

## Appendix 1 (b): Schedule of Respondents' Comments and Officers' Proposed Responses, including Proposals Received in Call for Sites

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
	<b>Development Management</b>	<b>General comments</b>		
24/40	John Williams	Proposed Development Management Policies	It would appear the Council has produced a comprehensive list of proposed policies and we look forward to seeing the detail in due course. Unfortunately some of the good intentions expressed in the list will have been nullified by the recent relaxation of planning law. However we trust that in preparing the new policies the Council will, wherever possible, recognise and endeavour to retain, the urban character of the area.	Noted – the Council has commissioned a townscape character study to inform its Development Management Policies. No change.
38/121	Ruislip Residents Association	Proposed Development Management Policies	It would appear the Council has produced a comprehensive list of proposed policies and we look forward to seeing the detail in due course. Unfortunately some of the good intentions expressed in the list will have been nullified by the recent relaxation of the planning law. However we trust that in preparing the new policies of the Council will, wherever possible, recognise and endeavour to retain, the urban character of the area.	Noted – the Council has commissioned a townscape character study to inform its Development Management Policies. No change.
45/214	Solent Planning on behalf of Bourne Bourne End Investments Ltd	Development Policies- Other	It is considered that the issues listed within the Part 2 consultation document provide a comprehensive list of Development Plan Policies against which to assess development proposals. However, it is the content and wording of these proposed policies which will be key and as such our client will await the opportunity to review and respond to the policies in the final consultation Development Policies DPD.	Noted. No change.
46/217	Deloitte Real Estate on behalf of Universities Superannuation Scheme		USS agrees that the draft Development Management Policies should be set out under the same five principle headings use in Part 1 of the Draft Local Plan, which includes 'the economy'.	Support welcomed.
47/222	VRG Planning on behalf of Brunel University	Local Plan Part 2	The University made representations to various consultations in conjunction with preparation of the Core Strategy. These representations sought recognition of the continuing need to improve its facilities, in order to remain competitive in the Higher Education sector. They also sought recognition of the important economic contribution that the University makes to the local economy and the potential for this to be enhanced. These points are of particular importance in relation to the formulation of policies relating to the Green Belt.	Noted. No change.
49/225	Nathanial Lichfield on behalf of Cathedral Group	8. Public and Private Amenity Space in Residential Developments  10. Internal Floorspace Standards  19. Car Parking Standards for	It is important to ensure that any policies relating to the following provide a flexible approach rather than rigid standards: <ul style="list-style-type: none"> <li>• 8. Public and Private Amenity Space in Residential Developments</li> <li>• 10. Internal Floorspace Standards</li> <li>• 19. Car Parking Standards for residential development</li> </ul>	Noted – the Council is aware of national planning policy requirements regarding being flexible in the wording and interpretation of planning policies.

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		residential development		
	<b>The Economy</b>	<b>General comments</b>		
3/4	Marine Management Organisation		MMO has no comments on this document as the geographical area it covers does not include any area of the sea or tidal river and is therefore not within our remit.	Noted. No change.
6/8	Telereal Trillium on behalf of British Telecommunications plc		No comments.	Noted. No change.
8/10	Spelthorne Borough Council		We have no particular suggestions at this stage to make about the content of the plans you are about to embark on.	Noted. No change.
18/27	Yiewsley & West Drayton Town Centre Action Group		No specific responses or input to make in this initial consultation. The proposed content of the Local Plan: Part 2 indicates that the plan will contain the provision; scope and detail needed. As this is an initial consultation, it has been assumed there will be a further consultation after definitive data has been compiled and drafted.	Noted. No change.
19/28	Colne Valley Park CIC	Section a) The economy	<p>There should be a specific policy on Farming and the Rural economy. It is farming that maintains the landscape, farmers should be highly valued and offered incentives and protection in order to continue to farm. Farmers provide a Green Bridge around urban areas. However, this is not a one way street and farmers in the Green Belt must in turn expect to reciprocate and contractually supply the food production, tourism, education, recreation, energy and environmental credentials desired by the community.</p> <p>Also, see our comments on section d – policy 6 Farm diversification. We suggest that this policy is moved from section d) and merged with a new policy in section a) to change the emphasis from a negative policy stating what a farmer <b>cannot</b> do because of potential environmental harm to a positive policy stating what a farmer <b>can</b> do to support the economy and the environment.</p>	Farming is a significant use on Green Belt land in the borough. Whilst it is beyond the remit of the Local Plan to define land use and activities on local farms which would support the local economy and environment, it is entirely appropriate for the Plan to seek to safeguard local amenity and the environment when considering new development proposals located on farms.
30/76; 31/94	Phil Rumsey; Veronica Rumsey	The Economy	Support Items 1-9 with a modification to item 5.	Support welcomed.
45/213	Solent Planning on behalf of Bourne Bourne End Investments Ltd	Employment General	With regard to points 1 and 2 of the potential employment development management policies, it is considered essential that specific reference (with detailed plans) is provided to identify the areas for phased release of employment land. Policy E1 and Map 5.1 in the Local Plan Part 1 identifies potential areas for the phased release of employment land including Yiewsley. It acknowledges the findings of the Employment Land Supply studies which have been undertaken and confirms the potential for the managed release of 17.58 hectares of surplus industrial	Part 2 of the Local Plan will identify areas for the future release of employment land once the findings of the current Employment Land Study are available.

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			and warehousing land between 2006 - 2026. Para 5.12 confirms this includes part of the Trout Road area. This relates to the land which our client owns at the Rainbow and Kirby Industrial Estates. The red line site plan which accompanies our clients representations to this consultation identifies the employment area (and adjacent land totalling 2.31 ha) which should be identified for immediate release on this site.	
	<b>The Economy</b>	<b>1. Supply of Employment Land</b> -Protecting the use of land allocated for employment uses.		
12/14	CGMS on behalf of Mayor's Office for Policing and Crime / Metropolitan Police Service	The Economy	This section seeks to protect employment land. Whilst falling outside the 'B' Class definition, policing uses which are suited to employment/industrial land are employment generating and contribute to employment capacity. Generally the policing uses represent no material change from a Light Industrial/Office (B1) or warehousing (B8) use. They also possess an employment density similar to or in excess of 'B' class uses and can operate from warehouse type industrial buildings. Vehicle movements are also similar and the majority of these facilities do not require continued public access and therefore have no requirement to be located in town centres. For these reasons there should be some flexibility in the wording of any policy protecting employment land to allow for policing uses in protected employment areas.	Noted – the Council is aware of national planning policy requirements regarding being flexible in the wording and interpretation of planning policies.
26/62	Nathaniel Lichfield and Partners on behalf of British Airways Plc	Supply of Employment Land - Protecting the use of land allocated for Employment Uses	It is noted that the Strategic objective SO15 of the Local Plan: Part 1 seeks to (1) protect employment land and also (2) to manage the release of surplus employment land for other uses. In this respect the London Plan also confirms that Hillingdon should adopt a 'Limited Transfer' approach to the transfer of industrial sites to other uses.  In relation to the Heathrow Opportunity Area (HOA) it is important that any potential release of employment is carefully managed so as not to prejudice the availability of flexible employment space for airport related activities. Whilst certain employment sites, dependent upon their location may be suitable for alternative use, if it is evident that they are not attractive to the market for commercial use, any proposed changes of use will need to be carefully managed particularly if the London Plan employment targets of the HOA, as well the Policy E2 employment targets, are to be met.  We would suggest therefore the Development Management Policies should include policy criteria for assessing proposed changes of use of employment land to non-employment uses.	Noted - Part 2 of the Local Plan will identify areas for the future release of employment land once the findings of the current Employment Land Study are available. It is expected that policy criteria for assessing proposed changes of use of employment land to non-employment uses will be included, drawing on the findings of that Study.
38/122	Ruislip Residents Association	Supply of Employment Land Protecting the use of land allocated for employment uses	We do not believe we have any left!	Part 2 of the Local Plan will include a series of designations for Locally Significant Employment Locations and Locally Significant Industrial Sites.

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41/159; 44/187; 55/246; 57/272	Grow Heathrow (May Mackenzie); Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	1. Supply of Land 2. Locations for Employment Growth	The agricultural and horticultural sectors should be protected and enhanced to promote this important historic employment sector.	The Council will consider all development proposals affecting agricultural or horticultural land on their individual planning merits.
46/218	Deloitte Real Estate on behalf of Universities Superannuation Scheme	Supply of Employment Land, seeks to protect the use of land allocated for employment use	USS agrees with this policy in principle; however requests that the Council adopts a flexible approach to the management of employment land to avoid the long term protection of employment sites that are no longer viable. This approach would accord with the National Planning Policy Framework's objective of encouraging sustainable development and ensure sustainable economic growth is achieved in the LBH.	Part 2 of the Local Plan will identify areas for the future release of employment land once the findings of the current Employment Land Study are available. The Council is aware of national planning policy requirements regarding being flexible in the wording and interpretation of planning policies.
50/226	Heathrow Airport Ltd (Planning and Programmes)	a) The Economy 1. Supply of Employment Land 2. Locations for Employment Growth 3. Changes of Use within Industrial Development.	<p>HAL supports the protection of employment sites where they are in active use and particularly where such sites support the operation of the airport. We would encourage the Council not to be overly-prescriptive in its protection of employment sites, particularly where sites have been vacant for long periods and where there is no reasonable prospect of them being brought back into effective use. In this respect, the NPPF is clear at paragraph 22 that long term protection of employment sites with no prospect of use should be avoided and where such sites are not being utilised for their intended use, alternate land uses should be considered on their own merits.</p> <p>HAL acknowledges Hillingdon's strategic objective of securing 9,000 new jobs centred in Uxbridge and the Heathrow Opportunity Area. We encourage the Council to define the boundary of the Heathrow Opportunity Area so that the extent of employment growth in this area can be properly planned. HAL agrees with the position in Policy E2 of Part 1 of the Local Plan where it states that employment growth will be directed toward areas of high public transport accessibility. This could include many of the perimeter areas around the airport where they have high levels of accessibility and in particular the public transport interchange in the Central Terminal Area.</p> <p>Changes of use in industrial locations need to be assessed on the basis of demand for the use and whether the site has been vacant for a significant period of time.</p>	<p>Part 2 of the Local Plan will identify areas for the future release of employment land once the findings of the current Employment Land Study are available. The Council is aware of national planning policy requirements regarding the wording and interpretation of planning policies.</p> <p>The definition of a Heathrow Opportunity Area is dependent upon the introduction by the Mayor of London of a wider Opportunity Area Planning Framework. Once this is defined and a Planning Framework (OAPF) drafted by the Mayor, it should then be possible for the Council to bring forward its own detailed area action plan policies for that part of Hillingdon covered by the OAPF.</p>
59/300	CgMs on behalf of Mayor's Office for Policing and Crime / Metropolitan Police Service	Topic Area: The Economy	This section seeks to protect employment land. Whilst falling outside the 'B' Class definition, policing uses which are suited to employment/industrial land are employment generating and contribute to employment capacity. Generally the policing uses represent no material change from a Light Industrial/Office (B1) or warehousing (B8) use. They also possess an employment density similar to or in excess	<p>Noted - Part 2 of the Local Plan will identify areas for the future release of employment land once the findings of the current Employment Land Study are available.</p> <p>The Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.</p>

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			<p>of 'B' class uses and can operate from warehouse type industrial buildings. Vehicle movements are also similar and the majority of these facilities do not require continued public access and therefore have no requirement to be located in town centres.</p> <p>For these reasons there should be some flexibility in the wording of any policy protecting employment land to allow for policing uses in protected employment areas.</p>	
	<b>The Economy</b>	<b>2. Locations for Employment Growth - Protecting the locations of land allocated for employment uses.</b>		
4/5	Orbit Developments (Kerren Phillips)	Economy, Employment, Growth	Heathrow Boulevard, Bath Road and Sovereign Court, Sipson Road should retain their employment status. They should remain in the Heathrow Opportunity Area. The Policies for the Heathrow Opportunity Area should be flexible to allow modern employment uses such as some D1 uses to maximise occupancy and respond to changes in the nature of employment in the area.	<p>The Council will take into account the findings of its Employment Land Study when preparing proposals for the future designation of these current employment sites.</p> <p>The Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.</p>
26/63	Nathanial Lichfield and Partners on behalf of British Airways Plc	Locations for Employment Growth	<p>It is anticipated that the Opportunity Framework DPD for the Heathrow Opportunity Area will in due course set out what proportion of the London Plan 12,000 jobs (indicative employment capacity) will be accommodated in Hillingdon and where. However, it is noted that Part 2 of the Local Plan will include proposed Site Allocations which will be reflected on the associated Proposals Map.</p> <p>It is evident therefore that consideration should be given as part of the Part 2 exercise to the locations of these new employment sites to meet this target. In doing so it is important that regard is given to the need for adequate transport infrastructure to accommodate new employment uses and the availability of public transport to ensure that Heathrow Airport and existing related activities are able to operate efficiently.</p>	The Council will take into account the potential for new employment created on identified sites and the position regarding transport infrastructure.
46/219	Deloitte Real Estate on behalf of Universities Superannuation Scheme	Locations for Employment Growth, seeks to protect the locations of land allocated for employment uses.	As with Policy 1, USS agrees with the principle of protecting allocated employment land where appropriate, but requests that the wording of the policy is sufficiently flexible to ensure that sites can be assessed on a case by case basis and not protected for employment use where there may be more viable uses for the site. USS considers this to be the most sustainable way economic growth can be achieved and that alternative uses should be acknowledged as providing essential support to the existing economic function of employment areas.	Noted - the Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.
	<b>The Economy</b>	<b>3. Change of Use within Industrial Development - Protecting light industrial uses from change of use to heavy industrial uses.</b>		

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26/64	Nathanial Lichfield and Partners on behalf of British Airways Plc	Change of Use within Industrial Development	The Part 2 employment policies should incorporate and encourage sufficient flexibility between the employment uses to provide opportunities for airport related uses in particular in the Heathrow Opportunity Area. It is important, in order to facilitate the continued growth of the airport, to ensure that particular employment use classes are not protected where it is evident that market demand seeks alternative employment uses.	The Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.
	<b>The Economy</b>	<b>4. Office Development - Support for office development in town centres.</b>		
38/123	Ruislip Residents Association	Office Development Support for office development in town centres	We suggest that existing empty office space be reused before constructing new office space or allowing change of use to offices.	When considering new proposals for office development the Council will consider the availability of office accommodation elsewhere and the needs of competing land uses.
46/220	Deloitte Real Estate on behalf of Universities Superannuation Scheme	Office Development, seeks to support office development in town centres	Whilst USS supports office development, USS urges the Council to consider office development outside of the town centre as well where appropriate. The emerging policy should have sufficient flexibility to acknowledge the merits of out of centre office developments.	The Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.
50/227	Heathrow Airport Ltd (Planning and Programmes)	a) The Economy Office Development Hotel Development	Part 1 of the Local Plan has shown that the strategic direction of employment is moving away from industrial use and towards office based employment. Additionally, the Heathrow Opportunity Area is identified as an attractor for office development, although the boundary is not yet defined. Policy E2 generally directs employment development toward highly accessible locations. However, the proposed approach in the Heathrow Opportunity Area seeks to protect land within the airport boundary for uses directly related to the airport only. This approach appears to be at odds with itself (in that the most accessible locations are not eligible for employment growth) and with the London Plan. The London Plan policies for office and hotel development are clear in stating at Policy 4.2 that offices outside of central London are supported in viable locations with good public transport accessibility, and at Policy 4.5 that hotel development should be located close to public transport and opportunity areas. HAL does not agree that only airport related development should be permitted on airport land and recommends that Part 2 policies should be in line with the London Plan's strategic approach of locating office and hotel development in the most highly accessible locations, including Heathrow.	Policy E2 in Part 1 of the Local Plan has been found to be acceptable by the Secretary of State prior to adoption and via the public examination process to be in general conformity with the London Plan.  Simply because Heathrow is highly accessible does not in itself make it a suitable location for general commercial development for offices or other uses – i.e. as would be the case with a town centre. The unique operational requirements of a major international airport have to be taken into consideration by the Council. It considers these outweigh any general policy regarding locating commercial offices in highly accessible locations.
	<b>The Economy</b>	<b>5. Hotel Development - Support for hotel and similar uses in Uxbridge and other town centres.</b>		
30/77; 31/95	Phil Rumsey; Veronica Rumsey	Hotel Development	Support for Hotel and similar uses in Uxbridge and other town centres away from pollution hotspots such as the Heathrow Villages.	Noted – the Council would normally seek to locate hotel and other commercial development primarily in town centres.

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38/124	Ruislip Residents Association	Hotel Development Support for hotel and similar uses in Uxbridge and other town centres	We are not overly served by hotels in the north of the borough at present.	This is not a matter which can be directly addressed by the Council through its Local Plan. It is dependent on market operators choosing where to locate in the borough. The Council would normally look to locate such uses in town centres where they do come forward.
41/160; 44/188; 55/247 ; 57/273	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech) Transition Heathrow	Hotel development	Development of hotels surrounding the airport should be restricted in order to promote employment within sustainable communities.	The Council would normally look to locate such uses in town centres where they do come forward.
	<b>The Economy</b>	<b>6. Uxbridge</b> - Support for the development of Uxbridge as a major Metropolitan Centre.		
51/235	Nathaniel Lichfield on behalf of Intu Properties plc	Support for the development of Uxbridge as a major Metropolitan Centre	<p>Intu is the owner and manager of intu Uxbridge shopping centre which opened in 2001, and comprises 50,372 sqm of retail and leisure floorspace.</p> <p>Intu supports the designation of Uxbridge as the main urban centre within Hillingdon and a Metropolitan Centre within London. Intu concurs that the growth of retail, leisure and employment development is essential to secure Uxbridge's position in the future and considers that defining Uxbridge as requiring an additional 18,855sqm of net comparison goods floorspace between 2011-26 is a positive step towards achieving this.</p> <p>Intu would support a policy that focuses large scale retail development towards Uxbridge town centre as opposed to the smaller centres in Hillingdon up to 2026, (where development should be at a scale appropriate to their size and location (as specified by the Greater London Authority)). This approach will help secure Uxbridge's position within London's shopping hierarchy, in light of the new large scale retail developments across the city. Intu would also welcome the extension of the Uxbridge town centre boundary, if evidence demonstrated this was necessary to provide for further sustainable retail growth, thereby reducing the need for out of town retail development and also support the retention of the location of the Primary Shopping Frontage.</p> <p>Intu would like to see policies allow for a pragmatic approach to applications for retail development which will not be fixed on achieving a set quantum of retail floorspace per annum. This will encourage more entrepreneurialism and ensure Uxbridge town centre maintains its market position in the area.</p> <p>Intu would support a policy which steers development towards the most sustainable locations in terms of transport infrastructure. It is considered that Uxbridge town centre is currently the most sustainable location in Hillingdon for retail development due to its public transport connections</p>	<p>Noted - the Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.</p> <p>Policy T2 in Part 1 of the Local Plan notes the Council will facilitate improved public transport interchange at Uxbridge and other borough centres. Part 1 of the Plan identifies Uxbridge Metropolitan town centre for employment and retail growth, along with new housing at RAF Uxbridge, which will create significant new users of public transport in Uxbridge. The redevelopment of the bus/Underground station is an important infrastructure improvement which will help to exploit the town's Metropolitan status and create a gateway to Uxbridge and the borough as a whole. There is scope to improve both the frequency and travel times of Underground services between Uxbridge and London, and establish public transport links to the north and south of the borough.</p> <p>This is to be re-iterated in more detail in the Site Allocations to be included in Part 2 of the Plan.</p>

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			<p>and complementary uses and therefore new retail floor space should be focused there.</p> <p>Intu would therefore support a policy that sought to enhance public transport facilities in Uxbridge in order to improve the vitality and viability of the centre. For example, improvements to the interchange at Uxbridge would support links to/from central London, other Metropolitan Centres in outer London and smaller centres within Hillingdon. It is also hoped that policy will support public transport improvements in other Hillingdon centres to improve links to Uxbridge, as the main urban centre in the Borough.</p>	
	<b>The Economy</b>	<b>7. Safeguarding retail uses in Town, District and Neighbourhood Centres - Protecting retail uses in the Town, District and Neighbourhood Centres.</b>		
4/6	Emerson Group on behalf of Orbit Developments (Southern) Limited	Retail Parades	In the ground floor of Sovereign Court, Sipson Road is a retail parade. It should be recognised as such on the Proposals Map. Policies for the parade should be flexible to ensure use changes take place speedily to avoid empty units.	Existing retail parades are already present locally in Sipson and Harlington. This small group of shops will not materially add to this existing provision and is not considered appropriate for formal designation as a separate retail parade.
10/13	Gregory Gray Associates on behalf of The Garden Centre Group		<p>It is noted that only Policy E5 of Part 1 of the Local Plan relates to retail uses and that it is specific to Town and Local Centres. This indicates that new retail development will be required to accord with national policy and that detailed policies will be included within the Development Management Policies DPD.</p> <p>Whilst the NPPF supports a 'town centre first' approach, it also requires Local Planning Authorities to <i>"set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres"</i> (para. 23).</p> <p>Garden centres, such as our client's site, tend to be located outside of town centres due to their having specific locational requirements. Typically, they require a high proportion of open land for the display of plant material and tend to sell low value, bulky products that are not economically viable to retail within the High Street.</p> <p>Paragraph 28 of the National Planning Policy Framework (NPPF) indicates that <i>"Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:</i></p> <ul style="list-style-type: none"> <li><i>Support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new</i></li> </ul>	<p>Noted - the Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.</p> <p>It will consider individual planning applications for uses with specialised locational requirements on their merits, generally approach sustainable development proposals positively as required by national planning policy, taking into consideration the need for a sequential test and other policy requirements set out in both the Local Plan and London Plan.</p>

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			<p><i>buildings....."</i></p> <p>Given that garden centres are generally found beyond the urban limits, and that Government advice affords support to rural enterprises, it is considered essential for the Council's detailed Development Management Policies to include a specific policy that would address the issue of new development associated with such specialist retail uses.</p> <p>Accordingly, it is requested that a specific policy relating to garden centres be included in the emerging Development Management Policies Plan. This should be supportive of sustainable new development on such sites, subject to the provisions of the retail policy within the Core Strategy (which itself refers to national policy), any other relevant policies (e.g Green Belt policy) and to the new development not having an adverse impact upon the character or amenities of the area.</p> <p>It is suggested that the wording of the policy could be:</p> <p><b><i>Policy DM - Garden Centres and Other Specialist Retail Uses Requiring an Out of Centre Location</i></b>  <i>Sustainable new development associated with existing specialist retailers located beyond the settlements' boundaries will be permitted, subject to other policies within the Development Plan, provided that the new development would support economic growth and would not have an adverse impact upon the character or amenities of the area.</i></p>	
14/17	British Steel Pension Fund	Retail	On the proposals/policies map allocate the site identified in appendix 7 of the representations made on behalf of British Steel Pension Fund (dated 23rd May 2013) for bulky/volume town centre type uses or quasi retail uses that for operational reasons are unsuitable in a town centre location.	The Council considers this site continues to fulfil an important function as employment land in an area of continuing need for job provision to replace former heavy industries based in the area which are now closing or moving away. It is located some distance to the south of the existing town centre boundary and is considered inappropriate for out-of-centre retail use.
38/125	Ruislip Residents Association	Safeguarding retail uses in Town, District and Neighbourhood Centres	We suggest that sympathetic parking policies will help in this.	Noted – this comment has been passed to the Council's parking strategy officers.
51/236	Nathaniel Lichfield on behalf of Intu Properties plc	Safeguarding retail uses in Town, District and Neighbourhood Centres: Protecting retail uses in the Town, District and Neighbourhood Centres	Intu would support a policy that states where applications for town centre uses are not within the defined centre they have to comply with the impact and sequential assessments. This approach accords with national planning policy (NPPF, Paras. 24 and 26). These retail tests must be upheld to resist incremental expansion of out of centre retailing which could undermine the town centre first approach. This is particularly important at this time, in the aftermath of the recession and when increasing internet shopping and non store sales continues to threaten the viability and vitality of town centres. The objective of the future plan is to encourage further growth of Uxbridge town centre so that it remains one of the best in the country for retail and employment. The success will depends on the rigorous application of town centre first	Noted - the Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.  National planning guidance does not require the Council to re-iterate the contents of national planning policies within the Local Plan. It has already defined a series of primary and secondary frontages within its various town centres. This is a long-standing policy approach it has taken which does not preclude other non-retail uses from locating within these frontages; it does seek to maintain a proportion of retail uses present in each type of frontage in order to ensure their continued vitality and viability as retail centres.

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			<p>principles.</p> <p>Against this background Intu considers a 1,000 sqm threshold for the impact assessment is appropriate. Intu also supports the commitment to ensuring all applications for main town centre uses outside an existing centre will be required to address the sequential assessment, as set out in para. 24 of the NPPF.</p> <p>In addition, the NPPF (Annex 2) makes a distinction between what comprises the centre for retail purposes and other main town centre uses. The definition of a town centre site for retail uses is different from that for other main town centre uses. The reference to 'primary and secondary retail areas' in the context of retail and other town centre uses can be misleading.</p> <p>Intu therefore suggest text included within a policy where this important distinction is clarified.</p> <p>Finally, Intu also considers that other town centre uses (leisure and dining for example) should not be precluded altogether from ground floor units within primary and secondary shopping areas as this is a defined town centre use in accord with the NPPF (Annex 2) and such operations may require a ground floor presence or entrance. To accord with national planning guidance we consider that policy should ensure flexibility in this respect.</p>	
	<b>The Economy</b>	<b>8. Restaurants and Hot Food Takeaways</b> - Protecting retail uses and preventing change of use to restaurants and hot food take-aways where appropriate.		
51/237	Nathaniel Lichfield on behalf of Intu Properties plc	Restaurants and Hot Food Takeaways: Protecting retail uses and preventing change of use to restaurants and hot food take aways where appropriate	<p>Intu supports the general thrust of policies that seek to safeguard retail uses, where appropriate. Intu would object to a policy that would prevent all changes of use from retail uses to restaurants or hot food take aways. Significant challenges to the future of town centres exist and therefore centres will need to evolve in order to respond to the ongoing effects of the recession and prolonged downturn, together with the increase in internet shopping. To remain competitive, vital and viable town centres need to actively encourage other forms of town centre uses, including restaurants, cafes and leisure uses, in order to encourage visitors to the town centre, extend stays and increase visitor spending.</p> <p>With regards to Uxbridge town centre, the most important urban centre, this approach must be carefully balanced to ensure it maintains its important retail role as the main provider of comparison goods across a wide catchment area. Intu will support policies that seek to provide an appropriate mix between Class A1 and Class A3-A5. Intu considers it will be important to strike the right balance between meeting the needs of the changing role of the town centre, whilst seeking to retain the</p>	Noted - the Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.

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			<p>primacy of A1 retail floorspace in the primary retail areas. It is important that flexibility is encouraged to embrace the changing needs of centres. Intu would support a policy to allow additional flexibility for promoting non retail Class A2-A5 uses within the primary and secondary retail area, by providing the Council with the ability to consider applications on a case by case basis. A key consideration should be the degree to which the proposals will benefit the vitality and viability of the City Centre. To the application of inflexible thresholds should be avoided. It is vital that the policy allows a level of flexibility to enable the Council to respond positively to development proposals which would support the viability or vitality of a centre and bringing back into active use units that are vacant. Intu considers that this approach will assist in ensuring that Uxbridge position as a major metropolitan centre is maintained and strengthened.</p>	
	<b>The Economy</b>	<b>9. Small and Medium Sized Businesses</b> - Supporting the development of affordable accommodation for small and medium-sized businesses in appropriate sustainable locations throughout the borough		
	<b>New Homes</b>			
	<b>New Homes</b>	<b>General comments</b>		
26/65	Nathanial Lichfield and Partners on behalf of British Airways Plc	New Homes - Locations for New Housing	<p>The preamble at para. 6.22 to Policy H1 of Part 1 of the Local Plan confirms that in meeting the Borough's housing targets that specific locations will be subject to an assessment of impacts on flood risk, ecology, conservation, the ability to deliver decentralised energy, sustainable transportation, access to green infrastructure and social quality. The London Plan target for the Heathrow Opportunity Area (HOA) also suggests an indicative housing capacity of 9,000 new homes albeit at this stage the London SHLAA (2011-2021) only identifies large sites in the HOA with the capacity to accommodate 318 dwellings. It is evident therefore that the Part 2 policies and the forthcoming Opportunity Framework will face a significant challenge in accommodating and identifying sites to meet these housing targets. In meeting this challenge we would suggest that in addition to the criteria identified at para. 6.22 (see above) it is also important to have regard to avoiding those areas which are focused on meeting the needs of airport related activities and priority should be given to those areas which are well related to existing services and where there are opportunities to deliver regeneration benefits.</p>	<p>The Council will consider individual planning applications for housing on their merits, generally approaching sustainable development proposals positively as required by national planning policy, taking into consideration the policy requirements set out in both the Local Plan and London Plan.</p>
30/78;	Phil Rumsey; Veronica		Support items 1 to 4 with modifications to all items.	Support welcomed.

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ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
31/96	Rumsey			
58/297	Carter Jonas on behalf of Buccleuch Property Fund	Proposed Development Management Policies (b) - Student Housing	A criteria based policy identifying suitable locations and dealing with sites for Student Housing should be included. Sites should be looked upon favourably that are located in sustainable locations and in accordance with wider general development control policies.	The Council will consider individual planning applications for specialised housing uses such as student hostels on their merits, generally approach sustainable development proposals positively as required by national planning policy, taking into consideration the policy requirements set out in both the Local Plan and London Plan. Specific housing proposals for student accommodation are unusual in the borough. The local housing market (e.g. the private rented sector) meets extensive short term accommodation needs across the borough for individual groups such as students. There is also an extensive amount of campus-based student accommodation located in the borough.
	<b>New Homes</b>	<b>1. Conversion or Subdivision of Dwellings-</b> Conversion or subdivision of residential dwellings into additional units.		
30/79; 31/97	Phil Rumsey; Veronica Rumsey	Conversion or Subdivision of Dwellings	Conversion or subdivision of residential dwellings into additional units should only be permitted in extreme circumstances and not at all in conservation areas.	The Council will consider individual planning applications on their merits, generally approaching sustainable development proposals positively as required by national planning policy, taking into consideration the policy requirements set out in both the Local Plan and London Plan.
38/126	Ruislip Residents Association	Conversion or Subdivision of Dwellings	OK where suitable and where facilities, such as parking, are available. Give preference to sites close to public transport hubs.	The Council will consider individual planning applications on their merits, generally approaching sustainable development proposals positively as required by national planning policy, taking into consideration the policy requirements set out in both the Local Plan and London Plan.
	<b>New Homes</b>	<b>2. Houses in Multiple Occupation (HMOs)-</b> Change of use of dwellings to Houses in Multiple Occupancy.		
30/80; 31/98	Phil Rumsey; Veronica Rumsey	Houses in Multiple Occupation	Change of use of dwellings to Houses of Multiple Occupancy should not be permitted in Conservation Areas or in buildings of special interest, nor in areas where there is high levels of pollution.	The Council will consider individual planning applications on their merits, generally approaching sustainable development proposals positively as required by national planning policy, taking into consideration the policy requirements set out in both the Local Plan and London Plan.
38/127	Ruislip Residents Association	Houses in Multiple Occupation (HMOs)	These need strong monitoring from the council and this appears not to be available at present.	The Council does monitor licensing and planning application records for Houses in Multiple Occupation and will report its findings in its annual Authority Monitoring Report.
	<b>New Homes</b>	<b>3. Affordable Housing-</b> Provision of affordable housing in residential development schemes.		

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ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
5/7	A Sapelli		<p>The Council could align itself with Government support, reinforce it's commitment to ex-servicemen and grow some truly sustainable communities in Hillingdon by enabling self-build development powered by the labour of local ex-servicemen.</p> <p>The ex-servicemen will free up existing housing stock when they move in to their new homes. Small as the scheme may be in its initial stages still it will go some way towards easing local housing pressures. In a recent similar project in Bristol, 14 two-bedroom homes were provided</p> <p>The project should be geared towards currently unemployed ex-servicemen who stand to gain construction skills and qualifications through the project further enabling them to secure employment. The sense of satisfaction and confidence associated with 'building your own home' will also contribute positively to the lives of the ex servicemen.</p> <p>In addition to the labour cost savings (both in terms of initial build and ongoing maintenance) there would be added values of living in a supportive community bonded by a common project, the creation of local icons of achievement, and the generation of new skills.</p> <p>A suggested operational plan for the scheme in brief:-</p> <ul style="list-style-type: none"> <li>➤ Group of suitable ex-servicemen identified by LBH and form a Community Land Trust (CLT)</li> <li>➤ CLT liaise with LBH to identify suitable sites</li> <li>➤ LBH take on a consultancy role to oversee technical design, legal and regulatory compliance; as part of this role LBH calculate a budget for the project and help source &amp; identify funds</li> <li>➤ By employing a qualified construction trainer CLT would help participants to gain skills and qualifications</li> <li>➤ The project team would devise a training programme which would be delivered on site before and in parallel with the works.</li> <li>➤ Following all necessary ground works being carried out professionally CLT build their houses to completion; this would be done in teams with all members expected to work to ensure that all the proposed houses on the site are built together.</li> <li>➤ Participants will be rewarded for their efforts and a proportion of ownership shall be traded for their 'sweat equity'.</li> <li>➤ The proportion of the new homes still owned by LBH/funding agencies would be rented to CLT members</li> </ul> <p>Full ownership could be negotiated by the tenants through the existing Right to Buy/Acquire route.</p>	Noted - these comments have been passed to the Council's housing service for information and any further action.
17/22	Geoff Armstrong, Armstrong Rigg Planning	b) New Homes – 3. Affordable Housing	<p>Current government guidance on tenure should be reflected in policy</p> <ul style="list-style-type: none"> <li>• Opportunities for variable tenures in affordable housing should be provided within policy</li> <li>• Policies should be flexible to allow adaptation to changing</li> </ul>	The Council will take into account the requirements of national and London Plan policies regarding affordable housing provision with the drafting of policies in Part 2 of the Local Plan.

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ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			<p>Government policies</p> <ul style="list-style-type: none"> <li>• Viability should form an integral part of any policy relating to affordable housing</li> <li>• The opportunity to provide off-site commuted sums should be included</li> <li>• RSLs should be agreed on a site by site basis with the developer and the LPA</li> <li>• The above will prevent restrictive policies hindering residential development</li> <li>• The NPPF states that policies which seek to provide affordable housing should be 'sufficiently flexible to take account of changing market conditions over time' (paragraph 50)</li> </ul>	
30/81;31/99	Phil Rumsey; Veronica Rumsey	Affordable Housing	Provision of affordable housing in residential development schemes throughout the borough.	<p>Part 1 of the Local Plan already notes that :</p> <p>"...the Council will seek to maximise the delivery of affordable housing from all sites over the period of the Hillingdon Local Plan: Part 1- Strategic Policies. For sites with a capacity of 10 or more units the Council will seek to ensure that the affordable housing mix reflects housing needs in the borough, particularly the need for larger family units."</p> <p>It is not possible to seek affordable housing provision on all residential schemes which come forward for development, but where viability allows it to do so it will seek affordable housing provision in appropriate cases.</p>
38/128	Ruislip Residents Association	Affordable Housing	What price is considered affordable? An important principle but needs to be implemented with more vigour by the Council.	The Council will keep the position with affordable housing provision under review and informed by periodic Housing Market Assessments.
41/161; 44/189; 55/248 ; 57/274	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	Affordable Housing	Affordable housing provided through community ownership schemes should be promoted through planning policy and grant support. Self build programmes should be promoted as a method of providing affordable housing.	The Council will seek to maximise the delivery of affordable housing from all sites over the period of the Hillingdon Local Plan. It cannot promote particular types of provision through the Local Plan.
45/212	Solent Planning on behalf of Bourne End Investments Ltd	Development Policies - Housing General	Point 7 Affordable housing it is considered essential that the policy provides for some flexibility in the application of affordable housing requirements allowing for consideration of the circumstances of specific sites (particularly allocated sites and sites subject to significant site costs and mitigation such as contamination) and viability. The draft policy should also consider the different ways in which affordable housing can be achieved including the potential for specialist and care housing.	<p>The Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.</p> <p>Part 1 of the Local Plan already notes that :</p> <p>"...the Council will seek to maximise the delivery of affordable housing from all sites over the period of the Hillingdon Local Plan: Part 1- Strategic Policies." It will consider the different ways in which affordable housing can be achieved when new development proposals come forward.</p>

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ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
	<b>New Homes</b>	<b>4. Provision for Gypsy and Travellers</b> - Criteria governing the location and suitability of sites for Gypsy and Travellers.		
26/66	Nathanial Lichfield and Partners on behalf of British Airways Plc	New Homes - Provision for Gypsy and Travellers	<p>Policy H3 of Part 1 of the Hillingdon Local Plan confirms that the Colne Park site will be protected for its current use but that in considering new sites there should be no significant adverse effects on the amenity of occupiers of adjoining land.</p> <p>Our clients control land adjacent to the Colne Park facility and would have concerns regarding any proposals to expand this site. Whilst any proposed improvements to this facility would be welcomed there have been occasions where the Colne Park site has had an adverse effect upon our client's land in terms of access onto private land and fly tipping.</p> <p>Our clients would therefore resist proposals to expand this existing facility on the basis of adverse effects.</p>	Noted – the Council will be reviewing the need for affordable housing during the preparation of Part 2 of the Local Plan.
30/82; 31/100	Phil Rumsey; Veronica Rumsey	Provision for Gypsy and Travellers	Criteria governing the location and suitability of sites for Gypsy and Travellers should ensure they are spread across the borough and not in just one area.	Noted – the Council will be reviewing the need for further provision of pitches during the preparation of Part 2 of the Local Plan.
41/162; 44/190; 55/249 ; 57/275	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	Provision for Gypsy and Travellers	Enhanced provision of sites for traditional modes of modular living should be provided. This provision should extend beyond these ethnic groups to facilitate more affordable living options upon boats or other movable structures for all in the borough.	Noted – the Council will be consider the need to include development management policies intended to encourage provision of a wider range of possible alternative forms of affordable housing in Hillingdon during the preparation of Part 2 of the Local Plan.
	<b>Historic and Built Environment</b>			
	<b>Historic and Built Environment</b>	<b>General Comments</b>		

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ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
11/13	Justine Bayley, Hayes Conservation Advisory Panel	Historic and Built Environment	<p>We are not seeking to insert new policies into the document but wish to ensure that the relevant policies in the London Borough of Hillingdon Unitary Development Plan: Saved Policies 2007 are carried forward into the new Local Plan, ie policies BE1-5 and BE8-12.</p> <p>We regret that policy PR4 has not been followed as we do not believe that the overall plan proposed for the Thorn EMI Complex, Blyth Road, Hayes is of sufficient merit, in terms of enhancing the Conservation area and its setting. We believe the historic building that are being retained are being hidden by the high-rise development planned for the areas around them, destroying their setting, contrary to several of the BE policies.</p> <p>We note that Powergen/Bulls Bridge Site, North Hyde Gardens, Hayes was previously the subject of a specific policy, PR10, and hope that this will be carried forward into the new plan. An appropriate and holistic industrial use needs to be found for this site that also enhances the Bulls Bridge Conservation Area which at present is the subject of separate planning applications (contra PR10). With Nestles' plan to vacate their buildings in the adjacent Conservation Area to the west, the opportunity should be taken to look at the whole area afresh.</p> <p>As this consultation is described as an <u>initial</u> one, we assume we will be consulted later on the details it is intended to include in the new plan.</p>	The Council will be consulting local groups and residents as detailed planning proposals come forward for these sites.
30/83; 31/101	Phil Rumsey; Veronica Rumsey	Historic and Built Environment	Support items 1-35 with modification to items 4 and 16.	Support welcomed.
	<b>Historic and Built Environment</b>	<b>1. Heritage Assets -</b> Development having an adverse impact of Heritage Assets and their settings.		
26/67	Nathanial Lichfield and Partners on behalf of British Airways Plc	Heritage Assets	<p>There is a need to ensure that the heritage policies that are incorporated into Part 2 of the Local Plan are NPPF compliant. In particular, it is necessary to ensure that (1) sufficient weight is attached in the determining of planning applications to the desirability of new development making a positive contribution to local character and distinctiveness (NPPF, para. 131) and (2) even where there is harm to the significance of a designated heritage asset that this should be weighed against the public benefits of the proposal including securing its optimum viable use (para. 134).</p> <p>In addition, there would also be merit in ensuring that the provisions and potential benefits of enabling development also are reflected in the Part 2 heritage policies.</p>	The Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.

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ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
38/129	Ruislip Residents Association	Heritage Assets	We agree that we need to protect those assets that we still have.	Support welcomed.
41/163; 44/1915; 55/250; 57/276	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	Heritage Assets	Existing agricultural and horticultural structures should be maintained and preserved as historic buildings that link the borough to its recent history of market gardens.	The Council will keep its Historic Environment Register under review. It would not be possible for it to make a general listing of all existing agricultural and horticultural structures in the way suggested here.
	<b>Historic and Built Environment</b>	<b>2. Archaeological Remains -</b> Proposals affecting archaeological sites and the need for detailed site appraisals.		
	<b>Historic and Built Environment</b>	<b>3. Listed Buildings -</b> Development affecting listed building and their settings.		
	<b>Historic and Built Environment</b>	<b>4. Conservation Areas -</b> Development affecting the character and appearance of Conservation Areas.		
20/35	Eastcote Village Conservation Advisory Panel		<p>There are three Conservation Areas in Eastcote :- Eastcote Village CA, Eastcote Park Estate CA and Morford Way CA.</p> <p>Morford Way Conservation Area- There is a draft appraisal for the Morford Way Conservation Area in which one recommendation is to extend the CA to include the part of the Field End Road shopping centre that is unchanged from the 1930s when it was built. This is an area of good quality Metro-Land suburb and to include this into the CA would be consistent with Policy HE1. This appraisal is with the Specialist Planning Team, Charmain Baker. Recommendation: The Morford Way CA be extended as per the recommendations made in the draft appraisal. 2012.</p> <p>Eastcote Village CA: Eastcote Village was one of the original Conservations Areas, this area would benefit from an up to date Appraisal. The EVCA is included in an Proposed Archaeological Priority Area. This should be upgraded to an Archaeological Priority Area. Recent archaeological digs at Eastcote House Gardens and Bishop Ramsey School have produced evidence of late iron age remains. Recommendations: An Appraisal of Eastcote Village CA be made a priority.</p>	The Council will bring forward its conservation area appraisals separately to the preparation of the Local Plan. Its policies will be informed by new evidence base studies on local townscape character and on archaeological assets.

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ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			The Proposed Archaeological Priority Area be up graded to an Archaeological Priority Area.	
30/84; 31/102	Phil Rumsey; Veronica Rumsey	Conservation Areas	Support items 1 – 35 with modification to items 4 and 16.	Support welcomed.  The Council is aware of national planning policy requirements regarding development affecting the character and appearance of Conservation Areas and their surroundings.
38/130	Ruislip Residents Association	Conservation Areas	These are important for preserving the character of our towns and villages. There should be no development within a conservation area without planning consent.	The Council is aware of national planning policy requirements regarding in Conservation Areas and surrounding areas.
	<b>Historic and Built Environment</b>	<b>5. Areas of Special Local Character</b> - Preventing development that is harmful to the character and appearance of Areas of Special Local Character		
41/164; 44/192; 55/251; 57/277	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	Areas of Special Local Character	The village character in the borough should be protected, retaining settlements' distinct character and geographic identity, particularly in areas surrounding the airport where the prospect of development and sprawl is most prevalent.	The Council's policies and future development management decisions will be informed by new evidence base studies on local townscape character and on archaeological assets.
	<b>Historic and Built Environment</b>	<b>6. Heritage and Climate Change</b> - Mitigating against the effects of climate change and their impacts on Heritage Assets		
	<b>Historic and Built Environment</b>	<b>7. Planning Applications</b> - Scope of the design content of planning applications		
50/228	Heathrow Airport Ltd (Planning and Programmes)	c) Historic and Built Environment Planning Applications	HAL considers that the information provided in support of planning applications should be needs-based and informed by pragmatic pre-application discussion.	The Council will follow national planning policy requirements regarding assessments and information required in support of planning applications.
	<b>Historic and Built Environment</b>	<b>8. Public and Private Amenity Space in Residential Developments</b> - Provision of public and private		

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ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
		amenity space in residential development		
38/131	Ruislip Residents Association	Public and Private Amenity Space in Residential Developments	Developers are trying to cram too many properties onto each site.	Noted - the Council's policies and future development management decisions will be informed by a new evidence base study on the borough's local townscape character and by national and London Plan planning policies.
41/165; 44/193; 55/252; 57/278	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	Public and Private Amenity Space in Residential developments	Provision of space for community use should be included in all residential development including areas of 'wildlife value' and allotment space.	The Council will take into account the requirements for amenity space provision in all proposed residential developments.
	<b>Historic and Built Environment</b>	<b>9. Trees and Landscaping -</b> Protection and provision of trees and landscaping.		
13/16	Natural England	Policy 9 Tree and Landscaping:	Natural England welcomes the inclusion here and would encourage the Council and developers to look at "soft/green" landscaping options, linking in with other policies and headings to help strengthen the document.	Noted.
38/132	Ruislip Residents Association	Trees and Landscaping	We need better enforcement and more tree protection orders where appropriate. Where trees that have to be taken down, more mature, larger stock should be used for replacement. We have tree nurseries in our own borough.	Noted.
41/166; 44/194; 55/253; 57/279	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	Trees and Landscaping	All remaining areas of orchard in the borough should be protected. Any development in the borough should make mandatory contribution to the establishment of areas of 'urban forest' to mitigate carbon emissions, improve air quality and reduce the urban heat island affect.	The Council will keep its agricultural land under review. It would not be possible for it to protect all existing orchards in the way suggested here nor to make contributions by developers to urban forest provision mandatory.
	<b>Historic and Built Environment</b>	<b>10. Internal Floorspace Standards -</b> Minimum floorspace requirements in residential dwellings.		
17/23	Geoff Armstrong Armstrong Rigg Planning	10. Internal Floorspace Standards 11. Garden Sizes 12. Garages 14. Lifetime Homes 15. Implementing Building for Life Standards	<ul style="list-style-type: none"> <li>All policies relating to these aspects of a development should be flexible and on a site-by-site basis, allowing for viability to be considered</li> <li>The NPPF states at paragraph 17 that development should always seek to secure high quality design and a good standard of amenity for all existing and future occupiers, however flexibility within standards will ensure a greater number of residential</li> </ul>	The Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.

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ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
		16. Carbon Reduction in Residential and Non Residential Development 17. Storage for Refuse and Recyclables in Residential Development	<p>developments come forward to address the current housing shortage. Paragraph 14 of the NPPF states that Local Plans should 'meet objectively assessed needs, with sufficient flexibility to adapt to rapid change' and LPA should 'positively seek opportunities to meet the development needs of their area</p> <ul style="list-style-type: none"> <li>Paragraph 15 states that Local Plans should make it clear that development which is sustainable can be approved without delay</li> </ul>	
	<b>Historic and Built Environment</b>	<b>11. Garden Sizes</b> - Provision of garden areas relative to the size of dwelling.		
38/133	Ruislip Residents Association	Garden Sizes	Please see item 8 above (Developers are trying to cram too many properties onto each site.	Noted - the Council's policies and future development management decisions will be informed by a new evidence base study on the borough's local townscape character and by national and London Plan planning policies.
41/167; 44/195; 55/254; 57/280	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	11. Garden sizes	Adequate space to offer the potential to grow food should be provided in any new development.	The Council will take into account the requirements for amenity space provision in all proposed developments.
	<b>Historic and Built Environment</b>	<b>12. Garages</b> - Size standards for garages.		
	<b>Historic and Built Environment</b>	<b>13. Security in Residential Development</b> -Designing out crime in residential developments.		
	<b>Historic and Built Environment</b>	<b>14. Lifetimes Homes</b> - Adaptability of homes including providing for wheelchair users.		
	<b>Historic and Built Environment</b>	<b>15. Implementing Building for Life Standards</b> - Standards in residential development to satisfy Building for Life standards.		
	<b>Historic and Built Environment</b>	<b>16. Carbon Reduction in Residential and Non Residential Development -</b>		

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ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
	<b>Environment</b>	Phased reduction of CO2 emission for all types of development.		
30/85; 31/103	Phil Rumsey; Veronica Rumsey	Carbon Reduction in Residential and Non Residential areas	Phased reduction of CO2 and NO2 emissions for all types of development.	The Council is aware of national planning and London Plan policy requirements regarding air pollution.
41/168; 44/196; 55/255; 57/281	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	Carbon Reduction in Residential and Non Residential Development	Renewable energy supply should be integrated into all new development. Strong preference should be given to carbon rich natural building materials such as timbre, hemp, straw and rammed earth in order to lower the embodied energy of new structures and sequester carbon. Retro fit of existing structures to improve energy performance should be considered as a first option and applications for demolition rejected where they are structurally sound.	The Council is aware of national planning and London Plan policy requirements regarding renewable energy and notes that section 10 of policy BE1 in Part 1 of the Local Plan already requires that all new developments should:  "Maximise the opportunities for all new homes to contribute to tackling and adapting to climate change and reducing emissions of local air quality pollutants. The Council will require all new development to achieve reductions in carbon dioxide emission in line with the London Plan targets through energy efficient design and effective use of low and zero carbon technologies. Where the required reduction from on-site renewable energy is not feasible within major developments, contributions off-site will be sought."
	<b>Historic and Built Environment</b>	<b>17. Storage for Refuse and Recyclables in Residential Development</b> - Provision of refuse facilities in residential development.		
41/169; 44/197; 55/256; 57/282	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	Storage for refuse and recyclables in residential development	Bio digestion of organic waste within residential development should be favoured in planning policy as a method of reducing waste and recovering energy.	The Council is aware of national planning and London Plan policy requirements for waste reduction and management. Where appropriate it may seek to encourage particular types of waste treatment on site such as bio-digestion but it cannot favour this method in the manner suggested.
	<b>Historic and Built Environment</b>	<b>18. Noise and Air Quality in Residential Development</b> - Levels of noise and air quality requirements in residential development.		
41/170; 44/198; 55/257; 57/283	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	Noise and Air quality in Residential development	Noise and air quality should be mitigated by a minimum of 2 trees per new residential unit developed. Any commercial development should be subjected to the same scale of mitigation with sizing appropriate to the development.	The Council is aware of national planning and London Plan policy requirements regarding noise and air quality. it cannot make tree planting mitigation proposals in the mandatory manner suggested here.

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ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
	<b>Historic and Built Environment</b>	<b>19. Car Parking Standards for residential development</b> - Car parking standards for residential development.		
17/24	Geoff Armstrong Armstrong Rigg Planning	1 Car Parking Standards for Residential Development	<ul style="list-style-type: none"> <li>• Policies on car parking standards should also be flexible, allowing provision to be considered on a site-by-site basis</li> <li>• It is necessary to have an appreciation for increased car ownership with the Borough and the UK as a whole when preparing car parking standards, especially in relation to residential developments</li> <li>• The NPPF states at paragraph 39 that when setting local parking standards LPAs should take into account local car ownership levels as well as accessibility of the development, availability of public transport, type, mix and use of the development and the need to reduce use of high-emission vehicles.</li> </ul>	The Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies. It will take local car use into account in setting its detailed parking standards in Part 2.
38/134	Ruislip Residents Association	Car Parking Standards for residential development	We suggest you look into under-provision in new planning applications.	The Council is aware of national planning policy requirements regarding car parking standards. It will take local car use into account in setting its detailed parking standards in Part 2.
41/171; 44/199; 55/258; 57/284	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	19. Car Parking Standards for residential development	A maximum of one unit of parking should be provided per unit. Developments with lower allocation should be given preference in planning policy. All parking should be permeable to reduce flood risk.	<p>The Council is aware of national planning policy requirements regarding car parking standards. It will take local car use into account in setting its detailed parking standards in Part 2.</p> <p>Section 9 of policy BE1 in Part 1 of the Local Plan already requires that all new developments should:</p> <p>“Not result in the inappropriate development of gardens and green spaces that erode the character and biodiversity of suburban areas and increase the risk of flooding through the loss of permeable areas...”</p> <p>The use of permeable parking surfaces will be encouraged but local geological and ground water conditions will affect any final requirements.</p>
	<b>Historic and Built Environment</b>	<b>20. Electric Car Charging Points</b> - Provision of electric charging points in residential development.		

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ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
	<b>Historic and Built Environment</b>	<b>21. Safeguarding Gardens from Development</b> - Safeguarding residential gardens from development.		
38/135	Ruislip Residents Association	Safeguarding Gardens from Development	We fully support this, indeed there has been a lot of local activism on this very point.	Support welcomed.
	<b>Historic and Built Environment</b>	<b>22. Rear Extensions</b> - Scale of residential rear extensions.		
	<b>Historic and Built Environment</b>	<b>23. Side Extensions</b> - Scale of residential side extensions		
	<b>Historic and Built Environment</b>	<b>24. Roof Extensions</b> - Scale of residential roof extensions.		
38/136	Ruislip Residents Association	Roof Extensions	We believe the design needs to be sympathetic to the local vernacular.	Noted - the Council's policies and future development management decisions will be informed by a new evidence base study on the borough's local townscape character and by national and London Plan planning policies.
	<b>Historic and Built Environment</b>	<b>25. Over Dominant Extensions</b> -Overly large residential extensions.		
38/137	Ruislip Residents Association	Over Dominant Extensions	Consideration should be given to the effect on neighbours' access to light.	This is a long-standing policy consideration in Hillingdon.
	<b>Historic and Built Environment</b>	<b>26. Privacy and Overlooking</b> -The retention of privacy and amenity for residential dwellings.		
	<b>Historic and Built Environment</b>	<b>27. Basements</b> - Design criteria for basement conversions.		

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ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
	<b>Historic and Built Environment</b>	<b>28. Retention of Off-Street Parking</b> -Retention of car parking for residential dwellings.		
38/138	Ruislip Residents Association	Retention of Off-Street Parking	We believe off-street parking is greatly preferable to on-street parking. Only allow conversion of garages to residential use if there is still suitable off-street parking.	Agreed – the Council will follow this general approach where possible.
	<b>Historic and Built Environment</b>	<b>29. Hard surfacing- Hard surfacing in residential gardens.</b>		
24/41	John Williams	Page 5, item 29 Hard surfacing	Assuming this relates to paving of front gardens for parking then provision should be made for compensatory landscaping to enhance the street scene. Otherwise front gardens will become one long strip of hard surfacing behind the pavement.	Noted - the Council's policies and future development management decisions will be informed by a new evidence base study on the borough's local townscape character and by national and London Plan planning policies. It will take into consideration the impact of front garden use for car parking on the general character and amenity of individual areas.
38/139	Ruislip Residents Association	Hard Surfacing	We suggest that when a front garden is replaced with hard surfacing that compensatory landscaping to improve the streetscape is required. Otherwise front gardens will become one long strip of hard surfacing behind the pavement. We also recommend that the curb drop be limited to maintain on-street parking where practicable. We have concerns about drainage to prevent flash flooding and wonder if water-permeable surfaces can be recommended.	Noted - the Council's policies and future development management decisions will be informed by a new evidence base study on the borough's local townscape character and by national and London Plan planning policies. It will take into consideration the impact of front garden use for car parking on the general character and amenity of individual areas.
41/172; 44/200; 55/259; 57/285	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	29. Hard surfacing	Any hard surfacing must be permeable to reduce flood risk.	Section 9 of policy BE1 in Part 1 of the Local Plan already requires that all new developments should:  "Not result in the inappropriate development of gardens and green spaces that erode the character and biodiversity of suburban areas and increase the risk of flooding through the loss of permeable areas..."  The use of permeable surfaces will be encouraged but local geological and ground water conditions will affect any final requirements.

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ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
	<b>Historic and Built Environment</b>	<b>30. Public Realm in Town, District Centres and in Retail Parades</b> -Improvements to the public realm.		
13/17	Natural England	Policy 30 Public Realm in Town, District Centre and in Retail Parades:	Consideration of "green/soft" landscaping should be incorporated, provision of green infrastructure can be linked to Policy 9 above as well as heading D – Environmental Improvements.	Section 7 of policy BE1 in Part 1 of the Local Plan already requires that all new developments should:  "Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity..."  This policy already allows the Council to negotiate with developers for such measures as "green infrastructure".
	<b>Historic and Built Environment</b>	<b>31. Design of Shop Fronts</b> - Design criteria for new shop fronts.		
38/140	Ruislip Residents Association	Design of Shop Fronts	We would like the design criteria to try and prevent 'blind' shop fronts which are not inviting ie. shopfronts that have no traditional window display area, nor even a clear window into the shop. Examples of such 'blind' shop fronts are Ruislip Post Office and M&S Ruislip.	Sections 1 & 2 of policy BE1 in Part 1 of the Local Plan already requires that 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..."  These set general design criteria within which the Council can already negotiate with developers to discourage "blind" shop fronts.
	<b>Historic and Built Environment</b>	<b>32. Advertisements on Retail Premises</b> - Design criteria for advertisements on retail premises.		

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ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
38/141		Advertisements on Retail Premises	These must be as agreed or approved. Enforcement is key.	Noted.
	<b>Historic and Built Environment</b>	<b>33. Hoardings</b> - Temporary hoardings on vacant sites		
38/142	Ruislip Residents Association	Hoardings	These must be properly maintained and be removed on schedule. Again enforcement is key.	Noted.
	<b>Historic and Built Environment</b>	<b>34. External Lighting</b> - Design criteria for external lighting.		
24/42	John Williams	Page 5, Item 34 - External lighting	Include consideration of the impact of floodlighting on surrounding areas and the night skyline e.g. from sports pitch illumination.	<p>Section 2 of policy BE1 in Part 1 of the Local Plan already requires that all new developments should:</p> <p>“ Be designed to be appropriate to the identity and context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials <b>and seek to protect the amenity of surrounding land and buildings, particularly residential properties...</b>” (our emphasis)</p> <p>These set general design criteria within which the Council can already negotiate with developers to discourage floodlighting which would have adverse impacts of this type.</p>
38/143	Ruislip Residents Association	External Lighting	We suggest this include consideration of the impact of flood lighting on surrounding areas and the night skyline, eg. from sport pitches. Planning conditions on light installations should be enforced.	<p>Section 2 of policy BE1 in Part 1 of the Local Plan already requires that all new developments should:</p> <p>“ Be designed to be appropriate to the identity and context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials <b>and seek to protect the amenity of surrounding land and buildings, particularly residential properties...</b>” (our emphasis)</p> <p>These set general design criteria within which the Council can already negotiate with developers to discourage floodlighting which would have adverse impacts of this type.</p>
	<b>Historic and Built Environment</b>	<b>35. Telecommunications Aerials and Apparatus</b> - Location of telecommunications equipment in designated and other areas.		

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ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
11/14	Mono Consultants on behalf of Mobile Operators Association	Telecommunications Development	<p>We would take this opportunity to comment that we consider it important that there is a telecommunications policy within the emerging Development Management Document. It is recognised that telecommunications plays a vital role in both the economic and social fabric of communities. National guidance recognises this through Section 5: "Supporting high quality communications infrastructure" of National Planning Policy Framework (March 2012) which provides clear guidance as to the main issues surrounding telecommunications development (NPPF paragraphs 42 and 43). Further advice on the siting and design of telecommunications and good practice procedural guidance is contained within the Code of Best Practice for Mobile Phone Network Development (2002). This builds on the Ten Commitments to ensure that the industry is alive to the concerns of local communities and consultation is built into the development process.</p> <p>The formulation of policy does not exist in isolation and there are numerous documents which will affect the formulation of any telecommunications policy, the most important of these being NPPF. On this basis we would suggest that a concise and flexible telecommunications policy should be included within the Development Management Document. Such a policy should give all stakeholders a clear indication of the issues that telecommunications development will be assessed against. We would suggest a policy which reads;</p> <p><b><i>"Proposals for telecommunications development will be permitted provided that the following criteria are met: -</i></b></p> <ul style="list-style-type: none"> <li data-bbox="824 970 1462 1070"><b><i>(i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;</i></b></li> <li data-bbox="824 1098 1462 1198"><b><i>(ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;</i></b></li> <li data-bbox="824 1225 1462 1369"><b><i>(iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority.</i></b></li> <li data-bbox="824 1396 1462 1495"><b><i>(iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites,</i></b></li> </ul>	A proposed policy on telecommunications will be included in the draft Development Management Policies for inclusion in Part 2 of the Local Plan.

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			<p><i>conservation areas or buildings of architectural or historic interest.</i></p> <p><i>When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology."</i></p> <p>We would consider it appropriate to introduce the policy and we would suggest the following;</p> <p>"Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With the growth of services such as mobile internet access, demand for new telecommunications infrastructure is continuing to grow. The authority is keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and siting equipment on existing tall structures and buildings."</p>	
38/144	Ruislip Residents Association	Telecommunications Aerials and Apparatus	The Council has always had a strong policy on this and we hope it will continue with its previous practice.	Noted - a proposed policy on telecommunications will be included in the draft Development Management Policies for inclusion in Part 2 of the Local Plan.
	<b>Environmental Improvement</b>	<b>General Comments</b>		
19/29	Colne Valley Park CIC	Section d) Environmental improvements	<p><u>Colne Valley Park policy</u></p> <p>16% of the London Borough of Hillingdon is located within the Colne Valley Regional Park. It was the first Chief Executive of Hillingdon who showed the vision and foresight to establish the Regional Park in 1965, just one year after the formation of the council. Today Hillingdon is a member of the Colne Valley Park CIC along with 42 other organisations from the public, private and voluntary sectors.</p> <p>There should be a specific policy for the Colne Valley Regional Park. This is required as a separate policy to '4: Development in the Green Belt or Metropolitan Open Land' because Green Belt policy has been successful at maintaining open land but has not been so successful at preserving or creating positive sustainable use of land (eg agriculture, nature conservation, recreation)– Green Belt policies say no to development but don't help with finding positive use for land.</p> <p>If integrated and we strongly urge you to do so the Colne Valley Park policy should include the 6 objectives of the Park, namely:</p>	<p>There is no statutory requirement and the Council considers it unnecessary to include a specific policy on the Regional Park in Part 2 of the Local Plan. It considers that sufficient planning policy protection is given in Part 1 of the Local Plan at policies EM2 and EM3 which seek to maintain Green Belt areas in the borough such as the Colne Valley and recognises at accompanying paragraphs 8.30 and 8.31 its unique large strategic character and quality as part of London's green infrastructure and 'Blue Ribbon' network.</p> <p>These policies reflect and conform with the approach in the London Plan at policy 2.18 with its recognition of the value of the Regional Park as part of London's strategic open space network (at Map 2.8).</p> <p>Other development management policies to be included in Part 2 will provide a general approach boroughwide to the control of development – alongside national and London Plan policies controlling development in the Green Belt.</p>

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ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			<p>Objective 1: To maintain and enhance the landscape, historic environment and waterscape of the Park in terms of their scenic and conservation value and their overall amenity.</p> <p>Objective 2: To safeguard the countryside of the Park from inappropriate development. Where development is permissible it will encourage the highest possible standards of design.</p> <p>Objective 3: To conserve and enhance biodiversity within the Park through the protection and management of its species, habitats and geological features</p> <p>Objective 4: To provide opportunities for countryside recreation and ensure that facilities are accessible to all.</p> <p>Objective 5: To achieve a vibrant and sustainable rural economy, including farming and forestry, underpinning the value of the countryside.</p> <p>Objective 6: To encourage community participation including volunteering and environmental education. To promote the health and social well-being benefits that access to high quality green space brings</p> <p>We would further state that this policy should become a consideration in all development proposals in, or affecting, the Park.</p>	
25/52	Environment Agency		Pleased to see points highlighted in our fact sheet have been incorporated in the Environmental section.	Noted.
30/86; 31/104	Phil Rumsey; Veronica Rumsey	Environment Improvements	Support Items 1-22 with modifications to items 4 and 20.	Support welcomed.
52/238	CgMs on behalf of Eastcote Hockey Club	Environmental Improvements	The list of Proposed Policies does not refer to Green Chains in either d) 4 or d) 9. This appears to be inconsistent with the Part 1 Local Plan.	The Council's approach to development in Green Chains is already referred to in Part 1 of the Local Plan at policy EM2. Proposals for changes to existing Green Chain land and for new designations are proposed in the draft Site Allocations and Designations to be included in Part 2.
	<b>Environmental Improvement</b>	<b>1. Low Carbon and Renewable Energy Systems in Residential dwellings</b> -Use of low carbon and renewable energy sources in dwellings.		
17/25	Geoff Armstrong, Armstrong Rigg Planning	<p>1. Low Carbon and Renewable Energy Systems in Residential Dwellings</p> <p>2. Decentralised Energy</p> <p>18. Water Efficiency in Homes</p>	<ul style="list-style-type: none"> <li>• These policies should be considered on a site-by-site basis</li> <li>• The suggestion for the inclusion of such policies within developments should come from the developer, rather than the council</li> <li>• The above will ensure more developments come forward, which</li> </ul>	<p>The Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.</p> <p>It is also aware of national planning and London Plan policy requirements regarding renewable energy and notes that section 10 of</p>

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			are no hindered by restrictive policies due to the associated costs	policy BE1 in Part 1 of the Local Plan already requires that all new developments should:  "Maximise the opportunities for all new homes to contribute to tackling and adapting to climate change and reducing emissions of local air quality pollutants. The Council will require all new development to achieve reductions in carbon dioxide emission in line with the London Plan targets through energy efficient design and effective use of low and zero carbon technologies. Where the required reduction from on-site renewable energy is not feasible within major developments, contributions off-site will be sought."
41/176; 44/204; 55/263; 57/289	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	1. Low Carbon and Renewable Energy Systems in Residential Dwellings	All new development should provide renewable energy systems.	The Council is aware of national planning and London Plan policy requirements regarding renewable energy and notes that section 10 of policy BE1 in Part 1 of the Local Plan already requires that all new developments should:  "Maximise the opportunities for all new homes to contribute to tackling and adapting to climate change and reducing emissions of local air quality pollutants. The Council will require all new development to achieve reductions in carbon dioxide emission in line with the London Plan targets through energy efficient design and effective use of low and zero carbon technologies. Where the required reduction from on-site renewable energy is not feasible within major developments, contributions off-site will be sought."
	<b>Environmental Improvement</b>	<b>2. Decentralised Energy-</b> Designing major developments to be able to connect to a Decentralised Energy Network (DEN).		
41/173; 44/201; 55/260; 57/286	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Transition Heathrow	2. Decentralised energy	Preference should be given to schemes that can provide localised energy production both in residential and commercial developments.	The Council will consider all development proposals on their individual planning merits.
	<b>Environmental Improvement</b>	<b>3. Living Walls and Roof -</b> Incorporating living roofs into major developments.		
13/20	Natural England		Policy 3) Living Walls and Roofs is welcomed and to be encouraged, it could also be linked to Policy C (30) above.	Noted – this will be considered during the drafting of the Development Management Policies.

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38/145	Ruislip Residents Association	Living Walls and Roof	We support this concept and hope it will be applied to the surface structures of HS2.	Noted.
41/174; 44/202; 55/261; 57/287	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	3. Living walls and roofs	All flat roofs should be living in new development. New developments should have minimum of 30% green roof, buildings that have 100% coverage should not be subject to normal planning constraints.	<p>Section 7 of policy BE1 in Part 1 of the Local Plan already requires that all new developments should:</p> <p>“Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity...”</p> <p>This policy already allows the Council to negotiate with developers for such measures as “living roofs”. It cannot make this a mandatory requirement.</p>
50/230	Heathrow Airport Ltd (Planning and Programmes)	d) Environmental Improvement 3. Living Walls and Roofs 14. Safeguarding of Biodiversity	<p>HAL understands the benefits of living walls and roofs in supporting biodiversity, attenuating surface water runoff from buildings and providing a natural form of insulation. However, the Council should be aware that living walls and roofs also have the potential to attract birdlife which in turn presents operational safety issues for the airport. Therefore, any policy requiring the provision of living walls and roofs in major developments should reflect the risk to aircraft safety and airport operations.</p> <p>HAL actively manages sites within its landholdings for their biodiversity value and has achieved the Biodiversity Benchmark Award for those areas. In line with the company's biodiversity strategy, any policy should state that the loss of biodiversity features will only be accepted where it will be replaced and enhanced in an alternate location.</p>	The Council does appreciate the concern expressed here regarding the special operational circumstances affecting Heathrow Airport. It will be flexible in the application of its policies partly because of these considerations.
	<b>Environmental Improvement</b>	<b>4. Development in the Metropolitan Green Belt or on Metropolitan Open land- Development affecting the Green Belt and Metropolitan Open Land.</b>		

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10/12	Gregory Gray Associates on behalf of The Garden Centre Group		<p>Gregory Gray Associates is instructed by our client, Hillingdon Garden Centre, to submit representations in relation to the above document. Our client's landholding, located on Pield Heath Road, Hillingdon extends approximately 4 acres and is located within the Green Belt. It is considered that the detailed Development Management Policies need to specifically address the issue of new buildings within the Green Belt and how they will be viewed. It is proposed that the wording of the policy could state:</p> <p><b>DM New buildings in the Green Belt</b>  <i>The Green Belt boundary is defined on the Policies Map. In order to uphold the purposes of the Green Belt to prevent urban sprawl and to keep land within its designation permanently open, inappropriate development, as defined within national guidance, will not be approved unless the applicant can demonstrate very special circumstances that will clearly outweigh the harm. Proposals for the limited infilling or the partial or complete redevelopment of previously developed sites will be considered in light of the size, height, type, layout and impact of existing buildings, structures and hardstanding. Such new development will be permitted provided that it does not have a greater impact upon the openness of the Green Belt and the purpose of including land within it. Particular support will be given to proposals that limit the dispersal of development throughout the site or can demonstrate that the openness of the Green Belt will be improved through the rationalisation of existing buildings into a smaller envelope of development within the site.</i></p>	<p>The Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies.</p> <p>It is also aware of national planning and London Plan policy requirements regarding development on Green Belt land. It does not consider that the proposed policy would add to these existing policies.</p>
13/21	Natural England		Policies (4) and (5) Green Belt and Metropolitan Open Land, looks at impacts and potential for development and dwellings within these areas and is to be encouraged.	
20/36	Eastcote Village Conservation Advisory Panel	Policies EM2 & EM3.	<p>The River Pinn runs through the Eastcote Meadows and this area is classed as a Site of Importance for Nature Conservation. Forms part of the Mayor of London's All London Green grid. The area is also in a Proposed Archaeological Priority Area, this should also be upgraded to an Archaeological Priority Area, as part of the area is within the Eastcote Village Conservation Area.</p> <p>Currently this area is classed as Green Chain, also Blue Ribbon. In line with Policy EM2 of HLP part 1, this area should be considered for Metropolitan Open Land Status.</p> <p>This area is part of the Colne Valley Catchment, LBH is a stakeholder in the Colne Catchment Action network which is working to achieve the standards set down in the European Framework Directive. This</p>	Agreed – this section of the River Pinn is included as a new area of Metropolitan Open Land and as part of a proposed Archaeological Priority Area for Eastcote Village in the draft proposed Site Allocations and Designations. The latter proposal stems from the Archaeological Assessment recently completed.

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			<p>involvement should continue.</p> <p>Recommendations.</p> <p>The area is upgraded to Metropolitan Open Land and to an Archaeological priority Area, continues to be classed as Blue Ribbon. Involvement with the Colne Catchment Action Network continues.</p>	
24/43	John Williams	Page 6, items 4 and 5 - Development in the Green Belt and Metropolitan Open Land	Add Green Chains.	The Council's approach to development in Green Chains is already referred to in Part 1 of the Local Plan at policy EM2. Proposals for changes to existing Green Chain land and for new designations are proposed in the draft Site Allocations and Designations to be included in Part 2.
30/87; 31/105	Phil Rumsey; Veronica Rumsey	Development in the Metropolitan Green Belt or Metropolitan Open Land	Prevention of Development on Green Belt Land and Metropolitan Open Land.	The Council's approach to development in the Metropolitan Green Belt or on Metropolitan Open Land is already referred to in Part 1 of the Local Plan at policy EM2.
32/112	London Square (Quod planning)	Development in the Metropolitan Green Belt or Metropolitan Open Land	<p>The adopted Hillingdon Local Plan Part 1 recognises as a matter of principle the expansion of education facilities within the Green Belt, and is a consideration which may be required to meet the Borough's sustainable objectives.</p> <p>Glebe Farm, Clovelly Avenue, Ickenham was specifically reviewed at Page 51 of Hillingdon's Green Belt and Major Development Site in the Green Belt Assessment January 2006. Whilst in 2006 the consideration for designation was simply whether land met one of the five tests, the consideration now is whether the land meets these tests "and" other components of the NPPF which would warrant allocation. We do not consider that this land meets any of the five tests identified within the NPPF. The sustainable development needs to the Borough also need to be considered.</p> <p>It is clear from an analysis of the site that it serves no function in Green Belt terms and indeed may well have been planned for further residential expansion when the new Glebe Avenue community was developed to the east of the Metropolitan line. Green Belt boundaries should not include land which it is unnecessary to keep permanently open. Paragraph 2.9 of the former PPG2 guidance noted that wherever practical a Green Belt boundary should be several miles wide, so as to ensure an appreciable open zone all around the built up area concerned. We would argue that this is not the case in respect of the subject land and indeed its functional form is simply one of greenfield rather than Green Belt. It should therefore be removed from the Green Belt.</p> <p>The content of the Proposed Development Management Policies has been identified in outline by Hillingdon Council. At this stage clearly there is limited detail in respect of the policies but nevertheless we do consider that at this stage there should be a policy to promote</p>	The Council is aware of national planning and London Plan policy requirements regarding development on Green Belt land. It does not consider that the area identified here for release should be de-designated. It will consider the individual merits of any proposals to expand the School when proposals come forward in the light of existing planning policies at that time.

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			<p>education facilities with need Borough recognising the need for enabling development to fund such provision.</p> <p>Land to the south of Clovelly Avenue and north of Dalton's Farm, Ickenham should be removed from the Green Belt and identified for education purposes supported by enabling residential development on site and at the Douay Martyrs School campus.</p>	
Q37/117	John Blackwell on behalf of London Gaelic Athletic Association	Section D4: Development in the Green Belt or on Metropolitan Open Land	<p>The GAA as a cultural, social and sporting organisation provides for mens and ladies Gaelic Football, Hurling and Camogie at adult level as well as youth activities for the same sports. The GAA has been playing and administering Gaelic games at this site since the early 1970s and we believe that the open space, sport, recreational and social activities both on and off the pitch would be better reflected in an open space, sport and recreational designation or equivalent of the site. The London GAA site in South Ruislip has been developed for sports amenities and sports administrative purposes over a period of a number of years.</p> <p>Notwithstanding our clients' belief that the use and character of their South Ruislip site are such that it would be appropriate to remove the current Green Belt designation, for sites within the Green Belt, policies should clearly set out the criteria for assessing proposals regarding sports pitches and other ancillary pitch sport-related developments.</p> <p>The existing network of sports and recreational facilities should be assessed to ensure that these sites are appropriately designated and this could be done in the context of the open space, sports and recreation strategies that each local authority including London Borough of Hillingdon are required to produce.</p>	<p>The primary purpose of the sports ground use is entirely appropriate to a Green Belt location. If the nature of this use has now changed from that primary purpose, that in itself is not an argument for the Council to de-designate the area as Green Belt.</p> <p>It may be the case that if future proposals come forward for enhancing the facilities for open recreation and pitch sports at the site could be potentially acceptable 'very special circumstance' whereby approval can be given for development within the Green Belt. That will be a matter for determination at the time of the application and within the then planning policy framework.</p>
38/146	Ruislip Residents Association	Development in the Metropolitan Green Belt or on Metropolitan Open land	We suggest you add Green Chains to this policy.	The Council's approach to development in Green Chains is already referred to in Part 1 of the Local Plan at policy EM2. Proposals for changes to existing Green Chain land and for new designations are proposed in the draft Site Allocations and Designations to be included in Part 2.
41/175; 44/203; 55/262; 57/288	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	4.Development in the Metropolitan Green Belt or on Metropolitan Open land	Open space and agricultural land in the green belt should be protected as such. New development should be mitigated by equal sized habitat creation schemes with an emphasis placed on wild flower meadows for bees and other pollinating insects.	<p>The Council's approach to development in the Metropolitan Green Belt or on Metropolitan Open Land is already referred to in Part 1 of the Local Plan at policy EM2.</p> <p>Section 7 of policy BE1 in Part 1 of the Local Plan already requires that all new developments should:</p> <p>"Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity..."</p>

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				This policy already allows the Council to negotiate with developers for such measures as "habitat creation schemes". It cannot make this a mandatory requirement.
	<b>Environmental Improvement</b>	<b>5. Dwellings in the Green Belt and Metropolitan Open Land</b> - Alterations and extensions to dwellings in the Green Belt or on Metropolitan Open Land.		
	<b>Environmental Improvement</b>	<b>6. Farm Diversification</b> -Farm diversification for employment related uses.		
19/30	Colne Valley Park CIC	Farm diversification	In order to be allowed to develop their farm business planning policy should be modified to allow a range of diversified activity particularly within existing farmsteads. However, a robust definition of agricultural activity is needed to ensure that the green belt as a whole is maintained. In return for permitted developments and/or planning consent the farmer should be prepared to fulfil his-her role as producer of local food and custodians of the environment by entering into contractual reciprocal agreements with the local authority to perpetuate farming and the Green Belt in Hillingdon. This policy should be moved from section D into a new 'farming and the rural economy' policy in section A.	Local Plan policies have to conform to national planning policies regarding farm diversification. It would be difficult for the Council to provide a comprehensive list of uses which might be considered acceptable, as proposed here and any contractual arrangement would fall outside the remit of the Local Plan.
41/177; 44/205; 55/264; 57/290	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	Farm Diversification	Farm land should be kept as green space devoted to growing of some sort.	Farm land in the borough is already normally covered by Green Belt or Metropolitan Open Land status, therefore heavily protected against any future development by London Plan and Local Plan Part 1 policies and therefore likely to remain in agricultural use during the Plan period.
		<b>7. Tourist, Facilities in the Countryside</b> -Tourism facilities in the countryside.		
	<b>Environmental Improvement</b>	<b>8. Outdoor Advertising in Rural Areas</b> -Outdoor advertisement displays in the countryside.		
	<b>Environmental</b>	<b>9. Development in Green Edge Locations</b> - Development in fringe		

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	<b>Improvement</b>	locations to the Blue Ribbon Network and Green Spaces.		
13/22	Natural England		Policies (9) and (10) relate to Development in Green Edge Locations and the Blue Ribbon Network which is also welcomed.	Support welcome.
16/20	Middlesex Branch of the Inland Waterways Association	Environmental Improvements (Development in Green Edge Locations)	<p>Across the waterway system people have been living on boats for many years. Some of these residential boaters do not have a home mooring but are designated as continuous cruisers, many of them roaming widely across the network in a progressive journey. The Navigation Authority (Canal &amp; River Trust) conditions for a continuous cruising licence impose requirements on continuous cruisers which are intended to ensure that other boat owners or hirers are able to enjoy leisure use of the waterway network.</p> <p>For many years there were no significant issues associated with this but in recent years there has been an increase in the numbers of people living on boats without a home mooring and sometimes staying within a narrow geographic area. No-where is this more acute than in the London area where the number of boats overstaying on moorings often for residential purposes, has increased. This is because of the pressures on accommodation in the London area and the lack of affordable residential moorings.</p> <p>The time limit rules for staying at designated visitor moorings or at other points along the canal (generally a maximum stay of 14 days) are being widely ignored by boat owners who have no home mooring. As a result many leisure boat owners are put off cruising in the London area for fear that they will be unable to find suitable overnight moorings. In order to address this issue the Inland Waterways Association (IWA) has recently published a document entitled A Proposal for Reducing Overstaying Boats in the London Area. The IWA supports the provision of more "Off-Line" residential moorings in the London Area and will press navigation authorities, local authorities and other stakeholders to develop strategies for the provision of more residential moorings in their plans.</p> <p>Along with a number of measures to allow better enforcement of mooring rules, the IWA are also proposing the introduction of a transitional arrangement to allow the reduction of the boats moored in the area to be carried out in a controlled manner, that is seen to be fair both to the over staying moorers, and those who stay within the rules and wish to visit London.</p> <p>The transitional arrangement will be made possible by the provision of a new type of mooring, controlled by the Canal &amp; River Trust, to be known as an On-Line Community Mooring. This is intended to satisfy the need</p>	The Council will discuss this proposal with the Canal and River Trust as it primarily concerns the management of moorings. Sufficient capacity for housing development has been identified for the Plan period without the need for new residential moorings being brought forward.

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			<p>for a type of mooring available for those boats without home moorings, or those who need to spend considerable time moored, in the London area.</p> <p>The IWA have produced a list of possible sites for Community Moorings (Eleven of these sites are within the boundaries of the London Borough of Hillingdon).</p> <p>RESIDENTIAL USE OF ON-LINE COMMUNITY MOORINGS ON THE GRAND UNION CANAL</p> <p>Applications for new residential moorings at sites designated by the Canal &amp; River Trust as Community Moorings will normally be considered favourably providing that the following conditions are met:</p> <p>(i) The number of boats moored at any one point should not be more than ten.</p> <p>(ii) The proposal incorporates appropriate facilities to allow safe and secure access between vessels and the bank, without interfering or endangering those using canalside walkways;</p> <p>(iii) Any provision for car parking must not adversely affect the amenities of the waterway, and adequate services facilities (e.g. water supply, sewage and waste disposal facilities) should be available within a reasonable cruising distance;</p> <p>(iv) Mains electricity should be provided where it is considered that the use of engines or generators would be liable to cause nuisance to nearby occupants;</p> <p>(v) The applicant submits a Mooring Agreement in support of the proposal. Such Management Agreements will specify the length of time that a permit holder can stay on a Community Mooring before they need to move to a new site</p>	
16/21	Middlesex Branch of the Inland Waterways Association	Environmental Improvements (Development in Green Edge Locations)	<p>Across the waterway system people have been living on boats for many years. Some of these residential boaters do not have a home mooring but are designated as continuous cruisers, many of them roaming widely across the network in a progressive journey. The Navigation Authority (Canal &amp; River Trust) conditions for a continuous cruising licence impose requirements on continuous cruisers which are intended to ensure that other boat owners or hirers are able to enjoy leisure use of the waterway network.</p> <p>For many years there were no significant issues associated with this but in recent years there has been an increase in the numbers of people living on boats without a home mooring and sometimes staying within a</p>	The Council will discuss this proposal with the Canal and River Trust as it primarily concerns the management of moorings. Sufficient capacity for housing development has been identified for the Plan period without the need for new residential moorings being brought forward.

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			<p>narrow geographic area. No-where is this more acute than in the London area where the number of boats overstaying on moorings, often for residential purposes, has increased. This is because of the pressures on accommodation in the London area and the lack of affordable residential moorings.</p> <p>The time limit rules for staying at designated visitor moorings or at other points along the canal (generally a maximum stay of 14 days) are being widely ignored by boat owners who have no home mooring. As a result many leisure boat owners are put off cruising in the London area for fear that they will be unable to find suitable overnight moorings.</p> <p>In order to address this issue the Inland Waterways Association (IWA) has recently published a document entitled A Proposal for Reducing Overstaying Boats in the London Area.</p> <p>Along with a number of measures to allow better enforcement of mooring rules and the introduction of new Community Mooring sites the IWA also supports the provision of more affordable "Off-Line" residential moorings to reduce the number of boats without home moorings in the London Area. "Off-Line" moorings are docks, basins or marinas connected to the canal but not forming part of the navigational route. The IWA will press navigation authorities, local authorities and other stakeholders to develop strategies for the provision of more residential moorings in their plans.</p> <p><b>Proposed Policy:</b></p> <p><b>RESIDENTIAL USE WITHIN PROPOSED OR EXISTING OFF-LINE MOORINGS ON THE GRAND UNION CANAL</b></p> <p>Applications for residential moorings at proposed or existing off-line mooring sites on the Grand Union Canal will normally be considered favourably providing that the following conditions are met:</p> <p>(i) Adequate services facilities (e.g. water supply, sewage and waste disposal facilities) should be available at the off-line mooring site.</p> <p>(ii) Mains electricity should be provided to residential moorings;</p> <p>(iii)The applicant submits a Mooring Agreement in support of the proposal. Such Management Agreements will specify the length of time for a residential mooring contract.</p> <p>(iv) Mooring fees for residential berths, inclusive of car parking and other site services, will charged at a fixed percentage, to be agreed with the Planning Authority, over and above the berthing fee for other non residential (leisure use) boats at the same off-line mooring site.</p>	

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19/31	Colne Valley Park CIC	Development in Green Edge Locations.	Clarity is needed that this refers to development adjacent to, but not inside, the Blue Ribbon Network and Green Spaces and the Colne Valley Park.	Noted – the Council will take this into consideration when drafting any proposed Development Management Policy.
24/44	John Williams	Page 6, item 9 -Developments in Green Edge Locations	Add Green Chains.	Noted – the Council will take this into consideration when drafting any proposed Development Management Policy.
38/147	Ruislip Residents Association	Development in Green Edge Locations	We suggest you add Green Chains to this policy.	Noted – the Council will take this into consideration when drafting any proposed Development Management Policy.
		<b>10. Blue Ribbon Network</b> - Development affecting the delivery of the Catchment Management Plans for the River Crane and Colne. Design and access requirements for waterside.		
25/53	Environment Agency	10 Blue Ribbon Network and 14 Safeguarding of Biodiversity -	<p>Aim to reach good ecological status or potential (WFD). Building in close proximity to any watercourse can lead to destabilisation and encroachment of ecological interest. The watercourses most at risk are the Crane, Colne and Pinn. New development that occurs adjacent to watercourses must allow for the preservation or creation of a buffer zone free from built development. This will protect the important natural habitat associated with watercourses and adjacent land. It is positive that the Catchment Management Plans for the Rivers Crane and Colne will be referenced within the policy.</p> <p>General requirements</p> <ul style="list-style-type: none"> <li>• Buffer zones (8m for main w/course and 5m for canal), native planting, removal of non-natives species. Sustainable drainage measures that prevent pollution entering watercourse.</li> <li>• Deculverting, removing concrete channels and bank, softening &amp; regrading of banks, creating green belt buffer zone.</li> <li>• Seek opportunities to link to neighbouring open spaces or create new green spaces, green corridors, buffer zones along rivers.</li> </ul>	Noted.
27/72	Canal and River Trust	Grand Union Canal	The Local Plan: Part 1 makes good reference to the value of the Grand Union Canal within the borough, as an amenity, biodiversity, transport and education resource. The policies of the Local Plan: Part 2, should continue to promote this, and ensure that development enhances and contributes to the canal environment and its positive use.	A considerable amount of policy protection covering these concerns is already given by London Plan and Local Plan Part 1 policies. The Council will discuss whether further policy coverage is required with the Canal and River Trust.

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			<p>The Canal &amp; River Trust, as owner and navigation authority of the Grand Union Canal, have been working with stakeholders in Hillingdon to improve the canal and maximise its potential in the regeneration of waterside sites. These include John McDonnell MP, the Hillingdon Canal Partnership (which includes members of the Hayes Town Partnership and West Drayton Town Centre Action Group, Groundwork, Thames21 and Stockley Park).</p> <p>Issues we would like to see covered, with reference to the canal, include moorings, access, biodiversity, transport and management. We are also keen that the canal in LB Hillingdon be viewed comprehensively with crossovers into neighbouring boroughs – and particularly the Slough Arm, which is less well used than the main line of the Grand Union Canal.</p> <p>The Trust (as previously British Waterways) had begun work on a waterspace strategy, and we would be pleased to meet with officers to discuss our main aspirations for the canal environment in LB Hillingdon.</p>	
38/148	Ruislip Residents Association	Blue Ribbon Network	We will need a new site and new facilities for Hillingdon Outdoor Activities Centre (HOAC) as the HS2 viaduct across the Colne Valley will make the current site unusable.	Noted.
50/229	Heathrow Airport Ltd (Planning and Programmes)	d) Environmental Improvements 10. Blue Ribbon Network 11. Critical Drainage Areas 12. Management of Flood Risk 16. Water Quality 17. Protection of Ground Water resources 19. Water Efficiency in Non-Residential Development	<p>HAL agrees that sustainable water management policies should be applied to new development and the range of policies headings would seem to be appropriate. However, Heathrow is a unique site within the context of the Borough and the wider area and operates an extensive and complicated water supply, distribution and drainage network that would not be reflected elsewhere in the Borough. It is therefore our view any policies relating to water management and drainage at the airport would need to be specific to the airport and would be better suited to fall within the overarching Heathrow Airport policy.</p> <p>HAL is developing an improvement plan to upgrade the airport surface water pollution control system in consultation with the Environment Agency. The improvements will support the Water Framework Directive objectives and are a requirement of HAL's Environmental Permits for discharging surface water runoff. The permits are regulated by the Environment Agency. The improvement plan will provide the agreed basis for meeting appropriate water quality standards from airport surface water runoff.</p>	It is unclear whether an airport-specific policy of this kind would be required in the Local Plan Part 2, given that the permit system operated by the Environment Agency will cover this issue. The Council will continue to liaise with Heathrow Airport Limited on its improvement plan and keep its existing policies under review.
	<b>Environmental Improvement</b>	<b>11. Critical Drainage Areas</b> - Development affecting Critical Drainage Areas.		
	<b>Environmental Improvement</b>	<b>12. Management of Flood Risk</b> - Development proposed		

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		in Flood Risk Zones.		
25/54	Environment Agency	<b>12. Management of Flood Risk –</b>	<p>The policy should steer new development away from areas at highest risk of flooding and following a sequential approach. Incorporation of SuDs(Sustainable Drainage Systems) hierarchy plus links to additional benefits for biodiversity, water quality</p> <ul style="list-style-type: none"> <li>• (WFD) and green infrastructure.</li> <li>• Requiring development to achieve Greenfield runoff rates aspirations of London Plan Policy 5.13</li> <li>• The Surface Water Management Plan should be used to develop policy approach to reduce surface water flood risk, including retrofitting of SuDs where appropriate</li> <li>• Use of SFRAs recommendations (planning) to formulate specific criteria on how developments can reduce flood risk, be resistant and resilient (climate change adaptation &amp; mitigation) safety of occupants and refer to SFRA for more specific requirements.</li> <li>• Focus long-term – use of Thames CFMP – flood storage, are there areas of 3b functional that need protection from unsuitable development?</li> </ul>	The Council will liaise with the Environment Agency during the drafting of Development Management Policies covering flooding and Surface Water Management.
	<b>Environmental Improvement</b>	<b>13. Sustainable Drainage Systems</b> -Use of sustainable drainage systems, the control of surface water run off rates and the use of water efficiency.		
13/23	Natural England		Policy (13) Sustainable Drainage Systems (SuDs) are welcomed and have a role to play in enhancing biodiversity and ecology within an area, together with helping to alleviate urban heat island affects. The policy can be linked green infrastructure provision as part of a holistic approach to development opportunities.	Noted.
25/55	Environment Agency	13 SuDs	Please note that only infiltrative SuDs techniques should be permitted in appropriate ground conditions (i.e. infiltration should not be permitted through contaminated and/or within shallow groundwater table due to the risk of mobilising contaminants and polluting controlled waters).	Noted.
	<b>Environmental Improvement</b>	<b>14. Safeguarding of Biodiversity-</b> Protection and enhancement of biodiversity features.		

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13/18	Natural England	Heading C Environmental Improvements	Hillingdon is close to the South West London Water Bodies RAMSAR and Special Protection Area (SPA), includes the Ruislip Woods National Nature Reserves as well as several Sites of Special Scientific Interest (SSSIs). Biodiversity and the natural environment can lead to various opportunities, not just for wildlife activity and connection, but also health, recreation, contributing to climate change adaptation and improving quality of life. This should be made explicit in the Local Plan and policies included to ensure the borough's green infrastructure is designed to deliver multiple functions.	<p>The Council already make this explicit in Part 1 of the Local Plan. The Vision statement there contains an aim that:</p> <p>"Improved environment and infrastructure is supporting healthier living and helping the borough to mitigate and adapt to climate change: Areas lacking the social, physical and green infrastructure required to support healthy lifestyles have been identified and measures are well under way to address these."</p> <p>A set of strategic objectives to deliver the Vision include the following:</p> <p>"SO3: Improve the quality of, and accessibility to, the heritage value of the borough's open spaces, including rivers and canals as areas for sports, recreation, visual interest, biodiversity, education, health and well being. In addition, address open space needs by providing new spaces identified in Hillingdon's Open Space Strategy.</p> <p>SO8: Protect and enhance biodiversity to support the necessary changes to adapt to climate change. Where possible, encourage the development of wildlife corridors.</p> <p>SO9: Promote healthier and more active lifestyles through the provision of access to a range of sport, recreation, health and leisure facilities."</p>
13/24	Natural England		Safeguarding of Biodiversity (policy -14) refers to the protection and enhancements of biodiversity features, this is welcomed in view of the proximity of Nationally Designated sites within and adjacent to the Borough. See also other comments in respect to Local Wildlife Sites.	Support welcomed.
13/25	Natural England	Local wildlife sites	If the proposal site is on or adjacent to a local wildlife site, e.g. Site of Nature Conservation Importance (SNCI) or Local Nature Reserve (LNR) the authority should ensure it has sufficient information to fully understand the impact of the proposal on the local wildlife site, and the importance of this in relation to development plan policies, before it determines the application.	Noted.
13/26	Natural England	Biodiversity enhancements	Development applications can provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. Hillingdon should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with Paragraph 118 of the National Planning Policy Framework. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that ' <i>Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity</i> '. Section 40(3) of the same Act also states that ' <i>conserving</i>	<p>Section 7 of policy BE1 in Part 1 of the Local Plan already requires that all new developments should:</p> <p>"Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity..."</p> <p>This policy already allows the Council to negotiate with developers on opportunities to incorporate features into their designs which are</p>

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			<i>biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'.</i>	beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes.
13/27	Natural England	Landscape enhancements	Applications also provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green space provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider new development and ensure that it makes a positive contribution in terms of design, form and location, to the character and functions of the landscape and avoids any unacceptable impacts.	Section 7 of policy BE1 in Part 1 of the Local Plan already requires that all new developments should:  "Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity..."  This policy already allows the Council to negotiate with developers on green space provision and access to and contact with nature. It has also undertaken landscape and townscape character assessments as part of its Local Plan evidence base to inform policy drafting for Part 2 and future development management decisions.
19/32	Colne Valley Park CIC	14. Safeguarding of Biodiversity	The Colne Valley Park CIC supports this, biodiversity is objective 3 of the Colne Valley Park and contained in LBH Core Policy 4.	Support welcomed.
41/178; 55/265; 57/291	Grow Heathrow (May Mackenzie); Grow Heathrow (Heathrow Greentech); Transition Heathrow	14. Safeguarding of biodiversity	Areas of 'wild' land should be protected and preserved. Undeveloped land should be planned into the urban matrix and linked into corridors to maintain biodiversity.	It is not clear what areas of "wild land" are referred to but the Council's Local Plan, the London Plan and national planning policies together already offer a considerable degree of policy protection for the borough's open and green spaces.
44/206	Charlie Cooley	14. Safeguarding of biodiversity	Areas of 'wild' land should be protected and preserved.	It is not clear what areas of "wild land" are referred to but the Council's Local Plan, the London Plan and national planning policies together already offer a considerable degree of policy protection for the borough's open and green spaces.
	<b>Environmental Improvement</b>	<b>15. Development of Land Affected by Contamination -</b> Restoration of contaminated land.		
25/56	Environment Agency	15 Land Contamination	It is positive that brownfield sites are mentioned but also need to ensure that there are no further impacts to land quality from new developments too. We will require a Preliminary Risk Assessment (PRA) to be submitted with a planning application for sites known or suspected to be contaminated.	Noted.
	<b>Environmental Improvement</b>	<b>16. Water Quality -</b> Water quality targets for new development.		
13/19	Natural England		The council should consider the role of the natural environment under	Noted – the Council considers that its existing Part 1 policies already

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			this section/objective, together with the Carbon Reduction identified under heading C (16). Incorporating the natural environment into the built environment can significantly contribute to climate change adaptation including through flood storage, reducing rainwater runoff and ameliorating the urban heat island effect. We recommend that the role the natural environment can play in climate change adaptation is drawn out further in the Local Plan, and policies tightened to reflect this.	offer considerable support and protection in this respect, e.g. at policy EM1, in conjunction with London Plan policies.
41/179; 44/207; 55/266; 57/292	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	16. Water quality	Developments with constructed wetlands to improve water quality should be favoured. All surfaces should be permeable to clean and filter ground water.	Policy EM 6 in Part 1 of the Local Plan already encourages the provision of sustainable urban drainage systems in all development. It states:  "The Council will require all development across the borough to use sustainable drainage systems (SuDS) unless demonstrated that it is not viable. The Council will encourage SuDS to be linked to water efficiency methods. The Council may require developer contributions to guarantee the long term maintenance and performance of SuDS is to an appropriate standard."
	<b>Environmental Improvement</b>	<b>17. Protection of Ground Water resources -</b> Development within a Source Protection Zone, Safeguard Zone or Water Protection Zone.		
25/57	Environment Agency	17 Protection of Ground Water Resources	Good to see groundwater resources mentioned but surface water quality also needs to be protected. Ground Source Heat Pumps –We expect all developers to follow our published Environmental Good Practice Guide which details the environmental risks of all types of schemes and how these can and should be mitigated. We will require a risk assessment for both the abstraction and discharge from the schemes we regulate. We expect developers to assess risks for schemes we do not regulate and we should be made aware of GSHC proposals on contaminated land or in a SPZ1	Noted – paragraphs 8.87 – 8.93 and policy EM 6 explain the Council's approach already regarding protecting surface water quality.
	<b>Environmental Improvement</b>	<b>18. Water Efficiency in Homes -</b> Residential development and the Code for Sustainable Homes.		
25/58	Environment Agency	18 & 19 Water Efficiency	We are pleased to see the intention to include policies in this area which set standards in line with the Code for Sustainable Homes and BREEAM.	Support welcome.

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	<b>Environmental Improvement</b>	<b>19. Water Efficiency in Non Residential Development -</b> Non residential development and BREEAM standards for water efficiency.		
25/59	Environment Agency	18 & 19 Water Efficiency	We are pleased to see the intention to include policies in this area which set standards in line with the Code for Sustainable Homes and BREEAM.	Support welcome.
	<b>Environmental Improvement</b>	<b>20. Air -</b> Development to be 'air quality neutral'.		
30/88; 31/106	Phil Rumsey; Veronica Rumsey	Air	Development to provide reduction in pollutants as opposed to being neutral.	The Council has to be guided here by the requirements of national and London Plan policies. It will keep its policies under review if it becomes possible to seek reductions in pollutant emissions.
50/231	Heathrow Airport Ltd (Planning and Programmes)	d) Environmental Improvement 20. Air	HAL acknowledges the position in Part 1 of the Local Plan where it seeks under strategic objective SO10 an improvement in air quality, while SO11 seeks to minimise air quality pollutants from new development and transport. It is acknowledged that the southern two thirds of the Borough is an AQMA and that policies specific to air pollution will be brought forward in the Part 2 document, including the Heathrow Area Policies LDD. The supporting text around air quality suggests that all development exploiting the benefits of Heathrow is a negative contributor to air quality (para. 8.134). While we recognise that this may be referring to development around the airport, we must clarify that the current regime of airport infrastructure renewal, including terminal and operational improvements, adopt environmental improvement and mitigation methods and practices wherever feasible. The strategic policies regard S106 or CIL funding as an appropriate form of mitigation, however the current on airport schemes should also be considered.	Clarification noted regarding air quality and comments regarding S106 agreements and / or CIL charges applying to on-airport development.
	<b>Environmental Improvement</b>	<b>21. Noise -</b> Ambient noise level standards.		
50/232	Heathrow Airport Ltd (Planning and Programmes)	d) Environmental Improvement 21. Noise	The existing policy context around noise is clear in how noisy development and noise sensitive development should be considered in the planning process. The NPPF states at various places that noise sensitive development should not be sited near noisy development, while the London Plan Policy 7.15 seeks to reduce noise by minimising existing and proposed noise from development proposals, separating noise sensitive development from noisy development and promoting	The full implications of the proposed zoning of types of development will be considered by the Council during the drafting of Development Management Policies.

## Appendix 1 (b): Schedule of Respondents' Comments and Officers' Proposed Responses, including Proposals Received in Call for Sites

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			<p>new technologies and practices and the source of noise.</p> <p>Policy EM8 of the Local Plan Part 1 is clear in stating that noise sensitive development and noise generating development will only be supported if the impacts can be mitigated. However, we believe that the Development Management policy on noise should go further in so far as it seeks to protect development from high levels of aircraft noise by specifically stating that planning permission will be refused for all noise sensitive development (namely residential, nursing/care homes, schools/ educational establishments, hospitals/healthcare facilities) within the 69dBA Leq contour. Between the 69 and 63dBA Leq contours there should be a restriction on residential development that avoids family accommodation being provided and other smaller one bed and studio accommodation should only be accepted with high levels of sound insulation/ ventilation. There should be a presumption against non-residential noise sensitive development in this zone given that the new Aviation Policy Framework states that noise exposure up to this level requires insulation to be provided for existing buildings, so it seems reasonable to avoid putting new community facilities in these noise exposure areas, unless there is an overwhelming case to override this general presumption against new development. Between 63 and 57dBA LAeq contours all new built development, including residential extensions, should have high levels of sound attenuation and ventilation.</p>	
	<b>Environmental Improvement</b>	<b>22. Minerals and Waste - Protection, extraction processing of aggregates and restoration of mineral sites, operation of waste disposal sites and operation of rail depot facilities.</b>		
19/33	Colne Valley Park CIC	Minerals and Waste	This policy should include specific wording to ensure that all minerals and waste sites within the Colne Valley Park should have a restoration plan that achieves the 6 objectives of the Colne Valley Park (see the proposed Colne Valley Park policy).	The objectives of the Colne Valley Park are not statutory requirements for the Council to consider when future restoration schemes come forward in the Park. There is no need for a separate policy to this effect in the Local Plan.
25/60	Environment Agency	Minerals and Waste	<p>Position Statement E1 of our Groundwater Protection: principles and practice (GP3), states that we will object to any proposed landfill site in groundwater Source Protection Zone 1 (SPZ1). For all other proposed landfill site locations, a risk assessment must be conducted based on the nature and quantity of the wastes and the natural setting and properties of the location.</p> <p>We would be pleased to meet with you as you progress your local plan and would be happy to comment on any informal drafts of policies if you would find this helpful. We look forward to working with you.</p>	Noted.

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38/149	Ruislip Residents Association	Minerals and Waste	We need a policy that will cover HS2 worksites and tunnel spoil removal.	The Council's general development management policies will be expected to adequately cover any environmental or amenity concerns arising from the proposed HS2 works without the need for a specific policy.
41/180; 44/208; 55/267; 57/293	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	Minerals and waste	Provision of bio digestion facilities should be central to waste management strategies and developments that provide this should be favoured.	The Council is aware of national planning and London Plan policy requirements for waste reduction and management. Where appropriate it may seek to encourage particular types of waste treatment on site such as bio-digestion but it cannot favour this method in the manner suggested.
	<b>Transport and Infrastructure</b>			
	<b>Transport and Infrastructure</b>	<b>General Comments</b>		
24/49	John Williams	Page 8	Add a section for Educational Facilities to include a review of future demand for educational facilities.	The Council will include a section on future school sites in its draft proposed Site Allocations and Designations.
30/89; 31/107	Phil Rumsey; Veronica Rumsey	Transport and Infrastructure	Support Items 1-8 with modifications to Items 2, 6, 7 and 8.	Support welcomed.
	<b>Transport and Infrastructure</b>	<b>1. Accessibility and Transport Objectives-</b> Improving accessibility and meeting sustainable transport objectives.		
24/45	John Williams	Page 7, item e)1 - Accessibility and Transport Objectives	Include an overall review of the current and projected volume of traffic and primary routes with a view to introducing measures to avoid future gridlock.	Traffic management is not within the remit of the Local Plan; it is dealt with instead by the Council's Local Implementation Plan. This comment has been passed to the Council's transport policy team.
24/46	John Williams		Review access to the South Ruislip Industrial/Retail Park to avoid HGVs travelling through Ruislip/ Ruislip Manor town centres.	Traffic management is not within the remit of the Local Plan; it is dealt with instead by the Council's Local Implementation Plan. This comment has been passed to the Council's transport policy team.
26/68	British Airways Plc (Nathanial Lichfield and Partners)	Accessibility and Transport Objectives	In principle, the objective of protecting road capacity in the Heathrow Opportunity Area (HOA) for airport related activities is supported. This is particularly important given the employment and housing targets that have been set for the HOA. This objective needs to be reflected in the application of Policy T1 when steering development to the most appropriate locations to reduce impact on the transport network in the HOA.  The policy objective of facilitating improvements to public transport interchanges, in particular at Heathrow Airport, is also supported. The Part 2 policies and the Local Implementation Plan (LIP) should 'flesh	Noted.  It is for the Council's Local Implementation Plan to set out the measures and mechanisms required.

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			<p>out' how this is to be achieved and the mechanisms for funding these improvements.</p> <p>The need to improve north/south links in the Borough is also endorsed. There is a need in particular to ensure that the employees and customers within the Borough of Hillingdon that work at or use Heathrow Airport are able to travel using public transport. At present, north/south links in the Borough are not as strong as the east-west public transport links. Again, it is hoped that the Part 2 policies, as well as the LIP, will set out details on the measures and mechanisms for achieving this.</p>	
38/150	Ruislip Residents Association	Accessibility and Transport Objectives	We recommend that the policy includes an overall review of the current and projected volume of traffic and the primary routes, with a view to introducing measures to avoid future gridlock. Review access to South Ruislip industrial/retail park to avoid HGVs travelling through Ruislip / Ruislip Manor town centres.	Traffic management is not within the remit of the Local Plan; it is dealt with instead by the Council's Local Implementation Plan. This comment has been passed to the Council's transport policy team.
41/181; 44/209; 55/268; 57/294	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech); Transition Heathrow	Accessibility and transport	All new residential development should be linked by walking distance to bus or train routes.	<p>Policy T1 in Part 1 of the Local Plan in effect meets this concern. It states:</p> <p>"The Council will steer development to the most appropriate locations in order to reduce their impact on the transport network. All development should encourage access by sustainable modes and include good cycling and walking provision."</p>
54/242	Transport for London (Borough Planning)	Freight	This policy should refer to the use of delivery and servicing plans (DSP) and construction and logistic plans (CLP). These are relevant should the development generate a high level of freight traffic and/or if in close proximity to a sensitive section of the road network, for example the Strategic Road Network or Transport for London Road Network. Reference on the use of the Blue Ribbon Network for freight transport should also be included.	These are matters which the Council will take into consideration through its Local Implementation Plan.
	<b>Transport and Infrastructure</b>	<b>2. Heathrow Airport -</b> Development at Heathrow Airport; maintaining air transport movements within current limits; improving air quality and reducing levels of congestion.		
1/1	Heathrow Airport Ltd (Safeguarding)		<p><b>Aerodrome Safeguarding</b></p> <p>Aerodromes important to the national air transport system are officially safeguarded by the Civil Aviation Authority and the process of ensuring that their operation and development is not inhibited is an integral part of the town planning system. A safeguarding map is derived from a series of protected three-dimensional surfaces above and around the</p>	Noted.

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			<p>aerodrome. The extent of the surfaces spans out to 15km centred on the Aerodrome Reference Point (ARP) for Heathrow Airport Ltd. Within this area the Planning Authority must consult the Airport Operator on development where the height of any building, structure, erection or works would affect the operation of the airport or the safe movement of aircraft i.e. potentially penetrate the protected surface. The aerodrome uses a variety of navigational aids, radio aids and telecommunications systems to facilitate air traffic control and aircraft movements. A new building, structure or extension because of its size, shape, location or construction materials can affect this equipment so the aerodrome must also be consulted to enable an assessment to be made of the potential impact on navigational aids. In addition, at night and in low visibility conditions pilots rely on approach and runway lights to align their plane with the runway and touch down at the correct point. Lighting elements of a development also have the potential to distract or confuse pilots, particularly in the immediate vicinity of the aerodrome and the aircraft approach paths. Safeguarding assessments therefore also consider the impact of lighting proposals for developments.</p> <p>Government advise that applicants should initiate discussions with the Planning Authority and the Airport Operator at an early stage before submitting an application to ensure that they understand the constraints and provide the information which will be needed for a detailed assessment to be made of the proposal e.g. a construction methodology or navigational impact assessment,. If the Planning Authority propose to grant permission or impose conditions contrary to the safeguarding advice of the Airport Operator, they must notify the Civil Aviation Authority and demonstrate they have assessed the application in the light of Government guidance and provide a statement of reasons. Ultimately, the application could be referred to the Secretary of State who has the power to issue a Direction.</p> <p>Safeguarding issues should only prevent development taking place were absolutely necessary to maintain the safe operation of the airport and the movement of aircraft. The safeguarding process rather seeks to mitigate the adverse impacts of development through; alternative design, appropriate landscaping and planting schemes, by conditions restricting how a development operates and may be extended. Legal agreements will be used to deal with aspects of a development, such as implementation of a Bird Hazard Management Plan, which cannot be satisfactorily covered by planning conditions.</p>	
1/2	Heathrow Airport Ltd (Safeguarding)		<p><b>Wind Turbine Developments</b></p> <p>The safeguarding requirements for Heathrow Airport includes a circle with a 30 kilometres radius drawn from the aerodrome reference point to indicate the area within which the Planning Authority must consult the Airport Operator on proposed wind turbine development. This recognises the fact that the introduction of wind-powered generator</p>	Noted.

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			<p>turbines as an alternative energy policy can create problems for aviation. In addition to their potential for presenting a physical obstacle to air navigation, wind turbines can affect radar and other electronic aids to air navigation from radio frequency interference (the rotating blades create electromagnetic disturbance which can degrade the performance of these systems and cause incorrect information to be received). The amount of interference depends on a number of factors; the number of turbines, their size, construction materials, location and shape of blades. A wind turbine development is also likely to be the subject of consultation with the Civil Aviation Authority (CAA), NATS En Route Ltd. (NERL) and the Ministry of Defence (MOD). Government advise applicants to initiate discussions with the Planning Authority and the Airport Operator at an early stage in the process and before submitting an application to ensure that they understand the constraints and provide the information to enable a detailed assessment to be made of the proposed development i.e. a navigational impact assessment study. Where it is determined that a planning application for a proposed development may have an effect on navigational or other aeronautical systems, simulation or other types of interference modelling of the effects of the development may need to be conducted before a decision can be made on the application. It is usual for the developer to bear the cost of the modelling.</p>	
26/69	British Airways Plc (Nathanial Lichfield and Partners)	Heathrow Airport	<p>Whilst the policy objectives of Policy T4 of Part 1 of the Local Plan are noted there is now a clear need to make progress with the Opportunity Framework, in consultation with LB Hounslow, in order to provide clear guidance on how the London Plan targets and growth with this Opportunity Area are to be accommodated.</p> <p>Our clients welcome the opportunity to contribute to the preparation of the Opportunity Framework to ensure that the economic importance of the Airport is recognised and that the anticipated growth can be properly managed. Consistent with our representations on other parts of the Part 2 consultation we would comment that real improvements in public transport accessibility need to be delivered if the objective of achieving a modal shift away from the car is to be achieved. In the intervening time the need to protect highway capacity for airport related users and provide flexibility, where justified, in relation to car park standards will, in our clients' view, be necessary to ensure that the economic importance and operation of the Airport is not prejudiced.</p>	<p>The Council welcome the offer of involvement by the respondents once work on the Opportunity Framework commences. This is an initiative in support of the London Plan which the Mayor of London will lead on. It is likely to follow on from the review of the London Plan, now under way, when growth figures for London may be revisited and updated, together with the outcome of work by the Davies Commission.</p>
30/90; 31/108	Phil Rumsey; Veronica Rumsey	Heathrow Airport	<p>With future development at Heathrow Airport, the Council should seek to maintain air transport movements within current limits; improve air quality and reduce levels of congestion and noise.</p>	<p>Part 1 of the Local Plan already seeks to keep appropriate development within the area covered by the airport and related development within the immediate vicinity. It cannot limit air traffic movements but will look to reduce levels of congestion and noise from associated development in the vicinity of the airport.</p>
41/182; 44/210; 57/295	Grow Heathrow (May Mackenzie) ; Charlie Cooley; Transition Heathrow	Heathrow Airport	<p>No expansion of Heathrow Airport.</p>	<p>This is beyond the remit of the Local Plan.</p>

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55/269	Grow Heathrow (Heathrow Greentech)	Heathrow Airport	Heathrow Airport already has made considerable damage to the environment and the community, so there should be no further expansion and be encouraged to reduce their operations.	This is beyond the remit of the Local Plan.
50/233	Heathrow Airport Ltd (Planning and Programmes)	e) Transport and Infrastructure 2. Heathrow Airport	<p>HAL is encouraged by the Council's desire to adopt a Heathrow Area LDD and a Heathrow OAPF (with the GLA). To date, the content of these documents, including the boundary definition has been vague, however it is our intention to work collaboratively with the Council and the GLA in framing these documents.</p> <p>While we acknowledge the Council's position on the expansion of the airport, both in size and air traffic movements, it is important that any future documents nevertheless support the refurbishment and renewal of Heathrow's infrastructure particularly where this will also lead to environmental improvements in the way the airport operates, or in the performance of buildings/energy use/lower emissions.</p> <p>Additionally, we feel it is important that Part 2 acknowledges the current review of airport capacity in the South East of England which may inform a Government decision on where additional airport capacity will be located. To this end, we recommend that the supporting text to any policy on Heathrow should be along the following lines:</p> <p>"The Government has set up an Airports Commission to examine airport capacity in the South East of England, which will include whether to expand hub capacity at Heathrow Airport. Whatever the recommendation of the Commission and the subsequent decision of Government, the Council acknowledges that the landscape of Heathrow Airport will undergo significant change. The Council will need to respond to these changing circumstances at the appropriate time which may include revisions to the Local Plan."</p> <p>Heathrow's role as a major public transport hub should also be considered and supported in Part 2. We have mentioned the location of office and hotel uses on airport land where they are in convenient reach of these interchanges, however we also regard the upgrade and improvement of underground, rail, bus and coach facilities being priority areas for any future documents. Heathrow's extensive public transport facilities and services, especially local bus services, provide significant benefits to the local communities around the airport and should be acknowledged and supported. Any further improvements that are likely to increase the airport's accessibility and public transport mode share should also be supported.</p> <p>The Development Management DPD also needs a specific policy regarding Public Safety Zones to ensure that the number of people living, working and/or congregating in the PSZ is not increased as a result of new development.</p>	<p>The Council welcomes the offer of continuing working co-operatively with the respondents on a future Opportunity Area Framework in conjunction with the Mayor of London who will be leading this work.</p> <p>Any text in the Plan on the Davies Commission would quickly fall out of date and will not be included.</p> <p>The role of the airport at national, regional and local levels is already acknowledged in Part 1 of the Plan and there is no need to re-iterate this in Part 2.</p> <p>The Council accepts the need to include a specific policy in its Development Management Policies regarding Public Safety Zones.</p>
54/244	Transport for London (Borough Planning)	Heathrow	TfL is currently undertaking a feasibility study for a new hub airport for London. A mayoral report 'A New Airport for London Part III' will expand upon the Mayoral priorities and aspirations on air travel and will be published shortly.	Noted.

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	<b>Transport and Infrastructure</b>	<b>3. RAF Northolt-</b> Civil flights at RAF Northolt		
24/47	John Williams	Page 7, item e)3 -RAF Northolt	Mitigate the effects of any increase in aircraft movements on traffic in West End Road.	The Council will look to its Local Implementation Plan to mitigate the impact of any additional traffic resulting from increased aircraft activity at Northolt.
26/70	British Airways Plc (Nathaniel Lichfield and Partners)	Northolt Airport	<p>Whilst the growth of civil flights at RAF Northolt is not a substantive concern in terms of competition with Heathrow Airport the potential for increased activity to add to local road congestion is. Allowing civil flights to increase without proper consideration being given to the potential effects upon highway capacity and the need to improve public transport accessibility is a real concern.</p> <p>We would suggest that the Part 2 policies should include a policy specific to Northolt Airport which addresses the above issue.</p>	Noted.
38/151	Ruislip Residents Association	RAF Northolt	This policy need to include plans to mitigate the effects of increases in aircraft movements on traffic in West End Road.	Noted.
	<b>Transport and Infrastructure</b>	<b>4. Car Parking Standards -</b> Car parking standards for different type of uses, the submission of travel plans and transport assessments and the provision of electric charging points for vehicles.		
10/12	Glaxo Smith Kline (Nathaniel Lichfield and Partners)	Car Parking Standards	GSK is currently the largest employer at Stockley Park and whilst they support and encourage improvements to public transport to enable this location to become more accessible the fact remains that in relative terms it is poorly served and has a low PTAL level. This position is unlikely to substantively change in the foreseeable future even if proposals to improve north/south public transport links, as encouraged by the Part 1 Local Plan, are delivered. There remains therefore a major challenge for GSK to fully utilise their property asset by ensuring their employees are able to travel easily to the Stockley Park location. This situation has become exacerbated by the fact that current car parking standards do not reflect the trend for employee / floorspace densities to increase as large companies make more efficient use of their real estate assets. Against the above background we believe that the Part 2 Development Management policies need to incorporate a review of car parking standards for office developments. Such a review would be justified and timely as the 2011 London recognises that in Outer London the application of restrictive car park standards, relative to more generous standards outside of London, have been a disincentive to office investment.	Car parking standards generally are being reviewed by the Council as part of work involved in drafting its Development Management Policies.

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			<p>Policy 6.13 of the London Plan therefore provides flexibility in setting office parking standards, if Outer London Boroughs wish to adopt a more appropriate standard, noting that this should be done via a Development Plan Document. The Part 2 plan offers such an opportunity to review car parking standards for B1 office proposals which we believe should also be extended to existing offices where a clear business case can be made.</p>	
12/15	Matthew Roe (CGMS on behalf of Mayor's Office for Policing and Crime / Metropolitan Police Service)		<p>Point 4 deals with car parking for different types of uses. In terms of the police, it should be recognised that car parking is entirely influenced by operational needs and thus should be assessed on a site by site basis, as opposed to a specific policy.</p>	<p>The Council will always take the individual merits of a planning application into account when considering proposals submitted to it for planning permission.</p>
15/19	The Theatres Trust	e) Transport and Infrastructure Provision	<p>Please include sui generis in a car parking standards schedule for item 4.</p>	<p>By definition Sui Generis uses cover a wide range of activities and it will not be possible to come forward with a specific car parking standard for this group.</p>
17/26	Armstrong Rigg Planning, Geoff Armstrong	e) Transport and Infrastructure 4. Car Parking Standards 8. Developer Contributions to the Provision of Local Infrastructure	<ul style="list-style-type: none"> <li>• Car parking standards should reflect the increasing car ownership which exists</li> <li>• Developer Contributions should be considered on a site-by-site basis and allow for viability</li> <li>• This will ensure that contributions sought are compliant with the NPPF which states at paragraph 204 that obligations should only be sought where they are necessary to make the development acceptable in planning terms, directly relate to the development and fairly and reasonable relate in scale and kind to the development. therefore, developer contributions should be assessed on a site-by-site basis</li> <li>• Policies which relate to developer contributions to be sought need to ensure that figures are not set too high, as high rates of developer contributions could seriously restrict development within the borough, as developers consider the viability of developments and seek alternative locations which may offer lower contribution rates. This could result in a negative effect upon the economy of the borough and the supply of housing.</li> </ul>	<p>The Council is aware of national planning policy requirements regarding the wording and flexible interpretation of planning policies. It will take local car use into account in setting its detailed parking standards in Part 2.</p>
26/71	British Airways Plc (Nathanial Lichfield and Partners)	Car Parking Standards	<p>Whilst the proposals to improve public transport accessibility to Heathrow Airport are fully supported it is likely to remain the case that a high proportion of Heathrow's employees and customers will need to travel to the airport by car.</p> <p>Furthermore, the London Plan recognises that in Outer London the application of restrictive car parking standards, relative to more generous standards outside of London, has been a disincentive in</p>	<p>Car parking standards generally are being reviewed by the Council as part of work involved in drafting its Development Management Policies.</p>

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			<p>relation to office investment. Policy 6.13 of the 2011 London Plan therefore provides flexibility in setting office parking standards if Boroughs wish to adopt a more generous standard noting that this should this be done via a Development Plan Document.</p> <p>The Part 2 plan offers an opportunity to review car parking standards for B1 office proposals which we believe should also be extended to existing offices where a business case can be made.</p>	
54/241	Transport for London (Borough Planning)	Cycle parking	<p>The policies that have been included are considered to be consistent with the London Plan transport policies however there are key omissions that TfL would expect to see included to ensure full conformity.</p> <p>Cycle parking In accordance with London Plan policy 6.9 'Cycling' this policy should reference the London Plan minimum standards and also provide guidance on appropriate cycle parking locations and the provision of changing and showering facilities for employment use.</p>	<p>Cycle parking standards generally are being reviewed by the Council as part of work involved in drafting its Development Management Policies.</p> <p>It is not considered necessary to repeat the standards included in the London Plan in addition to these revised standards.</p>
54/243	Transport for London (Borough Planning)	Coaches	<p>Considering the presence of Heathrow airport and the subsequent prevalence of hotels within Hillingdon a policy on the provision of coach parking should be included in accordance with London Plan policy 6.13 'Parking'</p>	<p>Coach parking standards are being reviewed by the Council as part of work involved in drafting its Development Management Policies.</p>
59/301	CgMs on behalf of Mayor's Office for Policing and Crime / Metropolitan Police Service	Topic Area: Transport And Infrastructure	<p>Point 4 deals with car parking for different types of uses. In terms of the police, it should be recognised that car parking is entirely influenced by operational needs and thus should be assessed on a site by site basis, as opposed to a specific policy.</p>	<p>The Council will always take the individual merits of a planning application into account when considering proposals submitted to it for planning permission.</p>
	<b>Transport and Infrastructure</b>	<b>5. Safeguarding Recreational, Leisure and Community Facilities - Safeguarding the use of recreational, leisure and community facilities.</b>		
12/16	Matthew Roe (CGMS on behalf of Mayor's Office for Policing and Crime / Metropolitan Police Service)		<p>Point 5 seeks to safeguard existing community facilities. The MOPAC believe facilities should be safeguarded unless replacement facilities are proposed on or off site which serve the needs of the area; or the development will enable the delivery of approved strategies for service improvements. This no net loss approach allows for the objectives of the MOPAC strategies to be met, by allowing the release of parts of the estate to allow reinvestment in policing.</p>	<p>The Council will always take the individual merits of a planning application into account when considering proposals submitted to it for planning permission.</p>
15/18	The Theatres Trust	e) Transport and Infrastructure Provision	<p>We would support a policy at item 5 to protect community facilities and suggest that an all-inclusive description is contained within the text for clarity and continuity, such as - <i>community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.</i></p>	<p>The Council will always take the individual merits of a planning application into account when considering proposals submitted to it for planning permission.</p>

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			<p>This would obviate the need to provide examples, and would cover the infrastructure as stated in item 70 of the National Planning Policy Framework on page 17 which advises that to deliver the social, recreational and cultural facilities and services that the community needs, planning policies and decisions should plan for the use of shared space and guard against unnecessary loss of valued facilities. Also to ensure that established facilities and services are retained and able to develop for the benefit of the community.</p> <p>A typical policy would state, for example, that the council will protect existing community, cultural and social facilities by resisting their loss or change of use unless replacement facilities are provided on site or within the vicinity which meet the need of the local population; or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision, and it has been demonstrated that there is no demand for another similar use on site.</p>	
24/48	John Williams	Page 8, item e) 5 - Safeguarding Recreational, Leisure and Community Facilities	There is a need not only to safeguard existing facilities but also to review and provide for future needs.	Agreed – the Council will keep its plan under review in future to ensure it provides for future needs.
37/118	John Blackwell on behalf of London Gaelic Athletic Association	Section E5: Safeguarding Recreational, Leisure and Community Facilities	<p>The GAA as a cultural, social and sporting organisation provides for mens and ladies Gaelic Football, Hurling and Camogie at adult level as well as youth activities for the same sports. The GAA has been playing and administering Gaelic games at this site since the early 1970s and we believe that the open space, sport, recreational and social activities both on and off the pitch would be better reflected in an open space, sport and recreational designation or equivalent of the site. The London GAA site in South Ruislip has been developed for sports amenities and sports administrative purposes over a period of a number of years.</p> <p>The Proposed Development Management Policies issued under the Hillingdon Local Plan: Part 2 Consultation Paper identify the safeguarding of the use of recreational, leisure and community facilities as a priority under item 4 of Section (e) Transport and Infrastructure. We fully support this as a priority and welcome the inclusion of policies not only seeking to safeguard but also, we suggest, positively encouraging the enhancement of existing sports facilities (such as those at West End Road, South Ruislip). Such an approach would be consistent with the guidance of the National Planning Policy Framework (NPPF) and be in accordance with the Strategic Policies of the Local Plan Part 1. These documents advise that policies should be based on an up-to-date assessment of need and existing provision of open space, sports and recreational facilities. In addition to identifying sites for new development, they should assess facilities and their scope for improvement and expansion.</p>	The Council considers that sufficient protection is already given in this area by policies in the National Planning Policy Framework, London Plan and Part 1 of the Hillingdon Local Plan. It is not necessary to further add to this in Part 2.

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			The existing outdoor, pitch and built sport and leisure facilities of the Borough are important assets, serving the communities in which they are located and, in some instances, the wider area, as in the case of the GAA's facility at Ruislip. The potential for upgrading or enhancing facilities, (particular where contributing to local community provision), should be recognised and encouraged in Part 2 of the Plan in a similar manner to that in which Policy EM5 (Sport and Leisure) of Part 1 of the Hillingdon Local Plan (November 2012) seeks to safeguard, enhance and extend the network of sport and leisure facilities in the borough.	
41/183; 44/211; 55/296; 57/296	; 57/272 hrow (May Mackenzie) ; Charlie Cooley; Grow Heathrow (Heathrow Greentech; Transition Heathrow	Safeguarding Recreational, Leisure and Community Facilities	Change of use from community facilities should not be permitted.	The Council will not be able to completely prevent changes of use in the manner proposed here.
59/302	CgMs on behalf of Mayor's Office for Policing and Crime / Metropolitan Police Service	Topic Area: Transport And Infrastructure	Point 5 seeks to safeguard existing community facilities. The MOPAC believe facilities should be safeguarded unless replacement facilities are proposed on or off site which serve the needs of the area; or the development will enable the delivery of approved strategies for service improvements. This no net loss approach allows for the objectives of the MOPAC strategies to be met, by allowing the release of parts of the estate to allow reinvestment in policing.	The Council will always take the individual merits of a planning application into account when considering proposals submitted to it for planning permission. It will take London Plan policies into account regarding community uses.
	<b>Transport and Infrastructure</b>	<b>6. Medical and Health Facilities</b> -Provision of medical and health facilities within town centres.		
30/91; 31/109	Phil Rumsey; Veronica Rumsey	Medical and Health Facilities	Provision of medical and health facilities within town centres and the villages.	The Council cannot use the Local Plan to direct medical services into the Heathrow Villages. It will take local health care needs into account when considering future applications for planning permission in the area.
38/152	Ruislip Residents Association	Medical and Health Facilities	We believe existing facilities need more parking provision for patients, especially badge holders.	Car parking standards are being reviewed by the Council as part of work involved in drafting its Development Management Policies.
	<b>Transport and Infrastructure</b>	<b>7. Religious Worship and Assembly</b> -New build and conversion of buildings for religious facilities.		
2/3	Streamside Gospel Hall Trust (Tim Douss)		I believe that it is important to make adequate provision for the religious and spiritual needs of the local community and that this must be considered within any Local Plan. As a Trustee of a local Church Group we would like to see specific provision made for the accommodation of local community groups to include the following considerations. "A commitment to support community organisations throughout the Borough, including diverse faith communities, in recognition of the social, spiritual and moral needs of our communities." As I am sure you	Part 1 of the Local Plan already makes clear the Council's commitment to improve the provision of community facilities throughout the borough.

## Appendix 1 (b): Schedule of Respondents' Comments and Officers' Proposed Responses, including Proposals Received in Call for Sites

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
			will appreciate, that these requirements are intertwined with the very existence of local communities and need to be, not only recognised but provided for positively.	
30/92; 31/110	Phil Rumsey; Veronica Rumsey	Religious Worship and Assembly	New Build of buildings for Religious facilities. No Conversions of existing buildings.	It will not be possible to prevent all changes of use in the manner proposed – the Council must consider each planning application on its merits.
34/114	Hillingdon Inter Faith Network	7. Religious Worship and Assembly New build and conversion of buildings for religious facilities	<p>To be explored:</p> <ul style="list-style-type: none"> <li>• specific statements regarding the need for community planning to better reflect the changing demographics of community need as identified through the latest census analysis so as to address potential community tension.</li> <li>• opportunities for identifying suitable space which is not required for domestic or commercial use so that new religious assembly places can be made available.</li> </ul>	Part 1 of the Local Plan already makes clear the Council's commitment to improve the provision of community facilities throughout the borough.
	<b>Transport and Infrastructure</b>	<b>8. Developer Contributions to the Provision of Local Infrastructure</b> -Funding of local infrastructure.		
007/9	Highways Agency (Steven Hall)		<p>The HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's strategic road network (SRN) on behalf of the Secretary of State for Transport. In the case of Hillingdon, this relates to the M25 Junctions 14 to 17, the M4 Junctions 3 to 4b, the M40 Junctions 1 and 1a and the A3113. Sections of the M4 and M25 are currently congested during the peak hour period. Consequently, we would be concerned if any material increase in traffic were to occur on these sections of the SRN as a result of development in Hillingdon without careful consideration of mitigation measures. DfT circular 02/2007 (Planning and the Strategic Road Network) sets out how the HA will take part in the development of Local Plans from the earliest stages. Please see HA Planning protocols guidance. <a href="http://www.highways.gov.uk/our-road-network/planning/">http://www.highways.gov.uk/our-road-network/planning/</a></p> <p>On an advisory basis, we also reiterate the importance of the production of Transport Assessments in order to support any development likely to have significant transport implications. The HA will be particularly interested to see reference to transport and infrastructure. The HA support the inclusion of the Infrastructure Schedule within the Core Strategy to identify the schemes planned within the borough. The infrastructure schedule currently lists the HA Managed Motorways programme of works. We are currently considering how the Managed Motorways might be delivered on the M4 between Junctions 3 and 12.</p>	Noted.

## Appendix 1 (b): Schedule of Respondents' Comments and Officers' Proposed Responses, including Proposals Received in Call for Sites

ID	Consultee	Policy/para/section/ map/ table	Summary of representation	Council's Response
9/11	Zoe Taylor on behalf of Drs Garsin, Madhok, Donner & Ramchandani, Belmont Medical Centre	RAF Uxbridge	We are a GP Practice within Uxbridge and are very concerned about the lack of medical services that it seems are being made for this site. Pressure is already being put upon practices in the area within the present increases in the population in Uxbridge. We understand that a new school will be required on this site. This development as obviously it will be housing a large community, thousands of new residents will need GP services too. There is no extra capacity with us or other local practices. We feel this is in need of urgent attention as local practices will not be able to maintain their high standards of care if they are expected to manage the residents on this new development.	The Council is aware of the need for new health care provision at St Andrews Park and will continue to discuss further provision there during the Plan period with the appropriate health service agencies.
30/93; 31/111	Phil Rumsey; Veronica Rumsey	Developer Contributions to the Provision of Local Infrastructure	Funding of Local Infrastructure and Planning Enforcement teams.	In major development schemes the Council does already seek contributions towards such services where considered to be appropriate.