

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

February 2015

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

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

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

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

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

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

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

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				<p>cables and there may need for further essential utility development at the site.</p> <p>Request that no permanent structures are built over or under cables or within the zone specified in the agreement, materials or soil are not stacked or stored on top of the cable route or its joint bays and that unrestricted and safe access to any cable(s) must be maintained at all times. .</p>	<p>Site is within close proximity to North Hyde sub-station. <i>New buildings should not be located beneath power lines. Site specific proposals should be discussed with National Grid at the earliest possible stage.</i></p>
39	1	Carter Jonas on behalf of Buccleuch Property	Policy SA10	<p>Welcomes the support provided for the opportunity to comprehensively redevelop site SA10 (Nestle), but consider that the mix of uses and density of development that might be achieved is unnecessarily constrained by the draft proposals for Site A and Site B.</p> <p>The justification for the provision of new B1 and B2 floorspace within the scheme is not clear and is likely to have a significant impact on the viability of development. This should be excluded. Also, it should be acknowledged that the site will be built in phases.</p> <p>The sites have potential to include a significant number of new homes, potentially accommodating up to 1,800 units. Other land uses that are considered appropriate for the site include a hotel, student housing, small scale retail and commercial, education, leisure and community facilities.</p>	<p>The Employment Land Study provides support for the release of this key site for non employment uses.</p> <p>The proposed higher percentage of non residential uses reflects its proximity to the town centre and the former industrial use of the site</p> <p>The density figures on sites A and B are based on the PTAL rating and reflect Table 3.2 in the London Plan.</p> <p>The site is not expected to be delivered until the final 5 years of the Plan. Given the uncertainties associated with the site at the present time it is difficult to be more specific but officers would wish to encourage comprehensive redevelopment proposals, rather than individual portions of the site coming forward on a piecemeal basis.</p> <p>Further discussions will take place with the landowner to develop proposals for the site that are economically viable and meet local needs.</p>

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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				schools in the Plan.	schools in the borough.
46	1	Cllr Ian Edwards	Proposed new site	Requests the allocation of the Old Coal Yard site at Tavistock Road for future development.	<p><u>Propose Change</u></p> <p>Officers proposed to allocate the Old Coal Yard Site for an appropriate mixed use development scheme.</p>
62	1	Douay Martyrs School, Roman Catholic Diocese of Westminster and Trustees of Guys Investment Limited	Proposed new site	Highlights the need for additional school places in the borough. Suggests that consideration should be given to the expansion of the Douay Martyrs School onto a portion of the Glebe farm site, which is designated Green Belt	<p>The latest position regarding secondary school provision in the Borough is set out in the School Capital Programme Update report to Cabinet in November 2014.</p> <p>The updated forecast shows a longer-term sustained pressure for additional secondary school places rising to 27 additional forms of entry over the next 8 years, with pressure for places commencing from 2016/17 onwards as predicted in previous forecasts. In particular, the forecast need for additional secondary school places is higher in the north / central parts of the Borough, which is where there tends to be higher numbers of pupils living outside the Borough travelling to a Hillingdon school.</p> <p>Officers are developing recommendations for consideration by Members to meet this secondary school places need - initially focusing on the next five year horizon and to be informed by targeted feasibility studies undertaken to date of specific secondary schools sites to assess their suitability for expansion.</p> <p>Officers have completed an initial appraisal of secondary school sites across the</p>

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

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

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

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

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

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

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

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

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

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

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				<p>local housing supply.</p> <p>Understand that a spatial planning framework for the Heathrow Opportunity Area has still not been prepared and consider this to be a serious omission which should be addressed now through the plan-making process.</p> <p>The Part 2 documents are unsound with these key omissions, and therefore fail all four tests of soundness. It is suggested that:</p> <p>a) the preparation of an interim housing policy addressing the revised housing requirements for the Borough, as set out in the FALP;</p> <p>b) consequent changes to Development Management Plan paragraphs 1.1 / 1.2 and 4.2 and Site Allocations and Designations paragraphs 3.1 and 4.1/4.2;</p> <p>c) the insertion of a policy regarding a spatial planning framework for the Heathrow Opportunity Area.</p> <p>Consider that Frog's Ditch Farm on Shepiston Lane and the adjoining CEMEX site do not merit its current Green Belt designation and should therefore be included in the schedule of proposed Green Belt deletions.</p>	<p>This will be updated as and when the review of the Local Plan Part 1 is undertaken.</p> <p>Following the issue of the FALP Inspector's report, the Local Plan Part 2 will be updated to reflect the revised housing target contained in the FALP.</p> <p>However, in order to meet this target it is not considered necessary to release significant areas of Green Belt land. The Council does not accept the need to release land at Frogs Ditch Farm from the Green Belt.</p> <p><u>No Proposed Change</u></p>
81	1	Deloitte Real Estate on behalf of USS	Paragraphs 5.1 - 5.10	Hayes Park on Meadhouse Lane is an established business park and does not serve any of the purposes for including land in the Green Belt. It should therefore be removed.	Hayes Park constitutes a low density grouping of industrial buildings by occupied by HJ Heinz and United Biscuits. The site is sparsely developed and does not have clearly defined boundaries. Given its location adjacent to Hayes Park officers are of the view that it would not be suitable for

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

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

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

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

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		Northwood, Eastcote Local History Society	11	as MOL. Suggest the inclusion of courtyards on either side of the Great Barn, the Duck Pond and St Martin's Approach car park, previously site of the Manorial Dovecote.	undertaken by the Council. Whilst minor changes can be made to the boundaries, additional evidence would be required to justify new MOLs. <u>No Proposed Change</u>
77	1	Ask Planning on behalf of KSIMC	New Green Chain Proposal 16: Ruislip Manor Sports & Social Club	<p>Object to the inclusion of Ruislip Manor Sports and Social Club, Grosvenor Vale, Ruislip as part of Green Chain link Site 16 on the basis that</p> <p>a) the designation will place an unnecessary constraint on the aspirations of current and future owners and users of the sports ground, and their desire for expansion and constant improvements; and</p> <p>b) the designation will virtually afford the site a similar status as Green Belt land or a Metropolitan Open Space, and in the process would place a significant constraint on the future use of the site for recreation and sports activities.</p> <p>The proposed Green Chain will not provide a suitable link with other green areas.</p> <p>There is no need for a green chain designation because the use of the site is already regulated by the policies and standards of Sport England. The recreational needs of KSIMC's members should be addressed instead of being discouraged. There are other sites that are more or equally suited for the 'Green Chain' in Ruislip Manor and elsewhere.</p>	<p>Ruislip Manor Sports and Social Club meets the criteria of policy DMEI5 as a designated Green Chain on the basis that it constitutes a valuable site for recreation.</p> <p>The Council is keen to protect this important site from other forms of development.</p> <p>In response to the points raised by the representor, officers are of the view that:</p> <p>a) In accordance with criteria iv) of the policy the proposed Green Chain designation will not necessarily prevent the improvement of recreational facilities at the site.</p> <p>b) The Green Chain designation does not carry the same weight as Green Belt or MOL. These designations do not prevent the use of the site as recreational facilities.</p> <p>Notwithstanding the existing protection afforded to the site, officers are of the view that the site meets the policy criteria and should be designated accordingly.</p> <p><u>No Proposed Change</u></p>

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

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

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

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				<p>acceptable.</p> <p>Are disappointed that the proposed policies would have a detrimental impact on the Trust's proposals for the Mount Vernon Hospital.</p> <p>Consider that site should be excluded from the Green Belt given its built up nature. The proposed SINC extension 13 is wholly inappropriate and undermines the redevelopment proposals that are currently being prepared for the site.</p> <p>A master plan for redevelopment of this site envisages the surplus area to the north to be developed for housing.</p>	<p>1. Green Belt</p> <p>The developed nature of the Mount Vernon site does not necessarily mean that it should be excluded from the Green Belt. Many settlements in the borough are 'washed over' by this designation on the basis that they are not considered appropriate for expansion beyond their existing boundaries.</p> <p>Officers consider that subject to meeting other policy considerations within the plan the Green Belt designation does not necessarily prevent development taking place within the existing developed envelope of the site.</p> <p>However, proposed expansion beyond the existing boundary is not considered appropriate or justified. The eastern boundary of the Green Belt is clearly defined by Rickmansworth Road to the east of the site. As currently defined, this prevents the expansion of the residential uses into open countryside.</p> <p>2. Proposed SINC</p> <p>The proposed SINC to the south of the site was defined by the London Ecology unit in 2005.</p> <p>A further review of SINC boundaries will be undertaken prior to the examination, in accordance with the recommendation contained in the Cabinet report.</p>

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

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

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

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