hillingdon Hospital Trust
Hillingdon PCT	Potential development at Eastcote Health Centre	Renew and improve existing PCT facilities	To be determined through discussion with the PCT	To be determined	Hillingdon Primary Care Trust / Private Sector	Hillingdon PCT	Alternative sites. Further discussions with LBH	Hillingdon Hospital Trust (2.1)
Hillingdon Hospital Trust	Redevelopment of Hillingdon Hospital.	Improvements to acute healthcare provision in the borough	Outline consent obtained for demolition works at Hillingdon Hospital and the phased redevelopment of the site.	To be determined	To be determined. Planning application received to extend the timescale of the outline consent.	Hillingdon Hospital Trust Capital Programme.	To be determined	PCT
Education, Learning and Youth Provision								

Appendix 2 Infrastructure Schedule

London Borough of Hillingdon – Education	Expansion of primary school estate	To accommodate recent 8% increase in birth rates and associated increase in school age population	Requirement for an additional 18 primary forms of entry across the borough.	£70 million	New facilities need to be in place by 2012	London Borough of Hillingdon / Section 106 / DCSF central gov't	Alternative siting options/ expansion of existing facilities	Partner organisations to be identified	
Uxbridge College	Expansion of Uxbridge College Uxbridge Campus	To accommodate 16.8% increase in student numbers at the Uxbridge campus and 6.4% increase at the Hayes site between 2007-2013	Planning application received for the development of new sports facilities, improved access arrangements, equivalent on-site parking and landscaping enhancements.	Undisclosed	Up to 2013	Self funded	To be determined	Working in partnership with the Council	
Brunel University	Completion of Brunel University masterplan and future development to be considered in next masterplan.	To enable the University to deliver international standards of academic and teaching facilities. Reason: To recognise the importance of high quality facilities to the University's success. To enable the University to deliver international standards of research and teaching facilities which necessitates continued expansion and improvements to its accommodation. (2.2)	The key outstanding project from the existing masterplan is the Eastern Gateway Building school, which is due for completion in 2012. A number of future projects are being considered for the next masterplanning period from 2014 to 2021. The key outstanding project from the existing masterplan is phase 1 of the Eastern Gateway Building, which is due for completion in 2012 and an extension to the main refectory building, due for completion in 2013/2014. A number of future projects are being considered for the next masterplanning period from 2014 to 2021. (2.3)	Expected annual spend of £13 million during the next masterplanning period	Current masterplanning period comes to an end in 2014. Production of new masterplan is currently being considered. Current masterplanning period comes to an end in 2014. Production of new masterplan is currently under preparation VRG Plan (2.4)	Primarily self funded. Grant funding and enabling development may also need to be considered.	Future masterplans will involve an appraisal of development options. Further discussions with LBH are required.	Partner organisations to be determined	
Other Community Infrastructure									
Metropolitan Police	Need to review police facilities in the borough as part of the asset management process, in accordance with the Metropolitan Police Estates Strategy.	To provide more effective policing and to comply with Asset Management Strategy	As defined in the Asset Management Plan, additional patrol bases to serve new development. Need for additional custody and patrol base facilities.	Undisclosed	Undisclosed	Undisclosed	Undisclosed	Undisclosed	
London Fire Service	Plans to redevelop two sites in the Borough	Maintain the provision of fire services in Hillingdon	Redevelopment of two stations in the borough	Undisclosed	Undisclosed	Undisclosed	Undisclosed	Undisclosed	
London Borough of Hillingdon	Places of Worship	Development of appropriate locations for places of worship in response to population growth,	Appropriate locations to be identified and developed in accordance with LDF policy.	To be determined	To be determined	To be determined	To be determined	To be determined	
London Borough of Hillingdon and Partner Organisations	Affordable Housing	To address housing needs in Hillingdon	Development of affordable housing on a number of key sites and its delivery through S106 contributions	Undisclosed	Undisclosed	Direct RSL funding, central government and S106 contributions	Alternative sites	Hillingdon Homes, RSLs and central government agencies.	

PHYSICAL INFRASTRUCTURE									
Lead Delivery Agency	Scheme	Need for Scheme	Requirements of Scheme	Approximate Cost	Indicative Delivery/Phasing	Funding Arrangements	Contingency Planning Required	Opportunities for other organisations	
Energy, Utilities and Waste									
National Grid	Upgrades to North Hyde and Iwer electricity sub-stations	To accommodate anticipated demand, as identified in National Grid's Seven Year Statement.	Install a third 275/66kV SGT banked between the existing two SGTs	Undisclosed	Identified to take place in the next 7 years	Undisclosed	Undisclosed	Undisclosed	
National Grid	Upgrades at Iwer sub station	To accommodate anticipated demand	Replace the 180 MVA SGT3A with the new 240MVA rated SGT.	Undisclosed	Undisclosed	Undisclosed	Undisclosed	Undisclosed	
Scottish and Southern Electricity	Diversion or alteration of electricity distribution infrastructure for new development. New and / or reinforced electricity infrastructure.	Facilitate new development and provide new or increased supplies	As required by the site	Cost of Primary substation = £4 million Cost of Distribution substation = £50,000	One year or less for low voltage and most 11kV work. Typically two years for 33kV work. Up to five years for 66kV and 132kV work.	Normally funded by developer	Undisclosed	Most new connections work is 'contestable' and can be completed by others.	
Thames Water	Mogden STW improvements	To improve water quality. Scheme may be required to continue to support population growth.	Site located in London Borough of Hounslow	Undisclosed	By 2012	Thames Water	Undisclosed	Undisclosed	
Thames Water	Improvements to the Colne Valley Trunk, Crane Valley Trunk and Bath Road Trunk	Additional capacity may be required to address growth in the south of borough, particularly in the Bath Road employment area.	Dependant on level of growth	Dependant on nature of works	Improvements will be undertaken as required	Funded through developer contributions and Thames Water Capital Programme	Improvements are like to be required	Undisclosed	
Three Valleys Water	Various projects	To protect drinking water supplies over the period of the Core Strategy, based on TVW's capital programme.	A range of demand and supply measures inside and outside Hillingdon. Proposals include the development of Upper Thames Reservoir and a programme of investment to minimise leakage.	£18 million to be invested in leakage prevention.	Up to 2031	Projects administered through TVW's capital programme.	A range of measures are being considered to protect supplies.	A range of organisations including OFWAT and LBH.	
West London Waste Partnership	Development of an appropriate number of waste management facilities in Hillingdon and the west London region.	To ensure the sustainable management of waste in Hillingdon over the period of the Core Strategy, and meet waste apportionment targets.	To be determined through the development of the West London Waste Plan.	To be determined	Up to 2026	To be determined	Safeguarding appropriate sites for waste management facilities.	Other West London partners.	
London Borough of Hillingdon	Harrington Road Depot	Increase recycling rates and the amount of waste sent to landfill.	Relocation of facility to New Years' Green Lane.						

Appendix 2 Infrastructure Schedule

Transport and Connectivity									
DFT/ Crossrail	Crossrail	To improve public transport access across London. Scheme is likely to benefit economic growth in the south of the borough.	New station facilities at West Drayton and Yiewsley/Bridges and viaducts. Track works and electrification will also take place.	Approximate overall cost of £12 billion. Cost in LBH to be determined	2015-2017	DFT/Crossrail/ Mayor of London/ TfL/ s106	Need to consider growth options for Hayes/West Drayton Corridor without Crossrail.	LBH is currently being consulted on Crossrail works.	
London Borough of Hillingdon	Upgrade works to Hayes Station	To improve station setting and appearance.	Relocation of station ticket office	Safeguarded S106 funding + Crossrail funding	Before 2015	Section 106 funding	Alternative station layout to accommodate Crossrail	Crossrail, Network Rail, First Great Western	
London Borough of Hillingdon	Maintenance of existing highway network	To maintain the existing highway network. Works will be required to address congestion hotspots.	Programme of prioritised improvements for borough wide highway network.	Budget to be determined	2010-2011. Further maintenance programmes will come forward on an annual basis over the period of the Core Strategy.	Schemes funded by the Council	Alternative improvements may need to be considered	To be determined	
London Borough of Hillingdon	Various schemes to be implemented through the LIP programme.	LBH LIP has been developed to respond to the requirements of the Mayor's Transport Strategy. Projects reflect different local needs. Works to minimise impact of congestion hotspots.	Requirements and nature of LIP schemes will vary.	£4 million to be split between approximately 40 projects	2010-2011. Further projects will come forward from subsequent LIPs over the period of the Core Strategy. (particularly 2011/12, 2012/13, 2013/14)	TfL	Funding for LIP projects has already been identified.	Partner organisations will be depend on the nature of individual projects.	
London Borough of Hillingdon	LIP major scheme Transportation improvements in Yiewsley/West Drayton	Need to address various transport issues in Yiewsley/ West Drayton High Street. Schemes will benefit growth of these district centres.	Comprehensive programme of improvements to address footway, cycle routes, parking issues, transport congestion, bus flow and other aspects of transport provision.	£2.4 million	3 year programme	TfL	Funding is secure so no contingency required.	TfL	
London Borough of Hillingdon	The Core Strategy Key Diagram proposes improved transport interchanges at Hayes, West Drayton, Uxbridge and West Ruislip.	To encourage public transport usage and accessibility and support growth in town centres. Improved interchanges will support growth in Uxbridge town centre.	Exact nature of the scheme is still to be determined but is likely to include a revised bus interchange in Uxbridge.	To be determined	2011-2026	Funding sources to be identified with TfL	Further work required to determine extent of growth that could take place without improvements.	TfL, GLA and other local groups	
London Borough of Hillingdon	Core Strategy proposes improved north/south public transport links	Improved accessibility from the north of the borough to employment areas in the south.	Indicative routes for 'Fastibus' identified on Core Strategy Key Diagram. Detailed development required.	To be determined	2011-2026	Funding sources to be identified with TfL.	Alternatives may be required if proposed routes do not receive funding.	TfL, GLA and other partner organisations	
Highways Agency	Managed Motorways	To address congestion on the M4	Hard shoulder running between junctions 3-12 on the M4	£6 billion for entire work programme. LBH cost not determined.	By 2015	Department of Transport/Highways Agency	Alternative solutions may need to be identified if proposal does not come forward	To be determined	
Transport for London	TfL schemes to be determined through developer-led contributions	Maintenance of TfL network	Minor works to Bath Road Car Park	£25,000	Coming financial year	To be funded through developer-led contributions	Undisclosed	Developer funding improvements would be involved in the scheme.	

Transport for London	TfL Road Renewal Programme	To maintain TfL's road network	Programme of works to maintain the TfL road network including resurfacing and footway works.	Approximately £4.5 million	Three year programme of works	TfL	Undisclosed	Undisclosed	
Transport for London	Signals works	To ensure the smooth running of TfL road network	Programme of signalisation works.	Undisclosed	Financial year 2009/10	Work to be funded by a number of organisations, including developers, LBH and Highways Agency	Undisclosed	Undisclosed	
Transport for London/London Borough of Hillingdon	Improved London Underground links to central London	To increase capacity, improve reliability and reduce journey time to and from central London	Improved Metropolitan Line. Proposals are still at pre-conception stage but likely to include upgrades of sub-surface lines and new rolling stock.	To be determined	2011-2026	Funding sources to be identified through discussion with TfL	None	To be determined	
Transport for London	Improved Underground links	Improved transport links	Interchange between the Metropolitan and Piccadilly lines and the Central line and Chiltern Railway in the Ruislip area.	To be determined	To be determined	To be determined	To be determined	To be determined	
Transport for London	Extension of the Central Line to Uxbridge	Improved transport links	Creation of a spur in the area to the west of Ruislip Gardens	To be determined	After 2015	To be determined	To be determined	To be determined (2.5)	
GLA/Transport for London	Cycle Super-Highway	To improve cycle connections in London	'Cycle Superhighways' are proposed in the Replacement London Plan (2009) and will provide direct routes into central London from outer London. The first two routes open in Summer 2010 with ten more being introduced by 2015.	To be determined	2015	TfL	Detailed routes to be considered	Local partnerships to be determined	
BAA	Airtrack	Provide new rail access to South West Trains rail network to the south of Heathrow Airport	New track signalling and possibly rolling stock	£673 million	2015	BAA/other	Undisclosed	Undisclosed	
Chiltern Railways	Chiltern Railways	To increase capacity, improve reliability and reduce journey time to and from central London and other destinations.	Upgraded track and signaling at Northolt Junction	To be determined	To be determined	Chiltern Railways/DfT	Undisclosed	Undisclosed	
HS2	HS2	Reduce journey time between London and Scotland.	HS2 route is likely to pass through Hillingdon	Estimated £34 billion	2019-2026 is identified as a possibility	Government funded/private finance	Unknown	A wide range of stakeholders.	
PHYSICAL INFRASTRUCTURE: BAA									
Lead Delivery Agency	Scheme	Need for Scheme	Requirements of Scheme	Approximate Cost	Indicative Delivery/Phasing	Funding Arrangements	Contingency Planning Required	Opportunities for other organisations	

Appendix 2 Infrastructure Schedule

BAA	Eastern Apron redevelopment	Improved airfield operations	Improved aircraft stands	£232 million	2009-2013	BAA	To be determined	None
BAA	Eastern Campus energy and infrastructure	Improved environmental performance	Power, heating and cooling infrastructure	£68 million	June 2011	BAA	To be determined	None
BAA	MSCP East and Forecourt	Need to improve infrastructure adjacent to Terminal 2.	Works to access roads and forecourt area	£135 million	Spring 2014	BAA	To be determined	None
BAA	Construction of new satellite pier	Improved operational efficiency	Construction of new satellite pier	£552 million	March 2014	BAA	To be determined	None
BAA	Terminal 2A	Operational efficiency	Provision of replacement terminal building, and associated infrastructure	£1.14 billion	April 2014	BAA	To be determined	None
BAA	Terminal 4 check in	Improved check-in times	Refurbishment and extension of check-in	£92 million	August 2013	BAA	To be determined	None
BAA	Improvements to Terminal 5 baggage system	Reduce number of lost bags	Links between T5-T3-T1 baggage system	£296 million	January 2012	BAA	To be determined	None
BAA	T1-T4 tunnel refurbishment	Existing facilities require upgrade	Refurbishment of baggage connection between T1-T4	£9 million	March 2009	BAA	To be determined	None
BAA	Cargo tunnel refurbishment	Maintain safe cargo link	Refurbish cargo tunnel	£3 million	June 2010	BAA	To be determined	None
BAA	Jetty works	Minimise connection times between jetties	Refurbished cargo jetties	£5 million	March 2013	BAA	To be determined	None
BAA	Taxiway improvements	Airfield Safety	Rebuild areas of the existing airfield	£16 million	December 2009	BAA	To be determined	None
BAA	London underground station refurbishment	Increased passenger flow	Refurbishment	£17 million	July 2014	BAA	To be determined	None
BAA	New aircraft hangar	Efficient use of land in airport boundary	Diversion of internal roads, relocation of facilities	£28 million	March 2013	BAA	To be determined	None
BAA	New Satellite Pier T5SC	Improved Operational efficiency	Construction of new satellite pier	£342 million	April 2011	BAA	To be determined	None
BAA	T3 integrated baggage facility	Reduce number of bag misconnects	Construction of new baggage building	£224 million	June 2013	BAA	To be determined	None
BAA	Storm water system improvements	Manage polluted airfield runoff	Investment in pollution control run-off	£17 million	Spring 2013	BAA	To be determined	None
BAA	Enabling works for implementation of full runway alternation (ending Cranford agreement)	Operational reliability	Additional taxiways and associated mitigation	£35 million	Spring 2013	BAA	To be determined	None

BAA	Airtrack	Improve sustainable access/mode share	New rail infrastructure	TBC	TBC	BAA/others	To be determined	None
BAA	Other capital programme works			Cost and time not scheduled	Dates not scheduled	BAA	To be determined	None

GREEN INFRASTRUCTURE								
Lead Delivery Agency	Scheme	Need for Scheme	Requirements of Scheme	Approximate Cost	Indicative Delivery/Phasing	Funding Arrangements	Contingency Planning Required	Opportunities for other organisations
Leisure, Recreation and Green Space								
British Waterways	Off- site residential mooring scheme above Station Road bridge in Hayes (2.6)	Permanent presence on water to discourage area's anti-social behaviour issues and to help meet large demand for moorings	Waterway wall works and infrastructure	£200,000-400,000 more design needed and in progress	2010-2011	Contributions from British Waterways, LBH and Section 106 contributions	Undisclosed	LBH and TfL
British Waterways	Waterway wall repairs at Ironbridge Narrows; adjacent to Stockley Park	Repair to waterway walls to ensure fit-for purpose and not a risk to passing craft/closing navigation;	Scoping of works required; feasibility of possible options for repairs; design and implementation	£200,000	2009-2010	British Waterways	Emergency works	Undisclosed (2.7)
British Waterways	Grand Union Canal Towpath National Cycle network	To extend the National Cycle network	Identified in LBH LIP	To be determined	To be determined	TfL LIP funding	None	LBH and TfL (2.8)
London Borough of Hillingdon	Ruislip Woods Management Plan	To manage Hillingdon's only National Nature Reserve	Outlined in the Ruislip Woods Management Plan	To be determined	Current Plan (2003-2008) has been rolled forward to this year. New plan is being produced.	London Borough of Hillingdon/Forestry Commission	None	Forestry Commission
London Borough of Hillingdon	Improving the quality of open space provision	To increase the number of high quality open spaces in the borough.	Obtain 13 additional Green Flag designations.	Unknown until the development of the revised Open Space Strategy (OSS).	To be determined by the emerging OSS	LBH and partner organisations	None	Partner organisations to be identified.
Environment Agency	Arklyne Kennels Project	To prevent overtopping of Bingley Ditch and flooding of properties between Colne/Wraysbury.	Details of the scheme to be discussed with the Environment Agency	Undisclosed	Undisclosed	Undisclosed	Undisclosed	British Waterways
London Borough of Hillingdon	Libraries Refurbishment Plan	To upgrade all library facilities in Hillingdon	8 refurbishments completed. Further conversions and new builds are under consideration.	To be determined	Further refurbishment projects in 2010/11 are under consideration.	Rollout of Libraries refurbishment and new build capital programme	None, funding already in place	Partnerships to be formed with key organisations
London Borough of Hillingdon	Upgrade of sports and leisure facilities in Hillingdon	Longer term aspirations for improved leisure facilities at Highgrove Pool.	To be determined	To be determined	These programmes are longer term and look beyond the current Core Strategy	Some programmes already have funding in place. Others are TBC	To be determined	Partnerships formed with key organisations
London Borough of Hillingdon	Improved children's play areas	To continue to provide for the needs of Hillingdon's children.	Phased development of 22 new children's play areas.	To be determined	Areas will be delivered in two batches of 11. First phase to be delivered by spring 2010, second phase to be delivered by March 2011.	Funding agreed	None required	Partnerships already formed with key organisations through Hillingdon sport and leisure.

End Notes

- 2.1 Hillingdon Primary Care Trust (75)
- 2.2 VRG Planning for Brunel University 404
- 2.3 VRG Planning for Brunel University((405)
- 2.4 ning for Brunel University (406)
- 2.5 Update to reflect recent discussions with TfL
- 2.6 British Waterways (49)
- 2.7 British Waterways (49)
- 2.8 British Waterways (49)

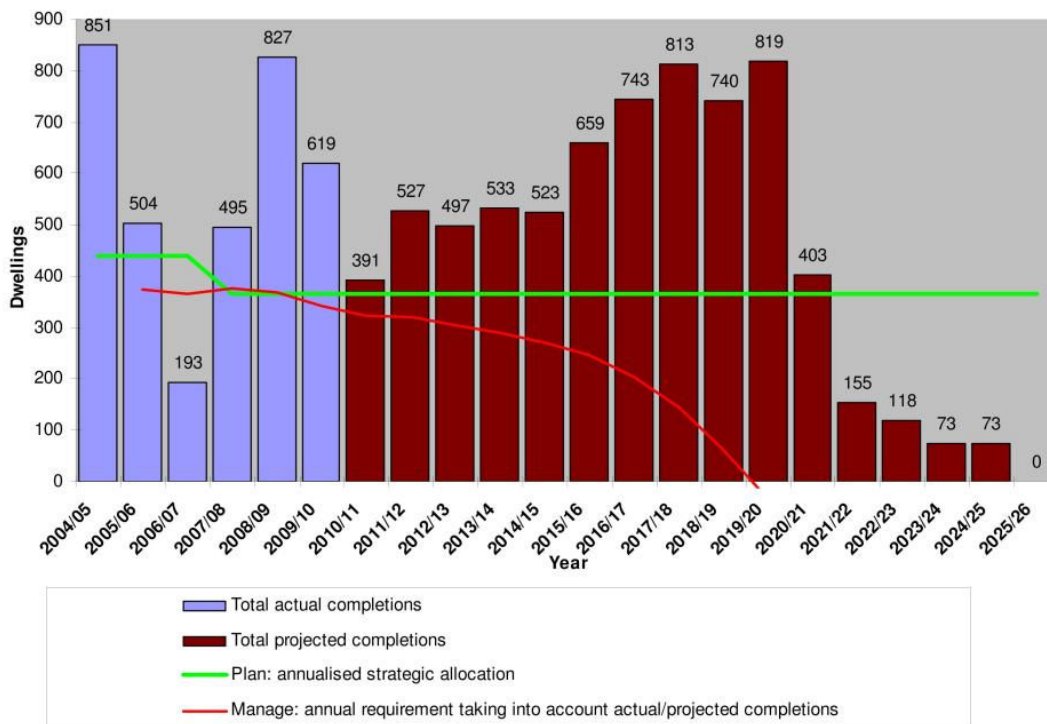
Appendix 3 London Borough of Hillingdon Housing Trajectory

The following extracts from Hillingdon's Annual Monitoring Report 2009/2010 show the current London Plan annual housing target and housing completions by year since 1997. Figures 10 and 11 show Hillingdon's housing trajectory, which forms the basis of it's five year land supply.

Indicator:	H1 (Core) - Plan period and housing targets
Target:	8,890 new dwellings to be provided between 1997-2016/7 (London Plan) 3,650 new dwellings to be provided between 2007/08 to 2026/2027 (revised London Plan)
Progress:	See housing trajectory table below

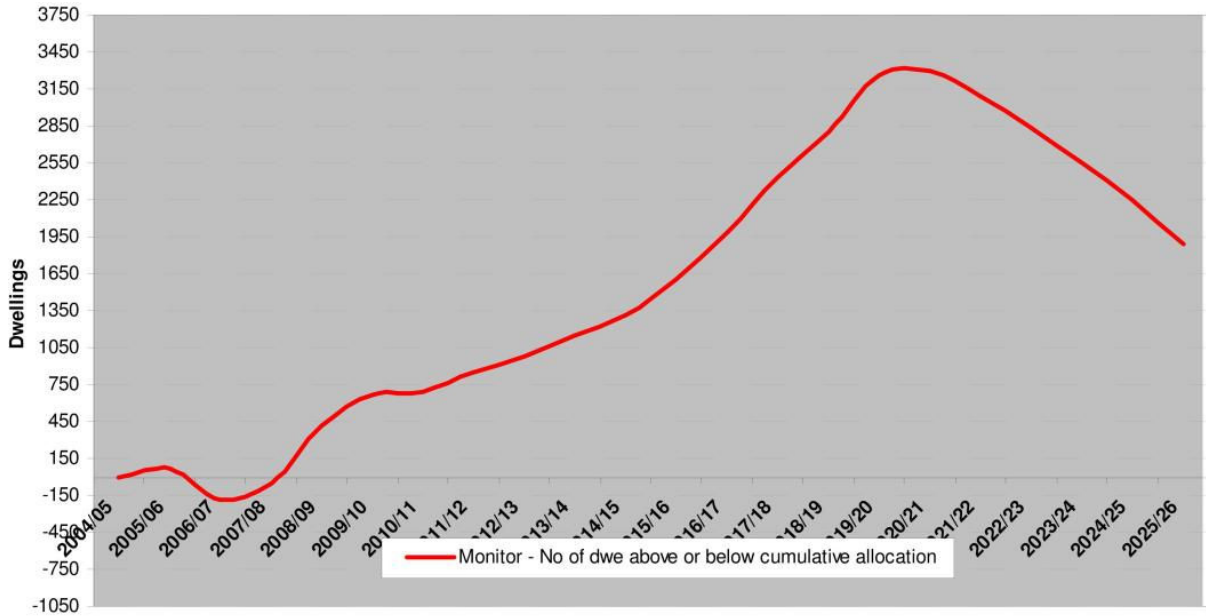
Indicator:	H2 (Core) Housing Trajectory
Target:	440 units per annum from 1997 to 31st March 2007 and 365 units per annum from 1st April 2007 to the end of the plan period.
Progress:	See housing trajectory table below

Figure10: Hillingdon's Housing Trajectory



Source: London Borough of Hillingdon, Planning Environment and Community Services & London Development Database

Figure 11: Monitor – Number of dwellings above or below cumulative target



Source: London Borough of Hillingdon, Planning Environment and Community Services

The housing trajectory includes the following core output indicators:

- H2(a) – Net additional dwellings – in previous years
- H2(b) – Net additional dwellings – for the reporting year
- H2(c) – Net additional dwellings – in future years
- H2(d) – Managed delivery target

Hillingdon’s LDF Housing Trajectory compares the levels of actual and projected completions over the 1997 – 2026 period against the London Plan strategic housing requirement.

Completions information is obtained from various sources including building control data, street naming and numbering, NHBC records, etc. The redevelopment, conversion and change of use to residential use are also recorded as part of the monitoring in the Housing Trajectory.

All data is presented in financial years with the exception of the first year, which include 92 units completed during the period 1 January 1997 to 31 March 1997, and needs to be counted against the London Plan targets.

Projections information is based on the data in the 2004 London Housing Capacity Study, published July 2005 and updated by new information on housing allocations which came forward from the LDF process.

The period covering beginning of April 2009 to the end of March 2010 acknowledged 619 additional housing completions compared to 827 units during 2008/09. Completions data shows large fluctuations from one year to another, this is mainly due to the way the Council collects completion data. This year's completions and those dating back to April 2004 reflect the information as contained in the London Development Database and the Council's Housing Monitoring Database as of the time of writing this report. Housing monitoring is based on building control data and does not reflect the progressive completion of residential units. Single residential units are not recorded as completed until all residential units on a development site are completed. Although this should not affect the accuracy of data in long-term calculations, it may make the year to year monitoring less representative.

Annual Monitoring Report Table 12: Housing Completions by Year

	Year	Total actual completions	Plan: annualised strategic allocation	Cumulative gains above target
Completions	1997/98*	598	440	158
Completions	1998/99	515	440	233
Completions	1999/00	323	440	116
Completions	2000/01	647	440	323
Completions	2001/02	324	440	207
Completions	2002/03	238	440	5
Completions	2003/04	705	440	270
Completions	2004/05	851	440	681
Completions	2005/06	504	440	745
Completions	2006/07	193	440	498
Completions	2007/08	495	365	628
Completions	2008/09	827	365	1090
Completions	2009/10	619	365	1344

Appendix 4 Glossary

Glossary

Term	Meaning
Accessibility	The ability of people to move around an area and reach places and facilities, including elderly and disabled people, those with young children and those encumbered with luggage or shopping.
Air Quality Management Area	A designated zone where specific air quality management proposals (defined in an Air Quality Action Plan) are implemented by a local authority to improve air quality.
Affordable Housing	<p>Housing subsidised in some way for people unable to rent or buy on the open housing market. PPS3 Housing defines affordable housing as follows: "Affordable housing includes social rented and intermediate housing, provided to specified eligible households whose needs are not met by the market.</p> <p>Affordable housing should:</p> <ul style="list-style-type: none"> • Meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices. • Include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision."
Amenity	A positive element or elements that contribute to the overall character or enjoyment of an area. For example, open land, trees, historic buildings and the inter-relationship between them, or less tangible factors such as tranquillity.
<u>Archaeological Priority Areas (APA)</u>	<u>Areas of particular archaeological importance or vulnerability in the Borough which have been identified by the Council with the advice of English Heritage. In these areas the Council's policies and proposals for archaeological sites will particularly apply. Planning applications affecting such areas will generate appropriate consultation, which could in turn lead to further processes of site assessment.</u> ^(4.1)

Term	Meaning
<u>Archaeological Priority Zones (APZ)</u>	<u>The boundaries of Archaeological Priority Zones are designated on the Proposals Map. These are areas where there is potential for significant archaeological remains, and planning applications within these areas must be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.</u> ^(4.2)
Back-land development	Development of 'landlocked' sites behind existing buildings, such as rear gardens and private open space, usually within predominantly residential areas. Such sites often have no street frontages.
Biodiversity	Literally the 'variety of life' - the innumerable species of animals and plants on earth, and the wide range of urban and rural habitats where they live.
Biomass	Living matter within an environmental area, for example plant material, vegetation, or agricultural waste used as a fuel or energy source.
Blue Ribbon Network	A spatial policy covering London's waterways and water spaces and land alongside them. The Blue Ribbon Network includes the Thames, the canal network, the other tributaries, rivers and streams within London and London's open water spaces such as docks, reservoirs and lakes. It includes culverted (or covered over) parts of rivers, canals or streams.
Biodiversity Action Plan	A plan that sets objectives and actions for the conservation of biodiversity in Hillingdon. The action plan also identifies priority species and habitats for conservation.
Building of Townscape Merit	A building or group of buildings that are not on the statutory list of buildings of special architectural or historic interest but that contribute positively and significantly to the character and appearance of an area.
BREEAM	BREEAM (BRE Environmental Assessment Method) is an environmental standard that rates the sustainability of buildings in the UK. The BREEAM environmental assessment aims to minimise environmental impact by ensuring sustainability best practises are in place while also lowering organisations' costs through energy efficiency.
Brownfield Site	Both land and premises are included in this term, which refers to a site that has previously been used or developed and is not currently fully in use, although it may be partially

Term	Meaning
	occupied or utilised. It may also be vacant, derelict or contaminated. This excludes open spaces and land where the remains of previous use have blended into the landscape, or have been overtaken by nature conservation value or amenity use and cannot be regarded as requiring development.
<u>Building for Life</u>	<u>The national standard for well-designed homes and neighbourhoods. A Building for Life assessment scores the design quality of planned or completed housing developments against 20 Building for life criteria. For further information refer to www.buildingforlife.org.</u> (4.3)
Carbon Footprint	A carbon footprint is a measure of the impact our activities have on the environment, and in particular climate change. It relates to the amount of greenhouse gases produced in our day-to-day lives through burning fossil fuels for electricity, heating and transportation etc. The carbon footprint is a measurement of all greenhouse gases we individually produce and has units of tonnes (or kg) of carbon dioxide equivalent.
Character	A term relating to Conservation Areas or Listed Buildings, but also to the appearance of any rural or urban location in terms of its landscape or the layout of streets and open spaces, often giving places their own distinct identity.
Code for Sustainable Homes	A new national standard for sustainable design and construction of new homes launched in December 2006, covering water use, waste generation, and the use of low-polluting materials and processes. Developed by the Building Research Establishment, the Code for Sustainable Homes (CSHs) subsumes the requirements of the BREEAM / EcoHomes System. The Code is based on levels, level 1 being the lowest and level 6, the zero-carbon level, the highest.
Combined Heating and Power / Decentralised Energy	Combined Heat and Power (CHP) is the term used when electrical energy is made on-site and the waste heat from the engine is utilised for a heating application such as making hot water or space heating. A decentralised energy scheme provides heat and /or power from a central source to more than one building, dwelling or customer as an alternative to providing individual national grid-connected systems to each dwelling. Schemes can vary in size from a few dwellings to city-wide networks, and reduce costs for tenants and cut carbon dioxide emissions.

Term	Meaning
Community Facilities	Community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community.
Comparison goods	Items not bought on a frequent basis, for example televisions and white goods (fridges, dishwashers etc). Customers often compare items and prices between several stores before making a purchase.
Community Strategies	These are practical tools for promoting or improving the economic, social and environmental wellbeing of the area of jurisdiction of a local authority. Such strategies are prepared allowing for local communities (based upon geography and/or interest) to articulate their aspirations, needs and priorities.
Conservation	The process of maintaining and managing change to a heritage asset in a way that sustains and where appropriate enhances its significance.
Conservation Area	An area declared by a local planning authority in accordance with the Town and Country Planning Act 1990 (as amended), as being of special architectural, historical or landscape interest, the character or appearance of which it is desirable to preserve or enhance. Consent is required for the demolition or partial substantial demolition of unlisted buildings in Conservation Areas.
Contaminated Land	<p>Section 78A(2) of Part 2A of the Environmental Protection Act 1990 defines "contaminated land" as "any land which appears to the local authority in whose area the land is situated to be in such a condition, by reason of substances in, on or under the land, that</p> <p>(a) significant harm is being caused or there is a significant possibility of such harm being caused; or</p> <p>(b) pollution of controlled waters is being, or is likely to be, caused'."</p>
Convenience goods	Everyday essential items, such as food and newspapers.
Core Strategy Development Plan Document (DPD)	The Core Strategy Development Plan Document sets out the key elements of the planning framework for the area. It comprises a spatial vision and strategic objectives for the area; a spatial strategy; core policies; and a monitoring

Term	Meaning
	and implementation framework with clear objectives for achieving delivery. Once adopted, all other Development Plan Documents must be in conformity with it.
Culture	Culture includes arts, media, sports, libraries, museums, <u>theatres</u> ^(4.4) parks, and the countryside, built heritage, <u>the historic environment</u> ^(4.5) tourism, and the creative industries.
Density (Residential)	As stated in PPS3 Housing: 'Density is a measure of the number of dwellings which can be accommodated on a site or in an area'. Net dwelling density is calculated by including only those site areas which will be developed for housing and directly associated uses, including access roads within the site, private garden space, car parking areas, incidental open space and landscaping and children's play areas, where these are provided.
Design and Access Statements	A statement that accompanies a planning application to explain the design principles and concepts that have informed the development and how access issues have been dealt with. The access element of the statement should demonstrate how the principles of inclusive design, including the specific needs of disabled people, have been integrated into the proposed development and how inclusion will be maintained and managed.
Designated Shopping Frontage	Divided into 2 categories: <u>Key frontage</u> : Shopping area which is to be retained primarily in retail use and from which further non-shop uses will normally be excluded. <u>Secondary frontage</u> : Area intended for shopping use where complementary non-retail uses such as cafés, laundrettes, estate agents etc. may be permitted.
Developer Contributions	See Planning Obligations.
Development	Defined and qualified by the Town and Country Planning Act 1990 (s.22) as the carrying out of building, engineering, mining or other operations in, on, over, or under land, or the making of any material change in the use of any building or other land.

Term	Meaning
Development Control & Development Management	The process whereby a local planning authority receives and considers the merits of a planning application and whether it should be given permission having regard to the development plan and all other material considerations.
Development Plan Document (DPD)	DPDs form part of the Local development Framework and can be the Core Strategy, Site Allocations, Proposals Map, Development Management Policies and sometimes Area Action Plans. Development Plan Documents together with the London Plan form the Development Plan for the area.
District Centre (e.g. Hayes, Yiewsley & West Drayton)	Distributed more widely than the Metropolitan and Major centres, providing convenience goods and services for more local communities and accessible by public transport, walking and cycling. Typically they contain 10,000 –50,000 sq.m of retail floorspace. Some District centres have developed specialist shopping functions.
District Park	A park of at least 20 hectares providing a fairly wide range of activities, including outdoor sports and recreational facilities for households within about 1.2km of the park.
Eco-Homes	See Code for Sustainable Homes.
Employment Land / Site	Land / sites defined by the Council for employment uses (usually B class uses) and appropriate sui-generis uses.
Examination	Undertaken on the 'soundness' of the Submission Local Development Framework Documents. The examination is held by an independent inspector appointed by the Secretary of State. The final report is binding on the Council. For Development Plan Documents an examination is held even if there are no representations.
Green Belt	Green belts are a national policy designation that helps to contain development, protect the countryside and promote brownfield development, and assists in the urban renaissance. There is a general presumption against inappropriate development in the green belt.
Green Chains	A series of linked open spaces forming extended parkways for the public and wildlife corridors in natural surroundings. These can cross borough boundaries.
Green Corridor	This refers to relatively continuous areas of open space leading through the built environment, which may be linked and may not be publicly accessible. They may allow

Term	Meaning
	animals and plants to be found further into the built-up area than would otherwise be the case and provide an extension to the habitats of the sites they join.
Historic Environment	All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible or buried, and deliberately planted or managed fauna.
Heritage Asset	A building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. Heritage assets are the valued components of the historic environment. They include designated heritage assets (as defined in PPS 5) and assets identified by the local planning authority during the process of decision-making or through the plan-making process (including local listing).
Infrastructure	Essential services necessary for development to take place, for example, roads, electricity, sewerage, water, education and health facilities.
Industrial Business Park (IBP).	Strategic Industrial Location designed to accommodate general industrial, light industrial and research and development uses that require a higher quality environment and less heavy goods access than a PIL. They can be accommodated next to environmentally sensitive uses.
Issues and Options	Prior to June 2008, part of the production stage for the preparation of DPDs. This has effectively been replaced with Regulation 25 of the amended Town and Country Planning (Local development) (England) Regulations.
Lifetime Homes Standards	Criteria developed by a group convened by the Joseph Rowntree Foundation in 1991 to help house builders produce new homes flexible enough to deal with changes in life situations of occupants e.g. caring for young children, temporary injuries, declining mobility with age.
Listed Building	A building of special architectural or historic interest included on a statutory list. Listed buildings are graded I, II* or II with grade I being the highest. Listing includes the interior as well as the exterior of the building, and any buildings or permanent structures (e.g. wells within its curtilage). English Heritage is responsible for designating buildings for listing in England. Permission is required for their demolition or alteration.

Term	Meaning
Local Centre (eg Harefield, South Ruislip)	Provides a range and choice of local shops and services for people within walking distance.
Local Development Framework	Sets out, in the form of a 'portfolio' or 'folder', the documents which collectively deliver the spatial planning strategy for the Council. The Local Development Framework comprises Development Plan Documents, Supplementary Planning Documents, the Statement of Community Involvement, the Local Development Scheme and the Annual Monitoring Report.
Local Strategic Partnership (LSP)	Non-statutory, multi-agency partnership which matches a local authority boundary. LSPs bring together, at a local level, different parts of the public, private, community and voluntary sectors, allowing different services to support one another so that they can work more effectively together. LSPs are charged with developing Sustainable Community Strategies and Local Area Agreements. In Hillingdon, LSPs are referred to as Hillingdon Partners.
Local Park	A park of at least 2 hectares providing court games, children's play, sitting out areas, including nature and landscape conservation, a landscaped environment and possibly playing fields for households within about 400m of the park.
Locally Significant Employment Location (LSEL)	Designated employment area suitable for light industrial, office and research uses that require a higher quality environment and good public transport access.
Locally Significant Industrial Site (LSIS)	Designated industrial area suitable for general industrial, light industrial and warehousing uses.
London Plan	The plan is a spatial development strategy for Greater London, to deal with matters of strategic importance to the area. The plan was first published by the Greater London Authority (GLA) in 2004 and has since been amended.
Mayor's Transport Strategy (MTS)	The draft MTS was published in October 2009 for consultation. It sets out the Mayor's vision for transport in the Capital over the next 20 years. The final MTS will be published in spring 2010.
Metropolitan Centre (e.g. Uxbridge)	Metropolitan centres serve wide catchment areas covering several boroughs and offer a high level and range of comparison shopping. They typically have over 100,000 square metres of retail floorspace, including multiple

Term	Meaning
	retailers and department stores. They also have significant employment, service and leisure functions (London Plan 2008 definition).
Metropolitan Open Land	Open land within built-up areas which has a London-wide significance and receives the same presumption against development as the Green Belt, defined in the Mayor's London Plan.
Minor Centre (eg Ruislip Manor, Northwood Hills)	Provides a full range and choice of local shops and services, including comparison goods, for people within approximately a three kilometre radius.
Mixed Mode	A method of operating two runways allowing for a mix of both take-offs and landings on each.
Mixed Use Development	A development that combines a mix of uses either on a site or in individual buildings, such as flats or offices over shops. It can refer to a small site or individual building with a mix of uses within the same building, or to a variety of uses in an area such as a neighbourhood, a town centre or an urban village.
Neighbourhood Centres	Used in this Core Strategy to refer collectively to District, Minor and Local Centres.
Nature Conservation	Protection, management and promotion for the benefit of wild species and habitats, as well as the human communities that use and enjoy them. This also covers the creation and re-creation of wildlife habitats and the techniques that protect genetic diversity and can be used to include geological conservation.
Other Open Land of Townscape Importance	Open areas, which are not extensive enough to be defined as Green Belt or Metropolitan Open Land, but act as pockets of greenery of local significance, contribute to the local character, and are valued by residents as open spaces in the built up area. These areas include public and private sports grounds, some school playing fields, cemeteries, some large private gardens and some allotments.
Open Space	All land in London that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers a the broad range of types of open space within London, whether in public or private ownership and whether public access is unrestricted, limited or restricted.

Term	Meaning
Planning Obligations/ Section 106 Agreements	A legally binding agreement between a developer and a council or undertaking by a developer to undertake works or to meet costs in connection with their development to enable it to become acceptable.
Planning Policy Guidance(PPG) notes	Statements of Government planning policy covering a range of issues. They are being replaced by Planning Policy Statements.
Planning Policy Statement (PPS)	Statements of national (England only) policy and principles on aspects of the town planning framework. They are legally binding and may be treated as material considerations in the determination of planning applications. They were introduced under the provisions of the Planning and Compulsory Purchase Act 2004 and are gradually replacing PPGs.
Preferred Industrial Location (PIL)	Strategic Industrial Location normally suitable for general industrial, light industrial and warehousing uses.
Preferred Options	Prior to June 2008, part of the production stage for the preparation of DPDs. This has effectively been replaced with Regulation 25 of the amended Town and Country Planning (Local development) (England) Regulations.
Previously Developed Land	Previously-developed land is that which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure.
Proposals Map	An Ordnance Survey based map showing the location and extents of policies, site allocations and constraints in Development Plan Documents, updated as necessary to reflect any changes in such documents.
Public Open Space	All open spaces of public value, including not just land, but also areas of water such as rivers and canals which offer important opportunities for sport and recreation and can also act as a visual amenity. The definition covers a broad range of types of open spaces within the borough, whether in public or private ownership and whether public access is unrestricted, limited or restricted.
Public Realm	That part of the built environment to which the public have free access, including streets, squares, parks, etc. Public realm issues embrace the social interaction and use of spaces as well as their servicing and management.

Term	Meaning
Public Transport Accessibility Levels (PTAL)	A measure of the relative accessibility of buildings and uses by public transport. The higher the PTAL score, the better the accessibility.
SSSI (Site of Special Scientific Interest)	A classification notified under the Wildlife and Countryside Act (1981 as amended). All the London sites of biodiversity interest are included within sites of Metropolitan Importance for Nature Conservation.
Regional Park	A large area of over 400 hectares primarily providing for informal recreation with some non-intensive active recreational uses for households within 3.2 to 8km of the park
Renewable Energy/Renewables	Energy generated from sources that are non-finite or can be replenished, e.g. solar power, wind energy, power generated from waste, biomass etc.
Site Allocations DPD	A Development Plan Document that sets out detailed proposals for the development of land in the area, with specific or mixed uses, locations and extents clearly shown.
Strategic Environmental Assessment (SEA)	Required by European and UK law, SEA is a way of systematically identifying and evaluating the impacts that a plan is likely to have on the environment. The aim is to provide information, in the form of an Environmental Report, that can be used to enable decision makers to take account of the environment and minimise the risk of the plan causing significant environmental damage. Government guidance advises that where a plan requires both strategic environmental assessment and sustainability appraisal, that the former process should be integrated into the latter one.
Strategic Flood Risk Assessment	The Environment Agency produce maps to show which areas of the country are most likely to be affected by flooding. The maps show three different zones covering the whole of England and referring to the probability of river and sea flooding, ignoring the presence of flood defences. The zones illustrate: the area that could be affected by flooding from a river by a flood that has a 1% (1 in 100) or greater chance of happening each year (Zone 3, divided into: 3a: High probability; and 3b: Functional floodplain), areas that are likely to be affected by a major flood, with up to a 0.1% (1 in 1000) chance of occurring

Term	Meaning
	<p>each year (Zone 2: Medium probability), and all other areas (Zone 1: Low probability) (see PPS25: Development and Flood Risk for further information).</p> <p>The Strategic Flood Risk Assessment (SFRA) for Hillingdon has been based on these maps, but has also taken into account other types of flooding to produce more detailed flood risk maps that can be used to help guide land use allocations within the borough.</p>
Strategic Industrial Location	Regionally important industrial areas designated through the London Plan. These should be promoted, managed and, where appropriate, protected as London's main reservoirs of industrial capacity. SILs are divided into Preferred Industrial Locations (PIL) and Industrial Business Parks (IBP).
Supplementary Planning Guidance/ Documents (SPG/ SPD)	Included in the Local Development Framework, SPDs may cover a range of issues, both topic and site specific, which may expand policy or provide further detail to policies in a Development Plan Document.
Sustainability Appraisal	The Planning and Compulsory Purchase Act 2004 requires Development Plan Documents to be prepared with a view to contributing to the achievement of sustainable development. The purpose of Sustainability Appraisal is to appraise the social, environmental and economic effects of the strategies and policies in a Development Plan Document from the outset of the preparation process. This will ensure that decisions are made that accord with sustainable development.
Sustainable Communities	Sustainable communities are places where people want to live and work, now and in the future. They meet the diverse needs of existing and future residents, are sensitive to their environment, and contribute to a high quality of life. They are safe and inclusive, well planned, built and run, and offer equality of opportunity and good services for all.
Sustainable Community Strategy	Local authorities are required by the Local Government Act 2000 to prepare these, with aim of improving the social, environmental and economic well being of their areas. Through the Sustainable Community Strategy, authorities are expected to co-ordinate the actions of local public, private, voluntary and community sectors.

Term	Meaning
Sustainable Development	This covers development that meets the needs of the present without compromising the ability of future generations to meet their own needs.
Sustainable Transport	Sustainable transport is used to describe all forms of transport which minimise emissions of carbon dioxide and pollutants. It can refer to public transport, car sharing, walking and cycling as well as technology such as electric and hybrid cars and biodiesel.
Sustainable Urban Drainage Systems (SUDS)	An alternative approach from the traditional ways of managing runoff from buildings and hardstanding. They can reduce the total amount, flow and rate of surface water that runs directly to rivers through stormwater systems.
Townscape	The general appearance of a built-up area, for example a street a town.
Unitary Development Plan (UDP)	Plans previously produced by each council, which contained policies and proposals for the development and use of land in their areas. Hillingdon formally saved its UDP policies in 2007.

End Notes

- 4.1 Heathrow Airport Ltd (217)
- 4.2 Heathrow Airport Ltd (217)
- 4.3 Text update
- 4.4 The Theatres Trust (270)
- 4.5 English Heritage (557)

Appendix 5 UDP Saved Policies Replacement

LB Hillingdon has an adopted Unitary Development Plan (UDP, September 1998), which from the 27th of September, 2007, specified policies that have been retained. The Council received a direction issued by the Secretary of State agreeing those policies that have been 'saved.'

The associated UDP Proposals Map also will retain development plan status during the preparation of the Development Plan Documents (DPDs) until it has been replaced by an updated Proposals Map as a result of land-use changes within a DPD. It is not intended that the Core Strategy include an updated Proposals Map.

Saved policies in Hillingdon's UDP will gradually be replaced by policies in Hillingdon's Local Development Framework documents. The Core Strategy is the first of these documents, and once adopted, will replace some of the saved policies, as shown in the table below. However, Development Plan policies are not necessarily replaced by like for like policies. They may be fully or partly absorbed by new policies. If a saved policy is to be retained, after being replaced only partly by the Core Strategy, then this will be made clear in the table.

The remaining saved policies will continue to be part of Hillingdon's Development Plan until they have been replaced (either in full or in part) by a future DPD within Hillingdon's Local Development Framework, or are no longer considered necessary.

UDP Saved Policies Replacement

Saved UDP Policy	Replacement policies in the Core Strategy (or future DPDs)	Retained/ replaced
Part One		
Pt 1.1 To maintain the Green Belt for uses which preserve or enhance the open nature of the area.	EM2	Replaced
Pt 1.2 To maintain Metropolitan Open Land for formal and informal open air recreation facilities including nature conservation.	EM2	Replaced
Pt 1.3 Pt 1.3 To seek greater public access to the countryside for informal leisure activities.		Retained
Pt 1.4 Pt 1.4 To safeguard a network of Green Chains from built development to provide a visual and physical break in the built-up area and opportunities for recreation and corridors for wildlife.	EM2	Replaced
Pt 1.5 To carry out and promote countryside management projects to improve the environment and nature conservation value of countryside and open land, particularly in areas which are degraded or derelict and important corridors along roads and watercourses.		Retained
Pt 1.6 To safeguard the nature conservation value of Sites of Special Scientific Interest, Sites of Metropolitan Importance for Nature Conservation, designated Local Nature Reserves or other Nature Reserves, or sites proposed by English Nature or the Local Authority for such designations.	EM7	Replaced
Pt 1.7 Pt 1.7 To promote the conservation, protection and enhancement of the archaeological heritage of the Borough.	HE1	Replaced
Pt 1.8 Pt 1.8 To preserve or enhance those features of Conservation Areas which contribute to their special architectural and visual qualities.	HE1	Replaced

Saved UDP Policy	Replacement policies in the Core Strategy (or future DPDs)	Retained/ replaced
Pt 1.9 Pt 1.9 To seek to preserve statutory Listed Buildings and buildings on the Local List.	HE1	Replaced
Pt 1.10 Pt 1.10 To seek to ensure that new development will not adversely affect the amenity and character of the Borough's residential areas.	BE1	Replaced
Pt 1.11 To facilitate the development of telecommunications networks in a manner that minimises the environmental and amenity impact of structures and equipment.		Retained
Pt 1.12 To avoid any unacceptable risk of flooding to new development in areas already liable to flood, or increased severity of flooding elsewhere.	EM6	Replaced
Pt 1.13 To seek to ensure the provision of 8,000 additional dwellings in the Borough between 1 January 1987 and 31 December 2001.	H1	Replaced
Pt 1.14 To not normally grant planning permission for a change from residential use.	H1	Replaced
Pt 1.15 To enable the conversion of residential properties to create more units, provided the additional units are suitable to live in and the character of the area and amenities of adjoining occupiers are not harmed.		Retained
Pt 1.16 To seek to ensure enough of new residential units are designed to wheelchair and mobility standards	BE1	Replaced
Pt 1.17 To seek to ensure the highest acceptable number of new dwellings are provided in the form of affordable housing.	H2	Replaced
Pt 1.18 To maintain, enhance and promote town centres as the principal centres for shopping, employment and community and cultural activities in the Borough.	E5	Replaced
Pt 1.19 To maintain a hierarchy of shopping centres which maximises accessibility to shops and to encourage retail development in existing centres or local parades which is appropriate to their scale and function and not likely to harm the viability and vitality of town or local centres.	E5	Replaced
Pt 1.20 Pt 1.20 To give priority to retail uses at ground floor level in the Borough's shopping areas.		Retained
Pt 1.21 To seek publicly accessible recreational open space in association with proposals for development where appropriate to help reduce deficiencies in recreation open space or to ensure that provision does not fall below accepted standards.		Retained
Pt 1.22 To seek the retention of existing recreation open space where there is an identified demand for such a facility or it makes a significant contribution to the visual amenity of the built up area.		Retained
Pt 1.23 To encourage industry and warehousing to locate within existing Industrial and Business areas, and offices and other business uses, shops and public buildings employing or attracting large numbers of people to locate within town centres or other areas identified for such purposes.		Retained
Pt 1.24 To reserve designated Industrial and Business Areas as the preferred locations for industry and warehousing.		Retained
Pt 1.25 To encourage the provision of small industrial, warehousing and business units within designated Industrial and Business Areas.		Retained
Pt 1.26 To encourage economic and urban regeneration in the Hayes/West Drayton Corridor, designated Industrial and Business Areas (IBAs) and other appropriate locations.		Retained

Saved UDP Policy	Replacement policies in the Core Strategy (or future DPDs)	Retained/ replaced
Pt 1.27 To ensure that development at Heathrow Airport for airport purposes mitigates or redresses any adverse effects on the environment.	E3 / T4	Replaced
Pt 1.28 To encourage the provision of a range of hotel and conference facilities provided development does not harm the environment.		Retained
Pt 1.29 To seek, in conjunction with other London boroughs, to contribute a proportion of the regional sand and gravel requirement and London-wide landbank, and to protect the amenities of those living, working and recreating in and travelling through that part of the Borough south of the M4 motorway from an over-concentration of aggregate working.	EM9 / EM10	Replaced
Pt 1.30 To promote and improve opportunities for everyone in Hillingdon, including in particular women, elderly people, people with disabilities and ethnic minorities.		Retained
Pt 1.31 To encourage the development and support the retention of a wide range of local services, including shops and community facilities, which are easily accessible to all, including people with disabilities or other mobility handicaps.	E5 / CI 1 / CI 2 / CI 3	Replaced
Pt 1.32 To encourage development for uses other than those providing local services to locate in places which are accessible by public transport.	T1	Replaced
Pt 1.33 To promote the construction of new roads or the widening of existing roads only where they would: improve safety; promote pedestrian movement, cycling or public transport, or the improvement of the environment; reduce local congestion in a cost effective way; or are required to accommodate traffic likely to be generated by new development.		Retained
Pt 1.34 To maintain the road hierarchy set out in this Plan and accordingly seek to segregate different types of traffic by the function of the various tiers of the hierarchy through traffic management schemes, road signing and planning control over development and redevelopment schemes.		Retained
Pt 1.35 To accord priority to pedestrians in the design and implementation of road construction and traffic management schemes, and to seek to provide a network of cycle routes through the Borough to promote safer cycling and better conditions for cyclists.		Retained
Pt 1.36 In consultation with public transport operators to improve facilities at bus and rail interchanges, and in consultation with LT and bus operators to promote traffic management measures which give priority to buses.	T2 / T3	Replaced
Pt 1.37 To facilitate the development and transport interchange facilities and rail and road improvements at Hayes Hub, which promote competitiveness, economic regeneration and environmental quality of the Hayes/West Drayton Corridor.		Retained
Pt 1.38 To seek a reduction in road accident casualties through highway improvements including traffic calming and the design of new highway schemes.		Retained
Pt 1.39 To seek, where appropriate, planning obligations to achieve benefits to the community related to the scale and type of development proposed.		Retained
Part 2		
3. Open Land and Countryside		
OL1 Green Belt – acceptable open land uses and restrictions on new development		Retained
OL2 Green Belt – landscaping improvements		Retained

Saved UDP Policy	Replacement policies in the Core Strategy (or future DPDs)	Retained/ replaced
OL4 Green Belt –replacement or extension of buildings		Retained
OL5 Development proposals adjacent to the Green Belt		Retained
OL9 Areas of Environmental Opportunity - condition and use of open land		Retained
OL11 Green Chains	EM2	Replaced
OL12 Development of agricultural land		Retained
OL13 Development associated with agricultural or forestry uses within or affecting conservation areas, archaeological priority areas etc.		Retained
OL14 Change of use or conversion of redundant agricultural buildings		Retained
OL15 Protection of Countryside Conservation Areas		Retained
OL19 Access to and use of the countryside by all sections of the community		Retained
OL21 Proposals to reclaim/restore damaged, derelict or otherwise degraded land		Retained
OL22 Proposals for damaged, derelict or otherwise degraded land – assessment of current condition and adverse effects		Retained
OL23 Restoration/reclamation of damaged, derelict or otherwise degraded land – provision for aftercare		Retained
OL26 Protection and enhancement of trees, woodland and landscape features		Retained
4. Ecology and Nature Conservation		
EC1 Protection of sites of special scientific interest, nature conservation importance and nature reserves	EM7	Replaced
EC2 Nature conservation considerations and ecological assessments		Retained
EC3 Potential effects of development on sites of nature conservation importance		Retained
EC4 Monitoring of existing sites of nature conservation importance and identification of new sites		Retained
EC5 Retention of ecological features and creation of new habitats		Retained
EC6 Retention of wildlife habitats on derelict or vacant land		Retained
5. Built Environment		
BE1 Development within archaeological priority areas		Retained
BE2 Scheduled ancient monuments	HE 1	Replaced
BE3 Investigation of sites of archaeological interest and protection of archaeological remains		Retained
BE4 New development within or on the fringes of conservation areas		Retained
BE5 New development within areas of special local character		Retained
BE6 New development within Gate Hill Farm and Copsewood Estates areas of special local character		Retained
BE7 Development schemes on the southeast side of Ducks Hill Road		Retained

Saved UDP Policy	Replacement policies in the Core Strategy (or future DPDs)	Retained/ replaced
BE8 Planning applications for alteration or extension of listed buildings		Retained
BE9 Listed building consent applications for alterations or extensions		Retained
BE10 Proposals detrimental to the setting of a listed building		Retained
BE11 Proposals for the demolition of statutory listed buildings		Retained
BE12 Proposals for alternative use (to original historic use) of statutorily listed buildings		Retained
BE13 Layout and appearance of new development		Retained
BE14 Development of sites in isolation		Retained
BE15 Alterations and extensions to existing buildings		Retained
BE18 Design considerations - pedestrian security and safety		Retained
BE19 New development within residential areas – complementing and improving amenity and character of the area		Retained
BE20 Daylight and sunlight considerations		Retained
BE21 Siting, bulk and proximity of new buildings/extensions		Retained
BE22 Residential extensions/buildings of two or more storeys		Retained
BE23 External amenity space and new residential development		Retained
BE24 Design of new buildings – protection of privacy		Retained
BE25 Modernisation and improvement of industrial and business areas		Retained
BE26 Town centres – design, layout and landscaping of new buildings		Retained
BE27 Advertisements requiring express consent - size, design and location		Retained
BE28 Shop fronts – design and materials		Retained
BE29 Advertisement displays on business premises		Retained
BE30 Advertisement hoardings enclosing sites under construction		Retained
BE31 Facilities for the recreational use of the canal		Retained
BE32 Development proposals adjacent to or affecting the Grand Union Canal		Retained
BE33 Proposals for the establishment of residential moorings		Retained
BE34 Proposals for development adjacent to or having a visual effect on rivers		Retained
BE35 Major development proposals adjacent to or visible from major road and rail connections to Heathrow and central London		Retained
BE36 Proposals for high buildings/structures in identified sensitive areas		Retained
BE37 Telecommunications developments – siting and design		Retained
BE38 Retention of topographical and landscape features, and provision of new planting and landscaping in developments proposals		Retained
BE39 Protection of trees and woodland – tree preservation orders		Retained

Saved UDP Policy	Replacement policies in the Core Strategy (or future DPDs)	Retained/ replaced
6. Other Environmental Considerations		
OE1 Protection of the character and amenities of surrounding properties and the local area		Retained
OE3 Buildings or uses likely to cause noise annoyance – mitigation measures		Retained
OE5 Siting of noise-sensitive developments		Retained
OE7 Development in areas likely to flooding – requirement for flood protection measures		Retained
OE8 Development likely to result in increased flood risk due to additional surface water run-off – requirement for attenuation measures		Retained
OE9 Limitation of development in areas with a potential for sewerage flooding		Retained
OE10 Phasing of development in areas of potential flooding or inadequate sewerage capacity		Retained
OE11 Development involving hazardous substances and contaminated land – requirement for ameliorative measures		Retained
7. Housing		
H1 Sites safeguarded for residential development		Retained
H2 Restrictions on changes of use of residential properties		Retained
H3 Loss and replacement of residential accommodation		Retained
H4 Mix of housing units		Retained
H5 Dwellings suitable for large families		Retained
H7 Conversion of residential properties into a number of units		Retained
H8 Change of use from non-residential to residential		Retained
H10 Proposals for hostels or other accommodation for people in need of care		Retained
H12 Tandem development of backland in residential areas		Retained
8. Shopping and Town Centres		
S6 Change of use of shops – safeguarding the amenities of shopping areas		Retained
S7 Change of use of shops in Parades		Retained
S9 Change of use of shops in Local Centres		Retained
S10 Change of use of shops in Local Centres – criteria for permitting changes of use outside core areas		Retained
S11 Service uses in Primary Shopping Areas		Retained
S12 Service uses in Secondary Shopping Areas		Retained
9. Recreation, Leisure and Community Facilities		
R1 Development proposals in or near areas deficient in recreational open space		Retained
R2 Provision of recreation, entertainment and leisure facilities in Town Centres		Retained

Saved UDP Policy	Replacement policies in the Core Strategy (or future DPDs)	Retained/ replaced
R3 Indoor sports, leisure and entertainment facilities		Retained
R4 Proposals that would involve the loss of recreational open space		Retained
R5 Proposals that involve the loss of sports, leisure, community, religious, cultural or entertainment facilities		Retained
R6 Ancillary recreational facilities		Retained
R7 Provision of facilities which support arts, cultural and entertainment activities		Retained
R8 Loss of facilities which support arts, cultural and entertainment activities		Retained
R9 Proposals for the use of buildings for religious and cultural purposes		Retained
R10 Proposals for new meeting halls and buildings for education, social, community and health services		Retained
R11 Proposals that involve the loss of land or buildings used for education, social, community and health services		Retained
R12 Use of premises to provide child care facilities		Retained
R13 Use of residential accommodation for educational and child care premises		Retained
R14 Provision child care facilities in shopping and other large developments		Retained
R15 Use of residential accommodation for medical/health care facilities		Retained
R16 Accessibility for elderly people, people with disabilities, women and children		Retained
R17 Use of planning obligations to supplement the provision of recreation, leisure and community facilities		Retained
10. The Local Economy		
LE1 Proposals for industry, warehousing and business development		Retained
LE2 Development in designated Industrial and Business Areas		Retained
LE3 Provision of small units in designated Industrial and Business Areas		Retained
LE4 Loss of existing industrial floorspace or land outside designated Industrial and Business Areas		Retained
LE6 Major officer and other business proposals in town centres		Retained
LE7 Provision of planning benefits from industry, warehousing and business development		Retained
11. Airports and Aviation		
A1 Proposals for development which extend Heathrow Airport on land to the north of Bath Road or otherwise increase runway capacity		Retained
A2 Developments at Heathrow airport likely to increase demand for off-airport development or have significant adverse environmental impact		Retained
A3 Development at Northolt Aerodrome		Retained
A4 New development directly related to Heathrow Airport		Retained

Saved UDP Policy	Replacement policies in the Core Strategy (or future DPDs)	Retained/ replaced
A5 New development at airports - incorporation of ancillary retail and leisure facilities and other services		Retained
A6 Development proposals within the public safety zones around Heathrow or likely to affect the operation of Heathrow or Northolt airports		Retained
12. Tourism		
T2 Location of tourist accommodation and conference facilities		Retained
T4 Hotels, guesthouses and other tourist accommodation – location, amenity and parking requirements		Retained
13. Minerals and Waste Disposal		
MIN1 Safeguarding of sand and gravel reserves		Retained
MIN2 Proposals to work sand and gravel in relation to regional requirements and London-wide Landbank	EM10	Replaced
MIN3 Restriction on area of land south of the M4 motorway subject to planning consent for sand and gravel extraction and/or waste disposal		Retained
MIN4 Restriction on the release of good agricultural land for mineral working and requirement for restoration		Retained
MIN5 Phased release of agricultural land for mineral extraction/disposal of waste where requirements of policy MIN4 have been met		Retained
MIN6 Consideration of impact on farming of proposals for mineral extraction/disposal of waste		Retained
MIN7 Restoration of good agricultural land following mineral extraction		Retained
MIN8 Restoration of land south of the A4020 Uxbridge Road		Retained
MIN9 Restoration of land north of the A4020 Uxbridge Road		Retained
MIN10 Restoration and after-use of sand and gravel workings in the Colne Valley		Retained
MIN11 After-use of mineral sites – landscaping and screening		Retained
MIN12 Proposals for extraction of clay or brickearth		Retained
MIN14 Proposals for mineral extraction in locations of archaeological importance		Retained
MIN15 Proposals for ready mix concrete plants		Retained
MIN16 Waste recycling and disposal – encouragement of efficient and environmentally acceptable facilities		Retained
MIN17 Proposals for concrete crushing/soil screening plants		Retained
MIN18 Safeguarding of existing civic amenity and waste transfer sites		Retained
MIN19 Use of Category A waste for restoration of sand and gravel pits		Retained
MIN20 Proposals involving landfilling, re-working or disturbance of old landfill sites –gas control and monitoring requirements		Retained
MIN21 Impact of development proposals involving landfilling on the local hydrogeological regime – requirement for monitoring and mitigation measures		Retained

Saved UDP Policy	Replacement policies in the Core Strategy (or future DPDs)	Retained/ replaced
MIN23 Schemes for mineral extraction, mineral processing, landfill, waste handling or treatment adjacent to noise-sensitive locations – noise monitoring and control requirements		Retained
MIN24 Sites for aggregates depots – access, location and amenity considerations		Retained
MIN25 Safeguarding of operational rail aggregates depot facilities		Retained
MIN26 Environmental up-grading of aggregates depots		Retained
MIN27 Support for temporary rail-served aggregates depots for major construction projects		Retained
14. Accessibility and Movement		
AM1 Developments which serve or draw upon more than a walking distance based catchment area – public transport accessibility and capacity considerations		Retained
AM2 Development proposals – assessment of traffic generation, impact on congestion and public transport availability and capacity		Retained
AM3 Proposals for new roads or widening of existing roads		Retained
AM4 Safeguarded road proposals -schemes shown on Proposals Map		Retained
AM5 Land safeguarded for road proposals of the Department of Transport and the Traffic Director for London		Retained
AM6 Measures to discourage the use of Local Distributor and Access Roads by through traffic		Retained
AM7 Consideration of traffic generated by proposed developments		Retained
AM8 Priority consideration to pedestrians in the design and implementation of road construction and traffic management schemes		Retained
AM9 Provision of cycle routes, consideration of cyclists' needs in design of highway improvement schemes, provision of cycle parking facilities		Retained
AM10 Incorporation in new developments of additions to the proposed cycle network		Retained
AM11 Improvement in facilities and promotion of safety and security at bus and rail interchanges; use of planning agreements to secure improvement in public transport services		Retained
AM12 Promotion of traffic management measures which give priority to buses		Retained
AM13 Increasing the ease of movement for frail and elderly people and people with disabilities in development schemes through (where appropriate): - i. Dial-a-ride and mobility bus services ii. Shopmobility schemes iii. Convenient parking spaces iv. Design of road, footway, parking and pedestrian and street furniture schemes		Retained
AM14 New development and car parking standards	Page 467	Retained

Saved UDP Policy	Replacement policies in the Core Strategy (or future DPDs)	Retained/ replaced
AM15 Provision of reserved parking spaces for disabled persons		Retained
AM16 Availability for public use of parking spaces in commercial developments in town centres and other areas		Retained
AM17 Provision of short stay off-street parking space for town centres		Retained
AM18 Developments adjoining the Grand Union Canal – securing facilities for canal borne freight		Retained
15. Proposals		
PR2 Western Core Area, Hayes		Retained
PR4 Thorn EMI Complex, Blyth Road, Hayes		Retained
PR8 RAF West Drayton		Retained
PR10 Powergen/Bulls Bridge Site, North Hyde Gardens, Hayes		Retained
PR16 Coppermill, Harefield		Retained
PR19 Breakspear House, Breakspear Road North, Harefield		Retained
PR20 Harefield Hospital		Retained
PR21 Hillingdon Hospital		Retained
PR22 Brunel University		Retained
PR23 Hillingdon Circus		Retained

Preface

This is the final updated version of part 3 of the Sustainability Appraisal of the London Borough of Hillingdon's Core Strategy. It is the last in a line of appraisals that have been used to determine the Core Strategy's performance against sustainability objectives.

The Core Strategy has gone through a number of consultation stages which have resulted in changes to the document. Running parallel to the consultation events has been the sustainability appraisal process which has 'scored' the performance of the Core Strategy.

The Main Sustainability Appraisal was undertaken for the draft Core Strategy in June 2010. This sets out the methodology, the process and the background information. It also draws on information from previous iterations of the appraisal from 2005 – 2007. Part 3 of the Main Report was the assessment of policies and objectives. It is this part that has been subject to change as the Core Strategy as developed. There is no need to change the methodology or supporting information, however as the Core Strategy policies and objectives change, it is necessary to update the Part 3 Appraisal. This July 2011 update of Part 3 follows two previous versions, the appraisal carried out in the original Main Report and the first amendment in January 2011.

The evolution of the sustainability appraisal alongside the Core Strategy development has resulted in a series of policies and objectives that are considered the most appropriate to meet the environment, social and economic goals of the Council.

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1. Non Technical Summary

1.1. Background

This is the last iteration of the Part 3 Sustainability Appraisal of the London Borough of Hillingdon's Core Strategy. It provides the final Part 3 which was first published for consultation in June 2010.

A second consultation event was carried out for the Pre-submission Core Strategy in February/March 2011. This was accompanied by the first update of Part 3 of Sustainability Appraisal Main Report from June 2010.

The Council received further comments through the consultation event on both the Core Strategy and the Sustainability Appraisal. These changes have now been acknowledged and included within the final Submission Core Strategy. As a consequence, Part 3 of the Sustainability Appraisal has now been updated.

This report sets out the final assessment of the policies and objectives set out in the Core Strategy. It uses the same methodology and evidence base as set out in Part 2 of the Main Sustainability Appraisal used for the first stage of this Core Strategy process. It is not a stand alone sustainability appraisal. It must be read in conjunction with Part 2 to fulfill the requirements of the Strategic Environmental Assessment Directive.

1.2. Findings

All the policies are considered to be compliant with the Borough's environmental, economic and social objectives. The January 2011 Part

3 update suggested a number of amendments to policies and objectives to improve their sustainability. These changes have now been made resulting in a suite of policies and objectives that successfully reflect the Council's sustainability objectives.

Policy E1: Managing the Supply of Employment Land	
<p>January 2011 Part 3 Update:</p> <p>This policy has been improved through the inclusion of greater emphasis on land contamination in EM8.</p> <p>No further recommendations.</p>	Good
<p>July 2011 Part 3 Update:</p> <p>No further changes have been made with regards to the scoring, however the policy has been improved by providing a greater link to the rest of the plan.</p>	Good
Policy E2: Location of Employment Growth	
<p>January 2011 Part 3 Update:</p> <p>This policy needs to take consideration of local air quality impact.</p> <p>Recommended change to policy wording to reflect local air quality and not climate change.</p>	Suggested Change
<p>July 2011 Part 3 Update:</p> <p>This policy has now been amended to reflect the recommended changes. It now provides a better link to air quality objectives and removes the out of context reference to climate change. It also changes the phrase</p>	Good

'that supports' to 'that delivers' making it a stronger policy regarding implementation.	
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Policy E3: Strategy for Heathrow Opportunity Area	Good
January 2011 Part 3 Update: This policy has been improved by clarification of climate change adaptation and mitigation impacts. No further recommendations.	
July 2011 Part 3 Update: No further changes were necessary	Good

Policy E4: Uxbridge	Good
January 2011 Part 3 Update: No changes No further recommendations.	
July 2011 Part 3 Update: No further changes necessary	Good

Policy E5: Town and Local Centres	Suggested Change
January 2011 Part 3 Update: This policy could further enhance local parades which are specifically mentioned in the policy. Recommended changes to ensure new development can help enhance not just protect existing local parades	
July 2011 Part 3 Update:	Good

<p>The policy has now been improved to provide greater emphasis on protection and enhancement of existing local parades. It allows more weight to be attributed to discussions with developers whose development may otherwise have pressurised local parades.</p>	
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<p>Policy E6: Small and Medium-Sized Enterprises (SME)</p>	
<p>January 2011 Part 3 Update:</p> <p>No changes</p> <p>No further recommendations</p>	<p>Good</p>
<p>July 2011 Part 3 Update:</p> <p>A slight change has been made to this policy to improve links to sustainable development. The policy does not score any differently, but it is acknowledged that the greater emphasis on sustainability is an improvement and provides better development management.</p>	<p>Good Improved</p>

<p>Policy E7: Raising Skills</p>	
<p>January 2011 Part 3 Update:</p> <p>This policy does not reflect the potential of the developing 'green' sector. The Government has committed a green fund to help develop the green sector which could help regenerate areas suffering from declining industries.</p> <p>Recommended changes to link policy to green jobs and to help the Borough capitalise on the growing green sector</p>	<p>Suggested Change</p>
<p>July 2011 Part 3 Update:</p>	<p>Good</p>

<p>The policy now includes a strong reference to green jobs. This is a growing sector with many Government policies and committed funds seeking to improve the UK's approach to climate change and energy production. This policy now includes acknowledgement of this and helps to ensure the Council is better set for future national 'green' policies.</p>	
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Policy H1: Housing Growth	
<p>January 2011 Part 3 Update:</p> <p>No Change</p> <p>No further recommendations</p>	Good
<p>July 2011 Part 3 Update:</p> <p>No further changes necessary</p>	Good

Policy H2: Affordable Housing	
<p>January 2011 Part 3 Update:</p> <p>No Change</p> <p>No further recommendations</p>	Good
<p>July 2011 Part 3 Update:</p> <p>No further changes necessary</p>	Good

Policy H3: Gypsy and Traveller Pitch Provision	Good
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<p>January 2011 Part 3 Update:</p> <p>No change</p> <p>No further recommendations</p>	
<p>July 2011 Part 3 Update:</p> <p>No further changes necessary</p>	Good

Policy HE1: Heritage	
<p>January 2011 Part 3 Update:</p> <p>This policy has been strengthened to consider heritage even further. However, it does need to acknowledge the conflict between conserving historic buildings and settings and delivering innovative design techniques, such as the inclusion of renewable energy technology.</p> <p>Recommended changes either in the policy or supporting text to provide greater support to addressing the conflict between new design and heritage matters.</p>	Suggested Changes
<p>July 2011 Part 3 Update:</p> <p>This policy has now been changed to reflect the challenge of meeting demands for improved and innovative housing design and in conservation areas. Raising energy prices means residents are looking to new housing solutions, such as PV panels to help meet the pressures. This invariably has an impact on historic buildings and conservation areas. The policy has been changed to acknowledge this challenge and will help the management of future decisions.</p>	Good

Policy BE1: Built Environment	
<p>January 2011 Part 3 Update:</p>	Suggested Changes

<p>This policy has been enhanced and considers landscape and heritage in more detail. However further improvements could be made to provide policy support to greater biodiversity and flood risk considerations, such as living walls and roofs, and the reduction in impermeable surfaces to better support surface water drainage.</p> <p>Recommended changes to better reflect biodiversity and flood risk objectives.</p>	
<p>July 2011 Part 3 Update:</p> <p>This policy has now been changed to reflect the need to protect biodiversity through specific mention of new green designs such as living walls and roofs. This could also result in improvements to air quality. This policy has been further improved to give greater consideration to the role green spaces and gardens play in managing flood risk. The loss of these permeable areas can generate more rainwater runoff which increases the possibility of flooding. The policy also clarifies the position of sustainable building requirements.</p>	<p>Good</p>
<p>Policy EM1: Climate Change Adaptation and Mitigation</p>	
<p>January 2011 Part 3 Update:</p> <p>This policy has been supported by changes to Policy EM8 and the linking of the water cycle to major development, ie the need to consider foul and surface water alongside water consumption.</p> <p>No further recommendations</p>	<p>Good</p>
<p>July 2011 Part 3 Update:</p> <p>No further changes necessary</p>	<p>Good</p>

Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	
January 2011 Part 3 Update: No change No further recommendation	Good
July 2011 Part 3 Update: No further changes necessary	Good

Policy EM3: Blue Ribbon Network	
January 2011 Part 3 Update: This policy has been improved through the inclusion of the need to consider transportation on the waterways. However, this policy also provides an opportunity to make a commitment to partnership working to achieve common goals. Recommended changes to provide opportunity and policy support to exploiting partnership working to maximise the potential of the Blue Ribbon Network	Suggested Changes
July 2011 Part 3 Update: The policy now sets out a commitment to work with other bodies to develop environmental improvements. This is necessary to ensure the Core Strategy is not just a Hillingdon document but recognises the importance of partnership working.	Good

Policy EM4: Open Space and Informal Recreation	Suggested Changes
January 2011 Part 3 Update:	

<p>This policy could provide greater support to the identification of new sites as opposed to protecting the existing provision. This would also provide a better link between the Open Space Study and future development.</p> <p>Recommended changes to maximise the potential for new development to help deliver new open space and recreation areas.</p>	
<p>July 2011 Part 3 Update:</p> <p>This policy has been changed to allow for open spaces to be considered as more than just recreational and amenity areas. Each piece of green open space plays a valuable role in helping to tackle climate change by absorbing harmful emissions. The changes regarding the open space study clarify the current position. It also provides a direct link between new development and what is required of developers.</p>	<p>Good</p>

<p>Policy EM5: Sport and Leisure</p>	
<p>January 2011 Part 3 Update:</p> <p>This policy could provide greater support to the identification of new sites as opposed to protecting the existing provision.</p> <p>Recommended changes to maximise the potential for new development to help deliver new sports and leisure opportunities.</p>	<p>Suggested Changes</p>
<p>July 2011 Part 3 Update:</p> <p>The changes to this policy allow for more focus to be made to the enhancement of sport and leisure provision and not just protection. Enhancement and not just protection will be needed to meet a growing population. As a consequence the level of protection may not be</p>	<p>Good</p>

<p>commensurate with the growth, meaning even if the existing resource was fully protected, in time it would not be sufficient. The policy changes therefore provide a greater focus on ensuring new provision is provided.</p>	
<p>Policy EM6: Flood Risk Management</p>	
<p>January 2011 Part 3 Update:</p> <p>This policy could benefit from a greater link to the need to reduce the amount of impermeable areas within the Borough. The proliferation of impermeable areas increases the risk of flooding as surface water is directed into drainage systems much quicker. The loss of gardens and green spaces all contribute to the increase in flood risk.</p> <p>No policy recommendations although the supporting text could be improved to consider the loss of permeable areas in more detail</p>	<p>Good</p>
<p>July 2011 Part 3 Update:</p> <p>This policy has now been changed to give more emphasis on the Council's aspirations for sustainable drainage. It is recognised that the changing climate could result in wetter winters and drier summers and therefore the SUDS combined with water collection, can meet both demands. The policy also provides an unequivocal stance by the Council which is open to limited interpretation.</p>	<p>Good</p>
<p>Policy EM7: Biodiversity and Geological Conservation</p>	
<p>January 2011 Part 3 Update:</p> <p>This policy has been improved giving further protection to the Borough's ecological features.</p>	<p>Good</p>

No further recommendations	
<p>July 2011 Part 3 Update:</p> <p>The inclusion of the requirement to consider SUDS alongside biodiversity gain improves the sustainability of this policy. It should ensure that developers are not solely focussed on one aspect when developing SUDS and allows the Council to seek environmental gain through functional drainage structures.</p>	Good

Policy EM8: Water, Air and Noise Water quality	
<p>January 2011 Part 3 Update:</p> <p>This policy has been improved considerably to consider all controlled waters and land contamination. As a consequence it scores much higher air quality, land quality, landscape and waste objectives of the Borough.</p> <p>No further recommendations</p>	Good
<p>July 2011 Part 3 Update:</p> <p>Although no further recommendations were made through the sustainability appraisal, comments were received from consultees requesting greater focus on water efficiency. As a consequence, the changes made have resulted in a better policy that allows consideration of water resources. This policy also allows a link to be made with the SUDS policy providing an overall ambition to meet challenges of too much water in times of flood and too little water in times of drought.</p>	Good

Policy EM9: Safeguarding Mineral Resources	
<p>January 2011 Part 3 Update:</p> <p>No Change</p>	Good

No further recommendations	
<p>July 2011 Part 3 Update:</p> <p>Although no recommendations were made in the previous appraisal, consultation responses highlighted a need to have more consideration for protecting minerals. As a consequence, the changes considerably strengthen the policy context for the borough's mineral reserves. This allows for a much more efficient use of land and resources.</p>	<p>Good</p>

Policy EM10: Mineral Extraction	
<p>January 2011 Part 3 Update:</p> <p>This policy could be enhanced to consider the restoration of mineral extraction in more detail. The current wording could be strengthened to ensure that the improvements from restoration outweigh the impacts caused by the extraction</p> <p>Recommended changes to give greater policy support to ensuring positive restoration proposals.</p>	<p>Suggested Changes</p>
<p>July 2011 Part 3 Update:</p> <p>The previous recommendation has now been made. It has been included alongside comments from consultees wishing to see more policy context for natural resources. As a consequence, the policy has been strengthened considerably to allow for greater management of resources, and post extraction processes.</p>	<p>Good</p>

Policy EM11: Sustainable Waste Management	
<p>January 2011 Part 3 Update:</p> <p>This policy would benefit from being linked to the waste</p>	<p>Suggested Changes</p>

<p>hierarchy, ie reduce, reuse, recycle. There is not enough emphasis on reducing the amount of waste generated. Furthermore, this policy could be improved to ensure any waste generated is seen as a resource, particularly in terms of energy generation.</p> <p>Recommended changes to provide a greater link to the waste hierarchy and the use of energy as a resource</p>	
<p>July 2011 Part 3 Update:</p> <p>The policy now recognises waste as a potential resource as well as the waste hierarchy. This is an important addition which links the Core Strategy back to the waste reduction and processing goals along with energy production aspirations of the London Plan and the Council's own targets. It provides a proactive policy framework which should encourage innovative companies to utilise waste as an asset. This in turn could provide links to the Council's aims to increase the amount of green jobs in the borough.</p>	<p>Good</p>

Policy T1: Accessible Local Destinations	
<p>January 2011 Part 3 Update:</p> <p>No change</p> <p>No further recommendations</p>	<p>Good</p>
<p>July 2011 Part 3 Update:</p> <p>No further changes necessary</p>	<p>Good</p>

Policy T2: Public Transport Interchanges	
<p>January 2011 Part 3 Update:</p> <p>No change</p>	<p>Good</p>

No further recommendations	Good
July 2011 Part 3 Update:	
No further changes necessary	

Policy T3: North-South Sustainable Transport Links	Good
January 2011 Part 3 Update:	
No change	
No further recommendations	Good
July 2011 Part 3 Update:	
No further changes necessary	

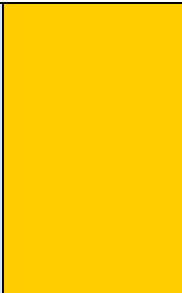

Policy T4: Heathrow Airport	Good
January 2011 Part 3 Update:	
This policy has been improved through the greater consideration of air quality and noise. As a consequence it now scores higher against the Borough's sustainability objectives.	
No further recommendations	Good
July 2011 Part 3 Update:	
No further changes necessary	

Policy CI1: Community Infrastructure Provision	Good
January 2011 Part 3 Update:	

No change	
No further recommendations	
July 2011 Part 3 Update:	Good
No further changes necessary	

Policy CI2: Leisure and Recreation	
<p>January 2011 Part 3 Update:</p> <p>This is a positive policy that generally scores well against the Borough's sustainability objectives. However, it could score better if there was more policy support to facilitating the upgrading of existing facilities as opposed to just protecting them.</p> <p>Recommended changes to provide policy support to Borough ambitions to upgrade existing facilities to improve access, sustainable transportation and improve energy efficiency</p>	Suggested Changes
<p>July 2011 Part 3 Update:</p> <p>This positive policy has now been improved by the inclusion of the changes. The changes are important to allow the policy to generate an increase in recreation and sports facilities as opposed to just protecting the existing resource.</p>	

Policy CI3: Culture	
<p>January 2011 Part 3 Update:</p> <p>This policy focuses on smaller facilities are accessible for walking and cycling. It could be improved by expanding</p>	Suggested Changes

<p>the requirement for all new facilities to demonstrate suitable walking and cycling facilities, and to help retrofit existing facilities.</p> <p>Recommended change to give policy support to ensuring new facilities and existing facilities can provide improved standards.</p>	
<p>July 2011 Part 3 Update:</p> <p>The previous recommended changes have now been made. The changes to this policy allow for a greater consideration of the historic environment and therefore providing complete inclusion of matters defined within the 'culture' section. The inclusion of requiring consideration of sustainable transportation within cultural facilities has a direct benefit in terms of air quality, and reducing traffic, but it also allows for further education of the 'green' agenda.</p>	 <p>Good</p>

2. Background

2.1. June 2010 Sustainability Appraisal

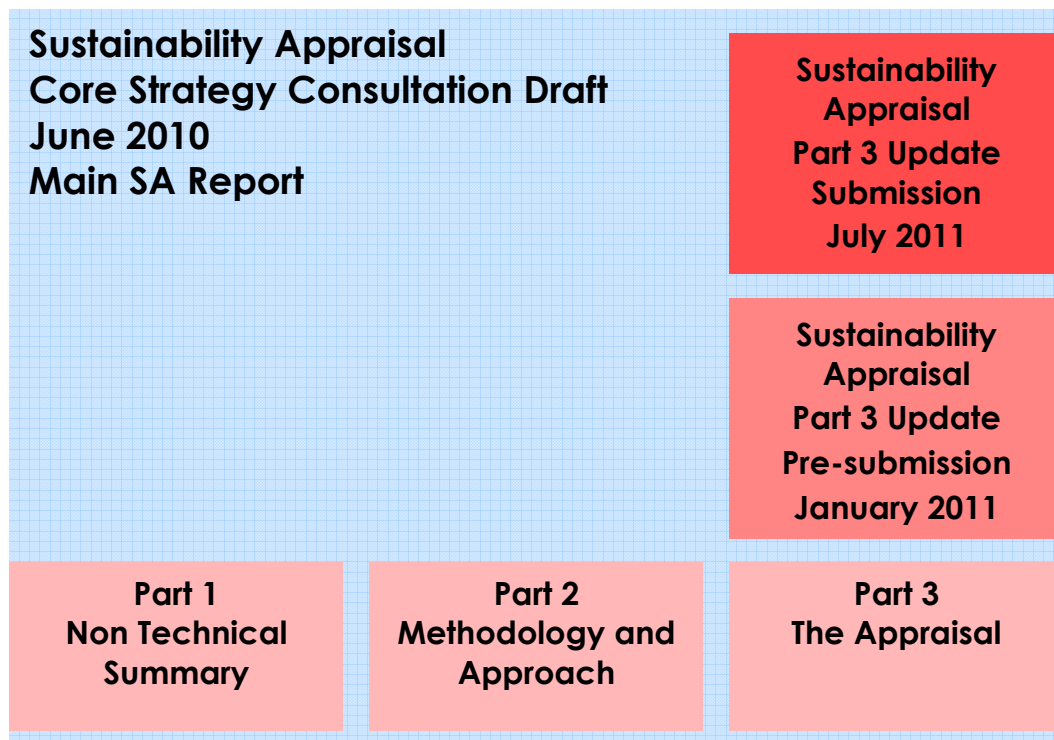
The preferred options Core Strategy in 2007 coincided with a change in guidance and regulations for Local Development Frameworks. A subsequent review of the Core Strategy was undertaken, resulting in the version published for consultation in June 2010. The original Sustainability Appraisal (SA) was revised and a new report was published for consultation in June 2010 alongside the Core Strategy. The Main SA Report is made up of 3 parts. Part 1 is the Non-Technical Summary, and Part 2 sets out the methodology, background information and approach. Part 3 provides the appraisal which is a dynamic assessment that needs to be changed to reflect Core Strategy amendments.

2.2. January 2011 Sustainability Appraisal

In February/March 2011 a second consultation stage was undertaken. This was the pre-submission Core Strategy that was produced in response to the changes following the June 2010 consultation event. As the Core Strategy was changed, it was necessary to appraise these amendments using the SA methodology. The original Part 2 methodology was used and only Part 3 was updated and sent out for consultation alongside the pre-submission Core Strategy. The June 2010 SA report was made available for viewing on the Council's website and Consultation portal.

2.3. July 2011 Sustainability Appraisal

The pre-submission consultation resulted in further changes to the Core Strategy. This amended document is the Submission Core Strategy and is not due to go through another public consultation. However, as changes were necessary it was important to update the Part 3 appraisal, which follows in this report. This Part 3 forms the final part of the Core Strategy appraisal process.



London Borough of Hillingdon
Submission Core Strategy
Submission Sustainability Appraisal
July 2011



Scoping Report
November 2004
Annex 1 to Main Report

The June 2010 SA represents the comprehensive assessment of the Core Strategy. It covers all the requirements of the SEA Directive and the Planning and Compulsory Purchase Act 2004. This document also provides the links to the previous SA reports which set the original objectives framework based on the initial scoping report. The June 2010 SA is therefore the primary document in understanding the process for appraising the Hillingdon Core Strategy.

2.4. Need for an Update

The Core Strategy is one of the most important documents for Borough and will help shape its future. It was published for consultation in June 2010 with the aim of understanding the views of the public, local businesses, house builders along with statutory technical bodies. This is an important part of the process and vital in ensuring the Core Strategy reflects the needs of the Borough.

The Borough has responded to this consultation and revised the Core Strategy where appropriate to reflect the responses whilst maintaining compliance with other national, regional and local policies. In addition to the consultation, the Main SA Report also suggested improvements and improvements to the objectives and policies. Therefore, the revised Core Strategy needs re-appraising to ensure its continued development is linked to the original sustainability objectives set by the Borough.

This update is a further iteration of Part 3 of the Main SA Report. It is meant as a supplement to the Main SA Report and is not designed to replace it. This report is purposefully focused solely on the appraisal whilst the Main SA Report provides the legislative background and links to previous SA reports.

2.5. Report Structure and links to SEA Directive

The comprehensive background to the appraisal process is contained within the Main SA Report. The Main Report also provides the links to previous reports as well as fulfilling the majority of the SEA requirements. This Part 3 Update should only be seen as a partial update of the Main SA Report. It is not necessary to provide a complete new SA. This update demonstrates the changeable nature of the Core Strategy whilst using the fixed methodology set out in the Main SA Report in June 2010.

The information to be included in the Environmental Report		Location in Main SA Report
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;		Part 3 Appendix 2
January 2011 Update	The objectives have been updated in this report within Chapter 3 (the Appraisal). The updated Core Strategy contains a comprehensive list of other plans and programmes	
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;		Annex 1 Annex 3 Annex 4 Section 5
Update	No update. Contained within the Main SA Report	
c) The environmental characteristics of areas likely to be significantly affected;		Part 3 Section 9 Annex 1
Update	No update. Contained within the Main SA Report	
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated		Annex 1 Annex 3 Section 5

pursuant to Directives 79/409/EEC and 92/43/EEC;		
Update	No update. Contained within the Main SA Report	
e) The environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	Annex 1 Annex 3	
Update	No update. Contained within the Main SA Report	
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, & fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Annex 2 Annex 3 Part 3 Section 8	
Update	Revised assessment of the environmental effects is included within Chapter 3 of this report.	
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Annex 2 Annex 3 Part 3 Section 9 and 10	
Update	Revised assessment of the environmental effects is included within Chapter 3 of this report.	
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Annex 2 Annex 3 Part 2 Section 2 and 6	
Update	No update. The broad Core Strategy objectives and policies have been developed following extensive consultation. The Main SA Report addresses this requirement sufficiently. Any changes made as part of this appraisal will also satisfy this SEA requirement.	

i) a description of measures envisaged concerning monitoring in accordance with Article 10;	Part 2 Section 7 Annex 4
Update	No update. Contained within the Main SA Report
j) a non-technical summary of the information provided under the above headings.	Part 1
Update	A brief non-technical summary is included for this update report in Chapter 1. The Main SA Report also contains a non-technical summary.

3. The Appraisal

3.1. The Vision

The Core Strategy sets out a vision for Hillingdon in 2026. This is an aspirational aim for the Borough and sets a target for what the Core Strategy should achieve.

The Main SA Report acknowledged that the Vision sets a broad agenda for the Core Strategy and is therefore difficult to appraise. However, the vision is implemented through the strategic objectives and the policies which are detailed enough to be able to appraise. However, the Core Strategy has been revised following the June and February consultation events. The Vision which was already considered to reflect the Borough's sustainability objectives has been further enhanced by the changes made.

3.2. Strategic Objectives and Core Policies

The strategic objectives provide the primary link to implementing the vision. These objectives then provide the focus for the policies. It is therefore necessary to appraise both the strategic objectives and the policies, both of which have been altered as a consequence of the consultation events.

In particular, it is important to reappraise the Core Strategy to determine if the suggested changes made in the June 2010 and January 2011 SA reports have been included.

4. Strategic Objectives Appraisal

		Sustainability Objectives																							
		Air Quality	Biodiversity	Heritage	Landscapes & Water	Soil & Water	Climate Change	Flood Risk	Resources and Waste	Use	Efficient Land	Housing	High Quality	Safety, Crime	Health, Noise, Accessibility	Accessability	Traffic reduction	Education	Skills & Amenity	Design & Growth	Economic	Business Image	Jobs	Provision of	
++ A likely highly positive effect + A likely positive effect 0 No significant effect or clear link - A likely negative effect -- A likely highly negative effect / Potential positive or negative effect depending on implementation																									
Plan Objectives The scoring from the Main SA Report (June 10) is shown alongside the scoring of the first stage amendments (January 11) and the submission document (July 11) No commentary is provided where strategic objectives have not changed.																									
SO1: Conserve and enhance the Borough's heritage and its setting by ensuring new development, including changes to the public realm, are of high quality design, appropriate to the significance of the heritage asset, and sensitive to the wider historic environment.	June 10	0	0	++	0	0	0	0	0	+	+	0	0	0	0	0	0	0	0	+	0	0	0	0	0
	January 11	0	0	++	0	0	0	0	0	+	+	0	0	0	0	0	0	0	0	+	0	0	0	0	0
	July 11	0	0	++	0	0	0	0	0	0	+	+	0	0	0	0	0	0	0	+	0	0	0	0	0
January 2011 Commentary: No change																									
July 2011 Commentary: No change																									

Plan Objectives		Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Climate Change	Flood Risk	Resources and Waste	Efficient Land Use	Housing	High Quality	Health, Noise, Safety, Crime	Accessibility	Traffic reduction	Education	Skills & Amenities	Design & Growth	Economic Image	Business	Jobs	Provision of
SO2: Create neighbourhoods that are of a high quality sustainable design, that have regard for their historic context and use sustainability principles which are sensitive and responsive to the significance of the historic environment, are distinctive, safe, functional and accessible and which reinforce the identity and suburban qualities of the borough's streets and public places, introduce public art to celebrate civic pride and serve the long-term needs of all residents.	June 10	0	+	+	0	+	+	0	+	++	+	++	0	+	+	+	0	0	0	0	0
	January 11	0	+	++	0	+	+	0	+	++	++	++	0	+	++	+	0	0	0	0	0
	July 11	0	+	++	0	+	+	0	+	++	++	++	0	+	++	+	0	0	0	0	0
January 2011 Commentary: The introduction of a greater emphasis on landscape, heritage and public art enhances this strategic objective.																					
July 2011 Commentary: No change																					
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 Study.	June 10	0	++	++	++	+	+	+	+	0	0	+	-	0	+	0	0	0	0	0	0
	January 11	0	++	++	++	+	+	+	+	+	0	+	-	0	+	0	0	0	0	0	0
	July 11	0	++	++	++	+	+	+	+	+	0	+	-	0	+	0	0	0	0	0	0

January 2011 Commentary: The additional comments on health and well being have enhanced this strategic objective.																				
July 2011 Commentary: No change																				
Plan Objectives		Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Climate Change	Flood Risk	Resources and Waste	Efficient Land Use	Housing	High Quality	Health, Noise, Safety, Crime	Accessibility	Traffic reduction	Education	Skills & Amenities	Design & Growth	Economic Image	Business Jobs	Provision of
SO4: Ensure development contributes to a reduction in crime and disorder, is resilient to terrorism, and delivers safe and secure buildings, spaces and inclusive communities.	June 10	0	0	0	0	0	0	0	0	+	++	0	0	0	+	0	0	0	0	
	January 11	0	0	0	0	0	0	0	0	+	++	0	0	0	+	0	0	0	0	
	July 11	0	0	0	0	0	0	0	0	+	++	0	0	0	+	0	0	0	0	
January 2011 Commentary: No change																				
July 2011 Commentary: No change																				
SO5: Safeguard and promote areas of geological importance and make a proportionate contribution to West London's target to extract 0.5 million tonnes of minerals.	June 10	-	-	-	/	0	/	+	+	0	0	0	0	-	0	0	0	0	+	
	January 11	-	-	-	/	0	/	+	+	0	0	0	0	-	0	0	0	0	+	
	July 11	-	-	-	/	0	/	+	+	0	0	0	0	-	0	0	0	0	+	
January 2011 Commentary: No change																				

July 2011 Commentary: No change																				
Plan Objectives		Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Climate Change	Flood Risk	Resources and Waste	Efficient Land Use	Housing	High Quality	Health, Noise, Safety, Crime	Accessibility	Traffic reduction	Education	Skills & Amenities	Design & Growth	Economic Image	Business Jobs	Provision of
SO6: Promote social inclusion through equality of opportunity and equality of access to social, educational, health, employment, recreational, green space and cultural facilities for all in the borough, particularly for residents living in areas of identified need.	June 10	0	0	0	0	0	0	0	0	0	0	++	+	-	++	+	+	+	+	++
	January 11	0	0	0	0	0	0	0	0	0	0	++	+	-	++	+	+	+	+	++
	July 11	0	0	0	0	0	0	0	0	0	0	++	+	-	++	+	+	+	+	++
January 2011 Commentary: No change																				
July 2011 Commentary: No change																				
SO7: Address Hillingdon's housing needs by using appropriate planning measures	June 10	0	0	/	0	/	/	0	+	+	+	/	0	0	0	+	+	0	+	0
	January 11	0	0	/	0	/	/	0	+	+	+	/	0	0	0	+	+	0	+	0
	July 11	0	0	/	0	/	/	0	+	+	+	/	0	0	0	+	+	0	+	0
January 2011 Commentary: No change																				
July 2011 Commentary: No change																				

Plan Objectives		Air Quality	Biodiversity	Heritage	Landscape & Water	Soil & Water	Climate Change	Flood Risk	Resources and Waste	Efficient Land Use	Housing	High Quality	Safety, Crime	Health, Noise, Accessability	Traffic reduction	Education	Skills & Amenity	Design & Growth	Economic Image	Business Jobs	Provision of
SO8: Protect and enhance biodiversity to support the necessary changes to adapt to climate change. Where possible, encourage the development of wildlife corridors.	June 10	+	++	+	++	++	+	+	0	0	+	0	0	0	+	+	0	0	0	0	0
	January 11	+	++	+	++	++	+	+	0	0	+	0	0	0	+	+	0	0	0	0	0
	July 11	+	++	+	++	++	+	+	0	0	+	0	0	0	+	+	0	0	0	0	0
January 2011 Commentary: No change																					
July 2011 Commentary: No change																					
SO9: Promote healthy and active lifestyles through the provision of access to a range of sport, recreation, health and leisure facilities.	June 10	0	0	+	0	+	0	0	+	0	++	+	0	++	+	0	0	0	0	0	0
	January 11	0	0	+	0	+	0	0	+	0	++	+	0	++	+	0	0	0	0	0	0
	July 11	0	0	+	0	+	0	0	+	0	++	+	0	++	+	0	0	0	0	0	0
January 2011 Commentary: No change																					
July 2011 Commentary: No change																					
SO10: Improve and protect air and water quality, reduce adverse impacts from noise including the safeguarding of quiet areas and reduce the impacts of contaminated land.	June 10	++	+	+	++	+	+	+	0	0	+	0	+	0	+	0	+	0	0	0	0
	January 11	++	++	+	++	+	+	+	+	0	+	0	+	0	+	0	+	0	0	0	0
	July 11	++	++	+	++	+	+	+	+	0	+	0	+	0	+	0	+	0	0	0	0
January 2011 Commentary: The use of the word 'protection' helps to improve this objective. The requirement to reduce the impacts of contaminated land will have an additional benefit on biodiversity and will ensure a more efficient use of land.																					

July 2011 Commentary: No change																				
Plan Objectives		Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Climate Change	Flood Risk	Resources and Waste	Efficient Land Use	Housing	High Quality	Health, Noise, Safety, Crime	Accessibility	Traffic reduction	Education	Skills & Amenity	Design & Growth	Economic Image	Business Jobs	Provision of
SO11: Address the impacts of climate change, and minimise emissions of carbon and local air quality pollutants from new development and transport.	June 10	++	+	+	+	++	+	0	0	+	+	0	+	0	+	+	-	0	0	/
	January 11	++	++	+	+	++	+	0	0	+	++	0	++	0	+	+	-	0	0	/
	July 11	++	++	+	+	++	+	0	0	+	++	0	++	0	+	+	-	0	0	/
January 2011 Commentary: The additional comments ensure more than carbon emissions are considered in the Core Strategy. Emissions other than carbon can have significant local air quality impacts without necessarily having major impacts on climate change. This objective is enhanced by considering wider air quality impacts which can have a detrimental effect on biodiversity and health. It also provides another justification for reducing polluting transportation modes.																				
July 2011 Commentary: No change																				
SO12: Reduce the reliance on the use of the car by promoting safe and sustainable forms of transport, such as improved walking and cycling routes and encouraging travel plans.	June 10	++	0	0	0	+	0	0	0	0	+	++	++	0	+	+	/	0	0	0
	January 11	++	0	0	0	+	0	0	0	0	+	++	++	0	+	+	/	0	0	0
	July 11	++	0	0	0	+	0	0	0	0	+	++	++	0	+	+	/	0	0	0
January 2011 Commentary: No change																				

July 2011 Commentary: No change																					
Plan Objectives		Air Quality	Biodiversity	Heritage	Landscapes & Heritage	Soil & Water	Climate Change	Flood Risk	Resources and Waste	Efficient Land Use	Housing	High Quality	Health, Noise, Safety, Crime	Accessibility	Traffic reduction	Education	Skills & Amenity	Design & Growth	Economic Image	Business Jobs	Provision of
SO13: Support the objectives of sustainable waste management.	June 10	+	0	0	0	0	0	0	++	+	0	0	0	0	-	0	0	+	0	0	+
	January 11	+	0	0	0	0	0	0	++	+	0	0	0	0	-	0	0	+	0	0	+
	July 11	+	0	0	0	0	0	0	++	+	0	0	0	0	-	0	0	+	0	0	+
January 2011 Commentary: No change																					
July 2011 Commentary: No change																					
SO14: Provide 9,000 new jobs and accommodate most economic growth in Uxbridge and the Heathrow Opportunity Area.	June 10	--	0	-	0	-	0	0	0	+	0	/	+	-	0	/	++	++	++		
	January 11	--	0	-	0	-	0	0	0	+	0	/	+	-	0	/	++	++	++		
	July 11	--	0	-	0	-	0	0	0	+	0	/	+	-	0	/	++	++	++		
January 2011 Commentary: No change																					
July 2011 Commentary: No change																					
SO15: Protect land for employment uses to meet the needs of different sectors of the economy. Manage the release of surplus employment land for other uses.	June 10	0	0	0	0	0	0	0	0	+	0	0	+	/	0	0	++	++	++		
	January 11	0	0	0	0	0	0	0	0	+	0	0	+	/	0	0	++	++	++		
	July 11	0	0	0	0	0	0	0	0	+	0	0	+	/	0	0	++	++	++		
January 2011 Commentary: No change																					

July 2011 Commentary: No change																				
Plan Objectives		Air Quality	Biodiversity	Heritage	Landscape & Soil & Water	Climate Change	Flood Risk	Resources and Waste	Efficient Land Use	Housing	High Quality	Health, Noise, Safety, Crime	Accessibility	Traffic reduction	Education	Skills & Amenities	Design & Growth	Economic Image	Business Jobs	Provision of
SO16: Manage appropriate growth, viability and regeneration of town and neighbourhood centres.	June 10	/	/	+	0	0	/	0	++	+	+	+	/	+	0	+	0	0	++	
	January 11	/	/	+	0	0	/	0	++	+	+	+	/	+	0	+	0	0	++	
	July 11	/	/	+	0	0	/	0	++	+	+	+	/	+	0	+	0	0	++	
January 2011 Commentary: No change																				
July 2011 Commentary: No change																				
SO17: Link deprived areas with employment benefits arising from the development of major sites and existing key locations.	June 10	-	0	/	0	0	0	0	0	0	0	+	-	+	/	++	0	0	+	
	January 11	-	0	/	0	0	0	0	0	0	0	+	-	+	/	++	0	0	+	
	July 11	-	0	/	0	0	0	0	0	0	0	+	-	+	/	++	0	0	+	
January 2011 Commentary: No change																				
July 2011 Commentary: No change																				
SO18: Improve access to local services and facilities, including health, education, employment and training, local shopping, community, cultural, sport and leisure facilities, especially for those without a car and for those in more remote parts of the borough through well planned routes and	June 10	+	0	0	0	+	0	0	+	+	+	++	/	+	+	+	+	+	+	
	January 11	+	0	0	0	+	0	0	+	+	+	++	/	+	+	+	+	+	+	
	July 11	+	0	0	0	+	0	0	+	+	+	++	/	+	+	+	+	+	+	

integrated public transport.																				
January 2011 Commentary: No change																				
July 2011 Commentary: No change																				
Plan Objectives		Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Climate Change	Flood Risk	Resources and Waste	Efficient Land Use	Housing	High Quality	Safety, Crime	Health, Noise, Accessibility	Traffic reduction	Education	Skills & Amenity	Design & Growth	Economic Image	Business Jobs	Provision of
SO19: Meet the proposed Replacement London Plan target to provide 425 new homes p/a and consider the revised targets in the Replacement London Plan.	June 10	/	/	/	0	/	/	0	+	/	/	/	/	0	0	+	0	+		
	January 11	/	/	/	0	/	/	0	+	/	/	/	/	0	0	+	0	+		
	July 11	/	/	/	0	/	/	0	+	/	/	/	/	0	0	+	0	+		
January 2011 Commentary: No change																				
July 2011 Commentary: No change																				
SO20: Improve facilities at bus and underground/rail interchanges to promote sustainable growth in Uxbridge, Heathrow, the Hayes/West Drayton corridor and accessibility to other town centres.	June 10	+	0	+	0	/	/	0	+	+	+	++	++	+	+	++	+	+		
	January 11	+	0	+	0	/	/	0	+	+	+	++	++	+	+	++	+	+		
	July 11	+	0	+	0	/	/	0	+	+	+	++	++	+	+	++	+	+		
January 2011 Commentary: No change																				
July 2011 Commentary: No change																				
SO21: Improve public transport services between the north and the south of the borough to ensure easier access between	June 10	+	0	0	0	+	0	0	0	0	0	++	++	0	0	+	+	0		
	January	+	0	0	0	+	0	0	0	0	0	++	++	0	0	+	+	0		

residential areas such as Northwood and South Ruislip, Hillingdon Hospital, Brunel University, Stockley Park and Heathrow Airport.	11																		
	July 11	+	0	0	0	+	0	0	0	0	0	++	++	0	0	+	+	0	
January 2011 Commentary: No change																			
July 2011 Commentary: No change																			
Plan Objectives		Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Climate Change	Flood Risk	Resources and Waste	Efficient Land Use	High Quality Housing	High Quality Safety, Crime	Health, Noise, Accessibility	Traffic reduction	Education	Skills & Amenities	Design & Growth	Economic Image	Business Jobs	Provision of
SO22: Promote efficient use of public transport and in particular the enhancement of Underground services to Uxbridge and faster services to central London.	June 10	+	0	0	0	+	0	0	0	0	+	+	++	0	0	+	++	++	0
	January 11	+	0	0	0	+	0	0	0	0	+	+	++	0	0	+	++	++	0
	July 11	+	0	0	0	+	0	0	0	0	+	+	++	0	0	+	++	++	0
January 2011 Commentary: No change																			
July 2011 Commentary: No change																			
SO23: Develop and implement a strategy for the Heathrow Opportunity Area, in order to ensure that local people benefit from economic and employment growth and social and environmental improvements including reductions in noise and poor air	June 10	/	/	/	/	/	0	0	+	/	+	+	/	0	0	++	++	++	
	January 11	+	/	/	/	/	0	0	+	/	+	+	/	0	0	++	++	++	

quality	July 11	+	/	/	/	/	0	0	+	/	+	+	/	0	0	++	++	++				
January 2011 Commentary: The specific commitment relating to air and noise enhances this objective although the remaining environmental impacts will depend on future details.																						
July 2011 Commentary: No change																						
Plan Objectives		Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Climate Change	Flood Risk	Resources and Waste	Efficient Land Use	Housing	High Quality	Health, Noise, Safety, Crime	Accessibility	Traffic reduction	Education	Skills & Amenity	Design & Growth	Economic	Business Image	Jobs	Provision of	
SO24: Optimise the potential employment and educational benefits of Heathrow airport for local residents.	June 10	0	0	0	0	0	0	0	0	0	0	+	0	+	0	+	+	0				
	January 11	0	0	0	0	0	0	0	0	0	0	+	0	+	0	+	+	0				
	July 11	0	0	0	0	0	0	0	0	0	0	+	0	+	0	+	+	0				
January 2011 Commentary: No change																						
July 2011 Commentary: No change																						
SO25: Maintain support for operational uses within the existing airport boundary that do not increase environmental impacts and continue to reduce existing impacts.	June 10	New strategic objective																				
	January 11	/	/	/	/	/	/	/	+	0	0	0	0	0	0	0	++	++	++			
	July 11	+	0	+	+	+	+	+	+	+	0	0	0	0	0	0	++	++	++			
January 2011 Commentary: This is an additional objective that will help the Borough to continue to prosper from the presence of Heathrow. However, Heathrow operations can have significant environmental impacts. The caveat of minimising environmental impacts 'wherever possible' provides some protection for the environment but will be determined by the details. Extended and increased operations at Heathrow are often covered by permitted development rights reducing the role of the Borough in helping to design out environmental problems.																						

Suggestion: The current wording is heavily weighted to economic improvements. The wording should be changed to the following:

Maintain support for operational uses within the existing airport boundary that do not increase environmental impacts and continue to reduce existing impacts

July 2011 Commentary: The changes have now been made to give greater strength and weight to protecting the environment.

4.1. Core Strategy Objectives Appraisal Conclusion

The Core Strategy sets out clear and precise objectives to achieve the Vision for Hillingdon in 2026. The Main SA Report found that the strategic objectives were broadly compliant with the sustainability objectives. The changes made to the Core Strategy as a result of the June consultation have enhanced the strategic objectives further. In general, there is a greater emphasis on environmental impacts. In particular, the June 2010 Core Strategy did not properly address contaminated land, although it did consider water quality. By specifically including it within the revised Core Strategy, it has increased the performance of the plan against the sustainability objectives.

The Main SA Report found that one area of conflict between the objectives relates to the housing and economic growth and where it will be located. The Heathrow Opportunity Area is of vast importance to the Borough. It is targeted for more growth and expansion and will be the centre for further economic prosperity. However, there are a number of environmental concerns with this growth. The strategic objectives have been worded positively though to ensure these concerns are satisfactorily considered.

The addition of SO25 adds support to increased operations within the airport boundary, but with a minimal caveat promoting environmental performance. Suggested changes have been made to improve this new objective.

Further growth on and around the airport needs to be managed carefully to ensure environmental effects are considered equally alongside economic impacts. Regardless of the conflict

acknowledged in the Main SA Report, the Core Strategy objectives are still considered to be in compliance with the sustainability objectives. Changes to SO25 would be welcomed to ensure environmental impacts are equally considered alongside the economic growth of the airport. **There are no further changes as a result of the Part 3 Update Core Strategy Submission Appraisal.**

5. The Core Strategy Policies Appraisal

					Policy E1: Managing the Supply of Employment Land	
++ A likely highly positive effect		<p>Policy E1: Managing the Supply of Employment Land</p> <p>The Council will accommodate growth by protecting Strategic Industrial Locations and the designation of Locally Significant Industrial Sites (LSIS) and Locally Significant Employment Locations (LSEL) including the designation of 13.63ha of new employment land.</p> <p>The Council will manage the release of 17.58ha of surplus industrial land for other uses over the plan period <u>subject to other policies in the plan</u></p>				
+ A likely positive effect						
0 No significant effect or clear link						
- A likely negative effect						
-- A likely highly negative effect						
? Uncertain or insufficient information to determine effect						
/ Potential positive or negative effect depending on implementation						
		June 2010	January 2011	July 2011	June 2010 Proposed Policy Changes	January 2011 Assessment
Sustainability Appraisal Objectives	Air Quality	-	-	-	After: <i>The Council will manage the release of 17.58ha of surplus industrial land for other uses over the plan period...</i>	The previous suggestion has not been included within this Policy however much greater emphasis on development and contaminated land is now included within Policy EM8. The designation of new land will have to consider the other policies elsewhere in the Core Strategy.
	Biodiversity	-	-	-		
	Landscape & Heritage	/	/	/		
	Soil & Water	-	-	-		
	Flood Risk	0	0	0		
	Efficient Land Use	/	/	/		

Resources and Waste	0	0	0	<p>Add:</p> <p>...subject to suitable land conditions regarding contamination and remediation.</p>	<p>Flood Risk, Contaminated Land, Biodiversity, Public Transport Links, Air Quality and Landscape impacts will need to be considered when designating new land.</p> <p>Summary: No further changes necessary.</p>
Climate Change	-	-	-		
High Quality Housing	0	0	0		
Health, Noise, Safety, Crime	0	0	0		
Accessibility	0	0	0		
Traffic Reduction	-	-	-		
Skills & Education	0	0	0		
Design & Amenity	0	0	0		
Economic Growth	++	++	++		
Business Image	+	+	+		
Provision of Jobs	+	+	+		
				<p>July 2011 Submission Core Strategy: Final Appraisal</p> <p>Although there is no change in the scoring, the additional wording linking this policy to all the others in the plan reflects the suggestions set out in the June 2010 assessment. Whilst there is an implication that all policies will need to be compliant with other policies, there are sometimes conflicts and compromises that need to be found when making planning decisions. The additional words at the end of this policy ensure that economic development is not given unequal weighting over environmental and social objectives.</p> <p>Summary: The policy has been improved.</p>	

++ A likely highly positive effect	Policy E2: Location of Employment Growth
+ A likely positive effect	

0 No significant effect or clear link		<p>The Council will accommodate 9,000 new jobs during the plan period. Most of this employment growth will be directed towards suitable sites in the Heathrow Opportunity Area, Strategic Industrial Locations, Locally Significant Employment Locations (LSEL), Locally Significant Industrial Sites (LSIS), Uxbridge town centre and Hayes Town Centre with a particular focus around transport nodes. The Council will promote development in highly accessible locations that delivers sustainable travel patterns and contributes to the improvement of existing networks to reduce impacts on air quality. The Council will accommodate a minimum of 3,800 additional hotel bedrooms, and new hotels and visitor facilities will be encouraged in Uxbridge, Hayes on sites outside of designated employment land on the Heathrow perimeter and in other sustainable locations.</p>				
- A likely negative effect						
-- A likely highly negative effect						
? Uncertain or insufficient information to determine effect						
/ Potential positive or negative effect depending on implementation						
		June 2010	January 2011	July 2011	June 2010 Proposed Policy Changes	January 2011 Assessment
SA Objectives	Air Quality	-	-	-	<p>Replace:</p> <p><i>The Council will promote development in highly accessible locations that supports sustainable travel behaviour and reduces impacts on climate change.</i></p> <p>With:</p> <p><i>The Council will promote development in highly accessible locations that</i></p>	<p>The previous assessment in June 2010 recommended changes to clarify the types of emissions being reduced. This has not been included within the amended Core Strategy. Accordingly the use of the phrase 'reduces impacts on climate change' is slightly out of context as it needs to consider local air quality impacts as well. It also provides scope for the improvement of existing networks. This policy has negative Air Quality impacts without the recommended changes.</p> <p>Summary: The June 2010 recommendation is still</p>
	Biodiversity	0	0	0		
	Landscape & Heritage	0	0	0		
	Soil & Water	0	0	0		
	Flood Risk	0	0	0		
	Efficient Land Use	+	+	+		
	Resources and Waste	0	0	0		
	Climate Change	-	-	-		

	High Quality Housing	0	0	0	<i>delivers sustainable travel patterns and contributes to the improvement of existing networks to reduce emissions and impacts on air quality.</i>	valid and the recommended change should be made to improve the policy against the sustainability objectives.
	Health, Noise, Safety, Crime	0	0	0		
	Accessibility	+	+	+		
	Traffic Reduction	-	-	-		
	Skills & Education	0	0	0		
	Design & Amenity	0	0	+		
	Economic Growth	+	+	+		
	Business Image	+	+	+		
	Provision of Jobs	+	+	+		
<p>July 2011 Submission Core Strategy: Final Appraisal</p> <p>The June 2010 recommendation has now been made which provides greater links between the policy and air quality objectives. The reference to climate change in the original policy was out of context, and the use of the word 'supports' was considered too weak. The changes now provide a much more robust policy that will ensure the location of employment growth fully considers sustainable transportation.</p> <p>Summary: The policy has been improved.</p>						

					Policy E3: Strategy for Heathrow Opportunity Area	
++ A likely highly positive effect		<p>The Council will prepare a Development Plan Document (DPD) for the Heathrow area to achieve the future growth set out in Table 5.3, in consultation with the GLA and London Borough of Hounslow. This DPD will help manage development and protect land within Heathrow for airport-related activities. It will balance demand for hotel and employment uses, and ensure that local people benefit from sustainable economic growth. The DPD will also set requirements for climate change mitigation and adaptation through a low carbon emission strategy and measures to improve local air quality.</p>				
+ A likely positive effect						
0 No significant effect or clear link						
- A likely negative effect						
-- A likely highly negative effect						
? Uncertain or insufficient information to determine effect						
/ Potential positive or negative effect depending on implementation						
		June 2010	January 2011	July 2011	June 2010 Proposed Policy Changes	January 2011 Assessment
Sustainability Appraisal Objectives	Air Quality	+	+	+	None	<p>This policy has been reworded to clarify the requirements for climate change adaptation and mitigation. Further environmental factors could be included within this policy to provide more policy direction regarding the sustainability objectives.</p> <p>Summary: The policy has been improved. No further changes necessary.</p>
	Biodiversity	/	/	/		
	Landscape & Heritage	/	/	/		
	Soil & Water	/	/	/		
	Flood Risk	/	/	/		
	Efficient Land Use	/	/	/		
	Resources and Waste	/	/	/		
	Climate Change	+	+	+		

			+	+		
	High Quality Housing	/	/	/		
	Health, Noise, Safety, Crime	/	/	/		
	Accessibility	/	/	/		
	Traffic Reduction	/	/	/		
	Skills & Education	/	/	/		
	Design & Amenity	/	/	/		
	Economic Growth	+	+	+		
		+	+	+		
	Business Image	+	+	+		
	Provision of Jobs	/	/	/		
					July 2011 Submission Core Strategy: Final Appraisal	
					No further changes necessary	

++ A likely highly positive effect	<p>Policy E4: Uxbridge</p> <p>The Council will strengthen the status of Uxbridge town centre as a Metropolitan Centre by delivering growth set out in Table 5.4 and promoting Uxbridge as a suitable location for retail, offices, hotels, recreation and leisure, entertainment and culture, evening and night-time economy, education, community services, and mixed-use development. The Council will secure improvements to Uxbridge public transport interchange and the town centre boundary will be expanded.</p>
+ A likely positive effect	
0 No significant effect or clear link	
- A likely negative effect	
-- A likely highly negative effect	

? Uncertain or insufficient information to determine effect								
/ Potential positive or negative effect depending on implementation								
		June 2010	January 2011	July 2011	June 2010 Proposed Policy Changes	January 2011 Assessment		
Sustainability Appraisal Objectives	Air Quality	/	/	/	None.	No further changes necessary.		
	Biodiversity	0	0	0				
	Landscape & Heritage	/	/	/				
	Soil & Water	0	0	0				
	Flood Risk	-	-	-				
	Efficient Land Use	/	/	/				
	Resources and Waste	0	0	0				
	Climate Change	0	0	0				
	High Quality Housing	0	0	0				
	Health, Noise, Safety, Crime	/	/	/				
	Accessibility	/	/	/				
	Traffic Reduction	/	/	/				
	Skills & Education	0	0	0				
	Design & Amenity	0	0	0				
	Economic Growth	+	+	+				

Business Image	++	+	+		
Provision of Jobs	+	+	+		
				July 2011 Submission Core Strategy: Final Appraisal	
				No further changes necessary	

++	A likely highly positive effect	Policy E5: Town and Local Centres				
+	A likely positive effect	<p>The Council will accommodate additional retail growth in District Centres as set out in Table 5.5 and will promote uses appropriate to their size and location in accordance with the retail hierarchy. The Council will improve town and neighbourhood centres across Hillingdon as set out in Map 5.3, and improve public transport, walking and cycling connections to town and neighbourhood centres whilst ensuring an appropriate level of parking provision is provided for accessibility to local services and amenities Public transport will be improved to strengthen the viability and vitality of all town centres including Uxbridge, Eastcote, Hayes, Northwood, Ruislip, Yiewsley and West Drayton.</p> <p>Local parades will be protected, enhanced and managed to ensure they meet the needs of the local community and enhance the quality of life for local residents, particularly those without access to a car.</p>				
0	No significant effect or clear link					
-	A likely negative effect					
--	A likely highly negative effect					
?	Uncertain or insufficient information to determine effect					
/	Potential positive or negative effect depending on implementation					
		June 2010	January 2011	July 2011	June 2010 Proposed Policy Changes	January 2011 Assessment

Sustainability Appraisal Objectives	Air Quality	+	+	+	<p>Replace:</p> <p><i>Local parades will be protected and managed to ensure...</i></p> <p>With:</p> <p><i>Local parades will be protected, enhanced and managed to ensure...</i></p>	<p>The previous change has not yet been made. This policy provides an opportunity to help enhance existing Local Parades. This policy can be more positive in the context of the Borough sustainability objectives.</p> <p>Summary: The June 2010 recommendation is still valid and the recommended change should be made to improve the policy against the sustainability objectives.</p>
	Biodiversity	0	0	0		
	Landscape & Heritage	/	/	/		
	Soil & Water	/	/	/		
	Flood Risk	/	/	/		
	Efficient Land Use	+	+	+		
	Resources and Waste	0	0	0		
	Climate Change	0	0	0		
	High Quality Housing	0	0	0		
	Health, Noise, Safety, Crime	+	+	+		
	Accessibility	0	0	+		
	Traffic Reduction	++	+	+		
	Skills & Education	+	+	+		
	Design & Amenity	+	+	+		
	Economic Growth	+	+	+		
Business Image	+	+	+			
Provision of Jobs	+	+	+			
					<p>July 2011 Submission Core Strategy: Final Appraisal</p> <p>The recommended change from June 2010 has now been made. This provides a greater emphasis on enhancing the existing situation. This provides greater links to future development proposals particularly where new development may be able to help contribute to the enhancement. The policy wording now</p>	

	provides a hook for seeking additional funding to enhance these highly important local centres.
Summary: The policy has been improved.	

					Policy E6: Small and Medium-Sized Enterprises (SME)	
++ A likely highly positive effect		Hillingdon will encourage the development of affordable accommodation for small and medium-sized businesses in appropriate sustainable locations throughout the borough.				
+ A likely positive effect						
0 No significant effect or clear link						
- A likely negative effect						
-- A likely highly negative effect						
? Uncertain or insufficient information to determine effect						
/ Potential positive or negative effect depending on implementation						
		June 2010	January 2011	July 2011	June 2010 Proposed Policy Changes	January 2011 Assessment
Sustainability Appraisal Objectives	Air Quality	/	/	/	Replace <i>appropriate</i>	The proposed change from June 2010 has not been made. However, the policy is not considered to perform negatively against the Borough's sustainability objectives without the
	Biodiversity	0	0	0		
	Landscape & Heritage	0	0	0		
	Soil & Water	0	0	0		

Flood Risk	/	/	/	With: <i>sustainable</i>	change. Summary: No further recommendation.
Efficient Land Use	/	/	/		
Resources and Waste	0	0	0		
Climate Change	/	/	/		
High Quality Housing	0	0	0		
Health, Noise, Safety, Crime	0	0	0		
Accessibility	/	/	/		
Traffic Reduction	-	-	-		
Skills & Education	+	+	+		
Design & Amenity	0	0	0		
Economic Growth	+	+	+		
Business Image	+	+	+		
Provision of Jobs	+	+	+		
				<p>July 2011 Submission Core Strategy: Final Appraisal</p> <p>The June 2010 recommendation has now been made resulting in a more sustainable policy. Whilst this does not change the scoring, the use of the word 'sustainable' allows greater development management at future planning application and forward planning stages.</p> <p>Summary: The policy has been improved.</p>	

++ A likely highly positive effect	Policy E7: Raising Skills
+ A likely positive effect	

0 No significant effect or clear link		The Council will ensure training opportunities are linked with the development of major sites for both construction phases and end use occupiers, and through liaising with local colleges and businesses to ensure workforce development initiatives and training programmes reflect skill requirements in the workplace. The Council will engage with local businesses and universities to link high end jobs and green jobs in the borough with higher education courses. The Council will promote Hillingdon as a destination for visitors and tourists and ensure that local residents have access to jobs within related industries.				
- A likely negative effect						
-- A likely highly negative effect						
? Uncertain or insufficient information to determine effect						
/ Potential positive or negative effect depending on implementation						
		June 2010	January 2011	July 2011	June 2010 Proposed Policy Changes	January 2011 Assessment
Sustainability Appraisal Objectives	Air Quality	0	0	0	After: ...to link high end jobs... Insert: and green jobs...	The previous recommendations have not yet been made. Further Government announcements have recently been made which have increased the emphasis on the 'green' sector. The growth of the green sector could lead to regeneration opportunities, particularly in areas affected by the decline of manufacturing industries. There is still a lot of uncertainty about how the green sector will develop, but the Core Strategy should provide a positive link to maximise any future
	Biodiversity	0	0	0		
	Landscape & Heritage	0	0	0		
	Soil & Water	0	0	0		
	Flood Risk	0	0	0		
	Efficient Land Use	0	0	0		
	Resources and Waste	0	0	0		
	Climate Change	0	0	+		
	High Quality Housing	0	0	0		
	Health, Noise, Safety, Crime	0	0	0		

Accessibility	0	0	0	<p>opportunities.</p> <p>This policy could score higher against 'Economic Growth', 'Business Image', and 'Provision of Jobs' objectives if there was a link to the growing 'green' sector.</p> <p>Summary: The June 2010 recommendation is still valid and the recommended change should be made to improve the policy against the sustainability objectives.</p>
Traffic Reduction	0	0	0	
Skills & Education	++	+	++	
Design & Amenity	0	0	0	
Economic Growth	+	+	+	
Business Image	+	+	++	
Provision of Jobs	+	+	+	
<p>July 2011 Submission Core Strategy: Final Appraisal</p> <p>The June 2010 recommendation has now been made resulting in a more sustainable policy. This provides a greater emphasis on the types of jobs that are estimated to grow in the coming years. Green jobs, whilst not clearly defined, will be linked to the Government's Green Deal, and Green Investment bank. Furthermore, for the UK to meet its climate change and energy production targets there will need to be considerable investment in the green sector. The policy wording allows the Council to respond to this growing sector.</p> <p>Summary: The policy has been improved.</p>				

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++	A likely highly positive effect	<p>Policy H1: Housing Growth</p> <p>The Council will meet and exceed its minimum strategic dwelling requirement, where this can be achieved, in accordance with other Local Development Framework policies.</p> <p>The borough's current target is to provide an additional 4250 dwellings, annualised as 425 dwellings per</p>
+	A likely positive effect	
0	No significant effect or clear link	
-	A likely negative effect	

-- A likely highly negative effect					year, for the ten year period between 2011 and 2021. Rolled forward to 2026, this target equates a minimum provision of 5,475 dwellings over the period of the Core Strategy. Sites that will contribute to the achievement of this target will be identified in the Site Allocations DPD.	
? Uncertain or insufficient information to determine effect						
/ Potential positive or negative effect depending on implementation						
		June 2010	January 2011	July 2011	June 2010 Proposed Policy Changes	January 2011 Assessment
Sustainability Appraisal Objectives	Air Quality	-	-	-	None.	No further recommendations
	Biodiversity	-	-	-		
	Landscape & Heritage	+	+	+		
	Soil & Water	0	0	0		
	Flood Risk	/	/	/		
	Efficient Land Use	0	0	0		
	Resources and Waste	-	-	-		
	Climate Change	-	-	-		
	High Quality Housing	++	++	++		
	Health, Noise, Safety, Crime	/	/	/		
	Accessibility	/	/	/		
	Traffic Reduction	-	-	-		
	Skills & Education	0	0	0		
Design & Amenity	/	/	/			

Economic Growth	++	++	++		
Business Image	0	0	0		
Provision of Jobs	0	0	0		
				July 2011 Submission Core Strategy: Final Appraisal No changes necessary.	

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++	A likely highly positive effect	Policy H2: Affordable Housing Housing provision is expected to include a range of housing to meet the needs of all types of households and the Council will seek to maximise the delivery of affordable housing from all sites over the period of the Core Strategy. 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.				
+	A likely positive effect					
0	No significant effect or clear link					
-	A likely negative effect					
--	A likely highly negative effect					
?	Uncertain or insufficient information to determine effect					
/	Potential positive or negative effect depending on implementation					
		June 2010	January 2011	July 2011	June 2010 Proposed Policy Changes	January 2011 Assessment

Sustainability Appraisal Objectives	Air Quality	0	0	0	None	No further recommendations
	Biodiversity	0	0	0		
	Landscape & Heritage	0	0	0		
	Soil & Water	0	0	0		
	Flood Risk	0	0	0		
	Efficient Land Use	0	0	0		
	Resources and Waste	0	0	0		
	Climate Change	0	0	0		
	High Quality Housing	+	+	+		
	Health, Noise, Safety, Crime	0	0	0		
	Accessibility	0	0	0		
	Traffic Reduction	0	0	0		
	Skills & Education	0	0	0		
	Design & Amenity	0	0	0		
	Economic Growth	+	+	+		
Business Image	0	0	0			
Provision of Jobs	0	0	0			
					<p>July 2011 Submission Core Strategy: Final Appraisal</p> <p>No changes necessary.</p>	

					Policy H3: Gypsy and Traveller Pitch Provision						
++ A likely highly positive effect		<p>The Council will ensure that:</p> <p>A. The existing Colne Park site will be protected for its current use</p> <p>B. Targets for additional pitch provision take account of need and the availability of suitable sites; and</p> <p>C. Proposals for sites to accommodate the specific needs of Travellers (Irish and Scottish), Gypsies, Roma, Sinti and Travelling Show People should:</p> <ol style="list-style-type: none"> 1 Be located on a site and in an area that is environmentally acceptable for residential occupation; 2 Have no significant adverse effects on the amenity of occupiers of adjoining land; 3 Have acceptable road and pedestrian access and be accessible to local services and public transport; and 4 Be consistent with other relevant LDF policies. 									
+ A likely positive effect											
0 No significant effect or clear link											
- A likely negative effect											
-- A likely highly negative effect											
? Uncertain or insufficient information to determine effect											
/ Potential positive or negative effect depending on implementation		June 2010		January 2011		July 2011		June 2010 Proposed Policy Changes		January 2011 Assessment	
Sustainability Appraisal Objectives	Air Quality	0	0	0	None		No further recommendations.				
	Biodiversity	+	+	+							
	Landscape & Heritage	+	+	+							
	Soil & Water	0	0	0							
	Flood Risk	/	/	/							
	Efficient Land Use	0	0	0							

Resources and Waste	0	0	0		
Climate Change	0	0	0		
High Quality Housing	0	0	0		
Health, Noise, Safety, Crime	++	++	++		
Accessibility	0	0	0		
Traffic Reduction	0	0	0		
Skills & Education	0	0	0		
Design & Amenity	0	0	0		
Economic Growth	0	0	0		
Business Image	0	0	0		
Provision of Jobs	0	0	0		
				<p>July 2011 Submission Core Strategy: Final Appraisal</p> <p>No changes necessary.</p>	

++	A likely highly positive effect	<p style="text-align: center;">Policy HE1: Heritage</p> <p>The Council will:</p> <ol style="list-style-type: none"> Conserve and enhance Hillingdon's unique historic environment, including its heritage assets such as statutorily Listed Buildings, Conservation Areas, Scheduled Ancient Monuments, Registered Parks and Gardens, Locally Listed Buildings, Areas of Special Local Character, and Archaeological Priority Zones and Areas, their settings and the wider historic environment. Actively encourage the regeneration of heritage assets, particularly those which have been included in
+	A likely positive effect	
0	No significant effect or clear link	
-	A likely negative effect	
--	A likely highly negative	

effect		English Heritage's 'Heritage at Risk' register or are currently vacant.				
?		3. Promote increased public awareness, understanding of and access to the Borough's heritage assets and wider historic environment, through Section 106 agreements and via community engagement and outreach activities.				
/		4. Encourage the reuse and modification of heritage assets where appropriate, when considering proposals to mitigate or adapt to the effects of climate change.				
		June 2010	January 2011	July 2011	June 2010 Proposed Policy Changes	January 2011 Assessment
Sustainability Appraisal Objectives	Air Quality	0	0	0	Add: 4. Take a considerate approach to new development that meets higher building regulations standards or includes renewable energy technology and the need to conserve and enhance Hillingdon's historic environment.	The previous change has not been made however; it is acknowledged that it is a matter that will need to be considered in more detail within the Development Management Document. The Core Strategy does acknowledge the potential conflict between the need for sustainable construction and conserving the Borough's heritage. The Development Management Document will need to clearly outline the potential conflict and suggest a suitable approach that can balance the two requirements. Summary: This policy would benefit from acknowledgement of the conflict between sustainable construction and historic
	Biodiversity	0	0	0		
	Landscape & Heritage	++	++	++		
	Soil & Water	0	0	0		
	Flood Risk	0	0	0		
	Efficient Land Use	0	0	0		
	Resources and Waste	0	0	0		
	Climate Change	/	/	+		
	High Quality Housing	/	/	+		
	Health, Noise, Safety, Crime	0	0	0		
	Accessibility	0	0	0		
	Traffic Reduction	0	0	0		
	Skills & Education	0	0	0		

	Design & Amenity	+	+	+		conservation. The previous recommendation stands although is not necessary provided the Development Management Document includes a clear policy position.
	Economic Growth	0	0	0		
	Business Image	0	0	0		
	Provision of Jobs	0	0	0		
						<p>July 2011 Submission Core Strategy: Final Appraisal</p> <p>The policy has been improved by a variation of the suggested change from the June Part 3 Appraisal and the January Part 3 update. Meeting future building regulations and conserving the past is becoming increasingly challenging. Soaring energy prices mean that new housing should provide sustainable solutions to energy consumption. In most instances, this may take the form of renewable energy. However, in conservation areas, or on listed buildings this becomes increasingly problematic. Conservation areas and historic buildings are likely to become less viable if sustainable improvements are ignored and they become inefficient and less marketable. Rising energy prices will expose the less efficient older buildings in a competitive market. Similarly, conservation areas maybe sterilised if there is a tough stance on sustainable improvements. In turn, a hap hazard approach to technologies such as PV panels, can result in a significant compromise regarding the features of a building or area that is trying to be conserved.</p> <p>The change to the policy therefore allows for a much better understanding between the need for enhanced technology and the conservation of our heritage. The policy provides greater clarity for future planning documents and decisions.</p> <p>Summary: The policy has been improved.</p>

++ A likely highly positive effect	Policy BE1: Built Environment
+ A likely positive effect	

0 No significant effect or clear link	<p>The Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents. All new developments should:</p> <ol style="list-style-type: none"> 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; 3. Be designed to include "Lifetime Homes" principles so that they can be readily adapted to meet the needs of those with disabilities and the elderly, 10% of these should be wheelchair accessible or easily adaptable to wheelchair accessibility encouraging places of work and leisure, streets, neighbourhoods, parks and open spaces to be designed to meet the needs of the community at all stages of people's lives. ; 4. In the case of 10 dwellings or over, achieve a Building for Life assessment rating of 'silver' as a minimum (this includes 'good and very good' scorings); 5. Improve areas of poorer environmental quality, including within the areas of relative disadvantage of Hayes, Yiewsley and West Drayton. All regeneration schemes should ensure that they are appropriate to their historic context, make use of heritage assets and reinforce their significance; 6. Incorporate a clear network of routes that are easy to understand, inclusive, safe, secure and connect positively with interchanges, public transport, community facilities and services; 7. 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 and where appropriate introduce public art; 8. Create safe and secure environments that reduce crime and fear of crime, anti-social behaviour and risks from fire and arson having regard to Secure by Design standards and address resilience to terrorism in major development proposals. 9. Not result in the inappropriate development of gardens and green spaces that erode the character and biodiversity of suburban areas or increase the risk of flooding through the loss of permeable areas; 10. Maximise the opportunities for all new homes to contribute to tackling and adapting to climate change
- A likely negative effect	
-- A likely highly negative effect	
? Uncertain or insufficient information to determine effect	
/ Potential positive or negative effect depending on implementation	

		<p>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. The Council will seek to merge a suite of sustainable design goals, such as the use of SUDS, water efficiency, lifetime homes, and energy efficiency into a requirement measured against the Code for Sustainable Homes and BREEAM. These will be set out within the Development Management DPD. All developments should be designed to make the most efficient use of natural resources whilst safeguarding historic assets, their settings and local amenity and include sustainable design and construction techniques to increase the reuse and recycling of construction demolition and excavation waste and reduce the amount of disposed to landfill.</p> <p>11. In the case of tall buildings, not adversely affect their surroundings or impact on important local views. Appropriate locations for tall buildings will be defined in a Character Study and include parts of Uxbridge and Hayes subject to considering the Obstacle Limitation Surfaces for Heathrow Airport. The height of buildings should be appropriate to the surrounding townscape.</p> <p>Support will be given for proposals that are consistent with local strategies, guidelines, supplementary planning documents and development management policies.</p>				
		June 2010	January 2011	July 2011	June 2010 Proposed Policy Changes	January 2011 Assessment
Sustainability Appraisal Objectives	Air Quality	++	++	++	<p>Bullet point 7:</p> <p>After: <i>...promote and encourage biodiversity...</i></p>	<p>The additions made to this policy have enhanced its performance against the sustainability objectives. In particular there is a stronger consideration of landscape and heritage. However, the recommended changes from June 2010 are still considered</p>
	Biodiversity	+	+	++		
	Landscape & Heritage	+	+	++		
	Soil & Water	0	0	0		
	Flood Risk	0	0	0		

Efficient Land Use	0	0	0	<p>Add: <i>through the inclusion of living walls, roofs and areas for wildlife...</i></p> <p>Bullet point 9:</p> <p>Replace: <i>Not result in the inappropriate development of gardens that erode the character and biodiversity of suburban areas</i></p> <p>With: <i>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.</i></p>	<p>appropriate and will enhance the policy further still.</p> <p>Summary: The June 2010 recommendation is still valid and the recommended change should be made to further improve the policy against the sustainability objectives.</p>
Resources and Waste	+	+	+		
Climate Change	++	++	++		
High Quality Housing	++	++	++		
Health, Noise, Safety, Crime	++	++	++		
Accessibility	+	+	+		
Traffic Reduction	0	0	0		
Skills & Education	0	0	0		
Design & Amenity	+	+	+		
Economic Growth	/	/	/		
Business Image	/	/	/		
Provision of Jobs	/	/	/		
				<p>July 2011 Submission Core Strategy: Final Appraisal</p> <p>The policy has been improved by the suggested changes. Biodiversity gets a greater weighting for future planning decisions and ensure developments do not become too focussed on one aspect of enhancement. The changes to the policy regarding BREEAM and the Code for Sustainable homes are necessary to ensure flexibility with later stages of the forward planning process. The Council believes that the development management DPD is the more appropriate document for setting</p>	

	design standards, whilst the Core Strategy sets the principles. Summary: The policy has been improved.
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++ A likely highly positive effect	<h3>Policy EM1: Climate Change Adaptation and Mitigation</h3> <p>The Council will ensure that climate change mitigation is addressed at every stage of the development process by:</p> <ol style="list-style-type: none"> 1. Prioritising higher density development in urban and town centres that are well served by sustainable forms of transport. 2. Promoting a modal shift away from private car use and requiring new development to include innovative initiatives to reduce car dependency. 3. Ensuring development meets the highest possible design standards whilst still retaining competitiveness within the market. 4. Working with developers of major schemes to identify the opportunities to help provide efficiency initiatives that can benefit the existing building stock. 5. Promoting the use of decentralised energy within large scale development whilst improving local air quality levels. 6. Targeting areas with high carbon emissions for additional reductions through low carbon strategies. These strategies will also have an objective to minimise other pollutants that impact on local air quality. Targeting areas of poor air quality for additional emissions reductions 7. Encouraging sustainable techniques to land remediation to reduce the need to transport waste to landfill. In particular developers should consider bioremediation as part of their proposals. 8. Encouraging the installation of renewable energy for all new development in meeting the carbon reduction targets savings set out in the London Plan. Identify opportunities for new sources of electricity generation including anaerobic digestion, hydroelectricity and a greater use of waste as a resource.
+ A likely positive effect	
0 No significant effect or clear link	
- A likely negative effect	
-- A likely highly negative effect	
? Uncertain or insufficient information to determine effect	
/ Potential positive or negative effect depending on implementation	

		9. Promoting new development to contribute to the upgrading of existing housing stock where appropriate			<p>The Borough will ensure that climate change adaptation is addressed at every stage of the development process by:</p> <p>10. Locating and designing development to minimise the probability and impacts of flooding.</p> <p>11. Requiring major development proposals to consider the whole water cycle impact which includes flood risk management, foul and surface water drainage and water consumption.</p> <p>12. Giving preference to development of previously developed land to avoid the loss of further green areas.</p> <p>13. Promoting the use of living walls and roofs, alongside sustainable forms of drainage to manage surface water run-off and increase the amount of carbon sinks.</p> <p>14. Promoting the inclusion of passive design measures to reduce the impacts of urban heat effects</p>
		June 2010	January 2011	July 2011	
Sustainability Appraisal Objectives	Air Quality	++	++	++	<p>Bullet point 6:</p> <p>Replace:</p> <p><i>Targeting areas of poor air quality for additional carbon emissions reductions.</i></p> <p>With:</p> <p><i>This policy has been improved by further environmental considerations. The recommendation made in June 2010 has been considered within additional wording in the supporting text of the Core Strategy and changes to Policy EM8 which states:</i></p> <p><i>All development should not cause deterioration in the local air quality levels and</i></p>
	Biodiversity	++	++	++	
	Landscape & Heritage	+	+	+	
	Soil & Water	+	++	++	
	Flood Risk	+	++	++	
	Efficient Land Use	+	+	+	
	Resources and Waste	+	+	+	
	Climate Change	++	++	++	

High Quality Housing	+	++	++	<p>Requiring development in air quality management areas to demonstrate measures to minimise impacts on air quality.</p>	<p>should ensure the protection of both existing and new sensitive receptors.</p> <p>All major development within the Air Quality Management Area (AQMA) should demonstrate air quality neutrality (no worsening of impacts) where appropriate;</p> <p>In addition, the policy also requires greater consideration of the water cycle, linking foul water, surface water and water consumption together. The policy also provides the opportunity to further improve existing housing and building stock which will help in housing design, both new and existing.</p> <p>Summary: No further recommendations.</p>
Health, Noise, Safety, Crime	+	+	+		
Accessibility	0	0	0		
Traffic Reduction	++	++	++		
Skills & Education	0	0	0		
Design & Amenity	0	0	0		
Economic Growth	-	-	-		
Business Image	0	0	0		
Provision of Jobs	0	0	0		
				<p>July 2011 Submission Core Strategy: Final Appraisal</p> <p>No further changes necessary.</p>	

++ A likely highly positive effect	<p>Policy EM2: Green Belt, Metropolitan Open Land and Green Chains</p> <p>The Council will seek to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains.</p> <p>Land at Brunel University, Harefield Hospital and Mount Vernon Hospital is identified as Major Developed Sites</p>
+ A likely positive effect	
0 No significant effect or clear link	
- A likely negative effect	

- A likely highly negative effect					in the Green Belt. Any proposals for development in Green Belt, Metropolitan Open Land and Green Chains will be assessed against national policies, including the exceptional very special test. Minor adjustments to Green Belt, Metropolitan Open Land and Green Chain boundaries will be undertaken in the Site Allocations DPD.	
? Uncertain or insufficient information to determine effect						
/ Potential positive or negative effect depending on implementation						
		June 2010	January 2011	July 2011	June 2010 Proposed Policy Changes	January 2011 Assessment
Sustainability Appraisal Objectives	Air Quality	0	0	0	None.	No further recommendations
	Biodiversity	++	++	++		
	Landscape & Heritage	++	++	++		
	Soil & Water	+	+	+		
	Flood Risk	0	0	0		
	Efficient Land Use	+	+	+		
	Resources and Waste	+	+	+		
	Climate Change	+	+	+		
	High Quality Housing	0	0	0		
	Health, Noise, Safety, Crime	+	+	+		
	Accessibility	0	0	0		
	Traffic Reduction	0	0	0		
	Skills & Education	0	0	0		

	Design & Amenity	0	0	0		
	Economic Growth	-	-	-		
	Business Image	0	0	0		
	Provision of Jobs	-	-	-		
					July 2011 Submission Core Strategy: Final Appraisal	
					No further changes necessary.	

++	A likely highly positive effect	<p>Policy EM3: Blue Ribbon Network</p> <p>The Council will continue to promote and contribute to the positive enhancement of the strategic river and canal corridors and the associated wildlife and habitats through the Biodiversity Action Plan and the Thames River Basin Management Plan, and developer contributions where appropriate.</p> <p>The Council will work with the Environment Agency and other interested bodies to continue to enhance the local character, visual amenity, ecology, transportation, leisure opportunities and sustainable access to rivers and canals.</p> <p>The Council will collaborate with adjacent local authorities to ensure that Hillingdon's river and canal corridors complement and link with cross boundary corridors.</p>
+	A likely positive effect	
0	No significant effect or clear link	
-	A likely negative effect	
--	A likely highly negative effect	
?	Uncertain or insufficient information to determine effect	
/	Potential positive or negative effect depending on implementation	

		June 2010	January 2011	July 2011	June 2010 Proposed Policy Changes	January 2011 Assessment
Sustainability Appraisal Objectives	Air Quality	++	++	++	<p>Replace:</p> <p><i>The Council will continue to enhance the local character</i></p> <p>With:</p> <p><i>The Council will work with the Environment Agency and other interested bodies to continue to enhance the local character</i></p>	<p>The inclusion of transportation within the Policy and the changes to the supporting text helps the Core Strategy to improve against the sustainability objectives. The Grand Union Canal in particular provides a positive transportation route, especially on the Paddington arm which is lock free into the centre of London.</p> <p>This policy would benefit from a commitment from the Borough to work in partnership with partners to improve the River and Canal corridors.</p> <p>Summary: The June 2010 recommendation is still valid and the recommended change should be made to further improve the policy against the sustainability objectives.</p>
	Biodiversity	++	++	++		
	Landscape & Heritage	++	++	++		
	Soil & Water	+	+	+		
	Flood Risk	+	+	+		
	Efficient Land Use	0	0	0		
	Resources and Waste	0	0	0		
	Climate Change	+	+	+		
	High Quality Housing	0	0	0		
	Health, Noise, Safety, Crime	+	+	+		
	Accessibility	0	0	0		
	Traffic Reduction	0	+	+		
	Skills & Education	0	0	0		
	Design & Amenity	0	0	0		
	Economic Growth	-	-	-		
	Business Image	0	0	0		
Provision of Jobs	0	0	0			
					July 2011 Submission Core Strategy: Final Appraisal	

No further changes necessary.

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Policy EM4: Open Space and Informal Recreation	
++ A likely highly positive effect	<p>The Council will safeguard, enhance and extend the network of open spaces, informal recreational and environmental opportunities that operate as carbon sinks and that meet local community needs and facilitate active lifestyles by providing spaces within walking distance of homes. Provision should be made as close as possible to the community it will serve. There will be a presumption against any net loss of open space in the Borough.</p> <p>The Council will identify new opportunities for open space through an opens space study. Major development will be expected to make appropriate contributions to the delivering of new opportunities, or to the improvement and enhancements of existing facilities.</p> <p>The Council will seek to protect existing tree and landscape features and enhance open spaces with new areas of vegetation cover (including the linking of existing fragmented areas) including front and back gardens for the benefit of wildlife and a healthier lifestyle, mitigating climate change.</p> <p>The Council will work with DEFRA to identify and protect open spaces that provide quiet areas and will also consider whether other areas merit protection of relative tranquillity.</p> <p>The Council will work with other local authorities and agencies to pursue the key aims of the Colne Valley Park.</p>
+ A likely positive effect	
0 No significant effect or clear link	
- A likely negative effect	
-- A likely highly negative effect	
? Uncertain or insufficient information to determine effect	
/ Potential positive or negative effect depending on implementation	

		June 2010	January 2011	July 2011	June 2010 Proposed Policy Changes	January 2011 Assessment
Sustainability Appraisal Objectives	Air Quality	0	0	0	<p>After:</p> <p><i>Informal recreational and environmental opportunities...</i></p> <p>Add:</p> <p><i>...that operate as carbon sinks and...</i></p> <p>Replace:</p> <p><i>The Council will require development proposals to address local deficiencies in quality, quantity and accessibility of open spaces.</i></p> <p>With:</p> <p><i>The Council will identify new opportunities for open space through an open space study. Major developments will be expected to make appropriate contributions to the delivery of new</i></p>	<p>The June 2010 identified that the Policy could be more positive in providing a link between deficiencies in Open Space and opportunities from New Development.</p> <p>The Core Strategy acknowledges that an Open Space study is being completed but does not provide sufficient links to potential findings or the Strategic Objectives (SO3).</p> <p>Summary: The June 2010 recommendation is still valid and the recommended change should be made to further improve the policy against the sustainability objectives.</p>
	Biodiversity	++	++	++		
	Landscape & Heritage	++	++	++		
	Soil & Water	0	0	0		
	Flood Risk	0	0	0		
	Efficient Land Use	0	0	0		
	Resources and Waste	0	0	0		
	Climate Change	+	+	++		
	High Quality Housing	0	0	0		
	Health, Noise, Safety, Crime	+	+	+		
	Accessibility	0	0	+		
	Traffic Reduction	0	0	0		
	Skills & Education	0	0	0		
	Design & Amenity	0	0	+		
	Economic Growth	0	0	0		
	Business Image	0	0	0		
Provision of Jobs	0	0	0			

					opportunities, or to the improvement and enhancements of existing facilities.	
					<p>July 2011 Submission Core Strategy: Final Appraisal</p> <p>The changes to the policy allow for open spaces to be considered as more than just recreational and amenity areas. Each piece of green open space plays a valuable role in helping to tackle climate change by absorbing harmful emissions. The changes regarding the open space study clarify the current position. It also provides a direct link between new development and what is required of developers.</p> <p>Summary: The policy has been improved.</p>	

		Policy EM5: Sport and Leisure	
++	A likely highly positive effect	<p>The Council will:</p> <ul style="list-style-type: none"> • safeguard, enhance and extend the network of sport and leisure spaces that meet local community needs and facilitate active lifestyles by providing active sport and leisure spaces within walking distance of home. • ensure that the overall Borough-wide target, identified in the Open Space Study, of active sport and leisure facilities with unrestricted access is maintained. There will be a presumption against any net loss of active sport and leisure facilities in the Borough 	
+	A likely positive effect		
0	No significant effect or clear link		
-	A likely negative effect		
--	A likely highly negative effect		
?	Uncertain or insufficient information to determine effect		

/ Potential positive or negative effect depending on implementation		<ul style="list-style-type: none"> ensure that future development includes features that designs activity into areas, providing opportunities for improved cycle ways, formal and/or informal local sports facilities, to encourage participation in a more active lifestyle ensure that sufficient children's play space is provided to support proposals for new residential development, in accordance with national and local guidance promote Hillingdon's sport and leisure facilities to achieve more integrated public accessibility and active lifestyles Identify new opportunities for sport and leisure and measures to deliver them. Major development may be required to make contributions in order to minimise the impacts and pressures on the existing resources. 				
		June 2010	January 2011	July 2011	June 2010 Proposed Policy Changes	January 2011 Assessment
Sustainability Appraisal Objectives	Air Quality	0	0	0	<p>Add:</p> <p><i>Identify new opportunities for sport and leisure and measures to deliver them. Major development may be required to make contributions in order to minimise the impacts and pressures on the existing resource.</i></p>	<p>This policy has been amended to provide greater support for new proposals to deliver sufficient children's play space. This policy is improved by this inclusion.</p> <p>However, the June 2010 assessment also recommends greater emphasis on delivering new opportunities to ensure the Core Strategy does not focus solely on protecting existing provision. New development can help to achieve a greater variety and provision, but only if supported by planning policy.</p>
	Biodiversity	+	+	+		
	Landscape & Heritage	+	+	+		
	Soil & Water	0	0	0		
	Flood Risk	0	0	0		
	Efficient Land Use	0	0	0		
	Resources and Waste	0	0	0		
	Climate Change	0	0	0		
	High Quality Housing	0	0	0		
	Health, Noise, Safety, Crime	+	+	+		

	Accessibility	0	0	0	<p>Summary: The June 2010 recommendation is still valid and the recommended change should be made to further improve the policy against the sustainability objectives.</p>
	Traffic Reduction	0	0	0	
	Skills & Education	0	0	0	
	Design & Amenity	0	+	+	
	Economic Growth	0	0	0	
	Business Image	0	0	0	
	Provision of Jobs	0	0	0	
					<p>July 2011 Submission Core Strategy: Final Appraisal</p> <p>The changes to this policy allow for more focus to be made to enhancement of sport and leisure provision. The growing population will continue to put a strain on existing resources. This increase in population will in part be accommodated by new development but also by existing development and incremental smaller development. As a consequence the level of protection may not be commensurate with the growth, meaning even if the existing resource was fully protected, in time it would not be sufficient. The changes therefore provide a greater focus on ensuring new provision is provided.</p> <p>Summary: The policy has been improved.</p>

++	A likely highly positive effect	<p>Policy EM6: Flood Risk Management</p> <p>The Council will require new development to be directed away from away from flood zones 2 and 3 in accordance with the principles of Planning Policy Statement 25.</p> <p>The subsequent Site Allocations DPD will be subjected to the Sequential Test in accordance with PPS25. Sites will only be</p>
+	A likely positive effect	
0	No significant effect or clear link	
-	A likely negative effect	

-- A likely highly negative effect					allocated within flood zones 2 or 3 where there are overriding issues that outweigh flood risk. In these instances, policy criteria will be set requiring future applicants of these sites to demonstrate that flood risk can be suitably mitigated.	
? Uncertain or insufficient information to determine effect					The Council will require all development across the borough to use sustainable urban drainage systems (SUDS) unless demonstrated that it is not viable. The Council will encourage SUDS to be linked to water efficiency methods. The Council may require developer contributions to guarantee the long term maintenance and performance of SUDS is to an appropriate standard.	
/ Potential positive or negative effect depending on implementation						
		June 2010	January 2011	July 2011	June 2010 Proposed Policy Changes	January 2011 Assessment
Sustainability Appraisal Objectives	Air Quality	0	0	0	<p>Add:</p> <p><i>The Council will oppose the increase in impermeable areas where these will have an impact on surface water run-off. The loss of urban greenspaces and gardens can contribute significantly to the reduction of attenuation areas which increases the risk of flooding. The Council will require developers to utilise permeable areas, either through natural filtration or through modern methods of pavement construction.</i></p>	<p>The supporting text in the flood risk management section has been improved considerably. These changes help to provide a better link with the forthcoming Development Management Document. The recommendation from June 2010 is now more appropriate for the Development Management Document although the supporting text of this policy needs to reflect the impact loss of impermeable areas has on flood. This will then provide the policy support for future wording in the Development Management document</p>
	Biodiversity	0	0	0		
	Landscape & Heritage	0	0	+		
	Soil & Water	+	+	++		
	Flood Risk	++	++	++		
	Efficient Land Use	+	+	+		
	Resources and Waste	0	0	+		
	Climate Change	+	+	++		
	High Quality Housing	0	0	0		
	Health, Noise, Safety, Crime	0	0	0		
	Accessibility	0	0	0		
	Traffic Reduction	0	0	0		
Skills & Education	0	0	0		<p>The following should be added to the supporting text and not the policy:</p> <p><i>The Council will oppose the increase in</i></p>	

	Design & Amenity	0	0	0		<p><i>impermeable areas where these will have an impact on surface water run-off. The loss of urban greenspaces and gardens can contribute significantly to the reduction of attenuation areas which increases the risk of flooding. The Council will require developers to utilise permeable areas, either through natural filtration or through modern methods of pavement construction.</i></p> <p>Summary: No further recommendations to the policy, however the supporting text needs to include the June 2010 recommendations to allow a link to the Development Management Document.</p>
	Economic Growth	+	+	+		
	Business Image	0	0	0		
	Provision of Jobs	0	0	0		
					<p>July 2011 Submission Core Strategy: Final Appraisal</p> <p>The changes to this policy and supporting text place a greater emphasis on the Council's aspirations for sustainable drainage. It is recognised that the changing climate could result in wetter winters and drier summers and therefore the SUDS combined with water collection, can meet both demands. The policy also provides an unequivocal stance by the Council which is not open to interpretation.</p> <p>Summary: The policy has been improved.</p>	

++ A likely highly positive effect	Policy EM7: Biodiversity and Geological Conservation
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+ A likely positive effect	
0 No significant effect or clear link	The Council will seek to designate further Borough Sites of Important Nature Conservation with grade 1, 2 and local designations in the Site Allocations Document. These designations will be based on previous recommendations made in discussions with the Greater London Authority.
- A likely negative effect	
-- A likely highly negative effect	Hillingdon's biodiversity and geological conservation will be preserved and enhanced with particular attention given to:
? Uncertain or insufficient information to determine effect	1. The conservation and enhancement of the natural state of:
/ Potential positive or negative effect depending on implementation	<ul style="list-style-type: none"> a. Harefield Gravel Pits b. Colne Valley Regional Park c. Fray's Farm Meadows d. Harefield Pit <p>2. The protection and enhancement of all Sites of Importance for Nature Conservation. Sites with Metropolitan and Borough Grade 1 importance will be protected from any adverse impacts and loss. Borough Grade 2 and Sites of Local Importance will be protected from loss with harmful impacts mitigated through appropriate compensation.</p> <p>3. The protection and enhancement of populations of protected species as well as priority species and habitats identified within the UK, London and the Hillingdon Biodiversity Action Plans.</p> <p>4. Appropriate contributions from developers to help enhance Sites of Importance for Nature Conservation (SINCs) in close proximity to development and to deliver/ assist in the delivery of actions within the Biodiversity Action Plan.</p> <p>5. The provision of biodiversity improvements from all development, where feasible.</p> <p>6. The provision of green roofs and living walls which contribute to biodiversity and help tackle climate change.</p> <p>7. The use of sustainable drainage systems that promote ecological connectivity and natural habitats.</p>

		June 2010	January 2011	July 2011	June 2010 Proposed Policy Changes	January 2011 Assessment
Sustainability Appraisal Objectives	Air Quality	+	+	+	None	<p>This policy has been strengthened by the changes. It performs well against the sustainability objectives, and the changes clarify the policy context for future development.</p> <p>Summary: No further recommendations</p>
	Biodiversity	++	++	++		
	Landscape & Heritage	+	+	++		
	Soil & Water	+	+	+		
	Flood Risk	0	0	0		
	Efficient Land Use	0	0	0		
	Resources and Waste	+	+	+		
	Climate Change	+	+	+		
	High Quality Housing	0	0	0		
	Health, Noise, Safety, Crime	+	+	+		
	Accessibility	0	0	0		
	Traffic Reduction	0	0	0		
	Skills & Education	0	0	0		
	Design & Amenity	+	+	+		
	Economic Growth	/	/	/		
	Business Image	0	0	0		
Provision of Jobs	0	0	0			
					July 2011 Submission Core Strategy: Final Appraisal	

	<p>The inclusion of the requirement to consider SUDS alongside biodiversity gain improves the sustainability of this policy. It should ensure that developers are not solely focussed on the flood risk aspect when developing SUDS and allows the Council to seek environmental gain through functional drainage structures.</p> <p>Summary: The policy has been improved.</p>
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++ A likely highly positive effect	<p>Policy EM8: Land, Water, Air and Noise</p> <p><u>Water Quality</u></p> <p>The Council will seek to safeguard and improve all water quality, both ground and surface. Principal Aquifers, and Source Protection Zones will be given priority along with the:</p> <ul style="list-style-type: none"> a. River Colne b. Grand Union Canal c. River Pinn d. Yeading Brook e. Porter Land Brook f. River Crane g. Ruislip Lido <p><u>Air Quality</u></p>
+ A likely positive effect	
No significant effect or clear link	
- A likely negative effect	
-- A likely highly negative effect	
? Uncertain or insufficient information to determine effect	
/ Potential positive or negative effect depending on implementation	

All development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors.

All major development within the Air Quality Management Area (AQMA) should demonstrate air quality neutrality (no worsening of impacts) where appropriate; actively contribute to the promotion of sustainable transport measures such as vehicle charging points and the increased provision for vehicles with cleaner transport fuels; deliver increased planting through soft landscaping and living walls and roofs; and provide a management plan for ensuring air quality impacts can be kept to a minimum.

The Council seeks to reduce the levels of pollutants referred to in the Government's National Air Quality Strategy and will have regard to the Mayor's Air Quality Strategy. London Boroughs should also take account of the findings of the Air Quality Review and Assessments and Actions plans, in particular where Air Quality Management Areas have been designated.

Noise

The Council will investigate Hillingdon's target areas identified in the Defra Noise Action Plans, promote the maximum possible reduction in noise levels and will minimise the number of people potentially affected.

The Council will seek to identify and protect Quiet Areas in accordance with Government Policy on sustainable development and other Local Development Framework policies.

The Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.

Land Contamination

The Council will expect proposals for development on contaminated land to provide mitigation strategies that reduce the impacts on surrounding land uses. Major development proposals will be expected to demonstrate a sustainable approach to remediation that includes techniques to reduce the need to landfill.

		Water Resources				
		<p>The Council will require that all new development demonstrated the incorporation of water efficiency measures within new development to reduce the rising demand on potable water. All new development must incorporate water recycling and collection facilities unless it can be demonstrate it is not appropriate. For residential developments, the Council will require applicants to demonstrate that water consumption will not surpass 105litres per person per day.</p>				
		June 2010	January 2011	July 2011	June 2010 Proposed Policy Changes	January 2011 Assessment
Sustainability Appraisal Objectives	Air Quality	+	++	++	<p>Water Quality</p> <p>Replace:</p> <p><i>The Council will seek to safeguard and improve the water quality of the:</i></p> <p>With</p> <p><i>The Council will seek to safeguard and improve the water quality of controlled waters within the Borough, with a particular focus on improving the:</i></p> <p>Noise</p>	<p>This policy has been improved considerably by the inclusion of Land Contamination, consideration of all water resources, and air quality neutrality.</p> <p>The suggested changes from June 2010 have been carried forward and this policy now scores better against the Borough's sustainability objectives.</p> <p>Summary: No further recommendations.</p>
	Biodiversity	+	+	+		
	Landscape & Heritage	0	+	+		
	Soil & Water	+	++	++		
	Flood Risk	0	0	+		
	Efficient Land Use	0	+	+		
	Resources and Waste	0	+	++		
	Climate Change	++	++	++		
	High Quality Housing	0	0	0		
	Health, Noise, Safety, Crime	++	++	++		
	Accessibility	0	0	0		
	Traffic Reduction	+	+	+		
	Skills & Education	0	0	0		

	Design & Amenity	0	0	0	Add: <i>Development in Air Quality Management Areas should aim to be air quality positive with no additional impacts on air quality.</i>	
	Economic Growth	-	-	-		
	Business Image	0	0	0		
	Provision of Jobs	0	0	0		
<p>July 2011 Submission Core Strategy: Final Appraisal</p> <p>Although no further recommendations were made through the sustainability appraisal, comments were received from consultees requesting greater focus on water efficiency. As a consequence, the changes made have resulted in a better policy that allows consideration of water resources. This policy also allows a link to be made with the SUDS policy providing an overall ambition to meet challenges of too much water in times of flood and too little water in times of drought.</p> <p>Summary: The policy has been improved.</p>						

<p>Policy EM9: Safeguarding Mineral Resources</p>													
<table border="1"> <tr> <td>++</td> <td>A likely highly positive effect</td> </tr> <tr> <td>+</td> <td>A likely positive effect</td> </tr> <tr> <td>0</td> <td>No significant effect or clear link</td> </tr> <tr> <td>-</td> <td>A likely negative effect</td> </tr> <tr> <td>--</td> <td>A likely highly negative effect</td> </tr> <tr> <td>?</td> <td>Uncertain or insufficient information to determine effect</td> </tr> </table>	++	A likely highly positive effect	+	A likely positive effect	0	No significant effect or clear link	-	A likely negative effect	--	A likely highly negative effect	?	Uncertain or insufficient information to determine effect	<p>The Council will safeguard mineral resources in Hillingdon from other forms of development that would prejudice future mineral extraction. The Council will 'Mineral Safeguarding Area' in the Site Allocations DPD based on the geologically mapped sand and gravel resources that is considered to be of current and future economic importance. Major development in the area will only be permitted where it has been demonstrated that:</p> <ul style="list-style-type: none"> ▪ The mineral concerned is no longer of any value or potential value, or ▪ The mineral can be extracted prior to the development taking place, or
++	A likely highly positive effect												
+	A likely positive effect												
0	No significant effect or clear link												
-	A likely negative effect												
--	A likely highly negative effect												
?	Uncertain or insufficient information to determine effect												

		<ul style="list-style-type: none"> ▪ The development will not inhibit extraction if required in the future, or ▪ There is an overriding need for the development and prior extraction cannot be reasonably undertaken, or ▪ The development is allocated in a local development plan document, or ▪ The development is not incompatible. <p>The Council will also safeguard areas within 250m of the Preferred Mineral Safeguarding Area as a buffer for the future extraction of the sand and gravel reserve, to safeguard the resource from the impact of 'proximal development'.</p>				
		June 2010	January 2011	July 2011	June 2010 Proposed Policy Changes	January 2011 Assessment
Sustainability Appraisal Objectives	Air Quality	0	0	0	None	No further recommendations
	Biodiversity	0	0	0		
	Landscape & Heritage	0	0	0		
	Soil & Water	+	+	+		
	Flood Risk	0	0	0		
	Efficient Land Use	+	+	++		
	Resources and Waste	+	+	++		
	Climate Change	0	0	0		
	High Quality Housing	0	0	0		
	Health, Noise, Safety, Crime	/	/	/		
	Accessibility	0	0	0		

	Traffic Reduction	0	0	0		
	Skills & Education	0	0	0		
	Design & Amenity	0	0	0		
	Economic Growth	+	+	+		
	Business Image	0	0	0		
	Provision of Jobs	0	0	0		
					<p>July 2011 Submission Core Strategy: Final Appraisal</p> <p>Although no recommendations were made in the previous appraisal, consultation responses highlighted a need to have more consideration for protecting minerals. As a consequence, the changes considerably strengthen the policy context for the borough's mineral reserves. This allows for a much more efficient use of land and resources.</p> <p>Summary: The policy has been improved.</p>	

		Policy EM10: Mineral Extraction	
++	A likely highly positive effect	<ul style="list-style-type: none"> The Council will make an appropriate contribution towards the West London apportionment figure in the form of mineral working at the principal Broad Locations and will aim to maintain a minimum land bank equivalent to seven years production for the west London area at a rate of 0.25m tonnes per annum. The principal Broad Locations for mineral development are land west of the present Harmondsworth Quarry, land north of the village of Harmondsworth, and land at Sipson Lane, east of the M4 spur. Outside the allocated areas identified in this Plan mineral extraction will not be permitted except where: it is demonstrated that the proposal is sustainable, essential to maintain the West London land bank in accordance with national policy, and necessary to maintain apportioned provision for West London as 	
+	A likely positive effect		
0	No significant effect or clear link		
-	A likely negative effect		
--	A likely highly negative effect		
?	Uncertain or insufficient information to determine effect		

		/ Potential positive or negative effect depending on implementation			set out in the London Plan <ul style="list-style-type: none"> suitable measures and controls can be put in place to ensure there is not an unacceptable adverse impact on the environment or human health Restoration and aftercare proposals will outweigh the negative impacts caused by extraction. The restoration proposals will result in an overall positive impact on the environment considering the quality of soils, water, biodiversity and future land uses. 	
		June 2010	January 2011	July 2011	June 2010 Proposed Policy Changes	January 2011 Assessment
Sustainability Appraisal Objectives	Air Quality	0	0	0	<i>Replace:</i> <i>the mineral workings can be restored to the highest standards using progressive restoration techniques, and secure a beneficial and acceptable after use in line with Green Belt objectives.</i> <i>With:</i> <i>Restoration and aftercare proposals will outweigh the negative impacts caused by extraction. The restoration proposals will result in an overall</i>	This policy currently relies largely on the details of future proposals. It is not possible to properly score its performance against environmental performance with regards to the current wording. The June 2010 suggested change was made to attempt to ensure the policy considers the environment in more detail. Accordingly, this change should still be made to allow developers to understand the policy criteria for future proposals. Summary: The June 2010 recommendation is still valid and the recommended change should
	Biodiversity	/	/	+		
	Landscape & Heritage	/	/	+		
	Soil & Water	/	/	+		
	Flood Risk	0	0	0		
	Efficient Land Use	0	0	+		
	Resources and Waste	+	+	+		
	Climate Change	0	0	0		
	High Quality Housing	0	0	0		
	Health, Noise, Safety, Crime	/	/	/		
	Accessibility	0	0	0		
	Traffic Reduction	-	-	-		

Skills & Education	0	0	0	<i>positive impact on the environment, considering the quality of soils, water, biodiversity and future land uses.</i>	be made to further improve the policy against the sustainability objectives.
Design & Amenity	0	0	0		
Economic Growth	0	0	0		
Business Image	0	0	0		
Provision of Jobs	0	0	0		
				July 2011 Submission Core Strategy: Final Appraisal The previous recommendation has now been made. It has been included alongside comments from consultees wishing to see more policy context for natural resources. As a consequence, the policy has been strengthened considerably to allow for greater management of resources, and post extraction processes. Summary: The policy has been improved.	

		Policy EM11: Sustainable Waste Management	
++	A likely highly positive effect	<p>The Council will aim to reduce the amount of waste produced in the Borough and work in conjunction with its partners in West London, to identify and allocate suitable new sites for waste management facilities within the Joint West London Waste Plan to provide sufficient capacity to meet the apportionment requirements of the London Plan which is 382 thousand tonnes per annum for Hillingdon by 2026.</p> <p>The Council will require all new development to address waste management at all stages of a development's life from design and construction through to the end use and activity on site, ensuring that all waste is managed towards the upper end of the waste hierarchy.</p> <p>The Council will follow the waste hierarchy by promoting the reduction of waste generation through measures</p>	
+	A likely positive effect		
0	No significant effect or clear link		
-	A likely negative effect		
--	A likely highly negative effect		
?	Uncertain or insufficient information to determine effect		
/	Potential positive or		

negative effect depending on implementation					<p>such as bioremediation of soils and best practice in building construction.</p> <p>The Council will promote using waste as a resource encouraging the re-use of materials and recycling.</p> <p>The Council will also support opportunities for energy recovery from waste and composting where appropriate.</p> <p>The Council will safeguard existing waste sites unless compensatory provision can be made.</p> <p>The Council will seek to maximise the use of existing waste management sites through intensification or co-location of facilities.</p>	
		June 2010	January 2011	July 2011	June 2010 Proposed Policy Changes	January 2011 Assessment
Sustainability Appraisal Objectives	Air Quality	0	0	0	<p>Replace:</p> <p><i>The Council will promote waste as a resource and encourage increased re-use of materials and recycling and seek to maximise the use of existing waste management sites through intensification or co-location of facilities.</i></p> <p>With:</p> <p><i>The Council will promote the reduction of waste through measures such as bioremediation and best practice. Where waste is generated, the Council</i></p>	<p>The policy does not include acknowledgement that a waste resource can be utilised as an energy source. This policy could have additional benefits regarding the climate change objective. In addition, using waste as a resource will help the policy perform well against the 'provision of jobs', 'efficient land use' and 'soil and water' objectives.</p> <p>One of the SA Framework indicators relates to the amount of composting. This policy does not specifically refer to composting or the role it can play in the management of waste.</p> <p>Furthermore, the policy does not reference the need to reduce the amount of waste in line with the waste hierarchy. The following changes</p>
	Biodiversity	0	0	0		
	Landscape & Heritage	+	+	+		
	Soil & Water	+	+	+		
	Flood Risk	0	0	0		
	Efficient Land Use	0	0	+		
	Resources and Waste	++	++	++		
	Climate Change	0	0	+		
	High Quality Housing	0	0	0		
	Health, Noise, Safety, Crime	/	/	/		
	Accessibility	0	0	0		
	Traffic Reduction	/	/	/		
	Skills & Education	0	0	0		

	Design & Amenity	0	0	0	<p><i>will promote it as a resource encouraging the re-use of materials and recycling. The Council will also support opportunities for the energy recovery from waste and composting where appropriate.</i></p> <p><i>The Council will seek to maximise the use of existing waste management sites through intensification or co-location of facilities.</i></p>	<p>similar to those recommended in June 2010 should be made:</p> <p>Replace: <i>The Council will promote waste as a resource and encourage increased re-use of materials and recycling and seek to maximise the use of existing waste management sites through intensification or co-location of facilities.</i></p> <p>With: <i>The Council will follow the waste hierarchy by promoting the reduction of waste generation through measures such as bioremediation of soils and best practice in building construction. The Council will promote using waste as a resource and encouraging the re-use of materials and recycling. The Council will also support opportunities for the energy recovery from waste and composting where appropriate.</i></p> <p><i>The Council will seek to maximise the use of existing waste management sites through intensification or co-location of facilities.</i></p> <p>Summary: The policy could be reworded to provide a greater link to the waste hierarchy and provide clearer policy direction to developers. The recommended changes from June 2010 (as</p>
	Economic Growth	0	0	0		
	Business Image	0	0	+		
	Provision of Jobs	0	0	+		

						<p>amended above), should still be made to the policy to help it improve the performance against the sustainability objectives.</p>
					<p>July 2011 Submission Core Strategy: Final Appraisal</p> <p>The policy now recognises waste as a potential resource as well as the waste hierarchy. This is an important addition which links the Core Strategy to the waste reduction and processing goals along with energy production aspirations of the London Plan and the Council's own targets. It provides a proactive policy framework which should encourage innovative companies to utilise waste as an asset. This in turn could provide links to the Council's aims to increase the amount of green jobs in the</p>	

	borough. Summary: The policy has been improved.
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		Policy T1: Accessible Local Destinations				
		<p>The Council will steer development to the most appropriate locations in order to reduce their impact on the transport network. All development should encourage access by sustainable modes and include good cycling and walking provision</p> <p>The Council will ensure access to local destinations which provide services and amenities.</p> <p>The Council will promote active travel through improvements to Hillingdon's public rights of way.</p>				
		June 2010	January 2011	July 2011	June 2010 Proposed Policy Changes	January 2011 Assessment
++	A likely highly positive effect					
+	A likely positive effect					
0	No significant effect or clear link					
-	A likely negative effect					
--	A likely highly negative effect					
?	Uncertain or insufficient information to determine effect					
/	Potential positive or negative effect depending on implementation					
Sustainability Appraisal Objectives	Air Quality	+	+	+	None	No further recommendations.
	Biodiversity	0	0	0		
	Landscape & Heritage	0	0	0		
	Soil & Water	0	0	0		

Flood Risk	0	0	0		
Efficient Land Use	0	0	0		
Resources and Waste	0	0	0		
Climate Change	+	+	+		
High Quality Housing	0	0	0		
Health, Noise, Safety, Crime	0	0	0		
Accessibility	+	+	+		
Traffic Reduction	++	++	++		
Skills & Education	0	0	0		
Design & Amenity	0	0	0		
Economic Growth	+	+	+		
Business Image	0	0	0		
Provision of Jobs	0	0	0		
				July 2011 Submission Core Strategy: Final Appraisal No further changes necessary	

++	A likely highly positive effect	Policy T2: Public Transport Interchanges The Council will facilitate improved public transport interchanges at Uxbridge, Hayes, West Drayton, Heathrow Airport, West Ruislip and other locations as appropriate in the future. These interchanges will accommodate measures to encourage subsequent shorter journeys to be completed
+	A likely positive effect	
0	No significant effect or clear link	
-	A likely negative effect	

-- A likely highly negative effect					on foot or by cycle.	
? Uncertain or insufficient information to determine effect						
/ Potential positive or negative effect depending on implementation						
		June 2010	January 2011	July 2011	June 2010 Proposed Policy Changes	January 2011 Assessment
Sustainability Appraisal Objectives	Air Quality	++	++	++	None	No further recommendations.
	Biodiversity	0	0	0		
	Landscape & Heritage	0	0	0		
	Soil & Water	0	0	0		
	Flood Risk	0	0	0		
	Efficient Land Use	0	0	0		
	Resources and Waste	0	0	0		
	Climate Change	+	+	+		
	High Quality Housing	0	0	0		
	Health, Noise, Safety, Crime	0	0	0		
	Accessibility	0	0	0		
	Traffic Reduction	++	++	++		
	Skills & Education	0	0	0		

	Design & Amenity	0	0	0		
	Economic Growth	+	+	+		
	Business Image	+	+	+		
	Provision of Jobs	0	0	0		
					July 2011 Submission Core Strategy: Final Appraisal No further changes necessary	

++	A likely highly positive effect	<p>Policy T3: North-South Sustainable Transport Links</p> <p>The Council will improve north-south public transport links in the borough and link residential areas directly with employment areas and transport interchanges.</p>
+	A likely positive effect	
0	No significant effect or clear link	
-	A likely negative effect	
--	A likely highly negative effect	
?	Uncertain or insufficient information to determine effect	
/	Potential positive or negative effect depending on implementation	

		June 2010	January 2011	July 2011	June 2010 Proposed Policy Changes	January 2011 Assessment
Sustainability Appraisal Objectives	Air Quality	-	-	-	None	No further recommendations.
	Biodiversity	0	0	0		
	Landscape & Heritage	0	0	0		
	Soil & Water	0	0	0		
	Flood Risk	0	0	0		
	Efficient Land Use	0	0	0		
	Resources and Waste	0	0	0		
	Climate Change	-	-	-		
	High Quality Housing	0	0	0		
	Health, Noise, Safety, Crime	0	0	0		
	Accessibility	+	+	+		
	Traffic Reduction	-	-	-		
	Skills & Education	0	0	0		
	Design & Amenity	0	0	0		
	Economic Growth	++	++	++		
	Business Image	++	++	++		
Provision of Jobs	+	+	+			
					July 2011 Submission Core Strategy: Final Appraisal	

No further changes necessary

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					Policy T4: Heathrow Airport	
		<p>This Core Strategy will support the sustainable development, renewal and operation of Heathrow within the existing airport boundary and growth in the Heathrow Opportunity Area by facilitating improvements to public transport and cycle links, enhancing the public transport interchange to provide the opportunity for a modal shift from the use of private cars and from short haul air to sustainable transport modes and providing transport infrastructure to accommodate economic and housing growth whilst improving environmental conditions, for example noise and local air quality for local communities.</p>				
		June 2010	January 2011	July 2011	June 2010 Proposed Policy Changes	January 2011 Assessment
Sustainability Appraisal Objectives	++	A likely highly positive effect				
	+	A likely positive effect				
	0	No significant effect or clear link				
	-	A likely negative effect				
	--	A likely highly negative effect				
	?	Uncertain or insufficient information to determine effect				
/	Potential positive or negative effect depending on implementation					
		/	+	+	<p>Replace:</p> <p><i>This Core Strategy will support the function of Heathrow and growth in the Heathrow Opportunity Area by facilitating improvements to public transport and cycle links, enhancing</i></p>	<p>The recommended changes from June 2010 have been integrated into the new policy wording. This policy now scores better against the environmental sustainability objectives whilst maintaining a positive economic impact.</p>
	Air Quality	/	+	+		
	Biodiversity	0	0	0		
	Landscape & Heritage	0	0	0		
	Soil & Water	0	0	0		
	Flood Risk	0	0	0		

Efficient Land Use	0	0	0	<p><i>the public transport interchange and providing transport infrastructure to accommodate economic and housing growth.</i></p> <p>With <i>This Core Strategy will support the function of Heathrow and growth in the Heathrow Opportunity Area by facilitating improvements to public transport and cycle links and enhancing the public transport interchange.</i></p> <p><i>Low carbon initiatives and improvements to the existing transport infrastructure will help accommodate sustainable economic and housing growth.</i></p>	<p>Summary: No further recommendations.</p>
Resources and Waste	0	0	0		
Climate Change	/	+	+		
High Quality Housing	0	0	0		
Health, Noise, Safety, Crime	-	+	+		
Accessibility	0	0	0		
Traffic Reduction	0	+	+		
Skills & Education	0	0	0		
Design & Amenity	0	0	0		
Economic Growth	++	++	++		
Business Image	++	++	++		
Provision of Jobs	+	+	+		
				<p>July 2011 Submission Core Strategy: Final Appraisal</p> <p>No further changes necessary</p>	

++	A likely highly positive effect	<p>Policy CI1: Community Infrastructure Provision</p> <p>The Council will ensure that community and social infrastructure is provided in Hillingdon to cater for the needs of the existing community and future populations by:</p>
+	A likely positive effect	
0	No significant effect or	

clear link					<p>1) Resisting of the loss of community facilities, and where the loss of these facilities is justified it will seek to ensure that resulting development compensates these uses to ensure no net loss;</p> <p>2) Supporting the retention and enhancement of existing community facilities;</p> <p>3) Supporting extensions to existing schools and the development of new schools and youth facilities;</p> <p>4) Encouraging the development of multi-purpose facilities that can provide a range of services and facilities to the community at one accessible location;</p> <p>5) Promoting innovation in service provision and recognising that there are a range of modes appropriate for providing for all sections of the community;</p> <p>6) Requiring development to contribute towards the provision of community facilities to meet the needs of new communities and mitigate impacts on existing communities;</p> <p>7) Locating libraries, health facilities, police facilities, leisure facilities and community centres in town centres or other accessible locations to maximise community access, sustainable transport and build a sense of local community identity;</p> <p>8) Ensuring new facilities demonstrate how they will tackle climate change, in line with Policy EM1; and</p> <p>9) Providing facilities and services that are accessible and inclusive to all potential users regardless of age, ability, gender or socio-economic status.</p> <p>10) Implementing a borough-wide community infrastructure levy (CIL) to fund community infrastructure provision</p>	
- A likely negative effect						
-- A likely highly negative effect						
? Uncertain or insufficient information to determine effect						
/ Potential positive or negative effect depending on implementation						
		June 2010	January 2011	July 2011	June 2010 Proposed Policy Changes	January 2011 Assessment
Sustainability Appraisal Objectives	Air Quality	0	0	0	None	No further recommendations
	Biodiversity	0	0	0		
	Landscape & Heritage	0	0	0		
	Soil & Water	0	0	0		
	Flood Risk	0	0	0		

Efficient Land Use	0	0	0		
Resources and Waste	0	0	0		
Climate Change	+	+	+		
High Quality Housing	0	0	0		
Health, Noise, Safety, Crime	++	++	++		
Accessibility	+	+	+		
Traffic Reduction	0	0	0		
Skills & Education	++	++	++		
Design & Amenity	+	+	+		
Economic Growth	0	0	0		
Business Image	0	0	0		
Provision of Jobs	0	0	0		
				<p>July 2011 Submission Core Strategy: Final Appraisal</p> <p>No further changes necessary</p>	

++	A likely highly positive effect	<p>Policy C12: Leisure and Recreation</p> <p>The Council will, in partnership with other bodies, seek to secure good quality, well maintained leisure and recreation facilities to address identified deficiencies and meet the needs of local communities, particularly deprived groups, by:</p>
+	A likely positive effect	
0	No significant effect or clear link	
-	A likely negative effect	

<p>-- A likely highly negative effect</p>	<ul style="list-style-type: none"> • Safeguarding the existing viable leisure and recreational facilities and supporting proposals for new and improved facilities; <ul style="list-style-type: none"> ◦ Seeking to improve the geographical spread of leisure and recreational facilities across the borough by: ◦ Promoting 'community sport hubs' ◦ Improving and upgrading facilities to both modernise and maximise their capacity to meet current leisure trends and demands including refurbishment of Highgrove Pool, extension of facilities at Minet cycle track and Hillingdon Sports and Leisure Complex. ◦ Increased and improved facilities for specialist sports facilities to accommodate year round provision and standard of competition where local need can be identified. Such potential opportunities currently include indoor tennis courts, velodrome facilities and indoor bowls. ◦ Encouraging cultural and sporting facilities for schools and other institutions which can be shared with the community through new facilities provided from the Building Schools for the 21st Century programme, existing providers (at Brunel University and Uxbridge College) and sports club facilities (such as Eastcote Hockey Club). ◦ Opening up formal pay and play community access to school facilities.
<p>? Uncertain or insufficient information to determine effect</p>	
<p>/ Potential positive or negative effect depending on implementation</p>	<ul style="list-style-type: none"> • Increasing the provision of indoor facilities to address the needs of older people; • Ensuring that development proposals will not result in the loss of existing leisure and recreational facilities unless satisfactory alternative provision is made or it can be demonstrated that the asset is no longer needed; • Encouraging shared use of private leisure and recreational facilities; • Capitalising on opportunities to supply new sporting and associated facilities in the Borough to support the legacy of the 2012 Olympics; and • Seeking developer contributions towards improvements to the quality and quantity of leisure and recreational facilities. • Seeking new and existing developments to promote the need to have inclusive and accessible design, to tackle climate change and to include facilities that promote sustainable transportation.

		June 2010	January 2011	July 2011	June 2010 Proposed Policy Changes	January 2011 Assessment
Sustainability Appraisal Objectives	Air Quality	0	0	0	<p>Add:</p> <p><i>Seeking new and existing developments to promote the need to have inclusive and accessible design, to tackle climate change and to include facilities that promote sustainable transportation.</i></p>	<p>The June 2010 recommended changes still need to be made. This is a positive policy that will support improved Leisure and Recreation facilities in the Borough. However, the policy would score better against some sustainability objectives if there was more support for improving existing facilities.</p> <p>Summary: The June 2010 recommendation is still valid and the recommended change should be made to further improve the policy against the sustainability objectives.</p>
	Biodiversity	0	0	0		
	Landscape & Heritage	0	0	0		
	Soil & Water	0	0	0		
	Flood Risk	0	0	0		
	Efficient Land Use	0	0	0		
	Resources and Waste	0	0	0		
	Climate Change	0	0	+		
	High Quality Housing	0	0	0		
	Health, Noise, Safety, Crime	++	++	++		
	Accessibility	++	++	++		
	Traffic Reduction	0	0	0		
	Skills & Education	++	++	++		
	Design & Amenity	+	+	++		
	Economic Growth	0	0	0		
	Business Image	0	0	0		
Provision of Jobs	0	0	0			
					July 2011 Submission Core Strategy: Final Appraisal	

	<p>This positive policy has now been improved by the inclusion of the changes. The changes are important to allow the policy to generate an increase in recreation and sports facilities as opposed to just protecting the existing resource.</p> <p>Summary: This policy has been improved.</p>
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++ A likely highly positive effect	Policy C13: Culture				
+ A likely positive effect	<p>To ensure that cultural uses help improve the quality of life of residents and visitors, a strong and well-developed cultural provision will be established by:</p> <ul style="list-style-type: none"> • Safeguarding the quality of existing viable cultural facilities and supporting proposals for new and improved cultural facilities; • Identifying the need for new culture and arts facilities in the north of the borough and in the identified Opportunity Areas of Yiewsley/ West Drayton; • Protecting the historic environment as a cultural resource. • Promoting Uxbridge Town Centre, Compass Theatre (Ickenham), Manor Farm (Ruislip) and Beck Theatre (Hayes) as key cultural centres for the arts serving Hillingdon and the wider sub-region; • Ensuring all facilities promote walking, cycling and sustainable transport measures. The inclusion of cycle storage and electric charging will be encourage in new facilities and installed in existing facilities. • In locations where new development needs access to cultural facilities, developer contributions will be sought to provide for new and expanded services. 				
0 No significant effect or clear link					
- A likely negative effect					
-- A likely highly negative effect					
? Uncertain or insufficient information to determine effect					
/ Potential positive or negative effect depending on implementation					
	June 2010	January 2011	July 2011	June 2010 Proposed Policy Changes	January 2011 Assessment

Sustainability Appraisal Objectives	Air Quality	/	/	/	<p>Replace:</p> <p><i>Ensuring smaller facilities are accessible by walking and cycling;</i></p> <p>With</p> <p><i>Ensuring all facilities promote walking, cycling and sustainable transport measures. The inclusion of cycle storage and electric charging points will be encouraged in new facilities and installed in existing facilities.</i></p>	<p>The June 2010 recommended changes still need to be made to improve the policies performance against the sustainability objectives. The second to last bullet point focuses on smaller facilities, however this should be expanded to all facilities.</p> <p>Summary: The June 2010 recommendation is still valid and the recommended change should be made to further improve the policy against the sustainability objectives.</p>
	Biodiversity	0	0	0		
	Landscape & Heritage	/	/	+		
	Soil & Water	0	0	0		
	Flood Risk	0	0	0		
	Efficient Land Use	0	0	0		
	Resources and Waste	0	0	0		
	Climate Change	/	/	/		
	High Quality Housing	0	0	0		
	Health, Noise, Safety, Crime	/	/	/		
	Accessibility	0	0	0		
	Traffic Reduction	-	-	0		
	Skills & Education	++	++	++		
	Design & Amenity	0	0	+		
	Economic Growth	0	0	0		
Business Image	+	+	+			
Provision of Jobs	+	+	+			
<p>July 2011 Submission Core Strategy: Final Appraisal</p> <p>The previous recommended changes have now been made. The changes to this policy allow for a greater consideration of the historic environment and therefore providing complete inclusion of matters defined within the 'culture' section. The inclusion of requiring consideration of sustainable transportation within cultural facilities has a direct benefit in terms of air quality, and reducing traffic, but it also allows for further education of the 'green' agenda.</p>						

	Summary: This policy has been improved.
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6. Conclusions

This Part 3 Update provides a clear indication that the Core Strategy has consistently acknowledged and incorporated the sustainability objectives. This systematic approach to the SA makes it easy to understand the process by which the Council has developed a sustainable Core Strategy.

This Sustainability Appraisal has revealed the Core Strategy to be highly considerate of the sustainability objectives. It is evident that the length of time developing the strategy, along with updated sustainability appraisals, has resulted in a more sustainable plan.

The January 2011 Part 3 Update recommended several changes to improve the Core Strategy. All these recommended changes have now been made and consequently the plan scores successfully against the Council's sustainability objectives.

The plan includes a number of additions to policies that provides greater environmental weight to both decision making on planning applications, and the development of future strategic plans. As a consequence the SA process has ensured that the Core Strategy sets a spatial framework that will promote a sustainable future for the London Borough of Hillingdon.

7. Appendix 1: Sustainability Appraisal Framework

Sustainability Objectives		Reference in Appraisal
1	To improve air quality to a standard that is acceptable for human and ecological health	Air Quality
2	To ensure sustainable management and conservation of wildlife and habitats representative of the borough and reverse those in decline	Biodiversity
3	To protect and preserve landscape character, historic buildings, archaeological sites and cultural features of importance to the community	Landscape & Heritage
4	To avoid the adverse effects of activities and development on the natural functions of soil and water systems	Soil & Water
5	To reduce contributions towards, and vulnerability to, the effects of climate change	Climate Change
6	To minimise the hazard risk from flooding in Hillingdon	Flood Risk
7	To ensure efficient use of non renewable resources and minimise the production of waste	Resources and Waste
8	To encourage efficient use of available land that will not foreclose on future options	Efficient Land Use
9	To create a variety of high quality residential environments that provides everybody with the opportunity to live in a decent home	High Quality Housing
10	To provide environments that promote healthy and safe living and reduce anti social behaviour	Health, Noise, Safety, Crime
11	To improve the ready access to essential services and facilities for all residents	Accessibility
12	To promote methods to reduce dependence on private transport and manage the effects of traffic on the environment	Traffic reduction
13	To provide residents of all ages with the option to access education and skills based enhancement	Skills & Education
14	To encourage built environments of high quality urban design that assists in enhancing areas amenity value and promote community sense of place	Design & Amenity
15	To promote growth in the economy whilst improving its environmental and social performance	Economic Growth
16	To enhance the image of the borough as a location for new	Business Image

	business	
17	To encourage business to provide a range of jobs and services that will support and enhance existing residential and employment areas	Provision of Jobs

HILLINGDON CHILDREN & FAMILIES TRUST PLAN 2011-14

Reporting Officer: Head of Democratic Services

SUMMARY

As a policy framework document, this report seeks Council's approval of Hillingdon's Children and Families Trust Plan following consultation and recommendation by Cabinet on 28 July 2011. The new plan is aimed at improving the outcomes for vulnerable children, young people and their families within Hillingdon. The plan aligns the priorities of the Children and Families Trust alongside the Council's priorities and those of Hillingdon Partners and the Sustainable Communities Strategy.

RECOMMENDATION: That the Hillingdon Children and Families Trust Plan 2011-2014 as set out in the Appendix be adopted.

INFORMATION

The Children & Families Trust Board (the Children's Theme group of the Local Strategic Partnership –Hillingdon Partners) in Hillingdon believes a family approach is required to support the child and to improve their life chances and outcomes. To achieve this aim the Hillingdon Children and Families Trust Plan (HCFP) outlines the vision that the partnership has for vulnerable children, young people and their families in Hillingdon. It identifies the joint priorities that the Trust Board will commit to undertake, in partnership, over the next 3 years (2011-14) to improve outcomes for children and young people.

The current plan expired at the end of March 2011. This will be the third HCFP and is owned, delivered and monitored by the Children and Families Trust Board.

Effective joint work has taken place over the last five years and this work is now embedded in service delivery across children's services in Hillingdon. This Plan goes further and highlights the transformational agenda across the partnership in Hillingdon and how it will be achieved.

The partnership is focused on continuing to improve services and outcomes. However, the Trust Board realise given the current economic climate that we must change the way we work and target those most vulnerable within the community.

The Trust Board have agreed on six priorities which will drive the transformational agenda:

- Priority 1. Keeping all children and young people safe
- Priority 2. Ensuring all children have the best start in life
- Priority 3. Improving the health and well-being of young people, focusing on those groups undertaking risky behaviours¹
- Priority 4. Improving the outcomes of Looked After Children

¹ The risky behaviours we refer to include: 1. Unprotected sex leading to STI's and under 18 conceptions; 2.Substance misuse (including alcohol); 3. Emotional health and wellbeing; 4. Young people not in education, employment or training (NEET); and 5. First time entrance into the criminal justice system

- Priority 5. Improving the outcomes of Disabled Children
- Priority 6. Strengthen multi-professional integrated working

By identifying these priorities we will be able to focus our resources, ensuring that those most vulnerable receive the support they need, while ensuring that those potentially 'at risk' do not fall into acute statutory provisions.

Comments of the Education and Children's Services Policy Overview Committee

As a statutory consultee on policy framework documents, the Education and Children's Services Policy Overview Committee welcomed the Plan and felt that in this difficult economic climate it was positive that partners across Hillingdon had come together to form joint priorities. The Committee indicated that unlike in some areas it would be wrong to abandon a good model of partnership working in which the Local Authority is fully committed

The Committee made the following observations and comments:

- POC recently reviewed the impact of Overcrowding on children's attainment levels. The Committee requested that the findings be inserted and actioned in the HCFT Plan
- It was felt that a stronger statement was required within Priority 6 on the value of front line staff in the early identification of need to children, young people and their families
- The work in improving outcomes of children with SEN to be made more explicit in Priority 5
- Stronger statement on the governance arrangements and the accountability of the Children's Trust Board
- Commitment in the importance of sharing information and data across the partnership to be included in Priority 6.

These comments were incorporated, where possible, within the Plan.

Consultation Carried Out

The vision and priorities for the Plan were produced through the analysis of need and consultation of the following groups:

- Children and Young People
- Partner agency on the Children's Trust Board
- Local Safeguarding Children's Board
- Schools

Financial Implications

There are no direct financial implications arising from this report. For the current year, activity will be funded within existing resources. Any future budgetary implications that arise in relation to the delivery of the plan will be fully considered as part of the Council's medium term financial forecast (MTFF). Corporate Finance has also reviewed this report and there are no direct financial implications to the Council.

Legal

The Children and Families Trust Plan is an important element of the reforms underpinned by the Children Act 2004, building on the best local planning practice to produce a single, strategic, overarching plan for all services affecting children and young people. This should support more integrated and effective services to secure the outcomes for children set out in local Sustainable Communities Strategy.

Under the Council's Constitution and as a Policy Framework document, the Plan requires final adoption by full Council. There are no other significant legal implications arising out of this report to bring to Cabinet's attention.

Background Papers: Nil

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**HILLINGDON'S
CHILDREN AND FAMILIES TRUST PLAN
2011-14**

DRAFT

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DRAFT

Foreword

The biggest motivating factor driving the work of the Children and Families Trust Board is the desire to improve outcomes for the children and young people of Hillingdon. Since the formation of the Partnership Board in 2006 a great deal has been achieved and outcomes have improved in a number of key areas. These include reducing teenage pregnancy and infant mortality, raising attainment at Key Stage 2, GCSEs and A Levels and reducing numbers of young people not in education, employment or training. This is set against a backdrop of worsening financial positions both nationally and locally.

We recognise, particularly in the difficult economic climate in which we find ourselves, that difficult decisions have to be made and we know that the future presents us with a number of new challenges in a local and national context, in delivering services for children and young people. The size of the overall budget deficit means tough decisions have to be made. It is predicted that local authority funding will reduce by about 28% over the life of the current parliament. Work has now started on the range of projects aimed at transforming the way children's services in all agencies work and this is reflected in this plan.

We need to further develop the impact we can make as leaders of change across all aspects of services for children and young people in Hillingdon. We have already made a wide variety of changes to structure and processes. We have commissioned new evidence based services and reshaped others. To make the most of these changes and to ensure that all this work has the best impact on outcomes for children, young people and families and is 'value added' means further change in how we work and the cultures within which we work. This direction of travel requires clearer and more ambitious leadership, with everyone working in the partnership being clear how they contribute to our collective goals.

We submit this, the third Children and Families Trust Plan as our framework to deliver change for Hillingdon.

Hillingdon Children and Families Trust Board

Corporate Director, Social Care, Health and Housing and Statutory Director of Children's Services - London Borough of Hillingdon
 Education Services - London Borough of Hillingdon
 Children's Social Care - London Borough of Hillingdon
 Youth Offending Service - London Borough of Hillingdon
 Joint Director of Public Health - London Borough of Hillingdon/Primary Care Trust
 Chief Inspector, Partnership Office - Hillingdon Metropolitan Police
 Non-Acute Commissioning - Hillingdon Primary Care Trust
 Independent Chairman - Local Safeguarding Children's Board
 Children and Families Lead - Hillingdon Association of Voluntary Sector
 Consultant Paediatrician - Hillingdon Hospital
 Director of Patient Experience & Nursing - Hillingdon Hospital
 Managing Director - Hillingdon Community Health, CNWL
 Director - CAMHS
 Representative - Secondary School
 Representative - Special School
 Representative - Primary School
 Principal - Uxbridge College
 Child Poverty/Partnership Manager - Job Centre Plus

1. Hillingdon - Context

Hillingdon is the second largest of London's 32 boroughs covering an area of 42 square miles (11571 hectares), over half of which is a mosaic of countryside including canals, rivers, parks and woodland. As the home of Heathrow Airport, Hillingdon is London's foremost gateway to the world, and is also home to the largest RAF airport at RAF Northolt. Hillingdon shares its borders with Hertfordshire, Buckinghamshire, Hounslow, Ealing, and Harrow.

The London Borough of Hillingdon has been in existence since 1965. In its current form, it is made up of 22 wards. The north of the borough is semi-rural with a large proportion protected by green belt regulation, and Ruislip is the major centre of population. The south of Hillingdon is more densely populated, urban in character and contains administrative centre of Uxbridge and towns of Hayes and West Drayton.

Heathrow airport is situated in the south of the borough, and is the largest employer offering a range of relatively well-paid skilled and unskilled manual positions. There are a number of major manufacturing and retail organisations with headquarters and sites in Hillingdon. Stockley Park, to the north of Heathrow, is one of Europe's largest business parks. Hillingdon council, RAF Northolt, Brunel University, Harefield and Hillingdon hospitals are major public sector employers within the area.

1.1 Population

The Office of National Statistics (ONS) estimated (2008 MYE based) Hillingdon population for 2010 at 263,527. Hillingdon has a significantly larger proportion of people in younger age groups (5-19) when compared with England and London. ONS mid 2008 projections indicate 65,156 children and young people aged 0 to 19 live in Hillingdon, which represents nearly 25% of the total population of the borough. In January 2009, 48.8% of the school population was classified as belonging to an ethnic group other than White British. 33% of pupils speak English as an additional language, with this figure now 37% in the primary sector. Punjabi, Somali and Urdu are the most commonly spoken community languages in the borough. 6.4% of pupils are of Black African background, over half of which are Somali. This group is growing; 7.2% of pupils in primary schools are Black African compared to 5.4% in secondary schools.

44,033 pupils attend 91 schools in Hillingdon, an increase of 1,600 pupils since 2002. There are 65 primary schools, 18 secondary schools, 6 special schools, 1 nursery school and 1 pupil referral units. Around 7% of pupils attending schools in Hillingdon are resident in other local authorities.

1.2 Gender

Of the total of young people population under 19 there were marginally more males (52%) than females (48%).

1.3 Ethnicity

Hillingdon is expected to become more diverse, with greater diversity in the 0-25 age group where the ethnic minorities in this age group are expected to increase to 50% by 2016 (GLA 2007 Ethnic population projections). Population of ethnic elderly is expected to grow especially in the south of the borough.

Ethnicity is closely linked to health status, outcomes and inequalities. Black and minority ethnic (BME) groups generally have worse health than the overall population, although some BME groups fare much worse than others, and patterns vary from one health condition to the next. Evidence suggests that the poorer socio-economic position of BME groups is the main factor driving ethnic health inequalities.

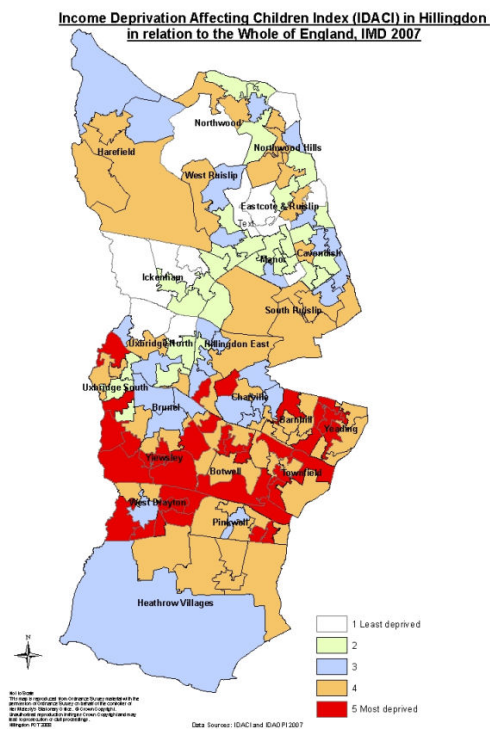
1.4 Changing Demography

In Hillingdon, numbers of births have risen for several consecutive years with record highs in 2006, 2007 and 2008. Births in 2008 were exceptionally high at 4,126 children and several hundred more than the previous record high. Demographic professionals at the GLA indicate a prolonged period of births at around the high 2008 level, which seems consistent with the local annual births data. Additionally, this demographic pressure is currently exacerbated by unusual family movements to Hillingdon believed to be caused by the recession and housing market crises. The geographical distribution of births in 2008 show that the increase is predominantly in the south of the borough (i.e. south of the A40). This translates into additional demand for services across education, health and social care in these areas. The current additional recession led pressure across the borough is expected to recede by 2012 (leaving mainly pressure from births and local housing developments).

The projected population for 0-19 years olds is expected to increase from 67,608 in 2010 to 75,494 in 2020 to 81,201 in 2030.

1.5 Deprivation

Hillingdon is ranked 157 out of 354 in the English index of multiple deprivation (IMD 2007) where the most deprived is ranked 1. Social segmentation of Hillingdon’s neighbourhoods by dominant acorn types also shows that a large proportion of Hillingdon’s population is stable, home owning and ‘fairly comfortable’. There are however major differences in deprivation between wards in the north and south of Hillingdon with small areas in the south the borough falling in the 20% most deprived quartile nationally.



The supplementary indices provided for estimating deprivation among children (0-15 year) IDACI shows that a significant proportion of areas in the South of the Borough have children living in poverty (defined as 60% of median national income before housing costs). An additional index on children’s wellbeing ranked Hillingdon 231 out of 354, where the best child wellbeing is ranked 1.

The Super Output Area (SOA) in Hillingdon which has the highest IDACI deprivation ranking is situated in Yeadon, where 55% of the children aged under 16 in that area are affected by income deprivation. The least deprived SOA is situated in Ickenham, Eastcote and East Ruislip where only 2% of children aged under 16 are affected. Income deprivation tends to affect children living across much of the south of the borough, in particular Botwell, Yiewsley and Townfield with some extreme pockets of deprivation in West Drayton, Pinkwell, Yeadon, Barnhill and Uxbridge South.

Source: Office for Deputy Prime Minister Indices of Deprivation 2007

2. Vision & Values

The Hillingdon Children & Families Trust Plan is our key strategic plan for all partners delivering services to children, young people and their families within Hillingdon.

2.1 Our **vision** is to:

“Improve the outcomes for children, young people and their families in need or at risk through co-ordinated evidence based services.”

2.2 Our **principles** on which this plan is formed ensure that the Trust is:

- delivering evidence based services and using limited resources effectively
- focused on the education and wellbeing of children, young people and their families
- taking account of what children, young people and families are telling us
- promoting equalities/addressing inequalities
- addressing issues where there is sustained poor performance in relation to our priorities
- taking the opportunity to intervene early
- cross-cutting across the partnership
- based on a willingness of partners to commit resources and do things differently
- responding effectively to the challenge of reduced resources

2.3 Our **purpose** as a partnership is:

- to ensure that children, young people and their families in Hillingdon experience better outcomes through improved services; and
- to support practitioners working in their constituent agencies to see themselves (and also act) as part of a community of Hillingdon children's workers, interconnected with others, and able to see their role in the wide range of provision and services.

2.4 We, the HCFT Board have agreed to focus on six key **priorities**:

Priority 1. Keeping all children and young people safe

Priority 2. Ensuring all children have the best start in life

Priority 3. Improving the health and well-being of young people, focusing on those groups undertaking risky behaviours¹

Priority 4. Improving the outcomes of Looked After Children

Priority 5. Improving the outcomes of Disabled Children

Priority 6. Strengthen multi-professional integrated working

See section 5 for further details.

By identifying these priorities we will be able to focus our resources, ensuring that those most vulnerable receive the support they need, while ensuring that those potentially 'at risk' do not fall into acute statutory provisions.

2.5 Transformational

¹ The risky behaviours we refer to include: 1. Unprotected sex leading to STI's and under 18 conceptions; 2. Substance misuse (including alcohol); 3. Emotional health and wellbeing; 4. Young people not in education, employment or training (NEET); and 5. First time entrance into the criminal justice system

We recognise that effective joint work has taken place over the last five years and this work is now embedded in service delivery. This Plan goes further and highlights the transformational agenda across the partnership in Hillingdon and how it will be achieved.

The partnership is focused on continuing to improve services and outcomes. However, we realise given the current economic climate that we must change the way we work and target those most vulnerable within the community. We recognise that difficult decisions will have to be made over the next 3 years. As a partnership we need to be innovative and transformational in our service design and delivery to ensure those most vulnerable will receive the services they need.

2.6 Value for Money (VfM)

We are operating in challenging financial times but by working together we are better placed to meet these challenges. Any decision to commission or de-commission services will be based on evidence, transparency, fairness, equality and will ensure we provide value for money for local people. The ultimate decision-making process will lie with the commissioning partner and be rigorous and consulted upon as required by the partner agency procurement procedures. VfM can be measured in terms of:

1. Quality and suitability of the service for the individual
2. Long-term implications or whole-of-life costs
3. Wider outcomes for society and the state.

2.7 Safeguarding

Underpinning the Plan and all our services must be the strongest possible commitment to safeguarding our children & young people.

The Hillingdon's Local Safeguarding Children Board (LSCB) is a multi-agency Board of key decision makers where safeguarding policies, procedures and practice are developed, monitored and reviewed. There are a number of shared aims and responsibilities across all agencies and communities to keep children and young people safe from harm. To achieve this, the Board makes a strong commitment to partnership between agencies. This includes integration, accountability and participation at all levels.

Further information on Hillingdon's LSCB see www.hillingdon.gov.uk/lscb

2.8 Prevention and Early Intervention

We will ensure that effective and appropriate early intervention/preventive services are in place across the 'continuum of need'. In particular; when targeted and multi-agency intervention is required the risk of poor outcomes for children and young people will be reduced. Services across the partnership will be targeted to focus on those 'at risk' and vulnerable ensuring their outcomes improve and support them back to universal provisions.

High quality early intervention, preventing poor outcomes for children and young people has huge long term benefits for the child, family and society but also adds value in preventing local expenditure through savings on high cost acute services. Early intervention and prevention is at the heart of our overall strategy to improve the outcomes of those children, young people and their families requiring high cost acute services.

2.9 Equality and Diversity

As with all public bodies, we are bound by the three general duties to promote disability, ethnicity and gender equality. This applies across all policies and functions. We strive to provide a range of experiences, cultures, traditions and histories that surround Hillingdon's

residents, enabling them to access a diversity of opportunities while at the same time catering for individual need. Our aim is to mainstream equality and diversity, rather than considering it as a separate issue to be addressed.

3. National and Local Context

3.1 National Context

The size of the overall budget deficit means tough decisions have to be made. It is predicted for instance that local authority funding will reduce by approximately 28% over the life of this Plan.

The Coalition Government have given their commitment to transforming and reforming education and children's services so that all children, regardless of their background, thrive and prosper. The governments proposals will provide teachers with the powers that they need to instil good behaviour; Health professionals are to commission Health services to meet the needs of their local communities, social workers will be free to do their day jobs without excessive bureaucracy and there will be a reform of early years education and Sure Start so that all children and families receive the support they need, particularly the most vulnerable.

3.1.1 White Paper, Equity and excellence: liberating the NHS: Department of Health²

It provides details of how government will:

- put patients at the heart of everything the NHS does
- focus on continuously improving those things that really matter to patients - the outcome of their healthcare
- empower and liberate clinicians to innovate, with the freedom to focus on improving health services

Further detail see appendix A.

3.1.2 White Paper, Healthy Lives, Healthy People: Department of Health³

It provides details of how government will:

- Make Public Health a higher priority locally placing it within the responsibilities of Local Authority to improve people's health and tackle health inequalities and the wider determinants of health in every community with a Director of Public Health as the strategic leader.
- Establish health and wellbeing boards in every top tier local authority.
- Protect the population from health threats – led by central government, with a strong system to the frontline
- Empower local leadership and encourage wide responsibility across society to improve everyone's health and wellbeing, and tackle the wider factors that influence it
- Strengthen self esteem, confidence and personal responsibility; positively promote behaviours and lifestyles; adapting the environment to make healthier choices easier

3.1.3 White Paper, The Importance of Teaching: Department of Education⁴

It provides details of how government will:

- free teachers from constraint and improve their professional status and authority
- raise the standards set by our curriculum and qualifications to match the best in the world
- hold schools effectively to account for the results they achieve
- ensure that school funding is fair, with more money for the most disadvantaged
- support teachers to learn from one another and from proven best practice

Further detail see appendix A.

² www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_117353

³ www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_121941

⁴ www.education.gov.uk/b0068570/the-importance-of-teaching/

3.1.4 Munro review of Child Protection⁵

The areas for reform include:

- the importance of a management and inspection process
- developing social work expertise
- giving other professionals easier access to social work advice when they have concerns
- revising and reducing the statutory guidance Working Together to Safeguard Children
- considering having a national system of trained reviewers of serious case reviews (SCRs)

Further detail see appendix A.

3.2 Local Context

Work has now started on the range of projects aimed at transforming the way the local authority works. The transformation programme known as Business Improvement Delivery (BID) will review every part of the Local Authority, with the aim of helping to deliver the council's children's services savings targets of more than £10.8 million over the next four years.

Hillingdon Primary Care Trust (PCT) is under going transition arrangements under the Health reforms and has merged with Hounslow and Ealing PCTs to ensure any adverse impact on clients is reduced and economies of scale can be achieved. Hillingdon Community Health (HCH) the local NHS Provider of community health services, formally joined Central and North West London NHS Foundation Trust (CNWL) from February 2011. CNWL is part of the NHS and provides community services in nine boroughs in Greater London.

Work is already underway in Hillingdon to implement government proposals where commissioning for children and young people's health will be split three ways between health and wellbeing board, the National Commissioning Board and GP consortia. A shadow Board has been formed with nine elected GPs and 12 non-voting members.

We can see clear benefits to children and young people from the development of a localised system of GP consortia, commissioning NHS services and being held to account for them. The role of the local authority led Health and Wellbeing Board will be crucial here, in providing the necessary constructive challenge on commissioning decisions made by GP consortia and also providing a route by which the views of children, young people and their parents and carers can be expressed.

Challenges of the GP consortia include managing the transition from the present to the future governance arrangement, this poses particular challenges that will need to be addressed regarding the demise of PCTs and the creation of new consortia. The potential for conflicts of interest and while much is promised by the reforms in terms of improving patient choice, the extent to which these will benefit patients is unclear, given that one of the overall primary objectives is to cut costs. Lastly, localism in policy decision-making may make it difficult for some patients to receive necessary care; i.e., there are likely to be significant variations between consortia regarding the availability of certain types of care.

Several Hillingdon secondary schools have made the decision to become Academies in 2011/12 and others will determine their status over the forthcoming years.

One of the main challenges to Uxbridge College and other full time education and training providers for 16-18s will be the reduced amount of funding available, following the abolition of the EMA, to support the participation of young people from low income households. The

⁵ www.education.gov.uk/munroreview/downloads/TheMunroReviewofChildProtection-Part%20one.pdf

reduction in support may impact on the initial recruitment of 16-18 learners, and potentially also the ability or willingness of these learners to stay the course.

3.3 Shaping Policy

As a partnership we need to ensure that we shaping and influence policy on a national and regional level to ensure local needs are understood. To enable this the Cabinet Member for Education and Children's Services in Hillingdon is Vice Chairman of the London Councils Children and Young People's Board, Vice Chairman of the National Employer's Organisation for Schoolteachers, Peer Member at Local Government Improvement and Development Agency and an advisory board member of the National Foundation for Education Research.

4 Needs Assessment

This section was informed by the Joint Strategic Needs Assessment⁶ (JSNA) which is relevant across all partners and all age groups within Hillingdon.

Outcomes from the needs assessments form an important part of commissioning, de-commissioning and service development, as well as informing priorities for our HCFT Plan. The needs assessment uses intelligence gathered from partners, children, young people and their families via the HCFT Plan consultation process. Much of this information was drawn together in the form of a detailed needs assessment in the summer of 2010.

The full children's needs assessment⁷ comprises of (1) engaging with priority groups of children and young people and an (2) desktop analysis which draws upon information from the field study, needs assessments across the partnership and other data sources.

4.1. Engaging with Children and Young People

Only by listening to our children and young people can we ensure that they receive the most effective types of support in the best ways for them and at the most appropriate times. We routinely consult children and young people to see how responsive services are to their needs and to ask what they think could be done to further improve their lives.

Hillingdon has an active Youth Council. There are School Councils in all Hillingdon's schools, and these are linked to the Youth Council. Both the Schools and Youth Councils participate in a number of initiatives, activities and consultations, regularly giving their views to inform strategies and projects on issues such as anti-bullying, safeguarding and youth services. These views are then used to inform service development and we give feedback on how they have been incorporated into plans for the borough. We have also developed a Children in Care Council.

This Children and Families Trust Plan has been informed by the views of children and young people gathered via a consultation process run by the NSPCC⁸, information gathered from the Tellus4 survey and the Youth Council.

4.2 Desktop analysis and other data sources

The desktop analysis pulls together data and information on:

- Demographics
- Improving the Health and Well-Being of Children and Young People
 - Community Health Activity

⁶ Hillingdon JSNA - www.hillingdon.gov.uk/index.jsp?articleid=21833

⁷ Hillingdon Children's Needs Assessment - www.hillingdon.gov.uk/index.jsp?articleid=14756

⁸ Hillingdon Children's Plan Consultation NSPCC report - www.hillingdon.gov.uk/index.jsp?articleid=17206

- Substance Misuse
- Sexual Health
- Mental Health
- Safeguarding
- Looked after children
- Disabled children
- Raising aspiration and achievement of children and young people
 - Early Years (0-4yrs)
 - School years (5-16yrs)
 - Post 16 (16-19yrs)
 - Young people's involvement in offending and disorder
 - Looked after children
 - Disabled children

5 Strategic Priorities

We have been through a rigorous review of our needs assessment in developing the new strategic priorities. As a consequence we have reduced the number of priorities from 13 to 6. By reducing the number of priorities we will be able to focus our resources to ensure that those most vulnerable receive the support they need.

Priority 1: Keep all children and young people safe

Why is this so important?

Safeguarding children and young people remains a key priority within Hillingdon. Since 2006, Hillingdon has received a 'Good or better' rating from Ofsted on the provisions to keep children and young people safe. However, as the demographics of Hillingdon and the external environment i.e. technology change so does the challenge to ensure all children are kept safe. Therefore the partners across Hillingdon will continue to work together to identify and safeguard vulnerable children and young people.

Overseeing this priority is the responsibility of the Local Safeguarding Children Board (LSCB). Through its sub groups, the LSCB drives improvement, monitors and oversees multi agency practice, and advises on the development of priorities for the Children and Families Plan

What will we do?

- The LSCB will focus its work on ensuring that all agencies are working together as effectively and efficiently as possible to safeguard children, and will make recommendations as to the most effective interventions and those target groups who are most in need of services in order to ensure that children are effectively protected and safeguarded.
- The LSCB will develop better ways of measuring impact on outcomes for children, and by incorporating more user views in its work.
- Funding for preventative services, though cost effective in the long term, will inevitably be reduced in the short to medium term so the LSCB, through the independent chairman, will continue to challenge the Children's Trust to ensure that those resources are being effectively targeted towards services most likely to impact on the safeguarding and protecting of children.
- The LSCB will also monitor each of its constituent agencies in terms of the impact of their funding decisions, and work with universal services to inform their work in safeguarding children, thus ensuring that specialist services are able to focus on those at high risk of harm
- Work with partner agencies to reduce the impact on children and young people's life chances of domestic violence, adult mental illness and bullying, particularly bullying online and by mobile phone.

Priority 2: Ensuring all children have the best start in life

Why is this so important?

Studies have shown that early Intervention to promote social and emotional development can significantly improve mental and physical health, educational attainment and employment opportunities later in life. Studies have shown that early intervention programmes in the pre-school years can help to prevent criminal behaviour (especially violent behaviour), drug and alcohol abuse and teenage pregnancy.

We believe by building on the strong network of Children Centres, Midwives, Health Visitors and other early year providers in Hillingdon we can give all parents with newborns and young children the information and support needed to give their babies and children the best possible start in life. The Hillingdon Play Pledge will offer an excellent facilitator of broader social outcomes including community cohesion, inclusion, health and education.

In addition, the Health Inequalities Working Group reviewed the effect that overcrowding has on educational attainment and children's development in the Borough. The Working Group believe that failure to tackle overcrowding will have a significant impact on many families and therefore further work needs to be undertaken to put mechanisms in place to identify instances where poor attainment at school is linked to overcrowding.

What will we do?

- We will implement evidence-based early years programmes such as, Play and Learning to Socialise (PALS), Attention Hillingdon and Every Child a Talker (ECAT) that are proven to improve the communication and social and emotional development of young children across early years and Children's Centre provision.
- We will implement the Childcare Sufficiency Assessment action plan, target outreach and information strategies to maximise the impact of lifting children out of poverty, piloting transformational delivery models of provision for vulnerable 2 year olds particularly for the most disadvantaged
- Transforming Children's Centres to provide more integrated preventative and early intervention services for families through the Team around the Child (TAC), mental health, early intervention and roll out of maternity care projects in order to improve health, educational and material outcomes for children under five and their families..
- Redesign parenting and family support for children in the early years through the early intervention and early years BID projects to provide more joined up, effective and efficient services
- Roll out a comprehensive programme to identify children as early as possible with communication issues and provide support to their parents/carers and settings so that co-ordinated action can be delivered.
- Further investigations be made into the development of breakfast clubs in primary/secondary schools, libraries and children's centres.
- Regular housing / overcrowding drop-in sessions be held in Children's Centres within the Wards that have the highest levels of overcrowding together with housing / overcrowding information leaflets being made available at all Children's Centres in the Borough.

Priority 3: Improving the health and well-being of young people, focusing on those group undertaking in risky behaviours

Why is this so important?

Some risky behaviour is a normal and positive part of growing up. It can also support the development of resilience and enable young people to grow and aspire to make positive decisions about their lives and the world they live in.

However some risky behaviour can be harmful. It can reduce aspirations, increase vulnerability, cause physical and social problems, reduce opportunities and may promote criminal and anti social behaviour.

Some young people are involved in multiple risky behaviours and may be receiving interventions from different agencies at the same time. This can appear confusing and at times contradictory to the needs of the young person. There are efficiencies to be made by co-ordinating these interventions better thus ensuring that some young people aren't being overwhelmed by services whilst others are having difficulty accessing any. Co-ordinated services will assist in actively improving young peoples life outcomes rather than simply maintaining their status quo. Therefore these young people are often accessing fragmented services and costing significant amount of resources to both the local authority and PCT who are simply reducing the behaviour from escalating rather than impacting and improving their life outcomes.

What will we do?

- We will develop an integrated service that will intervene early to promote positive outcomes for children, young people and their families or with a population most at risk of developing problems.
- We seek to ensure that effective and appropriate early intervention and prevention processes are in place across the 'continuum of need'. This will mean that targeted and multi-agency responses may be made when required so that the risk of poor outcomes for children and young people may be reduced.
- Processes will build on existing good practice, both locally and nationally. Processes and associated services will be shaped by available resources and the needs of the children, young people and their families to ensure that early intervention and prevention activity is managed and delivered in a manner that eliminates duplication and ensures resources are focussed on front-line service delivery.

Priority 4: Improving the outcomes of Looked after Children

Why is this so important?

A significant amount of work has been put in place to improve the outcomes of LAC over the life of the previous HCFT Plan. These include the introduction of the Virtual Head, targeted health services work with young people in residential homes, including sexual health and relationships education, and drug awareness and the development of the Children in Care Council. We believe that much more work needs to be done across the health, well being and education outcomes to narrow the gap between LAC and their peers. Therefore to confirm the importance for these children we have rolled forward this priority from the previous plan.

The Corporate Parenting Board remains the driver to ensure that this priority is delivered and will report to the HCFT Board on a quarterly basis on progress against performance and actions.

What will we do?

- Transformation of the commissioning of placements for LAC and Care Leavers that increases the number of in-of-borough placements, ensuring services provided to children looked after are within or close to Hillingdon
- Ensure the stability and choice of placements to children and young people in care
- Increase in-house foster care provision including carers who can deliver intervention programmes for young people with more challenging behaviours by developing a provision of wrap around support package to foster carers
- Broaden the range placements available for children/young people with more complex needs.
- Retain more young people within the local community where there are well established referral pathways, protocols and service level agreements with partner agencies who share responsibility for meeting the needs of these children and promoting positive outcomes.
- Further developing the Virtual Headteacher role to narrow the gap in achievement of LAC

and their peers

Priority 5: Improving the outcomes of Disabled Children

Why is this so important?

It is clear that progress has been made against the Disabled Children's Strategy and the use of the Aiming High grant, which includes the establishment of a parent forum, development of short break provisions and Easter, summer and out-of-school activities.

In some instances service provision is rarely based on the priorities and needs of individual families. What is provided is often too little and too late to make the best possible improvement to their everyday lives. For example, families may miss out on their full entitlements to benefits because services don't pass on key information at the right time. The Local Authority and the PCT jointly have an important role to play in commissioning services for children and young people with disabilities, complex and palliative care needs, ensuring an integrated approach which improves outcomes. It is for this reason we have rolled forward this priority from the previous plan to ensure improving the outcomes of disabled children remain high.

In addition, we will be working towards the final recommendations of the Green Paper 'Support and aspiration: A new approach to special educational needs and disability' which proposes a new approach to identifying SEN through a single Early Years setting-based category and school-based category of SEN; a new single assessment process and Education, Health and Care Plan by 2014; gives the option of a personal budget by 2014 for all families with children with a statement of SEN or a new Education, Health and Care Plan; and gives parents a real choice of school, either a mainstream or special school.

What will we do?

- Ensure, wherever possible, the services and support will provide progression as well as care for disabled children and young people. This therefore improves their life outcomes as adults, for example, through their involvement in sports and leisure, youth and play
- Provide more flexible and tailored support for disabled children with more complex needs, placing less reliance on traditionally inflexible and costly packages of care, for example, less use of out-of-borough and full-time residential provision and more emphasis of "shared care" arrangements involving statutory agencies working with families
- Ensure that through more effective assessments, joint commissioning and joint-working across agencies disabled children and their families receive better co-ordinated support which tackles health, education and social needs
- Help disabled children and their families choose and access the services and support which they want and need, through the further rollout of personalised budgets and direct payments
- Create a seamless journey for disabled children as they progress through services which support their transition to adulthood, through more effective joint-planning of services across Children's and Adult Social Care, Health and Education
- Narrow the gap in achievement of disabled children and their peers, for example, by tracking and improving their educational attainment both through individual schools' Self Evaluation Form (SEF) and Annual School Review (ASR) processes and monitoring performance over time at a borough-wide level

Priority 6: Strengthen multi-professional integrated working

Why is this so important?

We value the resources and knowledge base that front line staff offers the partnership in identifying and assessing the needs of children, young people and their families. We believe that integrated working makes a real difference to the lives of children and young people. We are committed to integrated working and where everyone supporting children and young people work together effectively to put the child at the centre of all services to improve their lives.

Only by working together, across statutory, voluntary and community sectors sharing information and resources effectively, can we maximise the difference we make for children and

young people. Effective integrated working is also becoming increasingly important in the current economic climate as a way to increase impact and deliver value for money with a limited budget.

Integrated working is achieved through collaboration and co-ordination at all levels and across all services to identify needs early, deliver a co-ordinated package of support for the child/young person and their family and help to secure better outcomes.

What will we do?

- Establish a Team Around the Child model and identification of a Lead Professional for every child requiring multi-agency support
- Provide services that deliver good value for money by working together across the children's partnership as efficiently as possible.
- Maintain multi-professional communication and best practice whilst agencies progress through structural change
- Offer skills development in areas identified by the Board as a priority

6 Framework for Delivery

This plan has been developed alongside the 'Sustainable Community Strategy' which sets out the priorities of the Local Strategic Partnership (LSP) and is aligned with the recommendations of the Joint Strategic Needs Assessment 2011.

6.1 Governance arrangements

Hillingdon Children & Families Trust Board is the Children's Theme group of the LSP and are accountable to the LSP Board. As the Board has senior representatives from agencies across Hillingdon this will ensure delivery of the priorities by the sub groups. We oversee the multi-agency working that is required to improve outcomes for children, young people and families in Hillingdon. This governance arrangement will be continually reviewed to reflect national and local policy and to remove duplication across other LSP theme groups.

Hillingdon has had strong partnership arrangements in place since the inception of the Children and Young People's Strategic Partnership Board in 2006. The Partnership developed formally into the Children and Families Trust in 2008.

The partnership can include any agency working with children and young people. In Hillingdon both statutory and non-statutory agencies are key partners. these include:

- Central and North West London Mental Health Trust (CNWL)
- Hillingdon Association of Voluntary Services (HAVs)
- Hillingdon Hospital Trust (HHT)
- Hillingdon Primary Care Trust (PCT)
- Hillingdon Metropolitan Police
- JobCentre +
- London Borough of Hillingdon
- Youth Offending Service
- Local Schools
- Local Safeguarding Partnership Board
- Uxbridge College

HCFT Board will meet every quarter with a special AGM in order to consider progress against the plan, review recommendations and to sign off the annual report.

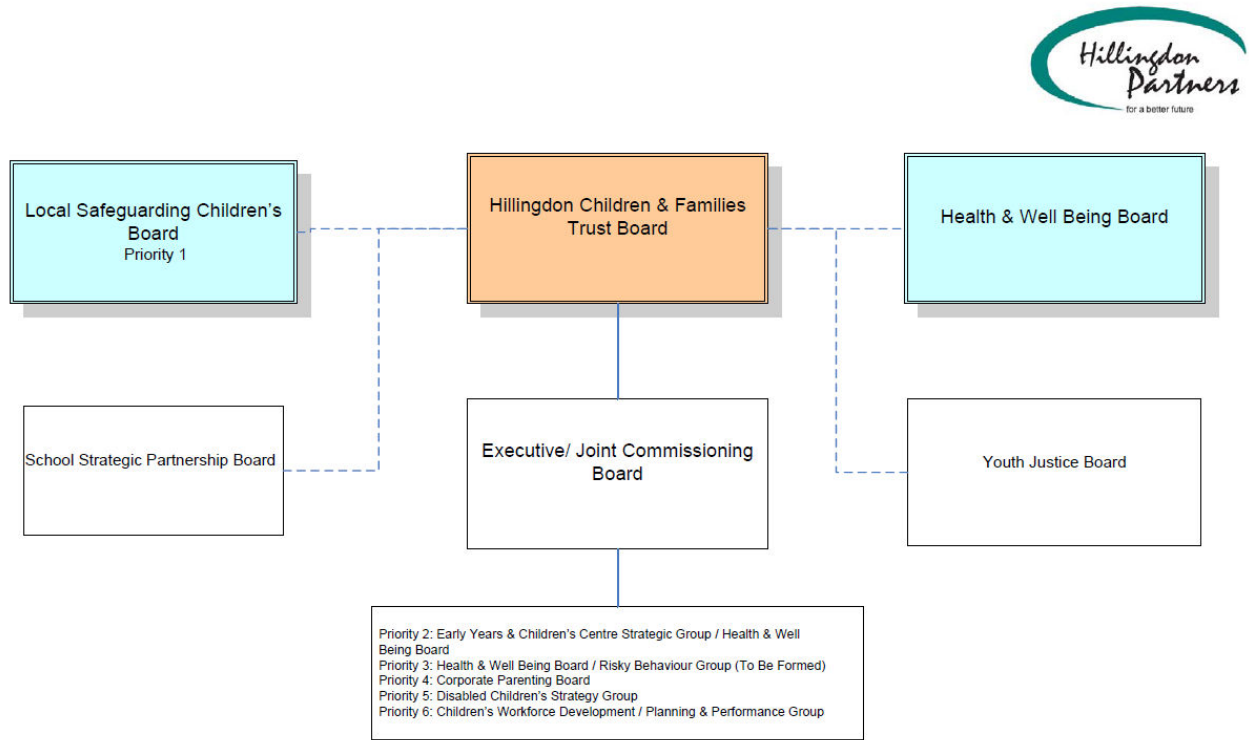
HCFT Executive/Joint Commissioning Board (JCB)

The HCFT Board devolves responsibility for a range of functions to the Executive/ JCB. The Executive/ JCB will be the 'engine room' for the joint decision-making, joint priority setting and managing the performance across the partnership.

Strategic Delivery Groups

Diagram 2 below gives an indication of the strategic delivery sub groups that currently exist. The sub groups are not set in stone but are set up and dissolved in accordance with national requirements and / or the priorities of the HCFT as detailed in this Plan. The purpose of the sub groups is to act with input from a wide range of relevant partners to assess local needs and scrutinise priorities. They act as a reference point for development of new strategies and the delivery of the plans and priorities. They are accountable to the HCFT Board; however they are overseen by the Executive/JCB.

Diagram 2 – Hillingdon Children and Families Trust Governance



HCFT Priorities 2011-14

1. Keeping all children and young people safe
2. Ensuring all children have the best start in life
3. Improving the health and well-being of young people, focusing on risky behaviour groups
4. Improving the outcomes of Looked After Children
5. Improving the outcomes of Disabled Children
6. Continuing to strengthen multi-professional integrated working

The multi-agency sub groups highlighted in diagram 2 will be expected to turn the HCFT priorities into operational work plans. These work plans will be signed off by the HCFT Board at the annual planning day and monitored and reviewed on a quarterly basis. The work plans will be part of the single agency plans and part of the responsible officer's individual tasks to deliver.

6.1 Involving children, young people and their families

We recognise and value children, young people and their families right to be actively involved in matters that concern them and acknowledge the unique role they play in a progressive and healthy society. We also recognise and value the contribution that genuine consultation and

active involvement users can make to service development, service improvement and improved outcomes. Active involvement is the key element in safeguarding children's well-being and ensuring that all children and young people, particularly those who may be more vulnerable or at risk, are included and their needs are being met.

6.2 Commissioning arrangements

Commissioning is about achieving best outcomes and this is most effective when partners across sectors work to a common set of standards.

Commissioning is a continuous cycle of needs analysis, prioritisation, design, performance management and service review, to ensure that services are focused on improving outcomes for children, young people and their families. As our population changes, the services needed by our children and young people also change and we must be responsive to this.

In Hillingdon, we aim to ensure services are commissioned based on a thorough assessment of needs and aspirations, including the experiences of users, partners and other stakeholders.

There are many different models and approaches to commissioning, but they generally all explore some combination of a four stage cycle of activity involving:

- Understand - understanding the needs of a particular population and what services exist and how they operate in the market
- Plan - being clear about a plan for changes required in services to better meet need and match best practice
- Do - driving change in services to deliver improvements and better meet desired outcomes
- Review - monitoring and reviewing the impact of plans and services to ensure that improvements continue.



The HCFT Plan acts as the main commissioning framework for children's services in Hillingdon, within the context of the budget provision agreed by partners.

We will only accept the highest standards of service delivery and will monitor contracts robustly; working with service providers to improve standards. Where necessary we will redesign and /or re-commission services to meet new needs or ensure quality requirements are met.

For further information on joint commissioning arrangements in Hillingdon see <http://www.hillingdon.gov.uk/index.jsp?articleid=15344>

6.3 Performance framework

It is increasingly clear that services should be outcome focussed, evidence based and be able to demonstrate, with a balanced mix of quantitative and qualitative data, that they are working and that they are making the required difference to their intended target populations.

The framework recognises the importance of outcome focussed (quality of life) measures alongside other data/information (including process measures).

Managing performance is integral to each step of the commissioning cycle, and the framework has been developed to structure performance management around the four stages of the

commissioning cycle outlined above.

Those responsible for strategic commissioning and for performance need to work closely together in the planning and commissioning services and reporting the performance at each stage to ensure accurate, properly analysed data is available to inform review and to measure success.

An Equality Impact Assessment and risk assessment, including action plans to alleviate risk, will also be prepared by each of the strategic delivery groups and each quarter report progress to the Executive to see how we're progressing towards the objectives outlined in this plan before this is fed up to the HCFT Board.

6.4 Joint Working

In Hillingdon there are some very successful examples of joint multi-agency working including the integrated targeted youth support service, which brings together multiple agencies to support vulnerable young people with a personalised package of support and Children's Centres which co-ordinate services for parents with young children from health visitors, JobCentre plus and Adult Education.

The Common Assessment Framework is also being used to coordinate the support for children identified as requiring interventions from more than one agency. This is helping us to identify and support children earlier, thereby reducing the likelihood of them requiring higher level interventions at a later stage.

We believe that further developing our partnership arrangements particularly across the voluntary and community sector will be key to securing value for money and improved outcomes for children and young people.

6.5 Developing our Workforce

The continued reform of our children's workforce is integral to the delivery of this plan - it's about thinking through and changing the ways in which services are delivered in order to ensure better outcomes for children and young people. Over the coming months the Children's Workforce Strategy will be refreshed in line with the new priorities set out in this Plan and will set out our ongoing partnership approach for developing a world-class children and young people's workforce through a diverse range of learning and development initiatives open to the entire workforce.

Our multi-agency Workforce Strategy Group has continued to lead the development of the skills and knowledge of our workforce through a diverse range of collaborative learning and development initiatives and a focus on common and practical recruitment approaches.

Our focus going forward is further developing the leadership skills across the partnership, equipping strategic leaders and managers with the relevant skills and knowledge to help them effectively lead and manage our integrated working approaches and embed joint service delivery.

Appendix 1: National Context

Equity and excellence: liberating the NHS: Department of Health⁹

The areas for reform include:

Structure of NHS: NHS funding will be handed to GPs to buy care for patients in their area, with primary care trusts and strategic health authorities to be abolished by 2013.

Foundation Trust hospitals will be allowed greater freedoms to treat more private patients and more patients with long-term conditions will be given their own health budgets to buy their care.

Patient records: The patient is to be put at the centre of the health service, under a Government motto of "no decision about me, without me" and will have greater control over their medical records and will decide who gets to see them. The aim is to make it easier for patients to download their records to share with healthcare organisations of their choice. Doctors and patients will also be able to communicate via email for greater efficiency and convenience.

Public health: The Department of Health will focus more on improving public health and less on the day-to-day running of the NHS. Regions with unhealthy inhabitants will be given extra cash to reduce inequalities. A national consultation has been issued regarding Public health responsibilities and associated budgets.

Information revolution: In a move away from waiting time targets, hospitals and doctors will be judged on the clinical effectiveness of their work. Hospitals and doctors' teams performance will be scrutinised in greater detail with data published on infections, deaths, readmission rates and accidents.

Patients feedback: The patient will be asked if they thought their treatment was effective and lived up to their expectations and this will be published so others can use the information to choose where to be treated.

The Importance of Teaching: Department of Education¹⁰

The areas for reform include:

Schools to work together with voluntary, business and statutory agencies to create an environment where every child can learn, where they can experience new and challenging opportunities through extended services and build stronger communities.

Dramatically extend the Academies programme so that all schools can take on the autonomy Academy status offers, using it to raise standards and narrow the attainment gap. Those attaining poorly and in an Ofsted category or not improving, are considered for conversion to become Academies to effect educational transformation.

Ensuring that local authorities play a critical new role – as strengthened champions of choice, securing a wide range of education options for parents and families, ensuring there are sufficient high-quality school places, coordinating fair admissions, promoting social justice by supporting vulnerable children and challenging schools which fail to improve.

Ensuring Local authorities are ultimately responsible for making sure the needs of some of our most vulnerable pupils, who attract significant additional funding, are met – such as those with highly complex Special Educational Needs and those being educated outside mainstream education.

⁹ www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_117353

¹⁰ <http://www.education.gov.uk/b0068570/the-importance-of-teaching/>

Munro review of Child Protection¹¹

Professor Munro recommends that local areas should have more freedom to develop their own effective CP services, rather than focusing on meeting central government targets. Her wide ranging review concludes that a 1 size-fits-all approach is preventing local areas from focusing on the child.

Professor Munro says that the Govt and LAs should operate in an open culture, continually learn from what has happened in the past, trust professionals and give them the best possible training.

Her recommendations signal a radical shift from previous reforms that, while well-intentioned resulted in a tick-box culture and a loss of focus on the needs of the child. Currently local areas are judged on how well they have carried out certain processes and procedures rather than what the end result has been for children themselves.

Professor Munro's recommendations are:

- Remove specific statutory requirement on LAs to complete assessments within often artificial set timescales, so professionals can give equal weight to helping children, young people, and families, as well as assessing their problems.
- Local services to be:
 - o freed from unhelpful targets, national IT systems and nationally prescribed ways of working.
 - o free to re-design services, that are informed by research and feedback, and that pay more attention to the impact on A change of approach to SCRs, learning from sectors such as aviation and healthcare, with a stronger focus on understanding underlying issues that made professionals behave the way they did and what prevented them from being able properly to help and protect children. The current system is too focused on what happened, not why.
- A duty on local services to coordinate an early offer of help to families who do not meet the criteria for social care, to address problems before they escalate to CP issues.
- Ofsted inspections of children's services to add more weight to feedback from children and families, directly observe social workers' interaction with children and families, as they do when inspecting schools, and pay more attention to whether children benefit from the help given.
- Experienced social workers to be kept on the frontline even when they become managers so their experience and skills are not lost. The expertise and status of the profession to be improved with continual professional development that focuses on the skills needed in CP.
- Each LA to designate a Principal Child and Family Social Worker to report views and experiences of front line to all levels of management. Nationally, a Chief Social Worker would be established to advise the Government on social work practice.

¹¹ <http://www.education.gov.uk/inthenews/inthenews/a0077182/independent-review-into-child-protection-says-free-professionals-from-central-government-control-to-let-them-do-their-jobs-properly>
<http://www.education.gov.uk/munroreview/>
http://www.education.gov.uk/munroreview/downloads/8875_DfE_Munro_Report_TAGGED.pdf

QUESTIONS FROM MEMBERS

8.1 QUESTION SUBMITTED BY COUNCILLOR FYFE TO THE CABINET MEMBER FOR EDUCATION AND CHILDRENS' SERVICES – COUNCILLOR SIMMONDS

Would the Cabinet Member for Education and Children's Services assure me that there will be no delay in the delivery, or the quality of provision, of the required number of new primary school places in Hayes to ensure that every child in Hayes has a school place close to where they live ?

8.2 QUESTION SUBMITTED BY COUNCILLOR RICHARD MILLS TO THE LEADER OF THE COUNCIL – COUNCILLOR PUDDIFOOT

Whilst we appreciate the current national economic position, in Hillingdon we appear to be doing better financially than many other local authorities, so will the Leader of the Council consider recommending to Cabinet that funding be allocated to the ward budget initiative that was so popular with Members and residents in the last Administration?

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MOTIONS

9.1 MOTION FROM COUNCILLOR NELSON:

This Council recognises the importance of Black History Month locally, nationally and internationally. This Council will endeavour to protect and actively uphold the history, heritage and culture of all its residents.

The Council seems to have forgotten why Black History Month (BHM) was launched in 1987 in the UK under the African Jubilee year declaration. The Declaration bound Councils to undertake to organise events that publicise, encourage and implement the tenets of the Declaration. There was also a commitment to promote positive imagery, achievements and contributions of Africans at home and abroad over a wide range of endeavours, plus naming buildings, parks or monuments or streets after notable Africans, such as the CLR James Library in Hackney, and Mandela Street in Camden.

The purpose of BHM is to empower Africans who are generally marginalised and disadvantaged on numerous fronts, to increase their self-worth and knowledge, and indeed for the wider community to also learn more about the achievements of Africans, which are not often found in mainstream education or media.

Over the last two years this Council has not marked Black History Month. Residents and groups of African origin have raised concern that over the last two years this Council has used the month of October to celebrate Hillingdon history month instead of recognising October as Black History Month where the focus should be on the history of people of African descent.

I call upon this Council to re-focus the month of October as the month to celebrate African history.

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