

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

February 2015

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

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

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

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

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

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

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

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

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

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

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

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			<p>DME14 DME15 DMT1</p>	<p>a) Suggest specifically mentioning The Manor Farm Complex in paragraph 2.29 as it includes several visitor attractions i.e. Winston Churchill Hall, Great Barn, Cow Byre, Library, Motte and Bailey site and Manor Farmhouse Heritage Centre.</p> <p>b) Suggests giving further consideration to limiting development in front and side gardens as part of Policy DMH6 (Garden and Backland Development).</p> <p>c) Caution against encouraging developers to adopt cladding systems without adequate evidence of their durability, ease of maintenance and cost effectiveness as part of policy DMHB16 (Living Walls and Roofs).</p> <p>d) Wish to see Policy DME15 (Development in Green Chains) amended to include important parts of the current Local Plan Policy EM2 Green Belt, Metropolitan Open Land and Green Chains - Clause (iv) of the draft Policy should be amended as follows: “the provision and improvement of suitable recreational facilities <u>where they are compatible with the conservation value of the area, and retain the openness of the Green Chain.</u>”</p> <p>e) Ruislip Station, Station Approach, off Pembroke Road should be added to the list of Key Transport Exchanges as it serves both Metropolitan and Piccadilly tube lines and seven bus routes.</p>	<p><u>Proposed Change</u></p> <p>Include reference to the Manor Farm Complex Ruislip and Eastcote House Gardens- HLF funded projects in the list of local and regional destinations in paragraph 2.29.</p> <p>Add an additional bullet point to paragraph 2.29 to read:</p> <p><i>Heritage assets such as Ancient Monuments, listed buildings, historic towns and villages, parks and gardens.</i></p> <p>Reword the first paragraph of DME4 (Visitor Attractions) to readThe Council will <i>encourage visitors to heritage sites and will</i> support, in principle, proposals that enhance the visitor offer in the borough, subject to:</p> <p><u>Proposed Change</u></p> <p>b) Insert additional bullet point on the importance of gardens in terms of their contribution to the character of areas into Policy DMH6 (Garden and Backland Development).</p> <p><u>Proposed Change</u></p> <p>Policy DMHB16 (Living Walls and Roofs) will be deleted and an additional criteria relating to living walls and roofs will be added to Policy DME11 (Sustainable Development Standards).</p> <p>c) Policy DME15 (Development in Green Chains) already contains</p>

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

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

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

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

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

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

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

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

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79	1	SSA Planning on behalf of KFC Ltd	DMTC4	<p>The harm that Policy DMTC4 (Location and Concentration of Town Centre Uses) seeks to prevent has not been identified. It will also be impossible to assess whether the policy has been effective.</p> <p>No monitoring criteria are proposed by which to measure success and no action is suggested to deal with any failure to be effective that may be assessed on review.</p> <p>Request the deletion of part (B) of Policy DMTC4 and the inclusion or a reference within part (A) to a definition of what will be considered an unacceptable concentration of the uses listed in part (A).</p>	<p>The harmful impact that a concentration of the uses referred to in criterion A can potentially have on local amenity, character and function of an area, noise levels, traffic generation and community safety in town centres are identified in the supporting text contained in paragraphs 3.20 - 3.31.</p> <p>Further clarification on the potential impacts of hot food takeaway on childhood obesity will be added to the supporting text in paragraphs 3.25 - 3.27 to make explicit the Council's rationale for proposing policy criterion B in relation to schools.</p> <p>The effectiveness of the Policy, if adopted, will be monitored through the Council's Annual Monitoring Report, which uses a number of indicators in relation to retail capacity.</p> <p><u>Proposed Change</u></p> <p>Insert new paragraph into supporting text to read:</p> <p><i>In considering unacceptable concentration of hot food take aways, drinking establishments, betting shops, night clubs, casinos amusement centres and similar uses, the Council will apply the maximum threshold of 15% of primary and secondary frontages set out in criteria A ii) and B ii) of draft Policy DMTC2.</i></p>

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

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					<p><i>amusement centres and similar uses, the Council will apply the maximum threshold of 15% of primary and secondary frontages set out in criteria A ii) and B ii) of Draft policy DMTC2.</i></p> <p>Part B is considered superfluous as the part i) of the Policy seeks to avoid adverse impacts due to an unacceptable concentration of these uses in one area. This provision would include adverse impacts on the sensitive uses listed in Part B.</p> <p><u>Proposed Change</u></p> <p>Propose removal of part B of the Policy.</p>
79	3	SSA Planning on behalf of KFC Ltd	DMTC4	<p>Consider that full regard has not been given to national policy and advice in preparing Policy DMTC4 (Location and Concentration of Town Centre Uses), a reasoned justification for the draft Policy has not been provided and the supporting text at paragraphs 3.25-3.27 of the draft Local Plan does not explain what a “sensitive community use” might be or why restaurants or hot food takeaways should be resisted in proximity to them or to schools.</p> <p>Request the deletion of part (B) of Policy DMTC4 of the draft Local Plan and the inclusion within part (A) or a reference within part (A) to a definition of what will be considered an unacceptable concentration of the uses listed in part (A).</p>	<p>The National Planning Policy Framework recognises the important role of the planning system in creating healthy communities. Diet is a key determinant both of general health and obesity levels and fast food takeaways are linked to childhood obesity, which in turn can reduce life expectancy and increase poor health.</p> <p>The proliferation of takeaway food shops in the borough, especially in proximity to schools, is therefore a cause for concern, which the Council seeks to address through Policy DMTC4 (Location and Concentration of Town Centre Uses). By definition an unacceptable concentration is one which would have an adverse</p>

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					<p>cumulative impact on the amenity of an area. What may be considered sensitive community uses is explained by way of examples in paragraph 3.22.</p> <p><u>Proposed Change</u></p> <p>Insert new paragraph into supporting text to read:</p> <p><i>In considering unacceptable concentration of hot food takeaways, drinking establishments, betting shops, night clubs, casinos amusement centres and similar uses, the Council will apply the maximum threshold of 15% of primary and secondary frontages set out in criteria A ii) and B ii) of draft policy DMTC2</i></p> <p>Part B is considered superfluous as the part i) of the Policy seeks to avoid adverse impacts due to an unacceptable concentration of these uses in one area. This provision would include adverse impacts on the sensitive uses listed in Part B.</p> <p><u>Proposed Change</u></p> <p>Propose removal of part B of the policy.</p>
79	4	SSA Planning on behalf of KFC Ltd	DMTC4	Consider plan unsound because the specific harm that the policy seeks to prevent or issues it seeks to address have not been identified. It is also difficult to link it to any policy of the NPPF and because the onus is on the plan-making authority to establish consistency, it	The harmful impact that a concentration of the uses referred to in criterion A can potentially have on local amenity, character and function of an area, noise levels, traffic generation and community safety in town centres are identified in

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				<p>must be assumed at this stage that the Policy does not comply.</p> <p>Request the deletion of part (B) of Policy DMTC 4 (Location and Concentration of Town Centre Uses) of the draft LP and the inclusion within part (A) or a reference within part (A) to a definition of what will be considered an unacceptable concentration of the uses listed in part (A).</p>	<p>the supporting text contained in paragraphs 3.20 - 3.31.</p> <p>Insert new paragraph into supporting text to read:</p> <p><i>In considering unacceptable concentration of hot food takeaways, drinking establishments, betting shops, night clubs, casinos amusement centres and similar uses, the Council will apply the maximum threshold of 15% of primary and secondary frontages set out in criteria A ii) and B ii) of draft Policy DMTC2.</i></p> <p>Part B is considered superfluous as the part i) of the Policy seeks to avoid adverse impacts due to an unacceptable concentration of these uses in one area. This provision would include adverse impacts on the sensitive uses listed in Part B.</p> <p><u>Proposed Change</u></p> <p>Propose removal of part B of the Policy.</p>
79	5	SSA Planning on behalf of KFC Ltd	DMTC4	<p>Consider that the draft Policy is not based on any objectively assessed development requirement. The fact that neither proximity nor sensitivity is defined means that the Policy could have the effect of banning restaurants and hot food takeaways from a large majority of the borough. Because no assessment has been made of the number of hot food</p>	<p>The intention of draft Policy DMTC4 is to regulate the concentration of the town centre uses specified in criterion A in out of centre locations. What may be considered sensitive community uses is explained by way of examples in paragraph 3.22.</p> <p>Part B is considered superfluous as the</p>

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

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

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

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

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

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

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

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

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

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

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

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

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				acceptable living standards for residents."	
53	12	Cllr Janet Duncan	Page 38	Proposes new policy to state: "New housing should not be permitted on sites and in areas where air quality is above the legally safe limit to protect health."	<p>The NPPF has a presumption in favour of sustainable development. Whilst there is support in the NPPF for meeting air quality limits there is also a need to ensure all mitigation is proactively explored. However, officers are of the view that revisions to Policy DME18 (Air Quality) could be made to clarify the intention of the policy.</p> <p><u>Proposed Change</u></p> <p>Reword Policy DME18 (Air Quality) to read:</p> <p><i>Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with, and contribute towards meeting, EU limit values and national objectives for pollutants. Proposals should, as a minimum: be at least air quality neutral; include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; actively contribute towards the continued improvement of air quality, especially within the AQMA.</i></p>
53	13	Cllr Janet Duncan	Page 38	Considers that an increase in housing provision should be accompanied by an appropriate increase in health, education, community, recreational and leisure facilities and these should be secured before	The Development Management Policies and Site Allocations document will be updated to reflect the latest position with regards to health and education facilities.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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				<p>targets/percentages set out in DME112.</p> <p>c) Point out misinterpretation in DME116 (Water Efficiency in Non-Residential Developments) of paragraph 5.62 of London Plan with regards to water neutrality.</p> <p>d) Suggest identifying the Regionally Important Geological site in Hillingdon on the Policies Map and including relevant policy.</p> <p>e) Point out that the draft FALP includes a higher annual housing target and that the Local Plan Part 1 will need to be reviewed following adoption of the FALP.</p> <p>f) Suggest that net change in MOL, Green Belt and Green Chain land is included.</p> <p>g) Suggest that paragraph 4.11 in revised to make clear that Prologis Park is a strategically significant industrial location.</p> <p>h) Support the designation of Stonefield Way and North Uxbridge as SILs and raise no objection to the de-designation of the Cape Boards site.</p>	<p><u>No Proposed Change</u></p> <p>d) The Policies Map will be amended to identify designated Regionally Important Geological sites.</p> <p>e) The content of the FALP is noted. The Local Plan Part 2 will be updated to include reference to Hillingdon's revised housing target contained in the FALP.</p> <p><u>Proposed Change</u></p> <p>Review annual housing target and the Local Plan Part 1 following adoption of the FALP to be in conformity with the London Plan.</p> <p>f) The comments regarding the Green Chain and Green Belt are noted.</p> <p><u>Proposed Change</u></p> <p>A table showing the net change in MOL, Green Belt and Green Chain land will be inserted.</p> <p>g) Prologis Park will be referred to in the Plan as a Strategic Industrial Location.</p> <p><u>Proposed Change</u></p> <p>Revise wording of paragraph 4.11 to read '<i>...has been designated as a strategically significant industrial location as part of the Hayes Industrial Area</i>'.</p> <p>h) Support noted and welcomed.</p>
37	1	D.K. Symes	DME11	Operational activities, which include 'mineral development', should be excluded from these	DME11 (Sustainable Design Standards), DME12 (Reducing Carbon Emissions)

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

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

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

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

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

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

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

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				misconnections.	
98	3	Environment Agency	DMEI10	<p>The recommendations and development principles from the SFRA and SWMP should directly inform Policy DMEI10 (Management of Flood Risk) so it is clear what developments in flood risk areas should be achieving to reduce the risk of flooding. It is recommended that:</p> <p>a) the wording is amended to reflect the fact that sites within Flood Zones 2, 3a and 3b will be required to pass the sequential test before submitting a Flood Risk Assessment; and</p> <p>b) where sites are located in Flood Zones 2, 3a or 3b and the sequential test has been passed, that the Policy requires development to be planned using a sequential approach within the site so that more vulnerable developments are placed in the least risky areas of the site.</p> <p>Further suggest considering how windfall sites, not included in the site allocations, will be sequentially tested and that there is additional text to make it clear that the LLFA will be responsible for assessing flood risk in critical drainage areas.</p> <p>It is unclear in what type of scenario it is envisaged that developments may make contributions in addressing surface water flood risk. Further information should be provided on this aspect of the Policy.</p> <p>Recommend that the Policy requires development to minimise the vulnerability of the development to flood risks through design and layout. In addition flood storage areas should be protected and provided for wherever</p>	<p>Policy DMEI10 (Management of Flood Risk) is informed by the SFRA and SWMP which is referenced in the associated wording.</p> <p><u>Proposed Change</u></p> <p>Site Allocations document informed by the SFRA should have reference to the SFRA and associated flood risk information within it to make it clearer.</p> <p>Although sequential test wording should not just repeat NPPF it is agreed that it should be made clearer in the Policy that for any windfall sites an agreed sequential test and area for the sequential test agreed early prior to any review of the detail of the FRA taking place.</p> <p>Roles and responsibilities on who reviews what is not appropriate for inclusion into the Policy. It is contained within the SFRA.</p> <p>Agree changes to the offsite contributions should be for all flood risks.</p> <p>Future flood risks and climate change for events over design standard.</p> <p>No site allocations are next to flood defences, therefore this is a comment for windfall sites. However agree to amend Policy to reference defences in last paragraph to demonstrate that the</p>

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				<p>possible.</p> <p>Where development is proposed next to flood defences the applicant is expected to demonstrate that the defence would be adequate for the lifetime of the scheme. Where required, they are replaced or repaired to ensure this is the case.</p>	<p>risk level to the site is managed for the foreseeable future.</p>
98	5	Environment Agency	DMEI11	<p>This Policy has very strong requirements for the use of SuDs and it is positive that Policy 5.13 of the London Plan has been used as a framework for demonstrating an appropriate SuDs system.</p> <p>Suggest considering:</p> <p>a) if the same standard should be applied to all development within critical drainage areas</p> <p>b) liaising with Newham who are looking at this issue and drafting up a policy approach.</p> <p>c) encouraging developments to incorporate multiple SuDs.</p>	<p>Support noted and welcomed</p> <p><u>Proposed Change</u></p> <p>Amend Policy so that all developments not including household developments should reduce run off to greenfield run of rates.</p>
98	6	Environment Agency	DMEI12	<p>The Agency is pleased to see a commitment to improving water quality.</p> <p>Requiring developers to use SuDs will contribute to improving water quality associated with urban diffuse pollution, which we would encourage the promotion of, but is unlikely to have contribute significantly in the reduction of phosphates.</p> <p>Have concerns that it could be very onerous for applicants to demonstrate the requirements set out in the Policy</p>	<p><u>Proposed Change</u></p> <p>Discussions will take place with the Environment Agency to confirm the exact wording that they would like to see in Policy DMEI12 (Water Quality).</p>

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

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

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					<p><i>to be provided with the application."</i></p> <p>This is a land contamination policy, and therefore 'brownfield' as a term has not been used. It should be noted that all allocations for new homes are located on 'previously developed land' or 'brownfield' land; therefore the Policy is used to encourage the reuse of previously developed sites. There is more information on the term in the Supplementary Planning Guidance document on land contamination.</p> <p>The Policy does indicate necessary remedial works are implemented and the development needs to be made suitable for use, which is required to 'prevent development from being adversely affected by the presence of unacceptable levels of soil pollution.'</p> <p>The protection of groundwater is addressed in Policy DME13 (Protection of Groundwater Resources). The land contamination policy indicates remediation of controlled waters may also be necessary as part of any development works.</p> <p>Suggest reference is made to the Environment Agency's guidance on groundwater when the Supplementary Planning Guidance on land contamination is updated to an Supplementary Planning Document.</p> <p><u>No Proposed Change</u></p>

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63	1	Rapleys LLP on behalf of Cedarwood Asset Management	DMEI18	Consider that the policy DMEI8 (Air Quality) should be amended to confirm that each case should be "taken on its own merit".	<p>The Policy sets out the general principles that new development in the borough will need to comply with. It is not considered that there a need to specify that development will be taken on its own merits.</p> <p><u>No Proposed Change</u></p>
70	7	Nathaniel Lichfield & Partners on behalf of British Airways	DMEI18	<p>Policy DMEI18 (Air Quality) potentially places an embargo on all development within the surrounding location of Heathrow Airport to the clear detriment of the local economy and the operation of Heathrow Airport.</p> <p>It is unreasonable to require developments that are in areas already above the national and European regulated levels to demonstrate reductions in emissions to ensure air quality levels for existing receptors are met. Unless it is clear that this policy does not unduly restrict development it should be deleted.</p>	<p>The NPPF states in paragraph 124 that planning policies should sustain compliance with and contribute towards meeting EU limit values or national objectives. It is proposed to reword Policy DMEI18 (Air Quality) to better reflect this. The Policy does not restrict development, it requires development to be appropriately mitigated and for it to contribute towards the improvement of air quality.</p> <p><u>Proposed Change</u></p> <p>Reword Policy DMEI18 to read:</p> <p><i>Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with, and contribute towards meeting, EU limit values and national objectives for pollutants. Proposals should, as a minimum: be at least air quality neutral; include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; actively contribute towards the continued improvement of air</i></p>

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

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

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

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		(Haulage) Limited		the overall financial viability of a proposed scheme".	DMEI17, regardless of the financial viability of a proposed scheme. <u>No Proposed Change</u>
82	3	Deloitte Real Estate on behalf of CEMEX Properties Ltd	DMEI17	Broadly support Policy DME17 (Development of Land Affected by Contamination), but suggest that the wording is amended to include reference to financial viability. The policy should be worded to include the wording ' <i>taking account of the overall financial viability of a proposed scheme</i> '.	Regardless of viability considerations the Council would not permit development on a site which is subject to contamination. <u>No Proposed Change.</u>
53	18	Cllr Janet Duncan	DMEI18	Suggests new bullet heading for policy DMEI 18 (Air Quality) (i) New housing will be resisted on sites and in areas where air quality is above the legally safe limit for human health; and new bullet heading (ii) Trees which trap air pollution will be part of landscaping schemes for development proposals.	<u>Proposed Change</u> Reword Policy DMEI18 to read: <i>Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with, and contribute towards meeting, EU limit values and national objectives for pollutants. Proposals should, as a minimum: be at least air quality neutral; include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; actively contribute towards the continued improvement of air quality, especially within the Air Quality Management Area.</i>
56	10	Heathrow Airport Ltd	DMEI18	Support policy DMEI18 (Air Quality) insofar as it seeks air quality neutral development proposals, but question wording of the second	<u>Proposed change:</u> Reword Policy DMEI 18 to read:

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

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

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

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

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

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

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

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				<p>target 'Reversion of the AQMA' but feel this does not have sufficient clarity of meaning.</p> <p>c) Indications in the Local Plan Part 1 in relation to the use of biomass for AQMAs and an updated Air Quality SPD have not been taken account of in the Local Plan Part 2.</p> <p>d) Policy DMT6 (Vehicle Parking) and the associated schedule at Appendix A is not in conformity with the London Plan.</p> <p>e) Policies relating to nature conservation in the Plan are not consistent with national planning guidance and are not in conformity with the London Plan 2011. The Local Plan is being advanced without a clear and transparent evidence base for nature conservation.</p> <p>f) Designations do not accurately reflect the nature value of at least 2 significant open spaces, Lake Farm Country Park and Cranford Park. As the Biodiversity Action Plan (BAP) is not being progressed the Local Plan is not consistent with London Plan 2011's requirement that species/habitats protection and enhancement/extent is through BAP targets.</p> <p>g) Policy DMEI7 (Biodiversity Protection and Enhancement) is inconsistent with national guidance. Suggest revising the Sustainability Appraisal's Recommendation 1 to ensure that it requires a net environmental gain in line with NPPF.</p> <p>h) In the interests of nature conservation, the provision of public open space and accuracy,</p>	<p><i>demonstrate appropriate reductions in emissions to sustain compliance with, and contribute towards meeting, EU limit values and national objectives for pollutants. Proposals should, as a minimum: be at least air quality neutral; include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; actively contribute towards the continued improvement of air quality, especially within the Air Quality Management Area.</i></p> <p>b) The wording of the target for the Air Quality SA Objective in Appendix 2 will be changed from "reversion" to "revocation". This is a defined legal process under the local air quality management regime. Official revocation of the AQMA would occur when the local authority was satisfied that air pollution levels had been brought down to within the national objectives and EU limit value standards.</p> <p><u>Proposed change:</u></p> <p>Replace "reversion" to "revocation" in Target for SA Objective "To improve air quality standard that is acceptable for human and ecological health"</p> <p>c) Biomass - the Mayor's SPG on Sustainable Design and Construction sets out guidance on the implementation of air quality neutral assessments, as</p>

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

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

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

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

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				benefit.”	
53	19	Cllr Janet Duncan	DMCI1	Considers that this policy DMCI1 (Retention of Existing Community Infrastructure) is not worded strongly enough to protect existing facilities and should be amended to read: "Proposals involving ... will not be permitted unless ..."	With a limited number of exceptions, policies in the Plan have been written in a positive light to reflect the presumption in favour of sustainable development contained in the NPPF. This means that policies state that development will be allowed, rather than will not be allowed, subject to certain criteria. <u>No Proposed Change</u>
57	1	Savills on behalf of London Diocesan Fund	DMCI1	Object to DMCI1 (Retention of Existing Community, Sport and Education Facilities) on the basis that: a) the demonstration that there is no requirement for a building in continued community use because of the condition or location should be a test in itself to justify the loss of it b) the policy is unduly onerous and restrictive and contains mutually exclusive criteria c) one of the tests being satisfied is sufficient. Suggest revised wording for DMCI1. Seek to include Ladygate Lane, Ruislip and Glovers Grove as a site allocation.	Policy DMCI1 reflects the provisions of Policy C11 in the Local Plan Part 1 which seeks to resist the loss of community facilities. Officers are of the view that community infrastructure is important in promoting healthy communities and social cohesion and should be subject to a high level of protection. The policy sets out specific circumstances where the loss of community infrastructure will be allowed. These criteria are stringent, but are not considered to be inconsistent with the NPPF. <u>No Proposed Change</u>
91	1	Garden City Estates Residents Association	DMCI1	The south of the borough has seen spaces for sport being used to deliver new housing. The situation is now that facilities for community, sport and education are insufficient to meet the needs of existing residents.	Policy DMCI 1 seeks to retain existing community, sport and education facilities. The need for community facilities on existing sites has been identified in the Site Allocations

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

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

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

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

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

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

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

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

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

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

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

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

February 2015

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