

Regulation 19 Consultation October 2015 - December 2015
Local Plan Part 2 Schedule of Representations Received and Officer Responses

APPENDIX 1: DEVELOPMENT MANAGEMENT POLICIES

ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
General Comments						
10	3	Harefield Tenants and Residents Association (Paul Stone)	N/A	Support	Support and endorse further changes to Local Plan Part 2 as discussed at a number of open meetings.	Support noted and welcomed.
104	1	Derek McCall	N/A	Comment	Considers himself and his wife too old to comment.	Officers take account of all comments received from residents.
106	5	Thomas NP Crow	N/A	Support	Thinks aims of Plan are good. Interested in maintaining good standards in borough. Reduction of car traffic is essential.	Comments are noted and welcomed.
44	5	Ickenham Residents Association	N/A	Comment	Request that LBH work with the Association to develop a Management Plan for the Ickenham Conservation Area.	Officers will look at progressing a Management Plan outside of the Local Plan process.
44	11	Ickenham Residents Association	N/A	Support	Support the wider policies on climate change adaptation and mitigation in the Local Plan and urge LBH to consider whether a specific development	Support noted and welcomed. Paragraph 4.18 notes the contribution that front gardens make to local character and the reduction

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					management policy on concreting over driveways might be suitable in areas at higher risk of surface water flooding	of flood risk. The Council will take account of the conclusions of the Townscape Character Study when assessing proposals that involve the loss of front gardens. The management of flood risk in relation to permeable surfaces is taken account of in policies DMEI 9, DMEI 10 and the Council's Surface Water Management Plan.
58	8	Greater London Authority	N/A	Object	Hillingdon has a Regionally Important Geological Site, identified on Map 7.4 of the London Plan as 'GLA 29 The Gravel Pits, Northwood'. There should be a Local Plan policy for the management and protection of this site in accordance with London Plan Policy 7.20.	Officers support the proposals to identify RIGs on the Policies Map.

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19	10	Rapleys on behalf of La Salle Investment Management	N/A	Object	Consider that the reference to the strategic office locations should be consistent across all Local Plan Part 2 documents.	Consistent references to strategic office locations will be included.
103	1	Runnymede Borough Council	N/A	Comment	Have no comments on the Local Plan documents.	Response noted
64	1	Canal & River Trust	N/A	Object	Previous comments have not been taken into account and are not referred to in Consultation Statement, October 2015. Known as Canal & River Trust, not Canal and River Trust.	Name will be amended in the document. All responses are fully assessed against policies and guidance contained in the national planning guidance, the London Plan and relevant evidence base documents.
102	1	Cobden Close Tenants and Residents' Association	N/A	Support	No comments to add, all issues look realistic.	Support noted and welcomed.
137	1	Conservation Area Panel for south of Borough	N/A	Support	Group generally support Local Plan Part 2 policies and proposals that would concern or affect heritage assets and their settings. Detailed guidance on shopfronts	Support noted and welcomed.

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					and for householder development is welcomed.	
1. Introduction						
109	1	CPRE	N/A	Support	Support the changes to the summary of Chapter 6 on Environmental Protection and Enhancement.	Support noted and welcomed.
2. Economy						
19	1	Rapleys on behalf of La Salle Investment Management	Policy DME 1: Employment Uses in Designated Sites	Support	Policy is supported DME 1 (C) and (F) relating to appropriate uses in designated employment areas and ancillary uses that are acceptable in these areas, but object to DME 1 (D) - the criteria where non B1, B2 and B8 uses will be acceptable. Consider that as drafted, the policy criterion is too restrictive, and does not allow for sufficient flexibility to respond to changing economic circumstances. There is	Support noted and welcomed. The requirement for a 2 year marketing reflects the Mayor of London's Land for Industry and Transport" SPG. To address the consistency between parts C and D of the policy, officers suggest rewording criteria D (i) to read:

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					a clear conflict between the objectives of the LSEL designation and the requirement of criterion i. Suggest (a) reducing the marketing period from 2 years to 12 months (b) the inclusion of a wider range of ancillary development and removal of the words 'small scale' in criterion F. Amended policy wording suggested.	<i>'There is no realistic prospect of the land being used in accordance with Part C.'</i> The list of ancillary development that will be suitable in designated employment areas listed in criterion F is not definitive. The key determinant will be that the proposed development is ancillary and therefore small scale.
117	2	Simply Planning on behalf of Crown Trading Estate	Policy DME 1: Employment Uses in Designated Sites	Object	Recommend that Policy DME 1 is amended to include a new criterion under iv) to permit alternative uses on designated employment sites where the site is specifically identified within the Local Plan as suitable for future release due to regeneration	The policy relates to uses that are considered appropriate in designated employment locations. If a site is identified as suitable for future release it will be identified elsewhere in the Local Plan and subject to

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					benefits."	separate policy criteria.
128	1	Emerson Group on behalf of Orbit Development Ltd	Policy DME 1: Employment Uses in Designated Sites, part D	Object	Object to Policy DME1 part D's proposed requirement for employment sites to have been vacant and consistently marketed for a period of two years. In the absence of any evidence to the contrary, a marketing period of 6-9 months for locally significant sites would be more equitable and proportionate to their importance.	The two year marketing period derives from the Mayor of London's Land for Industry and Transport SPG.
132	2	Barton Willmore on behalf of Segro	Policy DME 1: Employment Uses in Designated Sites	Object	Object to Policy DME1 part D's proposed requirement for employment sites to have been vacant and consistently marketed for a period of two years.	The two year marketing period derives from the Mayor of London's Land for Industry and Transport" SPG.
135	1	Robin Brown	Para 2.10	Object	Proposed deletion of paragraph relating to the retention of employment uses on non-designated sites would be	The loss of employment uses on non-designated sites will be subject to the criteria in policy DME 2. It is

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					contrary to Local Plan Part 1 strategic objective SO15 and NPPF para 21. The paragraph should be reinstated.	not considered that the deletion of para 21 conflicts with national policy or strategic objective 15 in the Local Plan Part 1.
124	2	Barton Willmore on behalf of Tokyo Inn	Policy DME 2: Employment Uses Outside of Designated Sites; DME 3: Office Development	Object	These policies should be reworded to allow sufficient flexibility to ensure they are consistent with Policy SEA 2, which encourages hotel and office uses within designated sites. There should not be a requirement for hotel development to demonstrate compliance with these policies. Suggested wording provided.	Officers propose to amend the policy to take account of other designations and site specific proposals identified in the Site Allocations and Designations document.
19	2	Rapleys on behalf of La Salle Investment Management	Policy DME 3: Office Development	Object	Support criterion E, but object to criterion F. Suggest the inclusion of LSEs into the criterion into list of locations where offices will generally not be permitted. Amended policy wording suggested.	Officers consider that criterion F of policy DME 3 could be amended to state that proposals for offices in other locations will be required to demonstrate that no other preferable locations are available.

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128	2	Emerson Group on behalf of Orbit Development Ltd	Policy DME 3: Office Development, part B	Object	Object to the proposed requirement for a 2 year marketing period. In the absence of any evidence to the contrary, a marketing period of 6-9 months for proposals involving the loss of office floorspace in preferred locations for office growth sites would be more appropriate. Suggest deleting the requirement to demonstrate that office use in no longer viable.	The Council seeks to accommodate the majority of office growth in identified growth locations, in accordance with the London Plan. The two year marketing period mirrors the marketing period for the protection of B1, B2 and B8 in designated SILs, LSIS and LSELs.
128	3	Emerson Group on behalf of Orbit Development Ltd	Policy DME 3: Office Development, part F	Object	Considers that offices can be located outside of the specified locations, subject to satisfying the sequential approach to main town centre uses as set out by NPPF paragraph 24. Request that part F be reworded accordingly and provide suggested wording.	The Council will seek to accommodate the majority of office Development in office growth locations and town centres. Officers consider that part F of the policy DME 3 could be amended to note that proposals for offices in other locations will be required to demonstrate

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						that no other suitable locations are available.
56	1	Heathrow Airport Ltd	Policy DME 3: Office Development	Object	Maintain that the policy potentially affects the future development of the airport and is not consistent with the London Plan and the NPPF. Consider that criterion A should explicitly allow for office development in Heathrow Airport and provide suggested wording.	Heathrow Airport is not identified in the Local Plan Part 1 as an Office Growth Location.
69	1	Historic England	Para 2.24	Support	Repairs and provision of public access to Harmondsworth Great Barn (listed grade I) justifies a reference to it in bullet point 6.	Officers propose to include Harmondsworth Great Barn in the list of visitor destinations within the borough.
23	1	Eastcote Conservation Panel	Policies DME 4: Visitor Attractions; DMH 6: Garden and Backland Development; DMEI 5:	Object	Disappointed that Warrender Park/Highgrove Woods and Bessingby/Cavendish/Pine Gardens Parks have not been upgraded to MOL as proposed. The document "Metropolitan Open Lands and Green Chain	These parks were not identified in the Council's evidence base documents relating to Metropolitan Open Land. The Council's evidence base document is available on the Local Plan

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			Development in Green Chains		Assessment" should be available to the public.	Part 2 webpage.
124	3	Barton Willmore on behalf of Tokyo Inn	Policy DME 5: Hotels and Visitor Accommodation	Support	Policy is supported as there is an identified need for visitor accommodation in the borough.	Support noted and welcomed.
19	3	Rapleys on behalf of La Salle Investment Management	Policy DME 5: Hotels and Visitor Accommodation, para 2.26	Support	Support policy.	Support noted and welcomed.
56	2	Heathrow Airport Ltd	Policy DME 5: Hotels and Visitor Accommodation, paras 2.26 and 2.27	Object	Policy E2 of Local Plan Part 1 refers to hotel development being accommodated in 'other sustainable locations'. Heathrow Airport has excellent public transport accessibility. Paragraph 2.27 requiring airport related development to remain within airport boundary is inconsistent with the London Plan and NPPF and should be removed.	The policy seeks to direct the majority of hotel growth to the locations specified in the Local Plan Part 1.

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3. Town Centres						
19	4	Rapleys on behalf of La Salle Investment Management	Policy DMTC 1: Town Centre Development	Object	Consider that the demonstration of adequate width and depth of floorspace is an unnecessary and onerous requirement and request that criterion i) is removed	The criterion seeks to resist a provision of inappropriately sized retail units, which could lead to the fragmentation of the town centre.
89	1	Nathaniel Lichfield on behalf of Intu Properties plc	Policy DMTC 2: Primary and Secondary Shopping Areas	Object	Intu supports the protection of Primary Shopping Area ground floor for retail uses, but objects to requirements (a) that a minimum of 70% of the frontage is retained in Use Class A1 and (b) the proposed use will not result a separation of more than 12 metres between A1 retail uses. The requirements would be supported if separate restaurant hub areas are allocated and excluded from the tight restrictions. Wording suggested.	The policy seeks to promote and protect the provision of A1 retail uses in town centres. At present, there are no specific concentrations of restaurant uses that could be defined hubs.
123	1	Nathaniel Lichfield on	Policy DMTC 2:	Object	The policy tests placed on	Officers will continue to

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		behalf of Inland Homes Plc	Primary and Secondary Shopping Areas		proposals in secondary shopping areas are inconsistent with the NPPF and the London Plan and should reflect the differing roles of each area, in addition to the changing nature of town centres. Suggest amended wording and deletion of criteria i and iii.	review the policy to ensure it is in accordance with the NPPF and the provisions of the London Plan.
113	4	Planning Potential on behalf of Paddy Power	Policy DMTC 2: Primary and Secondary Shopping Areas	Object	The policy does not provide an explanation of why the A1 threshold figures have been set, why A5 uses should be limited to a maximum of 15% and why a separation distance of 12 metres between A1 units is appropriate. The policy should be re-worded, or as a minimum, significantly loosened to allow healthy competition between betting shops whilst also removing the unnecessary grouping of a variety of uses which are not intertwined.	The policy seeks to avoid an overconcentration of uses that can cause detrimental cumulative impacts and to protect town centres for retail use. The proposed thresholds take account of all considerations and indicators of potential over concentration. Officers will continue to review the policy to ensure it is in accordance with the NPPF and the provisions of

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						the London Plan.
79	1	SSA Planning on behalf of KFC	Policies DMTC 2 Primary and Secondary Shopping Areas; DMTC 3: Maintaining the Viability of Local Centres and Local Parades; DMTC 4: Amenity and Town Centre Uses	Object	Welcome deletion of Part B in DMTC 4 and the clarification of 'unacceptable concentrations', but object to amendments to DMTC 3 and DMTC 2. Are concerned that these amendments focus only on A5 uses, which is inconsistent with DMTC 4. There is an error in DMTC3 A (i) as it sets alternative criteria of one-in-three or 70% of class A1 shops.	Support noted and welcomed. Criterion A i) should read "ensuring the retention of at least 70% of Class A1 shops". Officers will continue to review the policy to ensure it is in accordance with the NPPF and the provisions of the London Plan.
128	3	Emerson Group on behalf of Orbit Development Ltd	Policy DMTC 3: Maintaining the Viability of Local Centres and Local Parades; Table 3.2	Object	Object to the absence of the designation of Sovereign Court, Sipson Road as a Local Parade in Table 3.2 of Policy DMTC 3. Consider that the parade provides valuable amenities for the benefit of the local businesses, residents and visitors to the airport. The parade should be recognised as such in Table 3.2 and be allocated	Sovereign Court contains limited A1 floorspace. This does not justify its designation as a Local Parade.

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					on the Proposals Map.	
113	5	Planning Potential on behalf of Paddy Power	Policy DMTC 3: Maintaining the Viability of Local Centres and Local Parades	Object	The policy does not provide an explanation why the A1 threshold figures have been set, why A5 uses should be limited to a maximum of 15% and why a separation distance of 12 metres between A1 units is appropriate. The policy should be re-worded, or as a minimum, significantly loosened to allow healthy competition between betting shops whilst also removing the unnecessary grouping of a variety of uses which are not intertwined.	The policy seeks to avoid an over-concentration of uses that can cause detrimental cumulative impacts and to protect town centres for retail uses. The proposed thresholds take account of all considerations and indicators of potential over concentration. Officers will continue to review the policy to ensure it is in accordance with the NPPF and the provisions of the London Plan.
113	1	Planning Potential on behalf of Paddy Power	Para 3.20	Object	Do not consider that betting shops, hot food takeaways, night clubs, casinos, amusement centres and 'similar uses' should be grouped together. No explanation	The London Plan notes that over-concentrations of betting shops and hot food takeaways can give rise to

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					<p>is provided how the 15% threshold has been arrived at, and how this figure constitutes an over-concentration. The text should be removed and the paragraph re-worded, or as a minimum, significantly loosened to allow healthy competition between betting shops whilst also removing the unnecessary grouping of a variety of uses which are not intertwined.</p>	<p>particular concerns.</p> <p>The policy seeks to avoid an over-concentration of uses such as those described in para 3.20 that can lead to antisocial behaviour in local parades and town centres.</p> <p>The proposed thresholds take account of the considerations and indicators of potential over-concentration.</p>
113	2	Planning Potential on behalf of Paddy Power	Para 3.21	Object	<p>Suggest updating the document to reflect that the London Plan Town Centres SPG is now adopted. The para is factually incorrect as betting shops now fall under the 'Sui Generis' use, not A2, following the release of new legislation in April 2015.</p> <p>The text should be removed and the paragraph re-worded, or as a</p>	<p>Officers will ensure that the provisions of the Mayor's Town Centres SPG are reflected in the Local Plan. Any factual inaccuracies will be amended as part of the examination process.</p> <p>Officers will continue to review the policy to ensure it is in accordance with the</p>

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					minimum, significantly loosened to allow healthy competition between betting shops whilst also removing the unnecessary grouping of a variety of uses which are not intertwined.	NPPF and the provisions of the London Plan.
113	3	Planning Potential on behalf of Paddy Power	Para 3.22	Object	<p>Suggest updating document to reflect that the London Plan Town Centres SPG is now adopted. The para is factually incorrect as betting shops now fall under the 'Sui Generis' use, not A2, following the release of new legislation in April 2015.</p> <p>The paragraph should be reworded, or as a minimum, significantly loosened to allow healthy competition between betting shops whilst also removing the unnecessary grouping of a variety of uses which are not intertwined.</p>	<p>Officers will ensure that the provisions of the Mayor's Town Centres SPG are reflected in the Local Plan. Any factual inaccuracies will be amended as part of the examination process.</p> <p>Officers will continue to review the policy to ensure it is in accordance with the NPPF and the provisions of the London Plan.</p>

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113	6	Planning Potential on behalf of Paddy Power	Policy DMTC 4: Amenity and Town Centre Uses	Object	Consider that Policy DMTC 4 should have more regard to the London Plan Town Centres SPG. The policy should be re-worded, or as a minimum, significantly loosened to allow healthy competition between betting shops whilst also removing the unnecessary grouping of a variety of uses which are not intertwined.	Officers will ensure that the provisions of the Mayor's Town Centres SPG are reflected in the Local Plan. Officers will continue to review the policy to ensure it is in accordance with the NPPF and the provisions of the London Plan.
135	2	Robin Brown	Policy DMTC 4: Amenity and Town Centre Uses, part B.	Object	Proposed deletion of resisting various uses in proximity to schools or sensitive community uses does not comply with the NPPF core principle of promoting healthy communities. Text supporting London Plan Policy 4.8 notes concerns with over concentration of betting shops and hot food takeaways. Request deleted text be reinstated.	The policy continues to reflect the provisions of the London Plan, which note that over-concentrations of betting shops and hot food takeaways can give rise to particular concerns.

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4. New Homes						
57	3	Savills	Policy DMH 2: Housing Mix	Object	Suggest that the policy is revised in order to make reference to housing mix being subject to market requirements.	The policy notes that the Council will require a mix of housing units of different sizes in schemes for residential development to reflect the Council's latest information on housing need. Current needs information indicates that across the borough there is a significant need for family housing. Developers will be required to provide site specific justification if this need cannot be met.
123	2	Nathaniel Lichfield on behalf of Inland Home Plc	Policy DMH 2: Housing Mix	Object	Request that Policy DMH 2 should acknowledge that the mix of housing units will depend on the setting/location of the	The policy notes that the Council will require a mix of housing units of different sizes in schemes for

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					development and the demand for differing sizes of housing units in different locations. Suggest amended wording.	residential development to reflect the Council's latest information on housing need. Current needs information indicates that across the borough there is a significant need for family housing. Developers will be required to provide site specific justification if this need cannot be met.
122	2	Savills on behalf of Hurlington Ltd	Policy DMH 2: Housing Mix	Object	If the current policy is applied this would result in the delivery of low density housing development and an under provision of housing on development sites which would be contrary to the NPPF. Suggest the inclusion of a reference to the provision of a balanced mix of housing and the deletion table 4.1: Housing Requirement by Type and Size.	Table 4.1 reflects the Council's latest evidence of housing need and is included to assist the application of the policy. The policy notes that the Council will require a mix of housing units of different sizes in schemes for residential development to reflect the Council's latest information on housing

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						need. This indicates that across the borough there is a significant need for family housing. Developers will be required to provide site specific justification if this need cannot be met.
132	3	Barton Willmore on behalf of Segro	Policy DMH 2: Housing Mix	Object	Reference should be made that the mix will be applied on a site by site basis and the character and nature of the site and scheme will be taken into account.	The policy notes that the Council will require a mix of housing units of different sizes in schemes for residential development to reflect the Council's latest information on housing need. This indicates that across the borough there is a significant need for family housing. Developers will be required to provide site specific justification if this need cannot be met.
69	6	Historic England	Para 5.15	Object	Suggested wording to end of paragraph: "where these are	The Council will be undertaking discussions

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					available and other relevant assessments including the Hillingdon Townscape Character Assessment".	with Historic England, with a view to addressing their comments prior to the commencement of the examination process.
125	1	Robin Brethwick Associates on behalf of Leigh Brothers	Para DMH 6: Garden and Backland Development	Object	The presumption against loss of back gardens is unreasonable and conflicts with Local Plan Part 1 Policy BE1, which refers to 'inappropriate development of gardens' which is less restrictive. Wording confuses back garden development with backland development. Small plots are the lifeblood of smaller builder-developers and are important for the regeneration of suburban areas. The development of these plots should not be constrained.	Policy DMH 6 notes the contribution that back gardens make to local character. This reflects the conclusions of the Council's Townscape Character study and is in line with NPPF, para 53.
44	4	Ickenham Residents Association	Policy DMH 7: Provision of Affordable	Support	Support the application of policy DMH 7 in relation to Site Allocations and Designations Policy SA14 and across the	Support noted and welcomed. In accordance with other

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			Housing		Borough and are keen to see that all residential developments over 10 units provide 35% affordable housing provision, in accordance with policy H2 of Local Plan Part 1. Consider that an open-book viability assessment policy would help the Association work with LBH to deliver policy.	policies in the Plan, the Council will seek the provision of 35% affordable housing, subject to viability and if appropriate in all other circumstances.
57	5	Savills	Policy DMH 7: Provision of Affordable Housing	Support	Support policy DMH 7: Provision of Affordable Housing, due to the fact that the policy refers to viability tests.	Support noted and welcomed. Officers consider that the policy provides sufficient flexibility regarding the quantum and tenure of affordable housing.
132	4	Barton Willmore on behalf of Segro	Policy DMH 7: Provision of Affordable Housing	Object	The flexibility to adjust quantum and tenure to reflect site circumstances (site location and scheme characteristics as well as viability) is essential and policy wording should be changed accordingly.	Officers consider that the policy provides sufficient flexibility regarding the quantum and tenure of affordable housing.

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5. Historic and Built Environment						
69	3	Historic England	Para 5.1	Comment	Suggest words "or enhanced" are added to end of opening sentence in line with NPPF.	Officers are agree with the proposed minor addition. The Council will be undertaking discussions with Historic England, with a view to addressing their comments prior to the commencement of the examination process.
61	1	Ruislip, Northwood & Eastcote Local History Society (Mrs Susan Toms)	Paras 5.3, 5.5, 5.8, 5.11	Object	Para 5.3 - original paragraph should be reinstated. Para 5.5 - retain first sentence of original paragraph. 5.11 Reinststate "The Council will also have regard to the protection of its settings when considering proposals on neighbouring sites".	Representors seek to reinstate some of the text which is proposed to be deleted. Much of this was proposed for removal on the basis that it repeats the content of national planning guidance. Officers propose to include a glossary to define key terminology used in the document, including terms such as Heritage

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						Assets and Locally Listed buildings. All proposed changes will be identified on the Statement of Proposed Modifications, to be submitted with the Local Plan Part 2 documents for public examination.
69	4	Historic England	Para 5.4	Object	Townscape Character Study should be referred to in para 5.4 and made accessible within Local Plan pages of the Council's website	<p>The Townscape Study is already referred to in the document but additional references will be included as appropriate.</p> <p>The Council will be undertaking discussions with Historic England, with a view to addressing their comments prior to the commencement of the examination process.</p> <p>The Townscape Character</p>

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						Study is available as part of the Local Plan Part 2 evidence base.
69	5	Historic England	Policy DMHB 1: Heritage Assets	Support	<p>Recommend addition of an overarching sentence stating that the Council will expect development proposals to avoid harm to the historic environment in line with paras 126 and 15(8) of NPPF.</p> <p>Strongly support part C) and suggest this is taken further through proposed heritage strategy.</p>	<p>Support noted and welcomed.</p> <p>Supporting text to Policy DMHB 1 states that proposals affecting heritage assets will be determined in accordance with the NPPF. Officers do not consider that further policy guidance is required.</p> <p>The Council will be undertaking discussions with Historic England, with a view to addressing their comments prior to the commencement of the examination process.</p>

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60	1	Ruislip Village Conservation Panel (Mrs Eileen Bowlt)	Policies DMHB 1: Heritage Assets; DMHB 2: Listed Buildings, DMHB 3: Locally Listed Buildings; DMHB 5: Areas of Special Local Character	Object	<p>Para 5.3 Original paragraph is more informative. Please reinstate.</p> <p>Para 5.5 Reference to NPPF is important, please reinstate.</p> <p>Para 5.8 Reference to Historic England should be retained.</p> <p>Para 5.11 Please reinstate “The Council will also have regard to the protection of the setting when considering proposals on neighbouring sites”</p> <p>DMHB 2 - A - please reinstate “do not detract from its special architectural or historic interest”</p> <p>DMHB 2 C - please reinstate “as a condition of demolition”</p> <p>Para 5.21 This important statement should be retained.</p> <p>DMHB 5 - A - please reinstate the important first paragraph</p>	<p>Representors seek to reinstate some of the text which is proposed to be deleted. Much of this was proposed for removal on the basis that it repeats the content of national planning guidance. Officers propose to include a glossary to define key terminology used in the document, including terms such as Heritage Assets and Locally Listed buildings. All proposed changes will be identified on the Statement of Proposed Modifications, to be submitted with the Local Plan Part 2 documents for public examination.</p>

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61	2	Ruislip, Northwood & Eastcote Local History Society (Mrs Susan Toms)	Policies DMHB 2: Listed Buildings; DMHB 3: Locally Listed Buildings; paras 5.21, 5.22 - 26, paras 5.9 - 10, deleted DMHB 7 - scheduled ancient monuments	Object	DMHB 2 - A - reinstate “do not detract from its special architectural or historic interest”. DMHB 2 - C - reinstate “as a condition of demolition”. DMHB 3 - reinstate first paragraph. Para 5.21 - reinstate original paragraph Paras 5.22 - 26 reinstate all paragraphs Para 5.22 - should add the Cursus and Gruben houses at Harmondsworth Para 5.9 - 10 - reinstate these paragraphs and the deleted policy DMHB 7 Scheduled Ancient Monuments.	Representors seek to reinstate some of the text which is proposed to be deleted. Much of this was proposed for removal on the basis that it repeats the content of national planning guidance. Officers propose to include a glossary to define key terminology used in the document, including terms such as Heritage Assets and Locally Listed buildings. All proposed changes will be identified on the Statement of Proposed Modifications, to be submitted with the Local Plan Part 2 documents for public examination.
132	5	Barton Willmore on behalf of Segro	Policy DMHB 3: Locally Listed Buildings	Object	The policy should reflect that a Locally Listed Building can be demolished where tests set out in	The demolition of Locally Listed buildings will be discouraged. The policy

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					Paragraph 133 of the NPPF can be met.	notes that replacement will only be considered where it can be demonstrated that the community benefits of such proposals outweigh those of retaining the Locally Listed building.
60	2	Ruislip Village Conservation Panel (Mrs Eileen Bowlt)	Conservation Areas (page 54)	Support	Generally excellent but query removal of paras 5.22 - 5.26 as they are informative.	Support noted and welcomed. Deleted paragraphs relate to the definition of Conservation Areas. It is considered that this information could be included in a glossary.
132	6	Barton Willmore on behalf of Segro	Policy DMHB 4: Conservation Areas	Object	As is the case for draft policy DMHB 5, the policy should reflect Paragraph 133 of the NPPF to provide more flexibility when considering comprehensive redevelopment, such as that proposed at the former Nestle site.	The policy sets out general provisions relating to development in Conservation Areas. The policy is considered to be in general conformity with the NPPF.

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135	3	Robin Brown	Policy DMHB 4: Conservation Areas	Object	Policy does not apply para 5.15 requirement for Heritage Statements and does not fulfil NPPF para 128. Request requirement for Heritage Statement be added.	Paragraph 5.15 is supporting text to policy DMHB 4 and sets a requirement for Heritage Statements to be submitted with planning applications for development in Conservation Areas. The requirements of the policy are considered to be broadly consistent with the NPPF.
137	2	Conservation Area Panel for south of Borough	Policy DMHB 4: Conservation Areas	Comment	Panel requests a requirement for Heritage Statements to accompany planning statements be included. Request 'signposting' at various places throughout relevant parts of chapter for Conservation Areas, ASLCs and Appraisals/Management Plans etc such as the 'signpost' or link for more information on Locally Listed	Para 5.15 is supporting text to policy DMHB 4 and sets a requirement for Heritage Statements to be submitted with planning applications for development in Conservation Areas. The requirements of the policy are broadly consistent with the NPPF.

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					Buildings (para 5.13). This would improve functionality and usefulness of the Plan.	
60	3	Ruislip Village Conservation Panel (Mrs Eileen Bowlt)	Scheduled Ancient Monuments (page 58)	Object	Further justification required for the removal of paragraphs 5.9 - 5.10	The paragraphs provide contextual information on Scheduled Ancient Monuments. It is considered that this information could be provided in a glossary to the document.
123	3	Nathaniel Lichfield on behalf of Inland Home Plc	Policy DMHB 18: Private Outdoor Amenity Space	Object	Consider that the wording is unduly restrictive and risks prejudging the acceptability or otherwise of potential development schemes. The policy should worded to recognise that in some instances, for those sites which are more constrained due to their location (i.e. town centre locations), the provision of outdoor amenity space of that size may not always be realistically	Officers will continue to review the policy to ensure it is in accordance with the NPPF and the provisions of the London Plan.

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					achievable or feasible. Suggest amended wording.	
19	5	Rapleys on behalf of La Salle Investment Management	Policy DMHB 10: High Buildings and Structures, para 5.32	Object	The definition of high buildings is restrictive and ambiguous. It is unclear how Council will identify appropriate areas for high buildings.	The Council's Townscape Character Study provides evidence for locating high buildings in Uxbridge and Hayes. Much of the borough has height restrictions which are critical to the safe operation of flights into and out of Heathrow Airport and RAF Northolt. In areas not constrained by airport operations, applications for high buildings will be assessed on a case by case basis, taking into account the mostly low rise suburban nature of the borough, where tall buildings are generally inappropriate, the

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						Townscape Character Study and the London Plan.
69	8	Historic England	Para 5.33	Comment	For clarity, recommend that final sentence is not amended as proposed but reads "Within the two town centre locations higher density can also offer the potential to regenerate an area and a tall building can emphasise a point of civic or visual significance".	The Council will be undertaking discussions with Historic England, with a view to addressing their comments prior to the commencement of the examination process.
69	9	Historic England	Policy DMHB 10: High Buildings and Structures	Object	Consider some changes to Policy DMHB 10 are not justified. Recommend: - opening sentence omit "dominant" to avoid interpretations that override consideration of setting of a vulnerable heritage asset - in part i) omit "or an area identified by the Borough" as this creates uncertainty and departs	The Council will be undertaking discussions with Historic England, with a view to addressing their comments prior to the commencement of the examination process.

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					from background evidence - retain previous parts iv (contribution to skyline) and v (heritage assets and views) as these are justified in relation to background evidence.	
135	4	Robin Brown	Policy DMBH 10: High Buildings and Structures	Object	Proposed deletion of original clause ix) would not adequately ensure the contribution and enhancement of the natural and local environment, as required by NPPF para 109. The proposed deletion is contrary to Council's biodiversity statutory duty. Watercourses and water bodies are not referred to in Policy DMBH 11. Request clause is reinstated.	The deleted clause states that high buildings should not adversely impact on bio-diversity or open spaces, including watercourses. This provision is covered by other policies in the plan and is therefore not required.
14	1	Chris Thomas Ltd on behalf of British Sign & Graphic Association	Policy DMHB 13: Shopfronts, parts (E) & (F)		Interrelationship between DMBH 13 Shopfronts, DMBH 12 Streets and Public Realm and design guidance in Appendix B remains confusing and self- contradictory.	The Council's policies have been drafted to protect the particular character of town centres and Conservation Areas in the borough.

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					<p>All advice on shopfronts and advertisements should be contained within a single section or shopfronts and advertisements should be completely separated and contained within two totally separate sections.</p> <p>No evidential support for Policy DMHB 13 (E) and (F). Shop signs do not need to be restricted in number or to certain areas of shopfront - each proposal must be considered on its individual merit. Policy DMHB 12 (C) is correct in this regard. Advice contradicts that in Appendix B's description of the "signable area". Restricting shop sign content is contrary to regulations.</p> <p>Agree with Policy DMHB 13 (F) regarding illumination but this does not justify the proposed ban on flashing and internally</p>	<p>The issue of advertisements cuts across a number of policy areas including the public realm, heritage and shopfronts. The Council's general policy on advertisements has been prepared to protect visual amenity and to maintain the quality of the public realm. Policy requirements and guidance are geared towards meeting this objective.</p> <p>Officers will undertake a further review of the advice and guidance provided on advertisements and other detailed design matters, prior to the submission of the Local Plan documents for public examination.</p>

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					<p>illuminated "box lights".</p> <p>Para 5.53 does not advise Appendix B also involves advertisements. There are too many places to look for relevant advice.</p> <p>Para 5.48 - list is unnecessary as all are considered 'advertisements' within the statutory definition. Restrictive policy is not justified.</p> <p>Accept para 5.52 should draw attention to "clutter" but no justification for picking out particular forms of advertisement.</p>	
109	2	CPRE	Policy DMHB 14: Trees and Landscaping	Support	Support the inclusion of the trees and landscaping policy.	Support noted and welcomed.
132	7	Barton Willmore on behalf of Segro	Policy DMHB 16: Housing Standards	Object	This policy must be flexible to take into account changes in national standards.	Officers are of the view that policies should be amended to reflect the need to comply with recent

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						revisions to national housing standards. Appropriate revisions will be put forward in the Schedule of Proposed Modifications, to be submitted with the Local Plan documents.
132	8	Barton Willmore on behalf of Segro	Policy DMHB 17: Residential Density	Object	The column referring to different locations should be removed. There is no justification for a deviation from the London Plan density matrix (Table 3.2). Policy DMHB 20 should therefore refer to the density matrix as set out in the London Plan.	The proposed density guidelines in Table 5.3 (Residential Density Matrix) are broadly consistent with those contained in the London Plan.
57	5	Greater London Authority	Policy DMHB 10: Housing Standards	Object	The policy should refer to the national housing standards and the supporting text should note that this standard will be conditioned to ensure its application and enforcement	Officers are of the view that policies should be amended to reflect the need to comply with recent revisions to national housing standards.

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					through the Building Regulations (Part G)	Appropriate revisions will be put forward in the Schedule of Proposed Modifications to be submitted with the Local Plan Part 2 documents.
65	2	Nathaniel Lichfield on behalf of Purpleplexed LLP	Policy DMHB 17: Residential Density	Object	The density content of this policy is unjustified by any evidence base and should be deleted as being unsound	The proposed density guidelines in Table 5.3 (Residential Density Matrix) are broadly consistent with those contained in the London Plan.
132	9	Barton Willmore on behalf of Segro	Policy DMHB 18: Private Outdoor Amenity Space	Object	The proposed standards significantly exceed the Mayoral Housing SPG. There are no LB Hillingdon special circumstances that warrant different standards. Policy should be amended to reflect the London Plan.	The Council considers higher standards of private amenity space are especially valued by residents and an important element of the residential character and quality of the borough. Officers will continue to review the policy to ensure

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						it is in accordance with the NPPF and the provisions of the London Plan.
64	2	Canal & River Trust	Para 5.81, 5.82	Object	Para 5.81 - Using a description of 'moorings' does not cover all the different types of mooring use. Para 5.82 - Request amendments to reflect the wording provided.	Officers will undertake further investigations to assess the proposed definition of moorings.
64	3	Canal & River Trust	Policy DMHB 20: Moorings, parts i) ii) iii) v) and vi)	Object	i) This criterion is too restrictive, presumptuous and general. The mooring of boats on waterways is part of their character and there should not be a blanket negative response to proposed moorings in rural areas which is not adequately defined. Furthermore, the policy would only relate to permanent moorings and	Officers will assess the proposed changes in the context of the NPPF, the London Plan and other relevant planning guidance. Further discussions with the Canal & River Trust will be undertaken as appropriate. Any proposed changes to the policy will be set out in

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					<p>therefore would not necessarily solve the issues it is trying to address. Amended wording suggested.</p> <p>Criterion ii) This criterion is too restrictive and misses one of the key purposes of the canal. Furthermore, it must be recognised that moorings need access to the towpath for ingress and egress. Criterion iii) is too vague. It uses the word 'barrier' in an unclear manner.</p> <p>Criterion v) is not effective as it does not adequately identify what is meant by services. Boats are generally self sufficient providing they have access to suitable facilities on the network. Amended wording suggested.</p> <p>Criterion vi) change required to the wording to reflect the title of</p>	<p>the Schedule of Proposed Modifications, to be submitted for examination with the Local Plan Part 2 documents.</p>

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					the publication referenced.	
6. Environmental Protection and Enhancement						
106	1	Thomas NP Crow	N/A	Object	In North Hillingdon air quality is appalling, worst in the borough apart from Heathrow. Doctor has confirmed poor air quality is making nose run continually. Do not experience this elsewhere.	Comments regarding air quality in the borough are noted. North Hillingdon falls within the Council's Air Quality Management Area. Policy DMEI 14 seeks to address air quality issues in relation to new development.
135	5	Robin Brown	Para 6.6	Object	Proposed new wording omits reference to living walls as well as living roofs. To ensure consistency and clarity add phrase "and walls" to para 6.6.	Officers propose to amend paragraph 6.6 so that it refers to both living walls and roofs.
57	1	Greater London Authority	Policy DMEI 1: Living Walls, Roofs and Onsite Vegetation	Support	Welcome reference to the London Plan carbon dioxide emissions targets. The Council's proposed target of a 35% improvement beyond Part L 2013 Building Regulations is broadly equivalent	Support noted and welcomed.

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					to the existing London Plan 40% target, which is based on Part L 2010.	
109	3	CPRE	Policy DMEI 1: Living Walls, Roofs and Onsite Vegetation	Support	Support the emphasis on encouraging all major developments to incorporate living roofs and/or walls. However, the council should clarify what constitutes "suitable justification" for a developer to <i>not</i> incorporate living roofs and/or walls.	Support noted and welcomed.
32	3	Natural England	DMEI 1: Living Walls, Roofs and Onsite Vegetation	Support	Support for the inclusion of Green Roofs and Walls policy.	Support noted and welcomed.
135	6	Robin Brown	DMEI 1: Living Walls, Roofs and Onsite Vegetation	Object	Proposed deletion of Sustainable Design Standards would not fulfil Local Plan Part 1 Policy BE1 clause 10. Request reinstatement of Sustainable Design Standards to policy title and generalised requirement for sustainable	Since the publication of the Local Plan Part 1 requirements for sustainable design have been standardised and integrated into the Building Regulations. Relevant policy

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					design and construction.	criteria are therefore proposed for deletion.
56	3	Heathrow Airport Ltd	DMEI 1: Living Walls, Roofs and Onsite Vegetation	Support	Support revised wording of 1 i) as it enables flexibility in application of the policy. It may not be necessary for all developments in AQMAs to contribute to green infrastructure improvements to improve air quality.	Support noted and welcomed.
44	12	Ickenham Residents Association	DMEI 2: Reducing Carbon Emissions	Object	Consider that the policy is out-of-date and should be updated to reflect the latest position, as outlined on p.45 of the Government's recent Productivity Plan	Officers will continue to review the policy to ensure it is in accordance with the NPPF, NPPG and the provisions of the London Plan.
57	2	Greater London Authority	DMEI 2: Reducing Carbon Emissions	Support	Suggested that emphasis is placed on developments that genuinely cannot meet the targets on site in accordance with London Plan Policy 5.2, as opposed to the	Broadly agree and support suggested change with a slight addition as set out below:

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					<p>Council approving the development for other policy reasons and discounting the carbon targets.</p>	<p>"Proposals that fail to take reasonable steps to achieve the required savings will be resisted. However, <i>where it is clearly demonstrated that the targets for carbon emissions cannot be reasonably met onsite, the Council may approve the application and if the Council is minded to approve the application despite not meeting the carbon reduction targets, then it will seek an offsite contribution to make up for the shortfall.</i>"</p> <p>The addition of the word "reasonably" to the GLA's suggested changes allows for a greater emphasis on non technical matters for justifying why the target</p>

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						cannot be reached. For example, it may be technically possible to meet the target but financially prohibitive.
57	3	Greater London Authority	Footnote 8, page 103	Comment	The borough should not use the term 'Allowable Solution' in its policy and instead refer to carbon off-setting as set out in London Plan policy 5.2.	The footnote will be revised accordingly through the examination process.
57	4	Greater London Authority	Policy DMEI 3: Decentralised Energy	Comment	Developments located in areas of decentralised energy potential (as identified by the borough) should be future proofed for connection to potential future heat networks, as outlined in the London Heat Network Manual.	The policy seeks to ensure developments located near existing and future decentralised energy networks will be able to connect to those networks. The Council will be undertaking discussions with the GLA, with a view to addressing their comments prior to the commencement of the examination process.

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109	4	CPRE	Policy DMEI 4: Development in the Green Belt or on Metropolitan Open Land	Support	Supports this policy which seeks to prevent inappropriate development in the Green Belt and MOL. Look forward to seeing this being given due weight in planning decisions.	Support noted and welcomed.
44	3	Ickenham Residents Association	Policy DMEI 4: Development in the Green Belt or on Metropolitan Open Land	Object	Do not feel that the exceptional circumstances tests laid out in policy DMEI 4 to justify development in the Green Belt could conceivably be met at this time.	The exceptional circumstances test will be applied in accordance with national planning policy guidance and appropriate case law.
44	10	Ickenham Residents Association	Policy DMEI 4: Development in the Green Belt or on Metropolitan Open Land	Object	Would welcome clarity on the difference between 'very special' and 'exceptional' circumstances.	The reference to special circumstances will be omitted to ensure consistency with the wording used in the NPPF.
30	1	Ruislip Residents' Association	Policy DMEI 5: Development in Green Chains	Object	Reiterate the need to retain parts of current UDP Policy EM2 as the proposed policy weakens existing protection of Green Chains. Recent development in Green Belt	Strategic Policy EM2 is set out in the Local Plan Part 1 and provides strategic direction to the proposed development management

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					has not been done sensitively.	Policy DMEI 5 relating to development in the Green Belt. Once adopted, Policy DMEI 5 will replace saved UDP Policy OL11. The policies set out in the Local Plan Part 1 will be retained.
31	1	Friends of Pinn Meadows	Policy DMEI 5: Development in Green Chains	Object	UDP Green Chain Policy EM2 should be retained as proposed policy is weaker.	Strategic Policy EM2 is set out in the Local Plan Part 1 and provides strategic direction to the proposed development management policy DMEI 5 relating to development in the Green Belt. Once adopted, policy DMEI 5 will replace saved UDP policy OL11. The policies set out in the Local Plan Part 1 will be retained.
135	7	Robin Brown	Policy DMEI 5: Development in Green Chains	Object	Proposed new section B is not clear as criteria in opening sentence of section A, which relates to development in Green	Criterion A sets out the specific circumstances in which development in Green Chains would be

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					Chains and not to development in areas deficient in Green Chains. Para 6.23 is supported. Request rewording of clause B.	acceptable. Criterion B builds on this and requires all acceptable development to make a positive contribution to the nature conservation value and visual amenity of the Green Chain. It is not considered that the policy requires clarification.
98	1	Environment Agency	Policy DMEI 5: Development in Green Chains	Support	Pleased to note inclusion of requirement for developments to provide new areas of green infrastructure where Green Chains are currently deficient.	Support noted and welcomed.
135	8	Robin Brown	Para 6.27	Object	Proposed change of wording to 'aspire to include enhancement measures' would not comply with NPPF para 109 and the Council's statutory duty on biodiversity. Request deletion of proposed word changes to the paragraph.	It is not considered that the proposed wording results in conflicts with the NPPF.

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105	1	Herts and Middx Wildlife Trust	Policy DMEI 7: Biodiversity Protection and Enhancement	Object	The Policy should require all development to achieve no net loss. This should be assessed against the Biodiversity Impact Calculator. The Policy should also be prescriptive of the standard for ecology assessments. The policy should have more emphasis on certain types of improvement. Suggest amended wording to include in policy and paragraphs 6.26-6.29	Officers propose to amend the policy to clearly state the aim of new development is 'no net loss'; this would be consistent with the NPPF. The definition of no net loss could refer to the Biodiversity Impact Calculator but not prescribe its use. This could be too prescriptive for some developments and not always necessary. The other suggested changes are broadly captured by the current wordings and are therefore not necessary.
69	2	Historic England	Policy DMEI 7: Biodiversity Protection and Enhancement	Object	Impacts of renewable energy installations should be highlighted within the policy. Suggest part iv) includes "the significance of	The Council will be undertaking discussions with Historic England, with a view to addressing their

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					heritage assets" after "nature conservation value".	comments prior to the commencement of the examination process.
64	5	Canal & River Trust	Para 6.39	Object	Wording is not consistent with para 89 of the NPPF - most waterside facilities will support outdoor recreation and are therefore appropriate in Green Belt.	The paragraph refers specifically to residential moorings, which constitute residential uses and will not be supported in the Green Belt. It is recognised that outdoor recreation facilities would be considered as appropriate development in accordance with the tests set out in the NPPF.
132	10	Barton Willmore on behalf of Segro	Policy DMEI 8: Waterside Development	Object	Note that any development located in or adjacent to watercourses should enhance the waterside environment, by demonstrating a high quality design which respects the historic significance of the canal and character of the waterway, and provides access and improved	Comments noted and welcomed.

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					amenity to the waterfront.	
64	4	Canal & River Trust	Policy DMEI 8: Waterside Development, parts A ii) and F	Object	<p>Criterion A ii) - concerns are raised over the maintenance of a 5m buffer along the side of watercourses (including the canal).</p> <p>The Canal & River Trust has suggested changes to criteria F of the policy to allow improvements to encompass more than just biodiversity.</p>	<p>The requirement for a buffer was introduced in response to comments from the Environment Agency. The policy contains a caveat 'or an appropriate width as may be agreed by the Council'. This would address the concerns of the Trust that some development could be flush with the side of the canal. Officers agree with the changes proposed for clause F.</p>
98	2	Environment Agency	Policy DMEI 8: Waterside Development	Support	<p>Pleased to note inclusion of a number of the previous recommendations in this policy, particularly requirement for 8 and 5 metre buffers on main and ordinary watercourses. Policy could be stronger in section F -</p>	<p>Support noted and welcomed.</p>

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					requiring contributions to biodiversity and improvement for canal-side developments to be extended to all types of watercourse, building on Policy EM3 of Local Plan Part 1.	
98	3	Environment Agency	Policy DMEI 9: Management of Flood Risk	Support	<p>Pleased to note some positive changes. Still have some outstanding issues regarding sequential test, sequential approach, climate change and flood defences.</p> <p>Policy EM6 sets out a sequential approach in line with national policy. Recommend this is carried through into Part 2, with sites required to pass sequential test before undertaking a Flood Risk Assessment. Addendum to Sustainability Appraisal 2015 (pages 75 and 90) also highlights this and recommends inclusion of sequential and exception tests.</p>	The Council will be undertaking discussions with the Environment Agency, with a view to addressing their comments prior to the commencement of the examination process.

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					Also recommend that where sites are in Flood Zones 2, 3a or 3b and have passed the Sequential Test, the policy requires planned development to use a sequential approach within the site boundary so that more vulnerable developments are placed in areas at lowest risk of flooding. This would mean policy is in line with the SFRA in which windfall sites not included in Site Allocations should be sequentially tested to ensure they are directed towards areas at lower risk of flooding.	
98	4	Environment Agency	Policy DMEI 9: Management of Flood Risk	Object	Policy fails to mention explicitly climate change adaption and mitigation. The Sustainability Appraisal Addendum shows that the policy does not have any impact on climate change. Development proposals must be designed to reduce vulnerability	The Council will be undertaking discussions with the Environment Agency, with a view to addressing their comments prior to the commencement of the examination process.

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					<p>to climate change, with finished floor levels 300mm above the predicted flood level for the 1 in 100 chance in any year flood event and providing appropriate means of escape to a higher level within the building or safe evacuation. The Environment Agency is publishing updated climate change levels in near future.</p> <p>Policy fails to state explicitly that any development at risk of flooding protected by a defence asset must be commensurate with the lifetime of the development. Strongly recommend policy ensures that any works are designed to maintain integrity of any flood defence assets on site and do not prevent upgrading of defence assets to meet increased risk of flooding.</p>	

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					Wording to incorporate above suggested.	
54	2	Savills on behalf of Thames Water	Para 6.53	Support	Support para, however feel that the sentence stating “The Site Allocations document identifies sites that might have capacity issues and notes this as a constraint” should be removed as it infers all other sites in the document do not have capacity constraints, which could change if scale and phasing of a site changes.	Support noted and welcomed. Officers do not agree that the deletion of this sentence is necessary. It is acknowledged that changes in the scale of development may result in further infrastructure capacity issues. These matters will be addressed on a site by site basis.
54	1	Savills on behalf of Thames Water	Policy DMEI 10: Water Management, Efficiency and Quality	Support	Support Policy DMEI 10 and specifically bullet point J. Feel this could be clarified and strengthened by adding the following sentence: “Where there is a capacity constraint the Local Planning Authority will require the	Support noted and welcomed. The Council will be undertaking discussions with Thames Water, with a view to addressing their comments prior to the commencement of the

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					developer to provide detailed water and/or drainage strategy informing what infrastructure is required, where, when and how it will be delivered".	examination process.
135	9	Robin Brown	Policy DMEI 10: Water Management, Efficiency and Quality	Object	Proposed deletion of original Policy DMEI 12 has not been remedied by Policy DMEI 10 in addressing water quality. Does not comply with Local Plan Part 1 Policy EM8 or NPPF para 109. Request that Local Plan Part 1 para 8.128 should be added to policy DMEI 10.	Officers are content that the reworded Policy DMEI 10 addresses key provisions regarding water quality.
98	7	Environment Agency	Policy DMEI 10: Water Management, Efficiency and Quality	Support	Pleased to note removal of Policy DMEI 12 and strengthening of Policy DMEI 10 to include robust SuDS and focus on improving surface water quality. Agree with comment 14 of Sustainability Appraisal Addendum (Oct 2015) to include a more explicit link to benefits of SuDS. Maintain	The Council will be undertaking discussions with the Environment Agency, with a view to addressing their comments prior to the commencement of the examination process.

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					suggestion to include text to address misconnections in sewer network and role they play in phosphate pollution. Para 6.47 highlights issue of phosphates in certain rivers but policy does not include any measures for developments to address this. Wording suggested for either policy or supporting text reference to Water Framework Directive.	
98	8	Environment Agency	Policy DMEI 12: Development of Land Affected by Contamination	Support	Welcome inclusion of context in this policy. Policy should go further to encourage development on brownfield land in order to ensure remediation of contaminated sites were possible. This should be reflected both in policy and supporting text.	Support noted and welcomed. National planning policy (paragraph 111) sets out a presumption in favour of brownfield sites. It is not considered necessary to repeat the provisions of national policy.
16	3	Matthews and Son LLP (Henry Streeter Ltd)	Para 6.58	Object	Policies 5.18 and 5.20 of the London Plan are not recognised.	Officers will continue to review the policy to ensure

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					Encouragement of recycling of Construction, Demolition and Excavation materials should be enshrined in policy.	it is in accordance with the NPPF and the provisions of the London Plan.
44	2	Ickenham Residents Association	Policy DMEI 14: Air Quality	Comment	Would welcome clarification on how unacceptable risk in clause ii) of the policy is determined? Are concerned that the LBH Supplementary Planning Guidance on Air Quality and the LBH Air Quality Action Plan are both out-of-date.	The Council proposes to update its Air Quality Supplementary Planning Document. Further guidance on terminology within the policy will be defined in this document.
56	4	Heathrow Airport Ltd	DMEI 14: Air Quality	Object	Pleased that final paragraph of policy has been deleted but feel policy is still confusing and contradictory. Amended wording suggested.	The policy is line with national guidance and the London Plan. Officers will continue to review the policy to ensure it is in accordance with the NPPF and the provisions of the London Plan.
57	7	Greater London Authority	Policy DMEI 14: Air Quality	Support	Welcome the retention of the requirement to be at least 'Air	Support noted and welcomed. Reference to

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					Quality Neutral' in the draft document. To facilitate the implementation of this policy, reference to the Mayor's Sustainable Design and Construction SPG should be included.	the Mayor's Sustainable Design and Construction SPG will be included as appropriate.
16	1	Matthews and Son LLP (Henry Streeter Ltd)	Policies MIN 1: Safeguarding Areas for Minerals and Aggregates, MIN 2: Prior Extraction.	Object	Policy MIN 1 only partially recognises NPPF para 143 and NPPG. Continued confusion between requirement to identify new sites for mineral extraction and to define Minerals Safeguarding Areas (MSAs). Development Management Policies document also fails to define Minerals Consultation Areas or show any on a plan. Consider the following specific sites should be identified: Land South of Harmondsworth Quarry and North of A4; Land at Bedford Court.	Officers will continue to review the policy to ensure it is in accordance with the NPPF and the provisions of the London Plan.

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					Two of the sites listed in MIN 1 could be considered as Preferred Areas: Land west of Harmondsworth Quarry; Land north of Harmondsworth Quarry.	
56	7	Heathrow Airport Ltd	Policy MIN 2: Prior Extraction	Object	Caveat of where prior extraction of minerals would not be required should be reinstated or "overriding need" caveat that includes surface developments that are in the national interest should be added to new part iii) to be more in line with NPPF para 143, which states that minerals safeguarding should not create a presumption that resources will be worked and that prior extraction should only occur where practicable and environmentally feasible.	Officers will continue to review the policy to ensure it is in accordance with the NPPF and the provisions of the London Plan.
16	4	Matthews and Son LLP (Henry Streeter Ltd)	Deleted para 6.65	Object	Suggests deleting first line of paragraph.	Representor is referring to para 6.65 of previous proposed submission

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						document. The entire paragraph is proposed for deletion.
16	2	Matthews and Son LLP (Henry Streeter Ltd)	Policy MIN 4: Re-use and Recycling of Aggregates	Object	Basis for Policy MIN 4 is not clear and not consistent with NPPF Para 143 bullet 6, cumulative effects of multiple impact from individual sites. Should add justification for MIN 4 or delete. Evidence for choice of 165 ha should be provided together with special factors that exempt the sites in MIN 1.	Officers will continue to review the policy to ensure it is in accordance with the NPPF and the provisions of the London Plan.
126	1	Surrey County Council	Policy MIN 4: Re-use and Recycling of Aggregates	Support	Intentions of Policy MIN 1 fully supported. Only certain elements of CD&E waste stream are suitable for recycling as aggregates. Clause B (ii) should be reworded. Suggest renaming final paragraph as clause "C".	Support noted and welcomed. Officers will continue to review the policy to ensure it is in accordance with the NPPF and the provisions of the London Plan.
135	10	Robin Brown	MIN 4: Re-use and Recycling of	Object	Clause B predetermines the planning process and is	Officers will continue to review the policy to ensure

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			Aggregates		inconsistent with para 6.67, which explains that flat topography and lack of screening makes workings highly intrusive. As sites are in Green Belt this presumption in favour of permission would be contrary to national policy as the very special circumstances have not been set out. Request deletion of first sentence of clause B.	it is in accordance with the NPPF and the provisions of the London Plan.
7. Community Infrastructure						
106	2	Thomas NP Crow	N/A	Object	Questions whether or not community infrastructure is deficient.	The Council's Strategic Infrastructure Plan (SIP) provides an overview of the main areas of infrastructure that are required to support planned growth in the borough.
136	1	NHS Property Services Ltd	Para 7.5	Object	Proposed amendment replacing applicant "may" need to demonstrate" with "will" should	The supporting text and policy reflect the strategic direction for the retention

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					<p>be reversed to provide flexibility and enable assessment on a site by site basis. Alternative approach would be to add text reflecting the London Plan.</p> <p>Similarly in sentence "Where this is the case, marketing 'should' be submitted", replacement of 'may' with 'should' is not supported as not always appropriate to provide marketing evidence. This requirement should be flexibly applied and not conflict with paragraph 3.87A of the London Plan (FALP 2015).</p>	<p>of community infrastructure facilities, set out in the London Plan policy 3.16. Any proposal involving the loss of an existing community facility will be considered on a case by case basis against the policies in the development plan.</p>
53	1	Councillor Janet Duncan on behalf of LB Hillingdon Labour Group	Policy DMCI 1: Retention of Existing Community, Sport and Education Facilities	Object	<p>More protection needs to be given to existing community facilities and their incorporation into any future redevelopment proposals.</p>	<p>The Council seeks to protect existing community facilities through policy DMCI 1: Retention of Existing Community Infrastructure and is working with partners to ensure the delivery of infrastructure</p>

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						necessary to support growth. Developer contributions towards strategic and site specific infrastructure are sought through the CIL and Section 106 system.
91	3	Garden City Estate residents Association	Policy DMCI 1: Existing Community, Sport and Education Facilities	Support	Considers policy sound and prepared in accordance with the duty to cooperate, legal and procedural requirements.	Support noted and welcomed.
112	1	Theatres Trust	Policy DMCI 1: Existing Community, Sport and Education Facilities	Support	Agrees with the proposed policy, but recommends that all references to social infrastructure/ community infrastructure are consistently referred to as community facilities. Also suggest including a definition of community facilities.	Support noted and welcomed. Officers will ensure consistent terminology is used across the document.

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28	1	Sport England	Policy DMCI 1: Existing Community, Sport and Education Facilities	Object	Welcomes removal of 'Sport' from the policy (but needs removing from contents page). Part C (ii) is unclear and confusing and should be deleted. Part C (iii) should be changed to "...the redevelopment of the site would secure an over-riding <u>sporting</u> benefit". Remaining policies not sufficient to meet requirements set out in paras 73 and 74 of NPPF. Policies should seek to protect existing indoor and outdoor sports facilities from development.	The Council will be undertaking discussions with Sport England, with a view to addressing their concerns prior to the commencement of the examination process.
111	1	Councillor Sweeting	Policy DMCI 1: Existing Community, Sport and Education Facilities	Object	There should be no loss of community facilities in areas of significant housing development. Any existing sites currently used for community activities and those with a covenant restricting it to community use should be protected. Council should identify new sites for community use in	Policies in the plan relating to community infrastructure seek to resist the loss of existing facilities and encourage new provision, subject to a number of criteria. The Council's Strategic Infrastructure Plan (SIP) provides an overview

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					areas experiencing significant population increase through allocated housing sites. Alternative wording suggested.	of the main areas of infrastructure that are required to support planned growth in the borough. The SIP notes that additional school places will be required over the Plan period. The Plan will be updated to reflect the latest position with school place planning, as it progresses through the examination process. In addition, the Council is working with the Clinical Commissioning Group to ensure that the latest position with regard to new healthcare facilities is reflected in the Plan.
135	11	Robin Brown	Paras 7.12 & 7.13	Object	Does not meet objectively assessed requirements and is contrary to NPPF para 182 tests of soundness. Request that	The Council's Strategic Infrastructure Plan (SIP) provides an overview of the main areas of infrastructure

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					requirements (needs) be objectively assessed and set out how they would be met in order to achieve sustainable development.	that are required to support planned growth in the borough. The SIP notes that additional school places will be required over the Plan period. The Plan will be updated to reflect the latest position with school place planning, as it progresses through the examination process.
32	2	Natural England	Page 145	Object	No mention is made of Ruislip Woods Site of Special Scientific Interest as previously requested. Para 7.27 of the previous submission version which mentions the National Nature Reserve at the same site has been deleted and has not been mentioned elsewhere. Recognition of nationally designated sites and their protection in policy is required to	Paragraphs 7.26-7.28 of the Development Management Policies have been deleted as they provide unnecessary contextual information that adds little to the policy. SSSIs are already protected by national planning policy and policies in the London Plan. However, it is agreed that specific reference to Ruislip Woods SSSI should

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					make the plan justified and consistent with National Policy.	be included.
32	4	Natural England	Para 7.27	Support	Welcome the mention of applying Accessible Natural Green Space Standards for new development.	Support noted and welcomed.
132	11	Barton Willmore on behalf of Segro	Policy DMCI 5: Children's Play Areas	Object	The Policy should be amended to make reference to London Plan child yield calculations. There is no justification for deviation. Any policy referring to children's playspace provision should adopt a flexible approach and new residential developments should meet the playspace requirements for the new development alone and not the existing deficit.	The policy already refers to the London Plan SPG: Providing for Children's and Young Persons Play Space. This issue of yield figures will be discussed further with the GLA.
28	2	Sport England	Policy DCMI 6: Indoor Sports and Leisure Facilities	Object	No reference is made to outdoor sports facilities; this needs to be included in the policy.	The Council has recently commenced a Playing Pitch Needs Assessment in accordance with advice from Sport England. The Council will be undertaking

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						discussions with Sport England, with a view to addressing their concerns prior to the commencement of the examination process.
127	3	Transport for London	Para 7.35	Comment	Suggest inclusion of the date of the Mayor's CIL Charging Schedule for the avoidance of doubt, should rates change in the future.	Officers support the proposed inclusion of these changes.
127	4	Transport for London	Policy DMCI 7: Planning Obligations and Community Infrastructure	Object	Paragraph A states that "Infrastructure requirements will be predominantly addressed through Council's Community Infrastructure Levy. It is however understood this is not the case in Hillingdon as the borough infrastructure funding gap is higher than that which can be collected from the borough CIL. Therefore strongly caution against over-reliance on CIL funding to deliver the majority of the borough's infrastructure	It is recognised that the CIL will not address all of the identified infrastructure requirements in the borough. However, this funding route will contribute towards some transportation improvements over the period of the Plan.

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					requirements, and would suggest this wording be removed from the policy.	
135	12	Robin Brown	Deleted para 7.42	Object	Proposed deletion diminishes clarity and intent from Plan reducing its effectiveness and does not address the meaningful proportion of CIL that national regulations require for the local community. Request reinstatement of appropriately worded para 7.42.	Paragraph 7.42 is proposed to be deleted because it repeats the provisions of the Regulation 123 list and the Planning Obligations SPD. A reference to the relevant documents will be included in the supporting text for policy DMCI 1.
8. Transport and Aviation						
127	5	Transport for London	Policy DMT 1: Managing Transport Impacts, and Table 8.1	Object	Request that a transport statement may be submitted for developments if deemed it is required to assess highway and transport impacts of the proposal. Also requests that the threshold for travel plan is updated to reflect the current TfL guidance where the threshold for Use Class	The Council will be undertaking discussions with TfL, with a view to addressing their concerns prior to the commencement of the examination process.

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					D1 for places of worship and schools should be based on the number of members or staff/pupils respectively.	
127	7	Transport for London	Policy DMT 5: Pedestrians and Cyclists	Object	Requests that Policy DMT 5 promote the Legible London walking scheme as an initiative to assist in providing well signposted pedestrian and cycle routes.	The policy will be amended to make reference to the Legible London Walking Scheme.
127	6	Transport for London	DMT 5: Pedestrians and Cyclists; Appendix A table 1	Object	Cycle parking standards for multiple land uses including retail, residential units and office, are all stated incorrectly as 'maximum requirements' and should all be amended to 'minimum requirements' to ensure conformity with latest 2015 London Plan cycle parking standards.	The Council will be undertaking discussions with TfL, with a view to addressing their concerns prior to the commencement of the examination process.
127	8	Transport for London	Policies DMT 5: Pedestrians and Cyclists; DMT 6:	Object	Requests that the Hillingdon's parking standards in relation to electric vehicle charging points,	The Council will be undertaking discussions with TfL, with a view to

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			Vehicle Parking; Appendix A, Table 1		residential cycle and car parking and B1 office cycle and car parking should be revised to reflect and comply with the London Plan requirements. In relation to office parking, consider that cycle parking standards in town centres that have high public transport accessibility, such as Uxbridge, should have cycle parking standards that match inner/central London. Policy DMT 6 should clearly state that development in areas of high PTAL should aim for significantly less than 1 space per unit.	addressing their concerns prior to the commencement of the examination process.
127	10	Transport for London	Para 8.30	Object	Do not currently accept that Uxbridge should enjoy a more generous office car parking standard as justifiable circumstances because it failed to provide evidence to demonstrate that such an approach would not	The Council will be undertaking discussions with TfL, with a view to addressing their concerns prior to the commencement of the examination process.

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					cause significant adverse impacts to congestion or air quality, considering that the local highway network is often congested at peak hours; additionally, Uxbridge Town Centre is currently well served by public transport.	
127	9	Transport for London	Policy DMT 6: Vehicle Parking and Appendix A Table 1	Object	Consider the current approach adopted by Hillingdon to apply the relaxed standards for office parking across the entire borough is not acceptable. Whilst it is recognised that the London Plan allows for flexibility in setting office parking standards provided this can be justified, any flexibility should be site specific with a more detailed justification to allow TfL to assess the impact and consider the extent of conformity with London Plan policy.	The Council will be undertaking discussions with TfL, with a view to addressing their concerns prior to the commencement of the examination process.
127	11	Transport for London	Policy DMT 6: Vehicle Parking	Object	Acknowledge that in areas of low PTAL, sustainable transport	The Council will be undertaking discussions

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			and Appendix A Table 1		options for visitors could be limited; this does not apply to more accessible locations such as town centres or locations with higher PTAL. On this basis, TfL considers such parking provision for visitors may only be allowed with sites of a very low PTAL rating.	with TfL, with a view to addressing their concerns prior to the commencement of the examination process.
132	12	Barton Willmore on behalf of Segro	Policy DMT 6: Vehicle Parking	Object	The standards exceed those set out in the London Plan. When applying car parking standards to a scheme, a range of matters should be considered including local circumstances and the character and nature of the site and scheme. Parking standards should reflect PTAL and be expressed as maximums.	The Council will be undertaking discussions with TfL, with a view to addressing these comments prior to the commencement of the examination process.
65	3	Nathaniel Lichfield on behalf of Purplexed LLP	Policy DMT 6: Vehicle Parking	Object	Welcome that the parking standard has been modified to reflect the requirement for higher levels of additional B1 parking in	The Council will be undertaking discussions with TfL, with a view to addressing these comments

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					the borough to serve Outer London business needs; but Appendix C should specifically allow for additional parking in such cases (on a site-by-site basis) where it can be demonstrated that supplementary office car parking is required to allow a development to be competitive with other office facilities in the locality.	prior to the commencement of the examination process.
106	4	Thomas NP Crow	Para 8.53	Object	Pavements in many parts of North Hillingdon are deplorable eg Hercies Road, Sweetcroft Lane, junction of Hercies Road and Long Lane, North Side and outside SMC car showrooms.	This issue will be addressed outside of the Local Plan process.
106	3	Thomas NP Crow	Para 8.53	Object	Reference to commercial movements being restricted to quieter aircraft is not true. Some are louder than they used to be. Oak Farm Estate is very noisy due these aircraft, which are to be	Paragraph 8.53 reflects the latest agreements that are in place at RAF Northolt. Any necessary updates will be made during the course

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					increased in flight frequency. Need less commercial flights, not more.	of the examination process.
135	12	Robin Brown	Policy DMAV 1: Safe Operation of Airports	Object	Proposed deletion of last clause that developments should not deleteriously impact on safe movement of aircraft would run counter to the proper planning of the borough.	It is considered that the provisions of clause iii) are already covered by other policy criteria and supporting text.
56	5	Heathrow Airport Ltd	Policy DMAV 1: Safe Operations of Airports	Object	<p>Land uses and air noises - policy should specify where planning permission would be refused for sensitive uses within specific noise contours. Council should refer to paras 3.20 and 3.23 of the Government's Aviation Policy Framework.</p> <p>Aviation Safety - no justification has been given for deletion of iii) which provided necessary safeguards for protecting airport operations.</p>	<p>The policies and provisions comply with the NPPF and the London Plan.</p> <p>Para 8.35 will be amended to reflect the correct number of operational terminals at Heathrow Airport.</p>

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					Terminals - para 8.35 Heathrow currently operates four terminals; Terminal 1 was closed in June 2015 so original text was correct.	
56	6	Heathrow Airport Ltd	Policy DMAV 2: Heathrow Airport; paras 8.46,8.47,8.51	Object	<p>Airport related uses - ask for part B to be deleted as restricting airport uses to within the airport boundary will not prevent those uses from happening and runs counter to aspirations for economic development.</p> <p>Pressure on Green Belt and congestion - Green Belt already has a high level of protection to protect against encroachment. Heathrow Airport has greater public transport accessibility than suggested locations for office and hotel accommodation. Para 8.46 should be deleted.</p> <p>Other matters - Final sentence of para 8.47 should refer to Heathrow Airport Limited, not</p>	<p>Heathrow is a crucial influence in attracting new investment to the area. The Council seeks to ensure that land within the airport boundary continues to be protected for activity directly related to the airport. Outside the boundary there is a requirement to balance demand for hotel and employment uses in order to manage economic growth.</p> <p>Para 8.47 will be amended to refer to Heathrow Airport Limited.</p>

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					BAA.	
Appendix A: Householder Development Policies						
54	3	Savills on behalf of Thames Water	Policy DMHD 3: Basement Development	Support	Supports the policy but recommends the addition of a paragraph on the need to fit basements with a positive pumped device or equivalent to ensure basements are protected from sewer flooding caused by backflow and ensure policy complies with NPPF para 103.	Support noted and welcomed. Officers are happy for specific references to the inclusion of a pumping device to be added to the supporting text for Policy DMHD 3.
120	1	Jonathan Marx	Policy DMHD 3: Basement Development	Object	Concerns regarding the impacts and assessment of structural surveys to support applications for basement development. Suitable expertise should be present at Planning Committee to improve the quality of guidance being offered to decision-makers.	This issue will be taken forward outside of the Local Plan process.
44	1	Cllr Hensley	N/A	Comment	Request that the condition 'external surfaces to match' is	Further discussions will be undertaken with Cllr

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APPENDIX 1: DEVELOPMENT MANAGEMENT POLICIES						
ID	Rep no	Individual/Organisation	Para/Policy /Map	Support /Object	Summary of Representation Received	Officer Response
					revisited. This only applies to the property in question and adjacent properties. Reference that all external surfaces should match adjacent properties.	Hensley to ensure these proposals are incorporated into the Plan.
44	9	Ickenham Residents Association	Appendix A	Support	Support the 'No Hip to Gable' development management policy and urge LB Hillingdon to consider whether it is doing all it can to restrict the use of permitted development rights on loft conversions in areas that might qualify for Article 4 exemptions.	Support noted and welcomed.
Appendix B: Design Guidance for Shopfronts						
14	2	Chris Thomas Ltd on behalf of British Sign & Graphic Association	Para B1.11	Object	In many cases, corporate signs may not require adjusting. Suggest inserting "where necessary to preserve and/or enhance the character and appearance of the building and area" after "applicants will be expected to	The Council's policies have been drafted to protect the particular character of town centres and Conservation Areas in the borough. The issue of advertisements

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APPENDIX 1: DEVELOPMENT MANAGEMENT POLICIES

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					adapt their corporate signage". "effecting" in para B1.11 should be "affecting".	cuts across a number of policy areas including the public realm, heritage and shopfronts. The Council's general policy on advertisements has been prepared to protect visual amenity and to maintain the quality of the public realm. Policy requirements and guidance are geared towards meeting this objective. Officers will undertake a further review of the advice and guidance provided on advertisements and other detailed design matters, prior to the submission of the Local Plan documents for public examination.
14	3	Chris Thomas Ltd on behalf of British Sign &	Para B1.12	Object	Most of the advice is overly restrictive and some is contrary to	See the above response to all comments received from

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APPENDIX 1: DEVELOPMENT MANAGEMENT POLICIES						
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		Graphic Association			regulations. Consider whole paragraph should be deleted.	Chris Thomas Ltd on behalf of British Sign & Graphic Association.
14	4	Chris Thomas Ltd on behalf of British Sign & Graphic Association	Para B1.14	Object	Too many assumptions and generalisations. Many conservation areas which often include listed buildings are thriving commercial areas where the full range of advertising is to be expected and welcomed providing it does not detract from amenity. Consider second sentence of para B1.14 should be deleted.	See the above response to all comments received from Chris Thomas Ltd on behalf of British Sign & Graphic Association.
Appendix C: Parking Standards						
Appendix D: Town Centre Maps						
44	8	Ickenham Residents' Association	Ickenham Local Centre map	Comment	Seek clarification for the rationale for the designation of a Primary Shopping Area within the Ickenham shopping area.	The Primary Shopping Area has been carried forward from the Unitary Development Plan.

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