

Appendix 4: Non specific representations and representations received in relation to the Sustainability Appraisal: Schedule of Representations Received and Officer Comments

February 2015

ID	Rep No	Individual/ Organisation	Para, Policy, Map	Summary of Representation	Council Response
General Strategic Issues					
82	1	Deloitte Real Estate on behalf of CEMEX Properties Ltd	<p>Development Management Policies - Paragraphs 1.1 / 1.2 and 4.2</p> <p>Site Allocations and Designations - Paragraphs 3.1 and 4.1/4.2</p>	<p>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 in Hillingdon's plan making process.</p> <p>The Council should begin planning for revised housing figures as set out in the draft FALP, at least by issuing an interim policy supplementing the existing housing targets of the Local Plan Part 1.</p> <p>Also identify a large site in Harlington (Frogs Ditch Farm) that could be brought forward as a contribution to local housing supply.</p> <p>The fact that a spatial planning framework for the Heathrow Opportunity Area has not yet been prepared is a serious omission which should be addressed now through the plan-making process.</p> <p>Request the preparation of an interim housing policy addressing the revised housing requirements for the Borough, as set out in the FALP, 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 as well as the insertion of a policy regarding a spatial planning framework for the Heathrow Opportunity Area.</p>	<p>The boundary of the Heathrow Opportunity Area will be developed through the joint Opportunity Area Framework with the London Borough of Hounslow.</p> <p>This will be updated as and when the review of the Local Plan Part 1 is undertaken.</p> <p>Following the issue of the Inspectors report the Local Plan Part 2 will be updated to reflect the revised housing target contained in the FALP.</p> <p>The Council does not require any release of Green Belt land to meet its housing target.</p> <p><u>No Proposed Change</u></p>

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75	1	GVA on behalf of Brunel University	Numerous	<p>The draft plan has not been informed by an objective assessment of the development needs of the higher education/research institution sector (including Brunel University), and fails to plan positively to meet such needs in full.</p> <p>The proposed designation of land at Brunel University as a SINC is not underpinned by appropriate evidence.</p> <p>Suggest undertaking an objective assessment of the development needs of the higher education/research sector, including the allocation of Brunel University's Uxbridge Campus for higher education/research use.</p> <p>Propose deletion of Green Belt designation that currently applies to this site.</p> <p>Further request the deletion of the proposed designation of Site 4 of the campus as SINC, or alternatively prepare evidence as justification.</p>	<p>The Local Plan Part 1 was informed by the Strategic Infrastructure Plan, which set out infrastructure required to support key areas of growth over the plan period. The University was consulted during the production of this key document and did not highlight any strategic areas of growth. Had they done so, these would have included.</p> <p>The Local Plan Part 2: Site Allocations implements the policies and targets contained in the Part 1 document. It is not the appropriate mechanism for making strategic changes, such as the significant releases of Green Belt to meet housing or education needs. Such a proposal would be contrary to the Part 1 policy and would need to be addressed through a review of the Part 1 document.</p> <p>The key issue relating to these proposals is the release of land from the Green Belt to meet development needs.</p> <p>Policy EM2 in the Local Plan Part 1 states that any proposals in the Green Belt will be assessed against national policy, including the very special circumstances test. The representor has put forward the following very special circumstances to justify development in the Green Belt:</p> <ul style="list-style-type: none"> • There is a need for education development in the borough.

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					<p>In itself, it is not considered that need constitutes very special circumstances.</p> <ul style="list-style-type: none"> • There is a location specific need. <p>The analysis provided indicates preference for new facilities to meet growth targets to be co-located on the site. There is no analysis to demonstrate that other sites are not available, or that sites in other locations would not meet the University's needs.</p> <ul style="list-style-type: none"> • The loss of sites 1, 2, 3 and 4 would not have a significantly adverse effect on the objectives of the Green Belt. <p>Officers are of the view that in the vicinity of Brunel, the Green Belt meets two of the five purposes of Green Belt contained in the NPPF:</p> <ul style="list-style-type: none"> • To check the unrestricted sprawl of large built up areas and • To assist in safeguarding the countryside from encroachment. <p>Officers have met with the landowner to discuss these proposals and have noted that further information is required to undertake a full assessment of the proposals.</p> <p><u>No Proposed Change</u></p>
33	1	South Bucks District Council		Are concerned that the plan retains the current London Plan target to deliver 425 units per annum. GLA Further Alterations to the London Plan (FALP) proposals which sets out a figure	<p><u>Proposed Change</u></p> <p>Further to the publication of the Inspector's Report for the FALP examination, officers propose to amend the Local Plan Part 2</p>

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				<p>for Hillingdon to 2025 of 559 units per annum.</p> <p>Also note that the Council has not produced an up-to-date Local Development Scheme for the review of Part 1 and therefore question the relevance of Part 1 housing figures for the Local Plan Part 2.</p> <p>Further note that a handful of sites are either bordering or located near to the shared authority boundary and stress that each of these developments should ensure that their infrastructure and service requirements are accounted for and undue pressures are not placed on South Bucks.</p>	<p>documents to incorporate the revised annual monitoring target of 559 units per annum.</p> <p>Sufficient sites will be identified to meet this target.</p>
Representations relating to more than one Local Plan Part 2 Document					
90	2	Hillingdon Canals Partnership	<p>Numerous in Development Management Polices</p> <p>Numerous in Site Allocations & Designations</p>	<p>Broadly welcome the proposals to achieve regeneration and growth in Hayes in particular supports specific proposed Development Management Policies.</p> <p>The following points are put forward as suggested improvements:</p> <p>a) the retention of existing community, sport and education facilities in Policy DMCI1 is supported, although it should specifically mention facilities for young people</p> <p>b) the Plan fails to give sufficient attention or structure to the essential local services that are required to support the anticipated residential growth, in particular health and community</p>	<p>Support noted and welcomed.</p> <p><u>Proposed Change</u></p> <p>The plan will be amended to make specific reference to the additional community infrastructure that is needed to support growth in the borough.</p> <p>Specific detailed plans for the Grand Union Canal and the Hayes area will be identified in the emerging Heathrow Area Action Plan.</p> <p>Consideration will be given to amending the boundaries of the Western Core site.</p> <p>The Chailey site is identified for a residential led mixed use scheme in accordance with the</p>

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				<p>services.</p> <p>a) drawing up a specific planning framework for Hayes Town Centre in order to ensure that essential support facilities and services are in place in order to meet the needs of the increased numbers of people</p> <p>c) reviewing how the frontage of the Grand Union Canal could be used in a creative and coordinated way as a spur to regeneration and in particular examining the possibility of developing the frontage on the southern side of the canal between Station Road and Printing House Lane</p> <p>d) amending the boundaries of the 'Western Core' site</p> <p>e) investigating whether part of the Chailey Industrial Estate could be developed as a site for a purpose-built Mosque</p> <p>f) ensuring the protection of Shackles Dock and the continuation of a public house facility in any development of the Silverdale Road/Western View site</p> <p>g) considering whether the Benlow Works should be released from industrial use in order to ensure the restoration and proper maintenance of this Grade 2 listed building</p> <p>g) exploring the provision of a footbridge between the Nestle site and the Hayes Town side of the Grand Union canal.</p>	<p>evidence base for the Plan. The addition of a place or worship on the site would be subject to Policy DCMI 2 and would need to be agreed with the site owner.</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, should be allocated for residential use in the Site Allocations and Designations document.</p> <p>The provision of a footbridge from the Nestle site will need to be considered in the context of the viability of the overall scheme.</p>

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69	1	English Heritage	Sustainability Appraisal; Development Management Policies DMHB1A(iv), DMHB5 DMHB4 and DMHB6	<p>a) Recommend simplifying the Sustainability Appraisal (SA) Objective relating to ' To conserve and enhance heritage assets and their settings'.</p> <p>b) Note that the condition of Conservation Areas may prove a useful indicator in relation to improving the aesthetics of the borough. Reducing the number of Conservation Areas on the 'Heritage at Risk' Register for positive reasons could be a good target.</p> <p>c) Suggest using the word 'conserve' rather than 'preserve' in policies DMHB1 (A) (iv) (Heritage Assets), DMHB5 (Locally Listed Buildings) and DMHB6 (Conservations Areas). Welcome the reference to the appropriate adaptation of heritage assets for improved environmental performance in DMHB1 (B), but this could be accompanied by justification paragraphs.</p> <p>d) Advise that the phrase “when every option for a viable future use has been exhausted” in Policy DMHB4 (B) (Listed Buildings) runs the risk of being considered non-compliant in terms of the NPPF and suggest that this policy be amended.</p> <p>e) Concerned that the Borough’s Site Allocations document does not yet sufficiently reflect their implications for the historic environment.</p>	<p>a) The sustainability objectives have already been used to assess the plan.</p> <p><u>Proposed change</u></p> <p>Further appraisal will be undertaken of any amendments to the Plan documents resulting from the publication process. To ensure a consistent assessment process, the same objectives will be used.</p> <p>b) Comments noted and welcomed.</p> <p><u>No Proposed Change</u></p> <p>c) <u>Proposed Change</u></p> <p>Reword Policies DMHB 1 and DMHB 6 to include "<i>conserve</i>" and to relate to NPPF.</p> <p>d) <u>Proposed Change</u></p> <p>A full assessment will be undertaken to ensure the policy is consistent with the NPPF</p> <p>e) <u>No Proposed Change</u></p> <p>The Site Allocations document provides an overview of whether the principle of residential or other forms of development are likely to be acceptable on a site. Detailed assessments will be undertaken as part of the assessment of a planning application.</p>
N/A	N/A	Officer Comments	Development Management Policies and Site	Officers have proposed a significant number of changes to chapter 5 to ensure the protection of heritage assets in the borough, in accordance	<p><u>Proposed Change</u></p> <p>These comments will be fully reviewed in the context of other proposed changes that have</p>

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			Information Schedules contained in Site Allocations document.	<p>with national planning policy.</p> <p>Specific changes should be made to strengthen heritage designations and ensure that they are in accordance with the 'significance' based approach as defined in the NPPF.</p> <p>Site specific policies and designations that are no longer relevant or do not meet the provisions of national guidance should be deleted.</p>	<p>been received, with a view to the following changes:</p> <p>Policies in Chapter 5 will be strengthened to resist the loss of significant of heritage assets</p> <p>There will be a general presumption in favour of the retention of locally listed buildings</p> <p>Policy DMHB 6 (Conservation Areas) is to be amended to confirm the Council's expectations for new development in Conservation Areas</p> <p>There should be a general presumption in favour of the protection of war memorials.</p> <p>Policy DMHB12: High Buildings and Structures should refer specifically to areas that are suitable for high buildings.</p> <p>DMHB 13 should be amended to refer to the design of New Development.</p> <p>Site Information Schedules contained in the Site Allocations document will be updated to reflect heritage considerations where appropriate.</p> <p>Proposed Deletions:</p> <p>The following policies are not considered to comply with guidance contained in the NPPF and should be deleted:</p> <p>Policy DMHB8: Gatehill Farm Estate and Copse Wood Estate Areas of Special Local Character</p> <p>Policy DMHB 9: Registered Historic Parks,</p>

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					Gardens and Landscapes.
Sustainability Appraisal					
32	3	Natural England	Chapter 4 and 5	Broadly support the 17 sustainability objectives listed in chapter 4 and consider that appropriate plans and programmes have been identified in Chapter 5.	Support noted and welcomed. <u>No Proposed Change</u>
General Comments					
2	1	Marine Management Organisation	NS	MMO has no comments to submit in relation to this consultation.	Comments noted. <u>No Proposed Change.</u>
7	1	Dr. Klaus Armstrong-Braun	NS	Local Authorities have to carry out surveillance for European Protected Species for Local Plans/Development Applications etc. purposes as per ART 11 of the EU Habitats Directive.	The Council has carried out a Screening for Appropriate Assessment to meet the requirements of the EU Habitats Directive. The Screening has found that while impacts on European sites are likely, they are not likely to be significant.
24	1	Department of Health		Advise that the consultation responses have been passed to the London Area Team for a response.	Comments noted. <u>No Proposed Change</u>
53	1	Cllr Janet Duncan		Wishes to represent the views of the local community.	Comments Noted. <u>No Proposed Change</u>