

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
1	1	PINS	Core Strategy Consultation Draft	No comment	<p>Thank you for sending a copy of your Regulation 25 Public Participation document on which representations have been invited. I understand this has been published for consultation in accordance with Paragraphs 4.27 - 4.29 of PPS 12. On publication of the Development Plan Document under Regulation 27 please send the Planning Inspectorate one paper and one electronic copy of the Development Plan Document.</p> <p>Three publications which will prove useful are:</p> <p>(1) The Planning Inspectorate publication Local Development Frameworks Examining Development Plan Documents: Soundness Guidance (July 2008) which contains a framework for assessing soundness.</p> <p>(2) The Planning Inspectorate publication Examining Development Plan Documents: Procedure Guidance.</p> <p>(3) The 'Plan Making Manual' produced by the Planning Advisory Service.</p> <p>I am copying this letter to Julie Shanahan at GOL for information.</p>	<p>Noted. This Regulation 25 consultation has been carried out in line with the Council's Statement of Community Involvement (SCI) adopted in November 2006. The involvement of the public and key stakeholders in preparing the Core Strategy Consultation Draft has followed the approach set out in the SCI.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>To take into consideration the Planning Inspectorate guidance notes for the next Regulation 27 consultation.</p>
2	1	Waste Recycling Group	Core Strategy Consultation Draft	No comment	WRG has no comments to provide. I would be grateful if your database could be duly amended so that I am the initial contact.	<p>Noted - will amend consultation database as requested.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
3	1	Natural England	8 Core Policies - Environmental Management Policy EM7: Biodiversity and Geological Conservation	Object	We welcome the reference to green roofs and the planting of street trees but recommend that these are referenced under a section on Green Infrastructure.	<p>Disagree. The Environmental Management section adequately considers Green Infrastructure and its links to biodiversity, climate change, health and access.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
3	2	Natural England	8 Core Policies - Environmental Management Climate Change Adaptation and Mitigation	Object	<p>The Green Infrastructure section should be designed to be overarching and include within it specific policies on climate change adaptation, health, access and greenspace.</p> <p>Also recommend that the biodiversity policy be included within this section.</p>	<p>Disagree. There is no need for a specific Green Infrastructure section. The issues raised in this representation are covered elsewhere in the Environmental Management section.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
3	3	Natural England	8 Core Policies - Environmental Management General	Object	<p>Natural England have identified four expressions to reflect the key features of a place:</p> <ul style="list-style-type: none"> - Natural Signature - Natural Resilience - Natural Health Service - Natural Connections <p>We would expect the Core Strategy to demonstrate how these expressions have been considered and how policies contribute to the wider green infrastructure network. In particular we would expect any development to positively contribute to and reflect the 'natural signature' of Hillingdon.</p>	<p>Noted. The Core Strategy policies have been drawn up with these underlying objectives - it is considered that they are reflected already.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
3	4	Natural England	7 Core Policies - Historic and Built Environment Policy BE1 Built Environment	Object	<p>New developments should :</p> <ol style="list-style-type: none"> 1) protect the natural environment, 2) mitigate against adverse effects and 3) seek to enhance and protect biodiversity. 	<p>Agree, point 7 of Policy BE1 to be amended.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Amend Point 7 of Policy BE1 by deleting wording 'promote and encourage biodiversity' and replace with 'enhance and protect biodiversity'.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
3	5	Natural England	8 Core Policies - Environmental Management Policy EM1: Climate Change Adaptation and Mitigation Policy EM7: Biodiversity and Geological Conservation	Support	Welcome inclusion of policies EM1 (Climate Change Adaptation and Mitigation) and EM7 (Biodiversity and Geological Conservation).	Support welcomed. <u>Council's Proposed Action</u> No proposed change.
3	6	Natural England	8 Core Policies - Environmental Management Policy EM7: Biodiversity and Geological Conservation	Support	With regards to Policy EM7, support the Council's aim to increase the number of designated sites within the borough in order to improve site protection. With regards to site designation, we recommend that : 1) focus is paid to areas of deficiency and areas deficient in access to nature and 2) links are established between designated sites, allowing wildlife corridors to be established.	Noted. <u>Council's Proposed Action</u> No proposed change.
4	1	Home Group	Core Strategy Consultation Draft	Support	Supports the Core Strategy.	Support welcomed. <u>Council's Proposed Action</u> No proposed change.
5	1	Sustrans	8 Core Policies - Environmental Management Open Spaces, Rivers and Canal Corridors General Comments	Object	The following are recommended for local greenway developments: - Grand Union Canal - Hayes to Cranford - Yeading Brook	Noted. These recommendations will be explored through work on the Biodiversity Action Plan and Site Allocations Development Plan Document. <u>Council's Proposed Action</u> No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
6	1	BAA Airports	9 Core Policies - Transport and Infrastructure Heathrow Airport	Observation	<p>In order to meet the requirements of Paragraph 28 of Annex 2 to the Town and Country Planning (Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction 2002, suitable aerodrome safeguarding policies should be incorporated into the Local Development Framework.</p> <p>For Hillingdon Borough Council the following model policies would be recommended:</p> <p>Model Policy 1A: Aerodrome Safeguarding Within the Safeguarding Zones around Heathrow Airport, shown on the Proposals Map, developments will be permitted which demonstrate that:</p> <ul style="list-style-type: none"> a) the height of construction equipment, the height of the completed development and associated landscaping will not penetrate the protected surface of the safeguarding zone; development may have to follow an agreed construction methodology, restrictions may be imposed on future extensions and the height of landscaping to maintain the integrity of the protected surface b) the position and height of construction equipment, buildings, telecommunications equipment, landscaping and external lighting arrangements will not interfere with the visual and electronic navigational aids of the airport; restrictions may be imposed to enable further assessment of any proposed changes c) the design and construction of buildings, mining, engineering and other operations (including landscaping, water features and sustainable urban drainage schemes) and material changes of use of land will not increase the bird hazard risk to the safe operation of the airport or the movement of aircraft; the implementation of a bird hazard management plan will be made the subject of a legal agreement. <p>Model Policy 2: Wind Turbine Developments Within the safeguarding zone around Heathrow Airport, shown on the Proposals Map, wind turbine development will be permitted that demonstrates for the duration of the construction period and during operation it will not adversely affect the operation of Heathrow Airport or the navigational aids, communication or surveillance equipment used for air navigation at Heathrow Airport.</p>	<p>Safeguarding is appropriately dealt with in the Development Management and Proposals Map DPDs.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p style="text-align: right;">No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
7	1	Ministry of Defence	8 Core Policies - Environmental Management Climate Change Adaptation and Mitigation	Object	<p>Ensure structures do not cause an obstruction to air traffic movements at the MOD aerodromes or compromise the operation of air navigational transmitter/receiver facilities located in the area.</p> <p>The MOD's concern relates to the potential for compost facilities to be attractive to large or flocking bird species hazardous to air traffic. In relation to the use of solar panels or PV cells the MOD is concerned due to potential increased glare hazardous to air traffic procedures and critical stages of the flight process i.e. take off and landing.</p> <p>A further MOD safeguarding concern affecting the Borough of Hillingdon relates to the development of wind turbines due to their potential to create a physical obstruction to air traffic movements and cause interference to Air Traffic Control radar installations.</p>	<p>The Core Strategy is a high level strategic policy document that is required to be in accordance with the London Plan, and national policy statements, and as such, promotes energy saving technology and low carbon sources of energy generation.</p> <p>Concern over the design and/or scale of such energy saving or generating measures or developments will be dealt with in the Development Management DPD.</p> <p>In terms of waste composting creating potential hazards for aircraft. The Draft West London Waste Plan Development Plan Document (WLWP) is currently being prepared for a second round of consultation. Representations regarding the impacts of waste activities/facilities on the environment made during that consultation will be considered.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
8	1	Fulmer Parish Council	Core Strategy Consultation Draft General	Observation	There does not appear to be anything that impacts on Fulmer Parish, so we have no comments to make.	<p>Noted.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
9	1	Hillingdon Arts Association	9 Core Policies - Transport and Infrastructure Policy CI3: Culture 9.53-9.57	Object	National Indicator NI11 should be embedded as a core element of the strategy as the council's chosen measure of engagement in the arts.	<p>Policies are monitored in accordance with the provisions of the Annual Monitoring Report (AMR). NI11 relates to the implementation of the Council's Cultural Strategy rather than the Core Strategy.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Proposed amendment to Monitoring section of Policy CI3, second paragraph:</p> <p>'The Annual Monitoring Report will review the progress of Policy CI3 against the objectives of the Council's Cultural Strategy, which incorporates the main provisions of National Indicator 11.'</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
9	2	Hillingdon Arts Association	9 Core Policies - Transport and Infrastructure Policy CI3: Culture 9.53-9.57	Object	No attention given to creative industries which are a current and potential strength for Hillingdon. They could be a core driver for any new cultural quarter.	<p>The Council has conformed with the requirements of the current London Plan policy 3B.8 re: creative industries by its inclusion of policies CI 1 and CI 3, which stress the importance of arts and cultural facilities and activities in the borough - and at paragraph 9.55 where the potential for a new cultural quarter to augment Uxbridge town centre is highlighted.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
9	3	Hillingdon Arts Association	9 Core Policies - Transport and Infrastructure Policy CI3: Culture 9.55	Object	It is false to claim that the North-east of the borough is poorly served by facilities (9.55). It is only poorly served by Hillingdon facilities - it is brilliantly served by facilities in Watford and Harrow. The strategy should recognise this and should establish collaborations with these arts facilities rather than trying to replicate them.	<p>The Core Strategy has been prepared in accordance with Strategic Objective 6 (SO6), which seeks to promote social inclusion through equality of opportunity and equality of access to cultural facilities in the borough.</p> <p>Policy CI3 therefore seeks to identify deficiencies and promote access to cultural facilities in Hillingdon.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
9	4	Hillingdon Arts Association	9 Core Policies - Transport and Infrastructure Policy CI3: Culture 9.53-9.57	Object	It is impossible to create a viable strategy for the arts without a recognition of the importance of Quality.	<p>Reference to improving the quality of cultural facilities to be included in relation to policy CI 3.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend first bullet point at Policy CI3: Culture</p> <p>'Safeguarding the quality of existing viable cultural facilities and supporting proposals for new and improved cultural facilities.'</p>
10	1	Individual	8 Core Policies - Environmental Management Allotments	Object	<p>Allotments - Hillingdon compares favourably with other London boroughs when it comes to provision of allotments. Their role should be recognised in the context of their contribution to leisure, to health, to sustainability, biodiversity or to their contribution to green corridors.</p> <p>There are waiting lists for plots on the majority of allotment sites in Hillingdon, so a commitment to actively look for additional sites would be appropriate.</p>	<p>The Core Strategy contains policies EM 2 and EM 4 which together set out its approach to safeguard and enhance the borough's stock of open space - which includes allotments. Policy EM 4 notes the importance of open spaces generally for the opportunity they give to facilitate active lifestyles within walking distance of people's homes.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
11	1	Network Rail	Core Strategy Consultation Draft General	Observation	Network Rail has no comments to make.	Noted.
						<u>Council's Proposed Action</u>
						No proposed change.
12	1	Turley Associates on behalf of Sainsbury's	5 Core Policies - The Economy Policy E4: Uxbridge Map 5.2 Strategic Site (indicative): Boundary Changes to Uxbridge Town Centre	Object	In recognition that the Sainsbury's Store on York Road is the main convenience retail anchor for Uxbridge Metropolitan centre, it should be identified within a Shopping Frontage.	Detailed town shopping frontage proposals do not form part of the Core Strategy. Any detailed changes to town centre boundaries will be brought forward through the Site Allocations Development Plan Document.
						<u>Council's Proposed Action</u>
						No proposed change.
12	2	Turley Associates on behalf of Sainsbury's	5 Core Policies - The Economy Policy E5: Town and Local Centres Table 5.5: Net Additional Comparison Goods Floorspacee Req (sq.m)	Object	<p>This policy stipulates that retail growth will be directed to District Centres. However Uxbridge is a Metropolitan Centre and retail growth should also be encouraged to locate here.</p> <p>Policy E5 should be amended to read: "The Council will accommodate additional retail growth in all Town Centres as set out in Table 5.5 and will promote uses appropriate to their size and location..."</p>	Table 5.5 sets out GLA comparison retail growth figures for District Centres which form part of the strategic network of London-wide town centres. (Ickenham is included in Comparison Goods Retail Floorspace Need Study, but is no longer a District Centre and the appropriateness of setting growth requirements is questionable). Policy E5 states that the Council will accommodate this growth. Policy E4 covers Uxbridge separately and includes accommodation of retail growth. It is therefore not necessary to change Policy E5.
						<u>Council's Proposed Action</u>
						No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
12	3	Turley Associates on behalf of Sainsbury's	5 Core Policies - The Economy Map 5.3: Town Centre Improvements	Object	Uxbridge Road, Hayes should be a District Centre. Lombardy Retail Park is included within the town centre boundary of Uxbridge Road and should be identified as Primary Shopping Frontage.	<p>Disagree. Hillingdon's Retail Study (2006) examines the possibility of raising the centre's position within the retail network to a District Centre. Uxbridge Road, Hayes is located near Hayes, which is currently classified as a District Centre in the London Plan. The Retail Study states that increasing the position of Uxbridge Road, Hayes in the retail network may be detrimental to Hayes due to the close proximity of the centre to Hayes, which currently has relatively low vitality and viability. Due to the dominance of service provision within this centre relative to the comparison provision, the fact that much of the floorspace is under performing and there is no quantitative need to increase supply, the Study recommends that Uxbridge Road, Hayes should maintain its current position as a Minor Centre within the retail network. The Study also advises that the LDF should have regard to the network and hierarchy of all centres as well as each centres individual role and function.</p> <p>Changes to town centre boundaries will be brought forward through subsequent Development Plan Documents.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
12	4	Turley Associates on behalf of Sainsbury's	5 Core Policies - The Economy Map 5.3: Town Centre Improvements	Object	South Ruislip has the characteristics of a District Centre, and should be accorded this status.	<p>Disagree. The strategic town centre hierarchy is defined by the London Plan. The characteristics for District Centres are set out in Annex 2 of the Replacement London Plan (2009) as typically containing 10,000 –50,000sq.m of retail floorspace. South Ruislip has just under 8,500 sq.m of retail floorspace. It does not therefore meet the criteria for a District Centre.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
12	5	Turley Associates on behalf of Sainsbury's	5 Core Policies - The Economy Map 5.3: Town Centre Improvements	Object	The Sainsbury's at 11 Long Drive, South Ruislip is still only partially included within the Local Centre Boundary of South Ruislip. The southern half of the site should be included in the Local Centre Boundary and the Core Shopping Area	<p>Detailed changes to town centre boundaries do not form part of the Core Strategy. These will instead be brought forward through the Site Allocations Development Plan Document.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
13	1	GVA Grimley on behalf of VSM Estates	5 Core Policies - The Economy Policy E4: Uxbridge	Support	Overall, VSM Estates welcome a number of positive aspects to the Core Strategy including the recognition of the role that the redevelopment of RAF Uxbridge will play in the economic growth of Uxbridge town centre.	<p>Support welcomed</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
13	2	GVA Grimley on behalf of VSM Estates	5 Core Policies - The Economy Table 4.1 Summary of Growth in Hillingdon 2011-2026 Table 5.4 Future of Uxbridge Town Centre	Object	New RAF Uxbridge jobs in Tables 4.1 and 5.4 should show figures for the town centre extension only. Correct figures are approximately 969 permanent, direct jobs and between 48 – 146 indirect jobs.	<p>Agreed. Figures will be amended.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Figures in Tables 4.1 and 5.4 to be amended as recommended by the objector.</p>
13	3	GVA Grimley on behalf of VSM Estates	5 Core Policies - The Economy Map 5.2 Strategic Site (indicative): Boundary Changes to Uxbridge Town Centre	Object	The boundary of the town centre extension at RAF Uxbridge is not concurrent with the submitted planning application.	<p>Uxbridge town centre extension map will remain indicative until it can be defined through the planning application process.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
13	4	GVA Grimley on behalf of VSM Estates	6 Core Policies - New Homes Policy H2: Affordable Housing	Object	<p>The Core Strategy has a requirement for 50% affordable housing on developments of 10 or more residential units, subject to viability, with a tenure mix of 70% for housing for social rent and 30% intermediate housing. This differs significantly from the RAF Uxbridge SPD, which encourages 53% of affordable housing to be social rented and 47% to be low cost / intermediate housing.</p> <p>We request confirmation that the SPD policy on affordable housing will continue to prevail after the Core Strategy is adopted.</p>	<p>The policy is to be amended to reflect the findings of emerging evidence base documents, including the borough-wide Economic Viability Study and Housing Market Assessment. Subject to viability and if appropriate in all circumstances, 35% (rather than 50%) of all new units will be expected to be delivered as affordable housing.</p> <p>Site specific targets that have been agreed with the Council will not be subject to change as a result of emerging policy.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Sub-section i) in policy H 2 to be amended to read:</p> <p>" i.) subject to viability and if appropriate in all circumstances, 35% of all new units are delivered as affordable housing, with a tenure mix of 70% housing for social rent and 30% intermediate housing;"</p>
14	1	PAD Consultancy Limited on behalf of Crossier properties	5 Core Policies - The Economy Policy E1: Managing the Supply of Employment Land Appendix 1 Evidence Base	Object	The Wagon and Horses Public house, 15 Uxbridge Road, Uxbridge should be removed from the Springfield Road, Hayes employment area (LSIS).	<p>The Core Strategy does not deal with site specific locations. This representation will be considered as part of the Site Allocations DPD process.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
15	1	Irish Traveller Movement in Britain (ITMB)	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision 6.26 Intro to section	Object	Given the recent Letter update from the Secretary of State (6th July 2010) and the statement by the Mayor of London as part of the Draft Replacement London Plan EiP (19th July 2010) this introductory statement needs updating.	<p>The Council's policy on additional pitch provision will reflect government policy and the latest provisions of the London Plan. This section of the plan will be updated in the light of discussions and evidence presented at the Replacement London Plan EiP.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Explanation to be added to the draft Core Strategy at paragraphs 6.29 - 6.31:</p> <p>"Policy 3.8 of the Replacement London Plan (2009) contains borough specific gypsy and traveller pitch provision targets, to be met over the period 2007-2017.</p> <p>The proposed minor alteration to policy 3.8 of the Replacement London Plan on gypsies and travellers (including travelling show people) is currently open for public comment. Under the provisions of proposed policy, boroughs are required to work with the Mayor to ensure that needs are identified and accommodation requirements of these groups are addressed in line with national policy.</p> <p>In formulating its policy on this issue, the Council will balance the need for additional pitch provision with the availability of suitable sites. The identification of suitable sites may require the preparation of additional evidence base as part of the production of the subsequent Site Allocations Development Plan Document.</p>
15	2	Irish Traveller Movement in Britain (ITMB)	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision Point a, para 6.26	Support	The ITMB welcomes Hillingdon's commitment to protect Colne Park for its current use.	<p>Noted.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
15	3	Irish Traveller Movement in Britain (ITMB)	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision Point bi, para 6.26	Object	The ITMB opposes the stated position, whereby "a need for such accommodation which is not being met in the Borough or elsewhere in London." Local need must be met locally. A regional response to meeting Gypsy and Traveller pitch provision is no longer suitable.	<p>The Council's policy on additional pitch provision will reflect government policy and the latest provisions of the London Plan. This section of the plan will be updated in the light of discussions and evidence presented at the Replacement London Plan EiP.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Explanation to be added to the draft Core Strategy at paragraphs 6.29 - 6.31:</p> <p>"Policy 3.8 of the Replacement London Plan (2009) contains borough specific gypsy and traveller pitch provision targets, to be met over the period 2007-2017.</p> <p>The proposed minor alteration to policy 3.8 of the Replacement London Plan on gypsies and travellers (including travelling show people) is currently open for public comment. Under the provisions of proposed policy, boroughs are required to work with the Mayor to ensure that needs are identified and accommodation requirements of these groups are addressed in line with national policy.</p> <p>In formulating its policy on this issue, the Council will balance the need for additional pitch provision with the availability of suitable sites. The identification of suitable sites may require the preparation of additional evidence base as part of the production of the subsequent Site Allocations Development Plan Document.</p>
15	4	Irish Traveller Movement in Britain (ITMB)	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision Point bii, para 6.26,	Support	The ITMB supports Hillingdon's commitment to provide land that is "environmentally acceptable for residential occupation." However would suggest that "environmentally acceptable" should be defined in more detail in terms of being in line with planning and environmental regulations on the development of social accommodation	<p>Noted</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
15	5	Irish Traveller Movement in Britain (ITMB)	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision Point b iii	Object	The wording here is inappropriate. Why would the building of a new site have any "significant adverse effects on the amenity of occupiers of adjoining land."	<p>The impact on local amenity applies to the assessment of proposals for gypsy and traveller pitches, in the same way as it does to all other development proposals. Planning applications for development proposals that result in an adverse impact local amenity will be refused.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
15	6	Irish Traveller Movement in Britain (ITMB)	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision Para 6.26	Support	All communities require access to services; this right should be given careful consideration when building any new provision.	<p>Noted.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
15	7	Irish Traveller Movement in Britain (ITMB)	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision Para 6.27	Object	As mentioned above and in light of recent policy updates this is now out of date. The ITMB strongly opposes the target of 7 new pitches.	<p>The Council's policy on additional pitch provision will reflect government policy and the latest provisions of the London Plan. This section of the plan will be updated in the light of discussions and evidence presented at the Replacement London Plan EiP.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Explanation to be added to the draft Core Strategy at paragraphs 6.29 - 6.31:</p> <p>"Policy 3.8 of the Replacement London Plan (2009) contains borough specific gypsy and traveller pitch provision targets, to be met over the period 2007-2017.</p> <p>The proposed minor alteration to policy 3.8 of the Replacement London Plan on gypsies and travellers (including travelling show people) is currently open for public comment. Under the provisions of proposed policy, boroughs are required to work with the Mayor to ensure that needs are identified and accommodation requirements of these groups are addressed in line with national policy.</p> <p>In formulating its policy on this issue, the Council will balance the need for additional pitch provision with the availability of suitable sites. The identification of suitable sites may require the preparation of additional evidence base as part of the production of the subsequent Site Allocations Development Plan Document.</p>
15	8	Irish Traveller Movement in Britain (ITMB)	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision Para 6.28	Object	The decision to wait on the West London Housing Partnership report, before allocating land is inappropriate. There is already a need identified by Hillingdon Homes.	<p>Sites for additional pitches will be allocated through the Site Allocations Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
15	9	Irish Traveller Movement in Britain (ITMB)	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision Para 6.28	Object	The Hillingdon Traveller Inter Agency Forum is ideally placed to help inform this Core Strategy, ensuring Traveller participation and voice in the decisions that affect them. The ITMB recommends that this forum be seen as a critical friend to the council when considering and developing new Traveller site provision.	<p>The Council's policy on additional pitch provision will reflect government policy and the latest provisions of the London Plan. This section of the plan will be updated in the light of discussions and evidence presented at the Replacement London Plan EiP.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Paragraph 6.28 to be deleted.</p> <p>Explanation to be added to the draft Core Strategy at paragraphs 6.29 - 6.31:</p> <p>"Policy 3.8 of the Replacement London Plan (2009) contains borough specific gypsy and traveller pitch provision targets, to be met over the period 2007-2017.</p> <p>The proposed minor alteration to policy 3.8 of the Replacement London Plan on gypsies and travellers (including travelling show people) is currently open for public comment. Under the provisions of proposed policy, boroughs are required to work with the Mayor to ensure that needs are identified and accommodation requirements of these groups are addressed in line with national policy.</p> <p>In formulating its policy on this issue, the Council will balance the need for additional pitch provision with the availability of suitable sites. The identification of suitable sites may require the preparation of additional evidence base as part of the production of the subsequent Site Allocations Development Plan Document.</p>
15	10	Irish Traveller Movement in Britain (ITMB)	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision Flexibility	Object	Hillingdon should acknowledge the local need for Gypsy and Traveller accommodation based on an official consultation with the local Gypsy and Traveller community and inter agency forum.	<p>The need for additional pitch provision put forward in these representations is acknowledged. Additional pitches will be identified in the Site Allocations Development Plan Document, where appropriate.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
16	1	Arora Management Services Ltd	4 The Vision - where we want to be Map 4.1 Key diagram	Object	AMSL objects to the designation of the Terminal 5 site as Green Belt.	<p>The Council is aware of the need to reconsider the Green Belt boundary further to the development of Terminal 5 and will bring forward any proposed detailed change as part of a set of Green Belt boundary alterations to be brought forward as part of the Site Allocations Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
16	2	Arora Management Services Ltd	5 Core Policies - The Economy Map 5.1 Locations for Economic Growth	Object	The preferred area for growth for hotels and offices at Heathrow is not shown unlike those at Uxbridge and Hayes-West Drayton. It is not therefore clear where Policy E2 applies at Heathrow.	<p>It is agreed that Map 5.1 does not show detailed areas for hotel and office growth at Heathrow. The Core Strategy is strategic and is not intended to show specific sites which make up the complex Heathrow area. Detailed site-specific policies will be brought forward through the Development Management, Site Allocations and Heathrow Area DPDs. Instead of a detailed map, Policy E2 describes areas suitable for hotel growth which includes "sites outside of designated employment land on the Heathrow perimeter". Table 5.3 sets out the sub-areas of the Heathrow Opportunity Area, including Heathrow Airport and Perimeter. It states "Heathrow is a crucial influence in attracting new investment to the area and this Core Strategy will 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. The designated employment areas along Bath Road will be protected as Locally Significant Industrial Locations, while the Heathrow perimeter, specifically Bath Road, BA Waterside, Harmondsworth and along the South West Road, will continue to be a key location for offices. There is particular pressure on employment land for hotel uses in the Heathrow area and hotel development will be directed to locations outside the airport boundary and outside of designated employment areas."</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Changes to the Key Diagram and Map 5.1 are proposed to clarify growth areas in the Hayes-West Drayton Corridor. Add overarching sentence to the beginning of Table 5.3 which makes clear that growth in the Heathrow OA will be focused on sustainable locations such as town centres and areas with good access to public transport.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
16	3	Arora Management Services Ltd	5 Core Policies - The Economy Table 5.2 Projected Hotel Growth	Object	It is considered that the 5,600 additional hotel bedrooms identified in the Heathrow Tourism Study 2007 should be specified in place of the 3,800 GLA demand study 2006	<p>Disagree. Policy E2 states the Council will accommodate a minimum of 3,800 hotel additional hotel bedrooms over the plan period. Given the two different targets, it is considered appropriate to set a minimum growth benchmark of the lower figure which does not preclude achieving the higher number.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
16	4	Arora Management Services Ltd	5 Core Policies - The Economy Policy E2: Location of Employment Growth	Object	Object to the exclusion of hotels from Heathrow Airport.	<p>Activities related to the operation of Heathrow, such as passenger terminals and maintenance facilities, take place inside the airport boundary and the Council will ensure that land within the boundary is protected for activity directly related to the airport. There is particular pressure on land for hotel uses in the Heathrow area. The cumulative impact of development for other uses, including hotels, within the airport boundary is to reduce the land available for essential operational uses, both current and future. The Council will therefore resist such development and this will be reflected in the Development Management Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
16	5	Arora Management Services Ltd	5 Core Policies - The Economy Table 5.3 Heathrow Opportunity Area - Future of Key Sub-Areas	Object	There is a need for flexibility to allow non-airport related development on-airport where airport sites cannot realistically be used for airport development	<p>The Council has a responsibility to provide strategic direction for Hillingdon in order to maintain a sustainable borough and the Core Strategy is a vehicle for this. The Council will resist non-operational uses within the airport boundary in order to protect the strategically important but finite supply of land available. Applications will be assessed in line with policies in the Core Strategy, Development Management and Site Allocations DPDs.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
17	1	Individual	Core Strategy Consultation Draft Consultation	Object	Consultation period is not long enough and there has been no attempt to reach the individual resident.	<p>This Regulation 25 consultation has been carried out in line with the Town and Country Planning Regulations 2004 (as amended). Whilst the regulations do not specify a particular time period for representations on Regulation 25, Hillingdon's Statement of Community Involvement (SCI) adopted in November 2006 sets out a minimum of six weeks for public consultations for each of the stages in the plan making process. In line with previous consultations on the Core Strategy, a six week consultation period was planned for the draft Core Strategy to be consistent with Hillingdon's SCI.</p> <p>Involvement of the public and key stakeholders in preparing the Core Strategy Consultation Draft has followed the approach set out in the Council's Statement of Community Involvement (SCI) adopted in November 2006. Various publicity methods were used with the aim of raising awareness of the LDF and informing as many people as possible. These have included information being made available on the Council's website, at all borough libraries and One-stop-shop in Hayes, 6 public drop-in sessions, 7 press notices, an article in Hillingdon People magazine, poster displays at Post Offices, GP surgeries and schools, public exhibitions at Uxbridge Library and Civic Centre, audio advertisement in the Hillingdon Talking Newspaper for the visually impaired, attendance at representative group meetings. Approximately 2970 letters/ emails were sent to a wide range of groups and individuals on the LDF consultation database including 50 randomly selected residents per ward from the electoral register (1100) and to 197 randomly selected businesses from the 2008 Hillingdon Business Directory.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
17	2	Individual	Core Strategy Consultation Draft General	Object	I understand the Council intends to provide the citizens of West Drayton with an over-view of the above plans to be published in the West Drayton & Uxbridge Gazette next Wednesday July 28th, 2010. Yet the Council has decreed that the closing date for comment, favourable or otherwise, is July 30th, 2010. A two day window for perusal and response!	<p>Notices in the local press were placed on 16th June 2010 allowing a 6 week consultation period ending on 30th July.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
17	4	Individual	5 Core Policies - The Economy Map 5.1 Locations for Economic Growth Strategy for the Heathrow Opportunity Area	Object	Concern over Opportunity Area designation for West Drayton.	<p>West Drayton forms part of the Heathrow Opportunity Area which is a regionally important location for growth. Table 5.3 of the Core Strategy identifies Yiewsley & West Drayton as suitable for regeneration opportunities through the new Crossrail station, the Grand Union Canal and mixed use development schemes, modern business accommodation, and improved public transport. It is important to include West Drayton in the Heathrow OA so it can benefit from the inter-relationship of the area, for example access to new jobs, affordable homes, better public transport links. Detailed proposals for the area will be set out in a future Heathrow Area planning document. It is therefore an opportunity for the Greater London Authority to accommodate new jobs and homes at a strategic London-wide level, for boroughs to have a framework in which to manage major brownfield sites, and for local residents to benefit from planned growth together with appropriate provision of other uses such as local shops, leisure facilities and schools, health and social care facilities and services.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Changes to the Key Diagram and Map 5.1 will be made to clarify growth areas in the Hayes-West Drayton Corridor. Add overarching sentence to the beginning of Table 5.3 which makes clear that growth in the Heathrow OA will be focused on sustainable locations such as town centres and areas with good access to public transport.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
17	5	Individual	5 Core Policies - The Economy Map 5.1 Locations for Economic Growth Strategy for the Heathrow Opportunity Area	Object	Concern over impact and intensity of new development in West Drayton.	<p>Policy E1 protects existing employment land for employment uses, but also the release of surplus industrial land. Indeed, part of the Trout Road industrial site is identified as having potential for managed release for other uses. Policy E2 identifies Uxbridge, Hayes and sites on the Heathrow perimeter as suitable for hotel growth. Map 5.1 is intended to show general areas for growth and Yiewsley & West Drayton has been included in the area identified for office and hotel growth. This is misleading as it is meant to indicate the capacity of the existing employment areas within the Hayes-West Drayton corridor to accommodate new jobs, supported for example by new Crossrail stations. Changes to the Key Diagram and Map 5.1 will be made to clarify the areas for growth.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Changes to the Key Diagram and Map 5.1 are proposed to clarify growth areas in the Hayes-West Drayton Corridor. Add overarching sentence to the beginning of Table 5.3 which makes clear that growth in the Heathrow OA will be focused on sustainable locations such as town centres and areas with good access to public transport.</p>
18	1	London Borough of Hounslow	3 A Portrait of Hillingdon - where we are now Major Infrastructure Projects Strategy for the Heathrow Opportunity Area	Support	Hounslow supports Hillingdon's strong opposition to any further capacity increase at the airport	<p>Support and opportunity for future collaboration welcomed.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
18	2	London Borough of Hounslow	5 Core Policies - The Economy Strategy for the Heathrow Opportunity Area Map 5.1 Locations for Economic Growth	Observation	Subject to outcome of London Plan representation regarding change to Hounslow extent of Heathrow OA, the borough wish to work with Hillingdon on capacity testing.	<p>While neither the London Plan nor replacement London Plan shows the physical extent of the Opportunity Areas, some mapping work has been done through the West London SRDF (Annex 2). The Core Strategy indicates the general area of Hillingdon which falls within the OA designation, but does not suggest a defined boundary. The employment growth forecast for Heathrow OA is 12,000 to 2031 which is 9,000 pro rata to 2026; the period of Hillingdon's Core Strategy. Table 5.1 shows Hillingdon's requirement to accommodate a proportion of this growth. While the growth figures will be subject to further testing through the OAPF, the Mayor has indicated in a statement to the EiP that he intends to retain them. We welcome the opportunity to work with Hounslow on the Heathrow OA Planning Framework where boundary details, growth capacity and apportionment can be tested and agreed. We note that you have made representations for changes to the Hounslow element of the Heathrow OA and will await the outcome of the EiP on this matter.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Add sentence to paragraph 5.25 "Further capacity testing is required by Hillingdon and Hounslow to establish what proportion of jobs and new homes in the Opportunity Area will be provided by each Borough."</p>
18	3	London Borough of Hounslow	5 Core Policies - The Economy Strategy for the Heathrow Opportunity Area Map 5.1 Locations for Economic Growth	Observation	Close working with Hounslow, GLA and Hillingdon will be needed on Heathrow OA planning framework.	<p>Agreed. As the majority of the Heathrow OA is within Hillingdon, and since Hounslow wish to reduce the extent of the OA into the borough, it is appropriate that Hillingdon take a lead role in developing the planning framework. However, this process will rely on cross-boundary working to agree details such as boundaries and capacity for growth.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Make specific reference to LB Hounslow and Greater London Authority in Policy E3.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
18	4	London Borough of Hounslow	8 Core Policies - Environmental Management Minerals and Waste	Observation	Hounslow is seeking further information from Hillingdon regarding the annual mineral contribution Hillingdon intends to make to meet the West London apportionment of 500,000 tonnes.	Noted. <u>Council's Proposed Action</u> No proposed change.
18	5	London Borough of Hounslow	7 Core Policies - Historic and Built Environment Policy HE1: Heritage Map 7.1 Hillingdon's Heritage	Object	Hounslow is seeking further background information on the basis on which the Heathrow APZ has been designated and the significance it will have when considering proposals in the designated area.	The evidence supporting this designation is contained within a Background Report on Archaeology. Officers are updating this document in association with English Heritage prior to its publication on the Council's website. <u>Council's Proposed Action</u> No proposed change.
19	1	Eastcote Residents' Association	1 Introduction 1 Introduction Consultation	Object	Concerns about the consultation process and membership of the Local Strategic Partnership. Hillingdon Association of Voluntary Services does not represent the concerns of Residents Associations (or Conservation Groups), did not consult with these groups and did not attend the Core Strategy meetings. Thus it is clear that there has been no previous consultation on the Core Strategy with Residents Associations/Conservation Groups. We therefore request that in future for all consultations that Residents Associations and Conservation Groups, who represent a significant number of Hillingdon residents, are consulted in their own rights.	The remit of the Hillingdon Association of Volunteer Services (HAVS) is not a matter dealt with under the Core Strategy. Officers consulted with the Local Strategic Partnership (LSP) on the preparation of this consultation document. There are elected members within the LSP that represent the residents/ associations/ groups concerns. Members did attend and participate in the discussion meetings. Residents Associations have been informed individually (115 letters were sent), and two meetings were arranged (14th June and 14th July) to allow further discussion. <u>Council's Proposed Action</u> No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
19	2	Eastcote Residents' Association	1 Introduction Para 1.6	Object	In the Core Strategy consultation documents it states that in the production of the Core Strategy Hillingdon Council have consulted with their Hillingdon Partners. It now appears that the list of Hillingdon Partners does not include Residents Associations who probably represent more Hillingdon residents than any other organisations. For any future local Consultation to be valid Residents Associations must be members of Hillingdon Partners, please arrange for this to be initiated.	<p>Membership of Hillingdon Local Strategic Partnership, also referred to as Hillingdon Partners, is not a matter to be determined through the Core Strategy.</p> <p>All Residents Associations were written to at the start of the consultation process to inform them of how to comment on the Core Strategy. Two workshop sessions were held to provide further information on the content of the document and to answer questions from representatives.</p> <p>The Council undertook an extensive consultation process to ensure that residents were fully informed on the content of the document and how they could comment. In particular, 50 randomly selected residents were provided with this information in a letter at the start of the consultation process.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
19	3	Eastcote Residents' Association	Appendix 3 London Borough of Hillingdon Housing Trajectory Appendix 3 London Borough of Hillingdon Housing Trajectory	Object	Housing Targets and Trajectory - The illustration in Appendix 3 clearly indicates that Hillingdon has exceeded their targets over the last 10 years and are now some 3 years ahead of target.	<p>Representations will be made to GLA through the London Plan EiP that Hillingdon's annual monitoring target should be reduced.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
19	4	Eastcote Residents' Association	3 A Portrait of Hillingdon - where we are now Hillingdon's Key Facts	Object	Page 10, Environmental Management – The River Pinn has been omitted from the list of Rivers in the Borough	<p>Agree to amend bullet No.6 in the Environmental Status section to include River Pinn.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Replace the bullet point with the following:</p> <p>'A number of rivers run through the borough including the Colne, Frays, Yeading Brook, Pinn and Wraysbury as well as approximately 20 kms of the Grand Union Canal'.</p>
19	5	Eastcote Residents' Association	3 A Portrait of Hillingdon - where we are now 3 A Portrait of Hillingdon - where we are now Para 3.3	Object	Page 11 - We would be interested to know where the 4 Metropolitan Police Stations are, especially as Ruislip Police Station does not now function. Could you please supply details of current and future plans for Metropolitan Police Stations in Hillingdon?	<p>The location of police stations will be provided in Hillingdon's emerging Strategic Infrastructure Plan, a key part of the evidence base for the Core Strategy.</p> <p>Recent information from the Metropolitan Police Authority refers to the presence of five police stations in the borough at :</p> <ul style="list-style-type: none"> - Uxbridge - Hillingdon - Hayes - Ruislip - Northwood <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Proposed amendment to final bullet point, Community Facilities section:</p> <p>'Hillingdon contains 5 Metropolitan Police Stations, with additional facilities located at Heathrow. The borough also accommodates 4 London Fire Brigade Stations.'</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
19	6	Eastcote Residents' Association	3 A Portrait of Hillingdon - where we are now Table 3.1 Main Planning Challenges for Hillingdon	Object	Page 14 – We do not understand the reference to – “Retention of indicative housing density targets” as the Government has recently removed such density targets.	<p>The government has removed the 'minimum' density target of 30 dwellings per hectare from PPS 3.</p> <p>The reference refers to the fact that indicative density targets are retained in Table 3.2 of the Replacement London Plan. Representations have been made that this table should be removed from the Plan.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Proposed amendment to Table 3.1 Main challenges for Housing to read:</p> <p>'Retention of indicative housing density targets contained in Table 3.2 of the Replacement London Plan'.</p>
19	7	Eastcote Residents' Association	3 A Portrait of Hillingdon - where we are now Table 3.1 Main Planning Challenges for Hillingdon Statements 1 and 2	Object	At the section in Table 3.1 on Environmental Management why is the wording “The need to improve -----in the Community” repeated?	<p>Agree, duplicated in error.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend Table 3.1 Main Challenges by deleting second row of section on 'Environmental Management.</p>
19	8	Eastcote Residents' Association	7 Core Policies - Historic and Built Environment 7 Core Policies - Historic and Built Environment	Object	Historic and Built Environment – why the statement “Pressure for high density residential development” (page 15). Item 6 (Page 14) clarify reference to – “Retention of indicative housing density targets” as the Government has recently removed such density targets.	<p>Over recent years, there has been an increase in the number of planning applications for high density developments. The statement reflects this trend and the retention of the 'density matrix' in the Replacement London Plan.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
19	9	Eastcote Residents' Association	5 Core Policies - The Economy Policy E5: Town and Local Centres	Observation	Concern about retail growth figures for Eastcote.	<p>The Core Strategy is a 15 year plan which looks beyond the current economic downturn. There are no plans to expand any of the town centre boundaries, except for Uxbridge. All new retail floorspace will be accommodated within the existing boundaries (see para 5.3). This can be achieved through new development on existing sites, refurbishment of existing units or intensification of floorspace. The comparison floorspace figures are produced by the Greater London Authority who are responsible for the strategic growth and management of the bigger town centres throughout London. Through the Core Strategy and other planning documents Hillingdon will also manage the borough's town centres through the 'hierarchy' to ensure appropriate growth. The growth figures are not strict targets but indicate the likely scale of growth, and will be subject to monitoring.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
19	10	Eastcote Residents' Association	5 Core Policies - The Economy Policy E5: Town and Local Centres Town and Neighbourhood Centres	Observation	There are no concrete proposals or methodology as to how local parades will be protected and managed.	<p>The Core Strategy is a high-level plan for the borough. While the document recognises the strategic importance of Parades, detailed mechanisms to protect and manage parades will be contained in the Development Management Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
19	11	Eastcote Residents' Association	6 Core Policies - New Homes Strategic Objectives to deliver The Vision	Object	The Strategic Objective "to provide 365 new homes per annum" conflicts with the Proposed Annual Target of 620.	<p>The current London Plan (2008) contains an annual monitoring target for Hillingdon to provide 365 new homes per year.</p> <p>Hillingdon's proposed annual monitoring target in the Replacement London Plan has been reduced to 425 units per annum.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend policy H1 to reflect the amended Replacement London Plan annual monitoring target of 425 units per annum.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
19	12	Eastcote Residents' Association	6 Core Policies - New Homes	Object	Please explain the meaning of "intermediate tenure"?	<p>Intermediate tenure is defined in PPS 3 as follows:</p> <p>'Housing at prices and rents above those of social rent, but below market price or rents, and which meet the criteria set out above. These can include shared equity products (e.g. HomeBuy), other low cost homes for sale and intermediate rent.'</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Proposed amendment to paragraph 6.21: Insert footnote: 'see definition of affordable housing in glossary'</p> <p>Affordable housing is:</p> <p>'Affordable housing includes social rented and intermediate housing, provided to specified eligible households whose needs are not met by the market. Affordable housing should:</p> <ul style="list-style-type: none"> – Meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices. – Include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision'. <p>Social rented housing is:</p> <p>'Rented housing owned and managed by local authorities and registered social landlords, for which guideline target rents are determined through the national rent regime. The proposals set out in the Three Year Review of Rent Restructuring (July 2004) were implemented as policy in April 2006. It may also include rented housing owned or managed by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Housing Corporation as a condition of grant.'</p> <p>Intermediate affordable housing is:</p> <p>'Housing at prices and rents above those of social rent, but below market price or rents, and which meet the criteria set out above. These can include shared equity products (eg HomeBuy), other low cost homes for sale and intermediate rent.'</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
19	13	Eastcote Residents' Association	7 Core Policies - Historic and Built Environment	Object	Ensure that Residents Associations and Conservation Groups are included within Hillingdon Partners.	The Core Strategy cannot propose new members for the Council's Local Strategic Partnership. <u>Council's Proposed Action</u> No proposed change.
19	14	Eastcote Residents' Association	8 Core Policies - Environmental Management Open Spaces, Rivers and Canal Corridors Pages 20, 72, 80, 92, 93, 95, 96, 97, 98, 121	Object	Where can the Open Space Study be viewed?	Noted. Work on the Open Space study is continuing as part of the evidence base for the Core Strategy. <u>Council's Proposed Action</u> When work on the Open Space study is completed it will be made available for public information as soon as possible.
19	15	Eastcote Residents' Association	8 Core Policies - Environmental Management Policy EM2: Green Belt, Metropolitan Open Land and Green Chains Site Allocations DPD, Green Belt	Object	How will residents be consulted on the Site Allocations DPD and reallocation of particular sites? Page 84 – States that minor adjustments to Green belt and Metropolitan Open Land will be undertaken in the Site Allocations DPD. How and where will this occur and how will residents be consulted?	The Council is currently gathering information and background evidence on the Site Allocations Development Plan Document. Cabinet approval for a public consultation on the document will be sought during 2011. Publicity and notification about the consultation will be in accordance with the Council's Statement of Community Involvement (SCI) adopted in November 2006. Groups on the Council's LDF Consultation Database which includes relevant stakeholders, general consultation bodies and residents groups will be automatically notified. Representor's details are on the Database. <u>Council's Proposed Action</u> No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
20	1	Individual	5 Core Policies - The Economy Map 5.1 Locations for Economic Growth Strategy for the Heathrow Opportunity Area Accessible Local Destinations	Object	Concern about designation of Heathrow Opportunity Area and intensification of development for Yiewsley & West Drayton, particularly hotel and offices. Concern that transport and community infrastructure is not in place to meet the needs of a growing population. Concern about poor quality public realm.	<p>The Core Strategy covers broad issues including where and how the borough will accommodate new jobs and homes. Yiewsley & West Drayton forms part of the Heathrow Opportunity Area which is a regionally important location for growth. It is important to include Yiewsley & West Drayton in the Heathrow OA so it can benefit from the inter-relationship of the area, for example access to new jobs, affordable homes, better public transport links. Table 5.3 of the Core Strategy identifies Yiewsley & West Drayton as suitable for regeneration opportunities through the new Crossrail station, the Grand Union Canal and mixed use development schemes, modern business accommodation, and improved public transport. Detailed proposals for the area will be set out in a future Heathrow Area planning document. Policy E1 protects existing employment land for employment uses, but also the release of surplus industrial land. Part of the Trout Road industrial site is identified as having potential for managed release for other uses. Policy E2 identifies Uxbridge, Hayes and sites on the Heathrow perimeter as suitable for hotel growth. Map 5.1 is intended to show general areas for growth and Yiewsley & West Drayton has been included in the area identified for office and hotel growth. This is misleading as it is meant to indicate the capacity of the existing employment areas within the Hayes-West Drayton corridor to accommodate new jobs, supported for example by new Crossrail stations. Changes to the Key Diagram and Map 5.1 will be made to clarify the areas for growth. Infrastructure</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Changes to the Key Diagram and Map 5.1 are proposed to clarify growth areas in the Hayes-West Drayton Corridor. Add overarching sentence to the beginning of Table 5.3 which makes clear that growth in the Heathrow OA will be focused on sustainable locations such as town centres and areas with good access to public transport.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
21	1	Individual	4 The Vision - where we want to be The Spatial Strategy	Object	Why is there no mention of commercial traffic on the canal? Why is there no policy to use the canal for carrying goods – therefore easing traffic problems? Why is there no policy of compelling developers to use the canal to carry goods to & from development sites that lie alongside the canal? Why not encourage a water bus service?	<p>Reference is already made at policy EM 3 to encouraging sustainable transport use of the Grand Union Canal. A further reference in the Vision section is considered unnecessary.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
21	2	Individual	5 Core Policies - The Economy Map 5.1 Locations for Economic Growth Map 6.1 Distribution of units from large SHLAA sites (2011-2021) Map 8.5 Mineral Areas for Safeguarding Para 9.3	Object	Concern that growth proposals are not supported by infrastructure provision.	<p>A Strategic Infrastructure Plan is being prepared in support of the Core Strategy, setting out the social, physical and green infrastructure required to support growth in the borough.</p> <p>Thames Water maintains the foul sewerage network in the borough and has been consulted on planned growth. No concerns were raised in relation to the number of new homes.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
21	3	Individual	9 Core Policies - Transport and Infrastructure Community Infrastructure Para 9.43	Object	Where are the policies on education provision that will be needed long before we get to 2026? Where will these new schools be built? After all the hotels, offices and new housing you have planned, where will you put the schools – and the school playing fields?	<p>The Core Strategy estimates the number of new school places that are required to accommodate recent birth rate increases. Specific schools required to accommodate this expansion will be identified in the Site Allocations Development Plan Document.</p> <p>The Core Strategy contains sufficient flexibility for additional school expansions, should birth rates continue to rise.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
21	4	Individual	9 Core Policies - Transport and Infrastructure Community Infrastructure Para 9.44	Object	How will schools be delivered without BSF funding?	<p>Comment noted. The delivery of schools is not an issue for the Core Strategy</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
21	5	Individual	8 Core Policies - Environmental Management Policy EM3: River and Canal Corridors	Object	Lack of information or mention on boats on the Grand Union Canal.	<p>Noted. Further reference to the potential recreation and commercial importance of the Grand Union Canal is to be made to Policy EM3 and supporting text.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Amend Para 8.31 to read 'The Blue Ribbon Network also plays important roles in transport, recreation and education. It can provide a much needed respite from the built-up nature of the towns, and also provides important linear walking and cycling routes. They are also important for providing habitat and wildlife corridors, and fulfill other environmental functions such as drainage.'</p> <p>Amend Policy EM3 to read 'The Council will continue to enhance the local character, visual amenity, ecology, transportation, leisure opportunities and sustainable access to rivers and canals.'</p> <p>Amend Implementation of Policy EM3 to read 'Working with the Environment Agency, British Waterways, Natural England, English Heritage and other partners to develop a strategy for the Grand Union Canal and other blue ribbon networks where they are currently not in place.'</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
22	1	Individual	5 Core Policies - The Economy Map 5.1 Locations for Economic Growth	Object	Concern about the impact on West Drayton of Heathrow Opportunity Area designation and growth, particularly new residential development. Concern that infrastructure is not in place to cope with growth.	<p>The Core Strategy covers broad issues including where and how the borough will accommodate new jobs and homes. Yiewsley & West Drayton forms part of the Heathrow Opportunity Area which is a regionally important location for growth. It is important to include Yiewsley & West Drayton in the Heathrow OA so it can benefit from the inter-relationship of the area, for example access to new jobs, affordable homes, better public transport links. Table 5.3 of the Core Strategy identifies Yiewsley & West Drayton as suitable for regeneration opportunities through the new Crossrail station, the Grand Union Canal and mixed use development schemes, modern business accommodation, and improved public transport. Part of the Trout Road industrial site is identified as having potential for managed release for other uses. These plans are in addition to nearly half a million pounds already being spent to regenerate part of the West Drayton and Yiewsley town centres; improving footways, carriageways, parking, traffic and pedestrian facilities. Working with TfL a further £2 million is being invested to expand this even further within the coming years. Detailed proposals for the area will be set out in a future Heathrow Area planning document; and capacity for new homes will be tested through this process. Map 5.1 is intended to show general areas for growth and Yiewsley & West Drayton has been included in the area identified for office and hotel growth. This is misleading as it is meant to indicate the capacity of the existing employment areas within the Hayes-West Drayton corridor to accommodate new jobs, supported for example by new Crossrail stations. Hayes is identified for new hotel and office growth. Changes to the Key Diagram and Map 5.1 will be made to clarify the areas for growth. Infrastructure</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Changes to the Key Diagram and Map 5.1 are proposed to clarify growth areas in the Hayes-West Drayton Corridor. Add overarching sentence to the beginning of Table 5.3 which makes clear that growth in the Heathrow OA will be focused on sustainable locations such as town centres and areas with good access to public transport.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
23	1	Metropolis PD	5 Core Policies - The Economy Map 5.1 Locations for Economic Growth Employment Land Study background report	Object	We object to the proposed status of the Former Cape Boards Site, Iver Lane in Cowley as a 'Locally Significant Industrial Area' (LSIS) at Map 5.1 and its failure to identify it as being a potential area for managed release of employment land.	<p>The Core Strategy is a strategic plan for the borough and, as such, does not identify site boundaries in any of the maps. Map 5.1 shows the general distribution of LSIS and LSEL throughout the borough and indicates where release of employment land could take place.</p> <p>Any detailed boundary changes to employment sites and release of land for other uses will be considered during preparation of the Site Allocations Development Plan Document and this representation will be considered as part of that process.</p> <p>The concerns about the recommendations of the Employment Land Study will also be considered as part of the Site Allocations Development Plan Document preparation.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
24	1	Individual	5 Core Policies - The Economy Strategy for the Heathrow Opportunity Area	Object	Concern about the impact on West Drayton of Heathrow Opportunity Area designation and growth. Concern about environmental impacts associated with growth.	<p>The Core Strategy covers broad issues including where and how the borough will accommodate new jobs and homes. Yiewsley & West Drayton forms part of the Heathrow Opportunity Area (OA) which is a regionally important location for growth designated by the Greater London Authority through the London Plan. The Council is required to include this allocation as part of its planning documents. The OA includes parts of Hounslow, the airport perimeter, the Bath Road area and the Hayes-West Drayton Corridor, particularly Hayes. Opportunity Areas generally include major brownfield sites with capacity for new development and places with potential for significant increases in density linked to existing or potential improvements to public transport accessibility. It is important to include Yiewsley & West Drayton in the Heathrow OA so it can benefit from the inter-relationship of the area, for example access to new jobs, affordable homes, and better public transport links. Table 5.3 of the Core Strategy identifies Yiewsley & West Drayton as suitable for regeneration opportunities through the new Crossrail station, the Grand Union Canal and mixed use development schemes including modern business accommodation, and improved public transport. There are no plans to lose residential areas. Any new development will be assessed against policies which protect the environment, greenbelt and heritage, prevent flood risk, and manage adverse impacts such as increased traffic. Yiewsley & West Drayton is part of the Air Quality Management Area and policies on this as well as other environmental management are also included in the Core Strategy. Detailed proposals for the area will be set out in a future Heathrow Area planning document; and capacity for new homes and jobs will be tested through this process and you will be able to provide comments. Map 5.1 is intended to show general areas for growth and Yiewsley & West Drayton has been included in the area identified for office and hotel growth. This is misleading as it is meant to indicate the capacity of the existing employment areas within the Hayes-West Drayton corridor to accommodate new jobs, supported for example by new Crossrail stations. Hayes is identified for new hotel and office growth. Changes to the Key Diagram and Map 5.1 will be made to clarify the areas for growth.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
						<u>Council's Proposed Action</u> Changes to the Key Diagram and Map 5.1 are proposed to clarify growth areas in the Hayes-West Drayton Corridor. Add overarching sentence to the beginning of Table 5.3 which makes clear that growth in the Heathrow OA will be focused on sustainable locations such as town centres and areas with good access to public transport.
25	1	Individual	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision Paras 6.27-28	Object	I am an English Gypsy Traveller and there are not enough plots or sites in Hillingdon. I'd like my own place, with a big gate across, so that me and my children can live our life, and I know they would be safe.	Any additional gypsy and traveller pitches will be identified in the Site Allocations Development Plan Document. <u>Council's Proposed Action</u> No proposed change.
26	1	Individual	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision Paras 6.27-28	Object	I am an English Gypsy Traveller and there are not enough plots or sites in Hillingdon. I'd like my own place, for me, my husband and children to live our life. My husband is a showman and he has never lived in a house before. There just aren't any sites in Harefield, and nothing for Gypsy and Showmen families.	Any additional traveller pitches will be identified in the Site Allocations Development Plan Document. <u>Council's Proposed Action</u> No proposed change.
27	1	Individual	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision Paras 6.27-28	Object	I am an Irish Traveller and there are not enough plots or sites in Hillingdon. I would like a place for me and my children to live our life, without feeling we are a problem to the settled community.	Any additional traveller pitches will be identified in the Site Allocations Development Plan Document. <u>Council's Proposed Action</u> No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
28	1	Traveller Education Service	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision Para 6.27	Object	Insufficient consultation with gypsy and traveller community.	<p>The Core Strategy consultation has been discussed at the Gypsy and Traveller Forum on three occasions. The issue was first raised at the meeting in March. Notification of the consultation was given at the June meeting and a presentation was given to the group in June.</p> <p>The consultation was widely publicised within the Council and externally through the local media and a poster campaign.</p> <p>The Core Strategy policy on additional pitch provision does not draw on any 'new' evidence base. Rather, it reflects the London Plan targets for Hillingdon and contains general criteria for the selection of new sites. The allocation of sites for additional pitches will be undertaken through the Site Allocations Development Plan Document.</p> <p>Hillingdon may be required to develop its own new evidence base, in the light of the announcement that targets for additional pitch provision will be deferred to a borough-wide level.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
28	2	Traveller Education Service	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision Para 6.28	Object	The information provided by the West London Study and the Replacement London Plan (2009) is likely to be flawed as it was based on minimal research and does not accurately reflect the views of the Gypsy, Roma, Irish Traveller and Showmen families (approximately 400 in total) living in Hillingdon.	<p>The Replacement London Plan is unlikely to contain targets for additional pitch provision. The issue of 'psychological aversion' to bricks and mortar accommodation was called into question in the GLA's recent Minor Alteration to pitch provision targets.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
29	1	Individual	5 Core Policies - The Economy Map 5.1 Locations for Economic Growth Strategy for the Heathrow Opportunity Area Map 4.1 Key diagram	Object	Concern that Heathrow Opportunity Area designation will result in industrial units, hotels and high rise offices in West Drayton.	<p>Yiewsley & West Drayton forms part of the Heathrow Opportunity Area (OA) which is a regionally important location for growth designated by the Greater London Authority through the London Plan. Table 5.3 of the Core Strategy identifies Yiewsley & West Drayton as suitable for regeneration opportunities through the new Crossrail station, the Grand Union Canal and mixed use development schemes including modern business accommodation, and improved public transport. Maps 4.1 and 5.1 are intended to show general areas for growth and Yiewsley & West Drayton has been included in the area identified for office and hotel growth. This is misleading as it is meant to indicate the capacity of the existing employment areas within the Hayes-West Drayton corridor to accommodate new jobs, supported for example by new Crossrail stations. Hayes is identified for new hotel and office growth. Changes to Maps 4.1 and 5.1 will be made to clarify the areas for growth</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Changes to the Key Diagram and Map 5.1 are proposed to clarify growth areas in the Hayes-West Drayton Corridor. Add overarching sentence to the beginning of Table 5.3 which makes clear that growth in the Heathrow OA will be focused on sustainable locations such as town centres and areas with good access to public transport.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
30	1	Northwood Hills Residents Association	Core Strategy Consultation Draft General	Object	The document is flawed in a number of areas, does not take into account new Government Strategy, post the General Election. There are a number of sections in the document which need to be revised/re-written. Publication of this document should have been delayed for revisions to be made post the General Election and in any event to publish a document of this magnitude and request comments in 6 weeks is also not acceptable.	<p>The changes to national policy made by the new Coalition Government will be considered and incorporated into the pre-publication draft.</p> <p>This Regulation 25 consultation has been carried out in line with the Town and Country Planning Regulations 2004 (as amended). Whilst the regulations do not specify a particular time period for representations on Regulation 25, Hillingdon's Statement of Community Involvement (SCI) adopted in November 2006 sets out a minimum of six weeks for public consultations for each of the stages in the plan making process. In line with previous consultations on the Core Strategy, a six week consultation period was planned for the draft Core Strategy to be consistent with Hillingdon's SCI.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
30	2	Northwood Hills Residents Association	Core Strategy Consultation Draft Consultation	Object	Frustrated to learn that the HAV has represented the Residents Association during the consultation process. Northwood Hills Residents Association have not agreed to this and have had no contact from the HAV in respect of this matter. Also astounded to learn that HAVs representative did not attend any meeting with the Council during the Core Strategy process. This is unacceptable.	<p>The remit of the Hillingdon Association of Volunteer Services (HAVS) is not a matter dealt with under the Core Strategy. Officers consulted with the Local Strategic Partnership (LSP) on the preparation of this consultation document. There are elected Members within the LSP that represent the residents/ associations/ groups concerns. Members did attend and participate in the discussion meetings.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
30	3	Northwood Hills Residents Association	3 A Portrait of Hillingdon - where we are now Hillingdon's Key Facts Environmental Management	Object	<p>Environment – The River Pinn is not included in the list of Rivers shown in the Environmental Management section of Chapter 3.</p> <p>The document refers to Hillingdon's Open Space study identifying new areas to be designated open space, but when questioned officers reported that the results of this study have yet been published. This is nonsense!</p>	<p>Agree that reference to the river Pinn should be included in the Hillingdon's Key Facts Environmental Status section of Chapter 3.</p> <p>Note that work on the Open Space study is continuing as part of the evidence base for Core Strategy.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>To amend the Hillingdon's Key Facts Environmental Management section of Chapter 3 at bullet No.6 to include the River Pinn. Replace the bullet point with the following:</p> <p>A number of rivers run through the borough including the Colne, Frays, Yeading Brook, Pinn and Wraysbury as well as approximately 20 kms of the Grand Union Canal.</p> <p>When work on the Open Space study is completed it will be made available for public information as soon as possible.</p>
30	4	Northwood Hills Residents Association	8 Core Policies - Environmental Management General	Object	<p>Also we note that it is proposed to allow adjustments to the Green belt in the site allocations DPD presumably to allow development, but there is no indication of where the changes would be or how residents will be consulted.</p>	<p>The Council intend to bring forward a detailed set of Green Belt alterations as part of the Site Allocations Development Plan Document which will be subject to public consultation. The consultation methods will be in accordance with the Council's Statement of Community Involvement which include advertisements in the press.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
30	5	Northwood Hills Residents Association	9 Core Policies - Transport and Infrastructure Policy T3: North-South Sustainable Transport Links	Object	<p>There are no direct public transport links from Northwood Hills to Uxbridge. There is mention in the document of a new bus service from Northwood to Heathrow but it is not clear whether this will pass through Northwood Hills or go to Uxbridge.</p>	<p>The Core Strategy does not deal with detailed bus route proposals. Council officers are involved in regular discussions with Transport for London (TfL) and options are being considered to upgrade and improve services. The borough supports measures for improved public transport and will take forward these and other suggestions to inform discussions with TfL. Improvements such as new bus routes are influenced by TfL's strategic transport priorities and are reliant on funding.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
30	6	Northwood Hills Residents Association	9 Core Policies - Transport and Infrastructure Community Infrastructure	Object	Health – The document refers to PCT policies for Yiewsley and Hayes. A white paper has been published indicating that PCT will be abolished and funding will be allocated locally. Provision needs to be made to refurbish/rebuild Northwood and Pinner Cottage hospital which in any event is a community war memorial and funding should be being provided for this under the Councils stated objective to refurbish and re-dedicate all such memorials.	<p>The government's White Paper on health proposes that PCT's and Strategic Health Authorities will be abolished by 2013.</p> <p>The Council's infrastructure schedule will be updated to reflect proposals from NHS Estates. The PCT has not presented clear plans for Pinner Cottage Hospital.</p> <p>The infrastructure schedule will be updated on an annual basis and as and when the proposed changes to PCT's come forward. Further information will be sought on development at Northwood and Pinner Cottage Hospital.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
30	7	Northwood Hills Residents Association	5 Core Policies - The Economy General	Object	<p>The document talks about the need for local parades to be kept and managed, but conversely states only a few specialist shops will be retained in Northwood Hills.</p> <p>Find it unacceptable that there are plans to increase the size of Town Centre boundaries in neighbouring wards to Northwood Hills which are struggling to fill vacant shop units.</p>	<p>The Core Strategy provides strategic priorities for its town and neighbourhood centres through Policy E5 and Map 5.3. The vitality and viability of all centres, including Northwood Hills, will be supported. Hillingdon's Town Centre and Retail Study looks at the key issues for each centre and makes recommendations (shown on Map 5.3). In the case of Northwood Hills, the Study says "there are a number of independent specialist shops within Northwood Hills that make it distinct. This adds to the vibrancy of the centre and should be further encouraged". Map 5.3 shows the priority is to encourage the specialist shops in Northwood Hills in order to support the centre's vitality. There are no plans to expand any of the town centre boundaries, except for Uxbridge. All new retail floorspace will be accommodated within the existing boundaries (see para 5.3). This can be achieved through new development on existing sites, refurbishment of existing units or intensification of floorspace. The comparison floorspace figures are produced by the Greater London Authority who are responsible for the strategic growth and management of the bigger town centres throughout London.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
30	8	Northwood Hills Residents Association	6 Core Policies - New Homes Housing Growth	Object	<p>We have major concerns with the proposed Housing Strategy. As well as the document containing conflicting numbers of the housing units to be built the document 365 new homes p.a/proposed target 620 per annum. Which is correct? We also note that Hillingdon has exceeded recent targets yet there is no evidence that the GLA or central Government would be receptive to a projected average figure of housing units to be built in the future. We also question that as the Government is no longer working to housing density targets, new laws will allow development in rural areas and PPS3 stopping speculative developers land grabbing gardens for housing development the relevance of the numbers quoted.</p>	<p>Annual housing monitoring targets are set through the London Plan. Hillingdon's current target is to provide 365 new homes per annum. This is reflected in policy H1.</p> <p>Hillingdon's proposed annual monitoring target in the Replacement London Plan has been reduced to 425 units per annum.</p> <p>The annual monitoring target is a minimum figure set over a 10 year period and exceeding the target does not necessarily support a case for its reduction.</p> <p>Hillingdon has questioned the need for the density guidelines contained in the Replacement London Plan EiP, however if these are retained they will need to be reflected in the Core Strategy.</p> <p>Policy BE1 reflects the Mayor's presumption against the development of back gardens.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Explanation to be inserted at paragraph 6.7 on the latest position regarding the housing target in the draft Replacement London Plan:</p> <p>"In August 2010, the Mayor published a Housing Technical Note to assist participants at the draft Replacement London Plan Examination in Public hearings. This resulted in a proposed reduction in the pan-London target and a proposed reduction in Hillingdon's annual monitoring target from 620 to 470 dwellings per annum. Following representations prepared by the Council as part of the Examination in Public, a further amendment has been made to Hillingdon's annual monitoring target and the figure now stands at 425 units."</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
30	9	Northwood Hills Residents Association	9 Core Policies - Transport and Infrastructure Community Infrastructure Para 9.44	Object	School numbers across the borough are predicted to rise but now that the centrally funded Building Schools for the future programme has been abolished there does not appear to be a strategy to provide sufficient places in years to come.	<p>The abolition of BSF21 is noted, however the most pressing needs relate to primary school provision, which is addressed outside of BSF21. At secondary age a higher proportion of pupils will attend schools outside of the borough and needs will be spread over a wider area.</p> <p>It is currently unclear how the Council's education policy will be affected by the abolition of the government's BSF21 programme. The Core Strategy will be updated as this policy develops.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Paragraph 9.44 to be deleted. Amend paragraph 9.43 to read:</p> <p>"Birth rates in Hillingdon have risen for several consecutive years with record highs in 2006, 2007 and 2008. Births in 2008 were exceptionally high at 4,126 children and demographic projections indicate a prolonged period of births at or around this level. Hillingdon's primary and secondary school provision will need to react to changing demographics and this Core Strategy supports proposals to address the needs arising from an increase in the school age population. In the short term the most pressing need is to provide an estimated 18 new forms of entry in Hillingdon's primary schools. The Council recognises that the capacity of existing school sites is becoming increasingly limited and that these exceptional circumstances may necessitate the release of greenfield sites through the production of the Site Allocations DPD. In addition to primary and secondary provision, Hillingdon contains highly respected places of further and higher education. Policies will be developed in subsequent DPDs to ensure that a high standard of teaching can continue to be provided in these establishments over the period of the Core Strategy."</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
30	10	Northwood Hills Residents Association	4 The Vision - where we want to be The Vision for Hillingdon 2026	Object	The document lacks in vision and many parts of the document might be lifted from previous UDP documents.	<p>The Vision for 2026 was developed through discussion with Hillingdon's Local Strategic Partnership and reflects the Council's Sustainable Community Strategy.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
31	1	Thames Water Utilities Ltd	6 Core Policies - New Homes	Object	Broadly speaking it is easier to provide infrastructure for a small number of larger clearly defined sites than for a small number of less well defined ones. Localised upgrades may be required due to growth in the catchment - particularly for smaller catchments where pipe size and pumping station capacity is likely to be lower.	<p>Hillingdon needs to be aware of infrastructure upgrades resulting from proposed growth. The need for localised upgrades to the utility network will be identified in the Council's Strategic Infrastructure Plan. Infrastructure providers have been asked to comment on requirements resulting from planned growth.</p> <p>The difficulties associated with the prediction of such upgrades will also be identified in the Council's Strategic Infrastructure Plan.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
31	2	Thames Water Utilities Ltd	8 Core Policies - Environmental Management Climate Change Adaptation and Mitigation	Support	Support for reasonable realistic targets for renewable energy generation for new development (as set out in Planning and Climate Change. A supplement to Planning Policy Statement 1, December 2007), subject to the targets being backed up by evidence and thoroughly tested.	<p>Noted. Work on the Development Management Development Plan Document will consider whether to set detailed targets for new development.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
31	3	Thames Water Utilities Ltd	8 Core Policies - Environmental Management Water, Air and Noise Management	Support	Support reference to safeguarding and improving water quality of Rivers and Canals. We have worked hard to manage sewer treatment to reduce pressure on water quality. Plans to improve Mogden sewage works will further help maintain quality.	<p>Support noted.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
31	4	Thames Water Utilities Ltd	9 Core Policies - Transport and Infrastructure Infrastructure	Object	There is no specific policy on utility infrastructure within the draft Core Strategy.	<p>Thames Water was consulted on the need for additional infrastructure to support growth in the borough. Responses to the consultation are included in the infrastructure schedule. The Development Management Development Plan Document will reflect the need for specific development proposals to be supported by a sufficient level of physical infrastructure.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
31	5	Thames Water Utilities Ltd	9 Core Policies - Transport and Infrastructure Infrastructure	Object	Include a new policy on Utility infrastructure.	<p>This policy will be considered for inclusion in the Development Management Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
31	6	Thames Water Utilities Ltd	9 Core Policies - Transport and Infrastructure Para 9.9	Object	Insert sub text to reinforce the requirement that developers should demonstrate adequate supporting infrastructure to support their proposals.	<p>The Core Strategy will support the principle to provide an appropriate amount of physical infrastructure to support development in the borough. A new paragraph to re-enforce this will be added as proposed - and more detailed text relating to specific development proposals will be included in the Development Management Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>The Core Strategy will be amended as follows:</p> <p>Insert new paragraph after 9.9 :</p> <p>'The Infrastructure planning process has also identified the importance of other forms of physical infrastructure to the delivery of the Core Strategy objectives. The Development Management Policies Document (DMDPD) will need to contain appropriate policies to ensure this is delivered in support of planned growth and individual development proposals.'</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
31	7	Thames Water Utilities Ltd	8 Core Policies - Environmental Management Flood Risk Management	Support/ Object	<p>1 - Agree that most development should be avoided within floodplain however, it is suggested that allowances are made for essential infrastructure in accordance with PPS25.</p> <p>2 - Sewer flooding should also be considered as a form of flooding.</p>	<p>1 - Noted. PPS25 provides the policy framework. There is no need for the Core Strategy to repeat the requirements of PPS25.</p> <p>2 - Agree. Reference to sewer flooding to be added within new section on 'Surface and Foul Water Drainage'.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>1 - No proposed change.</p> <p>2 - Reference to sewer flooding added within the new section on 'Surface and Foul Water Drainage' after para 8.83 and further information on this will be sought from the Water Authority. New section to read 'The mismanagement of surface water flooding can also result in the increased risk of flooding. Sewage and drainage systems struggle to keep pace with the rate of development. The unchecked loss of natural drainage areas through increased hardstanding puts significant pressure on drainage systems, particularly in times of heavy rain. As development progresses and/or urban areas expand these systems become inadequate for the volumes and rates of storm water they receive, resulting in increased flood risk and/or pollution of watercourses. Allied to this are the implications of climate change on rainfall intensities, leading to flashier catchment/site responses and surcharging of piped systems. The impacts of climate change will add to the pressure on the drainage systems and it is therefore essential that all new development is managed to minimise the problems. The management of surface water drainage for new development comes in the form of Sustainable Urban Drainage Systems (SUDS). These seek to manage storm water as close to its source as possible, mimicking storm water flows arising from the site, prior to the proposed development. Typically this approach involves a move away from piped systems to softer engineering solutions inspired by natural drainage processes. SuDS should be designed to take into account the surface run-off quantity, rates and also water quality ensuring their effective operation up to and including the 1 in 100 year design standard flood including an increase in peak rainfall of up to 30% to account for climate change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
						<p>SUDS come in a variety of different types, from infiltration techniques through to water harvesting. Wherever possible, a SuDS technique should seek to contribute to each of the three goals identified below with the favoured system contributing significantly to each objective. Where possible SuDS solutions for a site should seek to:</p> <ul style="list-style-type: none"> -Reduce flood risk (to the site and neighbouring areas); -Reduce pollution; and -Provide landscape and wildlife benefits. <p>Foul water flooding is also a problem that occurs where there is a lack of capacity or blockages within the receiving system. The Council will continue to work with the water authorities to identify problem drainage areas, particularly where new development could worsen the impacts. Further surface and foul water studies will complement the existing strategic flood risk assessment and will be a material consideration in formulating planning decisions.'</p>
32	1	Yiewsley Community Involvement Group	Core Strategy Consultation Draft	Observation	Section 106 contributions should only apply to large developments and should be ring-fenced to the immediate area.	<p>Guidance on section 106 contributions is set out in the Council's Planning Obligations SPD and national planning guidance.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
32	3	Yiewsley Community Involvement Group	5 Core Policies - The Economy Town and Neighbourhood Centres	Observation	Policy EC4 of PPS 4 allows for the choice of offer to be a consideration of retail impact. There is justification for some more proactive policies within the retail section.	<p>The Core Strategy is a high-level strategy for the borough and more detailed policies on retail, including impact test thresholds, will form part of the Development Management Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
32	4	Yiewsley Community Involvement Group	Core Strategy Consultation Draft	Observation	Suggestions on application and appeal process.	<p>Suggestions on the application process will be passed on to the Council's Development Management service.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
32	5	Yiewsley Community Involvement Group	5 Core Policies - The Economy	Observation	EC4 permits the support of diversity and would permit a proactive policy to protect existing and promote the operation of new markets.	<p>Noted - policy E5 looks to improve town and neighbourhood centres. Protecting existing markets and considering proposals for new ones is effectively covered already by this policy - and complies with current London Plan policy 3D.3 and draft Replacement London Plan policy 4.8.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
32	6	Yiewsley Community Involvement Group	5 Core Policies - The Economy	Observation	The impact test should apply to all retail development over 100 square metres.	<p>Thresholds for retail development will be considered during preparation of the Development Management Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
32	7	Yiewsley Community Involvement Group	5 Core Policies - The Economy	Observation	Housing need should not be used as justification for retail development unless the full impact test requirements are met and the total space provided is supported by the findings of an up to date Town Centre Retail Assessment to ensure the health of the local retail environment.	<p>Applications for retail development are assessed against PPS4 criteria. The Council also undertakes annual shopping surveys to monitor the health of retail centres. It is able to consider the use of enabling development to help provide other types of development needed to meet identified local needs - e.g. some forms of housing.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
32	8	Yiewsley Community Involvement Group	8 Core Policies - Environmental Management Water, Air and Noise Management Accessible Local Destinations	Object	The Policy on the development of large traffic generating developments should also be subject to rigorous air quality impact assessment. You could have a policy that a site generating high levels of traffic should be located only with a PTAL location of 4 or above.	<p>This will be considered as part of the Development Management Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
32	9	Yiewsley Community Involvement Group	5 Core Policies - The Economy Town and Neighbourhood Centres	Observation	<p>11. The town centre first policy is considerably stronger in the London Plan than in PPS 4. This would also provide not only for the refusal of retail development outside centres but also the change of use of existing warehouse type retail provision within retail parks to convenience use.</p> <p>12. An EIA should be required on every development of retail space both comparative and convenience which is more than 1,000 sqm (Metro size) or which can be proved to have a detrimental impact on the local centre or other centres within the catchment area.</p> <p>13. The impact on the development of other sites identified within the Local Plan should also be a policy consideration.</p> <p>14. Local consumer choice should confirm the requirement to set a target growth figure for each centre within your jurisdiction as detailed in the Guidelines of PPS 4. This figure would have to reflect the results of the Town Centre Retail Assessment.</p> <p>15. In addition a cap on development prescribed in square metres for both comparison and convenience retail development should be set by type of centre. This figure would also need to reflect the need for the development to be of an appropriate scale, function and character for the individual centre. This Borough is already over supplied with retail floor space and new housing and therefore new expenditure would be needed to require new retail development.</p> <p>16. The provisions of the London Plan would permit a policy to actively achieve a threshold of at least 30% of all retail space being allocated to independent retailers and SME's.</p> <p>17. It also justifies a policy to that could dictate that any retail development that would lead to more than a 10% redirection from existing centres would be refused.</p> <p>18. A policy to actively support retail which sold local produce could also be included.</p> <p>19. No retail development should be accepted which would change the position of the centre in the hierarchy of towns unless already provided for in a Local Plan.</p>	<p>The impact test is already covered in PPS4. Applications for town centre uses are assessed against the tests in PPS4 and policies in the London Plan. The Core Strategy sets out comparison retail floorspace requirements for the Metropolitan and District centres. Policy E5 promotes uses appropriate to the size of each retail centre. Detailed policies for retail centres will be set out in the Development Management DPD.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p style="text-align: right;">No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
33	1	Individual	Core Strategy Consultation Draft Consultation	Object	<p>1. Time period for comments is too short for such an important document.</p> <p>2. Council has made it virtually impossible for large swathes of the population in Hillingdon to understand such a complex document and make a judgment on what effects the new policies will have in their area.</p> <p>3. There has been no significant or effective publicity in either the local press or through other instruments of local services such as schools, colleges, doctors' surgeries or local forums, or even in the Hillingdon People magazine.</p> <p>4. For many areas of the borough, particularly those to the north, the new policies in the above document will protect those areas and enhance and support local communities. However for Yiewsley and West Drayton this is not the case,</p> <p>5. Ask that the period of consultation is extended and that those communities to be most affected by the changes in this document are made fully aware of its implications to their way of life and their communities. To do this the Council needs to organize local meetings so that residents are able to question their elected representatives fully.</p>	<p>1. This Regulation 25 consultation has been carried out in line with the Town and Country Planning Regulations 2004 (as amended). Whilst the regulations do not specify a particular time period for representations on Regulation 25, Hillingdon's Statement of Community Involvement (SCI) adopted in November 2006 sets out a minimum of six weeks for public consultations for each of the stages in the plan making process. In line with previous consultations on the Core Strategy, a six week consultation period was planned for the draft Core Strategy to be consistent with Hillingdon's SCI.</p> <p>2. Officers have sought to use plain English to improve understanding of complex terms. However, some terms cannot be avoided as these form part of the statutory process.</p> <p>3. Involvement of the public and key stakeholders in preparing the Core Strategy Consultation Draft has followed the approach set out in the Council's Statement of Community Involvement (SCI) adopted in November 2006. Various publicity methods were used with the aim of raising awareness of the LDF and informing as many people as possible. These have included information being made available on the Council's website, at all borough libraries and One-stop-shop in Hayes, 6 public drop-in sessions, 7 press notices, an article in Hillingdon People magazine, poster displays at Post Offices, GP surgeries and schools, public exhibitions at Uxbridge Library and Civic Centre, audio advertisement in the Hillingdon Talking Newspaper for the visually impaired, attendance at representative group meetings. Approximately 2970 letters/ emails were sent to a wide range of groups and individuals on the LDF consultation database including 50 randomly selected residents per ward from the electoral register (1100) and to 197 randomly selected businesses from the 2008 Hillingdon Business Directory.</p> <p>4. Disagree, the Core Strategy policies seeks to improve areas in the south of the borough. Policy E3 seeks to improve the Heathrow Opportunity Area.</p> <p>5. The consultation stage was planned between</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
----	---------	---------------------------	-------------------------------	------------------------------	---------------------------	--------------------

16th June to 30th July as August was considered to be the main holiday period when people would be unavailable to comment on the document. Any extension to this period would therefore have run into September and would compromise the statutory timetable for adoption of the documents contained in the Council's Local Development Scheme (LDS). For these reasons, the consultation period was not extended. A number of local meetings were arranged to allow the public and elected representatives a chance to discuss the documents.

Council's Proposed Action

1. No proposed change.
2. Throughout the Core Strategy replace jargon with plain English wherever possible.
3. No proposed change.
4. No proposed change.
5. No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
33	2	Individual	5 Core Policies - The Economy Map 5.1 Locations for Economic Growth	Object	The Heathrow Opportunity Area should be confined to those areas which already have or have had business and/ or industrial use.	<p>Detailed proposals for the area will be set out in a future Heathrow Area DPD. The Council does not want industrial uses in residential areas and Policy E1 of the Core Strategy protects existing employment land for employment uses for this reason. In addition, development management policies control inappropriate development. Policy E2 of the Core Strategy proposes hotel growth for Uxbridge, Hayes and sites on the Heathrow perimeter. No hotel growth is planned for Yiewsley & West Drayton.</p> <p>Areas of Special Local Character and Conservation Areas in Yiewsley & West Drayton are identified and protected in the Core Strategy through Map 7.1 and Policy HE1.</p> <p>Changes to the Key Diagram and Map 5.1 will therefore be made to clarify the areas for growth.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Changes to the Key Diagram and Map 5.1 are proposed to clarify growth areas in the Hayes-West Drayton Corridor. Add overarching sentence to the beginning of Table 5.3 which makes clear that growth in the Heathrow OA will be focused on sustainable locations such as town centres and areas with good access to public transport.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
33	3	Individual	3 A Portrait of Hillingdon - where we are now Major Infrastructure Projects Para 3.11	Object	Changes to phasing of High Speed 2 should be reflected in the Core Strategy and residents should be allowed to comment on policies.	<p>Currently the High Speed Rail 2 (HS2) route is only indicative. The coalition government has put back the public consultation on HS2 until early 2011 in order to do further work on the Heathrow connection. The Mawhinney Review, published in July 2010, investigated potential HS2 connections to Heathrow Airport. It concluded that a 'Heathrow Hub' would be too costly for the government to pursue. Until the consultation and beyond, issues like the final route, phasing and connections will remain uncertain.</p> <p>The public consultation will be an opportunity for everyone with an interest to find out more about the proposals and to put forward their views. The London Borough of Hillingdon will assess the impacts on the borough and local residents and will look closely at mitigation of local impacts. The Council will work with local residents and in partnership with other organizations as part of the consultation process.</p> <p>□</p> <p>The Core Strategy consultation says: "In principle, the Council is supportive of high speed rail. However, this support will be very much conditional upon climate change objectives and local community aspirations being met. The Council will not support any proposals that could lead to an increase in demand for flights from Heathrow, an increase in road congestion or significant adverse local environmental impacts." This remains the Council's position.</p> <p>It is proposed to update paragraph 3.11 (and paragraph 9.27 in the Transport chapter). However, it would be pre-emptive to include any details of the route or phasing at this stage.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend paragraphs 3.9 - 3.11 to read:</p> <p>The High Speed 2 (HS2) Company was set up in January 2009 to work on the feasibility of a new rail route between London and the West Midlands. The Department of Transport issued a paper on 11th March 2010 which sets out the then Government's proposed strategy for High Speed Rail(11). The proposed preferred London-Birmingham route would run from London Euston via Old Oak Common (near Wormwood Scrubs</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
----	---------	---------------------------	-------------------------------	------------------------------	---------------------------	--------------------

prison) then via Ruislip, through the Chilterns to Birmingham. A connection to Heathrow is proposed to be provided by an interchange with Crossrail at a new Old Oak Common station.

In principle, the Council is supportive of a high speed rail network, although it does not support the preferred route (Chiltern line option). It considers that there is still a considerable amount of work to be undertaken on reviewing possible route options and that the review be dealt with in a way that fully takes into account more strategic and environmental issues, such as climate change objectives, as well as the impacts on residents and local community aspirations. The Council will not support any proposals that could lead to an increase in demand for flights from Heathrow, an increase in road congestion or significant adverse local environmental impacts.

The Coalition Government intends to begin an extensive consultation public consultation on HS2 early in 2011. The proposal is to start pre-construction works in 2015 and begin construction in 2017. Given the uncertainty about HS2, particularly in terms of the preferred route and timescales for implementation, the implications of the proposal have not been fully considered in the Core Strategy at this stage.

Amend paragraph 9.27 to read:

The proposed preferred London-Birmingham route for HS2 would run from London Euston via Old Oak Common (near Wormwood Scrubs prison) then via Ruislip, through the Chilterns to Birmingham. A connection to Heathrow is proposed to be provided by an interchange with Crossrail at a new Old Oak Common station. The proposal is to start pre-construction works in 2015 and begin construction in 2017. Given the uncertainty about HS2, particularly in terms of the preferred route and timescales for implementation, the implications of the proposal have not been fully considered in the Core Strategy at this stage.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
33	4	Individual	4 The Vision - where we want to be Strategic Objectives to deliver The Vision Town and Neighbourhood Centres Table 5.3 Heathrow Opportunity Area - Future of Key Sub-Areas Para 4.2	Object	<p>Yiewsley Pool is being closed and with no replacement/s being proposed. The proposed health centre on the pool site is not, in our opinion viable, as it is much smaller than alternative sites, which have been rejected due to inadequate size. Yiewsley library is poor comparison with new libraries built in other areas of the borough.</p> <p>Why isn't there an action plan and positive discrimination policies from this Council to support West Drayton and Yiewsley, which are not linked to Crossrail?</p> <p>The description of Yiewsley and West Drayton town centres is poor as it focuses on a semi-industrial past which is not accurate. It fails utterly to recognise them as actual shopping areas needed by local people, especially those without recourse to private cars.</p>	<p>Agree that an expanded description for Yiewsley & West Drayton Town Centre in Table 5.3 would be helpful, with more emphasis on the shopping centre function.</p> <p>More detailed policies and site proposals for the area will be included in the Heathrow Area Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend section on Yiewsley and West Drayton in Table 5.3 to read:</p> <p>The centre supports 29,336 sq m gross of retail floorspace, the majority of which is located in a linear fashion along High Street/Station Road. There are two designated Primary Shopping Areas and four Secondary Shopping Areas within the defined town centre. The majority of these are located along High Street/ Station Road. Both the primary and secondary frontages contain a high number of takeaway and service uses.</p>
33	5	Individual	9 Core Policies - Transport and Infrastructure Policy C11: Community Infrastructure Provision	Object	<p>Why there is not a more robust statement about finding sites in Hillingdon for the building of new schools, and why have at least some sites have not been identified?</p>	<p>The Core Strategy supports the principle of development required to address the needs of the borough's growing school-age population. The allocation of specific sites will be undertaken through the production of the Site Allocations Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
33	6	Individual	Core Strategy Consultation Draft General	Object	<p>1. We look forward to receiving your answers to questions and issues raised in this letter and to learn what revisions will be made to the plan in the light of omissions made due to a change of policies by the new coalition government.</p> <p>2. We would also welcome a response from the Council on the need to conduct a more effective consultation process by adequately advertising and fully informing those residents in the south of the borough who will be adversely affected by such policy changes as the Heathrow Opportunity Area.</p>	<p>1. The changes to national policy made by the new Coalition Government will be considered and incorporated in the next draft as they emerge.</p> <p>2. Involvement of the public and key stakeholders in preparing the Core Strategy Consultation Draft has followed the approach set out in the Council's Statement of Community Involvement (SCI) adopted in November 2006. Various publicity methods were used with the aim of raising awareness of the LDF and informing as many people as possible. These have included information being made available on the Council's website, at all borough libraries and One-stop-shop in Hayes, 6 public drop-in sessions, 7 press notices, an article in Hillingdon People magazine, poster displays at Post Offices, GP surgeries and schools, public exhibitions at Uxbridge Library and Civic Centre, audio advertisement in the Hillingdon Talking Newspaper for the visually impaired, attendance at representative group meetings. Approximately 2970 letters/ emails were sent to a wide range of groups and individuals on the LDF consultation database including 50 randomly selected residents per ward from the electoral register (1100) and to 197 randomly selected businesses from the 2008 Hillingdon Business Directory.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>1. Reflect emerging national policy in the Core Strategy.</p> <p>2. No proposed change.</p>
34	1	West London Waste Authority	8 Core Policies - Environmental Management Policy EM11: Sustainable Waste Management	Support/ Observation	<p>The Authority welcomes and supports your proposals and will be happy to work with you and other partner boroughs in support of Policy EM11.</p> <p>The Authority suggests that the policy could be improved by a more specific reference to the waste hierarchy in Policy EM11. Defra are currently consulting on the transposition of the revised Waste Framework Directive and propose to update PPS10 which will require Waste Development Frameworks to 'have regard to' the waste hierarchy. Specific reference to the waste hierarchy in Policy EM11 may 'future proof' your core strategy.</p> <p>In terms of monitoring W2 (Core) Indicator, BV82a and BV82b have been replaced by National Indicators NI 191, 192 and 193.</p>	<p>As the Local Development Framework is required to be in accordance with Regional and National Planning Policy Statements (PPS) including PPS10, the draft West London Waste Plan Development Plan Document will include specific mention of the waste hierarchy.</p> <p>Comments noted for monitoring indicator W2.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
35	1	Individual	Core Strategy Consultation Draft General	Object	<p>Numerous points raised as follows:</p> <p>P13 (E7) Is the performance of Uxbridge College being monitored?</p> <p>(E8) Planning could help with the conversion of existing sites to smaller units.</p> <p>P14 (H3) Requirements for gypsy and travellers pitches should be offset against Heathrow clearing centre obligations.</p> <p>P14 (EM5) Hillingdon Council gave franchise at Uxbridge Golf Course planning permission for a public restaurant.</p> <p>P14 (EM1 and EM8) Nothing is being done to mitigate the noise pollution in the area near Swakeleys underpass on A40.</p> <p>P17 - 3.9 Will the Council use every endeavour to reduce the disturbance levels and noise in connection with Heathrow loop and West Ruislip to Chilterns?</p> <p>P21 – SO10 A40 at Swakeleys again.</p> <p>P25 – 4.27 Potential problems from Uxbridge Golf Course</p> <p>P29 – 5.10 See P13 (E8)</p> <p>P43 Lost opportunities for long term parking.</p> <p>P47 Ickenham – again, long term parking wanted.</p> <p>P57 – 6.5 New homes north of A40, 637 [?]. Most in Ickenham but no parking.</p> <p>P67 – HE1 [?] Old Railway line – bridge over the river neglected.</p> <p>P75 – 8.5 The water meadow has only flooded once in last 10/15 years. It used to flood every winter – who is pushing the water elsewhere?</p> <p>P85 – 8.29</p>	<p>Responses to the specific points are as follows:</p> <p>E7. Development proposals for Uxbridge college are included in the infrastructure schedule at appendix B of the Core Strategy.</p> <p>E8. The Core Strategy recognises the needs of small to medium sized enterprises. These needs include small affordable business units.</p> <p>H3. The issue of pitch provision for gypsies and travellers will be addressed in the Site Allocations Development Plan Document.</p> <p>EM5. The issue of Uxbridge Golf Course is not a matter for the Core Strategy.</p> <p>EM1 and EM8. These site specific issues are not relevant to the Core Strategy.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
----	---------	---------------------------	-------------------------------	------------------------------	---------------------------	--------------------

Access on foot and disabled – not car, cycle and motorbike tracks.

P89 – 8.39

Surface water run off should be part of planning and enforced both for new and existing properties.

P91 – 8.46

A40 v Colne Valley – A40 warning.

P108 – Map 8.5

M4 only – A40 was promised years ago.

P125 – 9.15

Urgently required – long term car parking for West Ruislip and Ickenham stations and village centre for Hillingdon residents.

P127 – 9.24

Further details required for new station at West Ruislip.

THE DRIVE

Golf course – reinstatement and landscaping

Selling off of amenity land

No contribution from Hillingdon Council for maintenance of The Drive following franchise arrangements

Left outside of LE2 – no reply to correspondence to London Assembly[?].

NOTIFICATION TO ALL HILLINGDON RESIDENTS

Tradesmen – working times – I assume 7.30am-9.00pm is not acceptable

Bonfires – when? – surely not in daytime in summer months

Dogs – restatement of obligations – doggy poo bags etc – barking from gardens – cessation at 9.00pm-10.00pm

Amplified music – outdoor cessation times.

Council's Proposed Action

No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
36	1	Individual	Core Strategy Consultation Draft Consultation	Object	The time scale for consultation on such an important issue is too short. It probably took months to compile and yet we have such a short time to scrutinise the document and its implications for our borough. I request consideration be made to extend the period of consultation to mid September 2010. If an extension cannot be accommodated, please inform me on what legal grounds that it cannot be granted.	<p>The minimum requirements for community involvement in the plan making process are set out in the Town and Country Planning Regulations 2004 (as amended). The current stage is Regulation 25: Public Participation in the preparation of a development plan document (DPD). Whilst Regulation 25 does not specify a particular time period for representations, Hillingdon's Statement of Community Involvement (SCI) adopted in November 2006 sets out a minimum of six weeks for public consultations for each of the stages in the plan making process. In line with previous consultations on the Core Strategy, a six week consultation period was carried out for the draft Core Strategy to be consistent with Hillingdon's SCI.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
37	1	CgMs Consulting on behalf of British Steel Pension Fund Trustee Ltd	5 Core Policies - The Economy Supply of Employment Land Para 5.11	Object	At paragraph 5.11 add 'Part of Millington Road area, Hayes' to the list of locations proposed for the release of employment land.	<p>The Employment Land Study (ELS) assesses the borough's key employment sites to ensure adequate industrial and business site provision in the borough and identifies surplus sites which might be released to housing and other uses. It does not propose part of the Millington Road area for release for other uses.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
37	2	CgMs Consulting on behalf of British Steel Pension Fund Trustee Ltd	5 Core Policies - The Economy Table 5.3 Heathrow Opportunity Area - Future of Key Sub-Areas	Object	Under table 5.3 Heathrow Opportunity Area - Future of Key Sub-Areas, Hayes Town Centre, Future Growth amend.... 'Hayes is identified as having capacity for an additional 3,350 sq.m of comparison retail floorspace for the plan period which will be accommodated within the existing centre' to 'Hayes is identified as having capacity for an additional 3,350 sq.m of comparison retail floorspace for the plan period which will be accommodated as far as possible within the existing town centre. There is also a need for a main foodstore to limit convenience expenditure currently leaving the town to out-of-centre stores'.	<p>The Council notes that paragraph 4.43 of the draft Replacement London Plan states "New, or extensions to existing, out of centre retailing and leisure development can compromise the strong 'town centres first' policy".</p> <p>Any application for retail uses outside a town centre will be assessed through policies in PPS4, including the sequential and impact tests.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
38	1	Individual	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision	Object	I want my own piece of land with a big mobile home for 6 children and 2 adults and 2 big gates going in.	<p>Any allocation of sites for additional pitches will be undertaken through the Site Allocations Development Plan Document.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
39	1	Individual	9 Core Policies - Transport and Infrastructure Public Transport Network	Object	A bus service is needed to connect Botwell with Cherry Lane Cemetery in Shepiston Lane.	<p>Noted. The London Borough of Hillingdon is involved in regular discussions with Transport for London (TfL) and options are being considered to upgrade and improve services. The borough supports measures for improved public transport and will take forward these and other suggestions to inform discussions with TfL. Improvements such as new bus routes are influenced by TfL's strategic transport priorities and are reliant on funding.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
39	2	Individual	7 Core Policies - Historic and Built Environment Built Environment Policy BE1: Built Environment	Object	Re: Built Environment (Landscaping etc) - many footpaths are in poor condition, with repairs often carried out with overuse of tarmac, resulting in poor drainage. Thought should be given not only to accomplishment but subsequent good maintenance practice.	<p>Point 10 of Policy BE1 seeks to ensure that all new development maximises the opportunities for all new homes to contribute to tackling climate change. There will be more detailed policies within the Development Management Development Plan Document and Supplementary Planning Documents on measures to achieve this.</p> <p>Flood risk management is addressed in policy EM6 which encourages the use of sustainable urban drainage systems (SUDS) across the borough in all developments. The policy also states that the Council may require developer contributions to guarantee the long term maintenance and performance of SUDS is to an appropriate standard.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
39	3	Individual	5 Core Policies - The Economy Policy E1: Managing the Supply of Employment Land	Object	Object to LSIS designation for Hayes industrial area.	<p>Policy 4.4 of the draft replacement London Plan requires boroughs to show how their stock of industrial land will be planned and managed in line with policies in the London Plan, taking account of criteria including the need to identify and protect Locally Significant Industrial Sites and the need for strategic and local provision for waste management. The designation of LSIS and LSEL is a reflection of the type of employment sites which already exist. Both designations are represented in Hayes and both are equally important in the borough's portfolio of employment land.</p> <p>Design policies for new development in employment areas already exist and will be taken forward through the Development Management Development Plan Document, supported by Core Strategy Policy BE1 which states "Improve areas of poorer environmental quality, including within the areas of relative disadvantage of Hayes, Yiewsley and West Drayton".</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change</p>
40	1	Theatres Trust	4 The Vision - where we want to be Strategic Objectives to deliver The Vision Policy C13: Culture SO6, SO18	Support	From our point of view we find the document to be Sound in respect of Objectives SO6 and SO18, and Policy C13 on Culture but with some observations.	<p>Comments noted and welcomed.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
40	2	Theatres Trust	9 Core Policies - Transport and Infrastructure Policy CI1: Community Infrastructure Provision Appendix 4 Glossary	Object	There is no full description of the term 'community facilities' in the Glossary although there is an explanation of the word 'culture'. We suggest, for clarity and greater certainty of intended outcomes and so that guidelines are clear and consistent, a description for this term as: community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community.	<p>Agreed - definition of community facilities to be added to the Glossary.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Insert definition of community facilities in the Glossary:</p> <p>'Community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community.'</p>
40	3	Theatres Trust	9 Core Policies - Transport and Infrastructure Policy CI2: Leisure and Recreation	Object	Sub heading of Leisure and Recreation on page 134 is confusing.	<p>Agree to insert page break before paragraph 9.45 - but to retain word "Culture" in the title - to clarify that this section covers policies CI 2 & CI 3.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Insert page break before paragraph 9.45.</p>
40	4	Theatres Trust	Appendix 4 Glossary	Object	Include theatres in definition of culture.	<p>The definition includes arts - this would encompass theatres.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
41	1	GVA Grimley on behalf of Brunel University	4 The Vision - where we want to be The Vision for Hillingdon 2026 Para 3.3	Object	Hillingdon has continued to prosper from the presence of Heathrow - Add: and Brunel University. Reason: To recognise the key role of the University in the Borough's economy.	<p>The Vision sets out how Hillingdon will look in 2026, including what will be protected and where growth will take place. Heathrow is referred to as it is a unique feature of the borough that will have a direct impact on growth over the period of the Core Strategy. The role of Brunel is recognised in the document, however as part of the borough's social infrastructure, it is not considered appropriate to refer to it in the Vision.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
41	2	GVA Grimley on behalf of Brunel University	4 The Vision - where we want to be Strategic Objectives to deliver The Vision 4.3	Object	Hillingdon has continued to prosper from the presence of Heathrow. Strategic Objectives (SOs) 23 & 24 outlined to achieve this. Add: And Brunel University. SO 25: Facilitate Brunel University in providing world class academic and teaching facilities. Reason: To recognise the key role of the University in the Borough's economy	<p>Paragraph 9.42 refers to safeguarding sites for future education, health and community service needs and also to protect existing premises.</p> <p>Support for additional growth at Brunel University would need to be discussed and agreed on a site specific basis as part of work for the Site Allocations Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend end section of paragraph 9.43 to read:</p> <p>In addition to primary and secondary provision, Hillingdon contains highly respected places of further and higher education. Policies will be developed in subsequent DPDs to ensure that a high standard of teaching can continue to be provided in these establishments over the period of the Core Strategy.</p>
41	3	GVA Grimley on behalf of Brunel University	5 Core Policies - The Economy Location of Employment Growth Para 5.17	Observation	Research & Development at Brunel University Science Park listed as a 'specialist industry cluster'. Note that the whole University Campus represents a specialist industry cluster. Reason: To recognise that Research & Development is carried out throughout the University Campus and not just at the Science Park.	<p>Agree.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Remove 'science park' after Brunel University in paragraph 5.17</p>
41	4	GVA Grimley on behalf of Brunel University	8 Core Policies - Environmental Management Policy EM2: Green Belt, Metropolitan Open Land and Green Chains Para 8.25	Object	Land at Brunel University, Harefield Hospital and Mount Vernon Hospital is identified as Major Developed Sites in the Green Belt. Any proposals for development in Green Belt and Metropolitan Open Land will be assessed against national and London Plan policies, including the exceptional circumstances test. Add to first paragraph: This will include consideration of an adjustment to accommodate the future needs to Brunel University. Reason: To acknowledge that Brunel University will need to deliver new buildings during the plan period to 2026 and this is likely to necessitate the release of land within the Green Belt.	<p>The Council intend setting out any detailed changes to the Green Belt designations in its area when preparing the Site Allocations Development Plan Document. If proposals involving the extension of the University Campus are then available they will be considered at that stage and public consultations undertaken. Otherwise it would be premature to amend the Core Strategy as proposed and the Council will deal with any future proposals to extend the campus through the usual development management process.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
41	5	GVA Grimley on behalf of Brunel University	Appendix 2 Infrastructure Schedule	Object	Scheme: Completion of University Masterplan. Add '... and future development to be considered in next Masterplan. Reason: To acknowledge future masterplan to be prepared by University.'	<p>Reference to the next phase of the masterplan will be included in the infrastructure schedule.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Addition to Appendix 2: Infrastructure Schedule: Brunel University, column 2 'Completion of Brunel University masterplan and future development to be considered in next masterplan.'</p>
41	6	GVA Grimley on behalf of Brunel University	Appendix 2 Infrastructure Schedule	Object	Need for scheme: To address needs of existing students and provide updated facilities. Replace: To enabling the University to deliver international standards of academic and teaching facilities. Reason: To recognise the importance high quality facilities to the University's success	<p>Agreed - Infrastructure Schedule at Appendix 2 will be amended.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Addition to Appendix 2: Infrastructure Schedule: Brunel University, column 2: 'Completion of Brunel University masterplan and future development to be considered in next masterplan.'</p> <p>Delete: ' to address needs of existing students and provide updated facilities.' and replace with: 'To enable the University to deliver international standards of academic and teaching facilities.'</p>
41	7	GVA Grimley on behalf of Brunel University	Appendix 2 Infrastructure Schedule	Object	Amend Infrastructure Schedule to note outstanding work on masterplan.	<p>Noted. Schedule will be amended in accordance with comments.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Appendix 2 Infrastructure Schedule - amend as follows: add additional text to Brunel University under Requirements of Scheme: Key outstanding project...</p> <p>New column will read:</p> <p>The existing masterplan contains a number of remaining phases covering the period to 2014. The key outstanding project from the existing masterplan is the Eastern Gateway Building school, which is due for completion in 2012. A number of future projects are being considered for the next masterplanning period from 2014 to 2021.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
41	8	GVA Grimley on behalf of Brunel University	Appendix 2 Infrastructure Schedule	Object	Amend Infrastructure Schedule to recognise funding constraints upon the University.	<p>Schedule 2 will be amended in accordance with comments.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Addition to Appendix 2: Infrastructure Schedule: Brunel University, Funding arrangements:</p> <p>Primarily self funded. Grant funding and enabling development may also need to be considered.</p>
41	9	GVA Grimley on behalf of Brunel University	Appendix 2 Infrastructure Schedule	Object	Amend Infrastructure Schedule to refer to Green Belt land release for new University buildings.	<p>The need for release of Green Belt land will not be acknowledged in the schedule.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
42	1	Civil Aviation Authority: Safety Regulation Group	Core Strategy Consultation Draft	Observation	Whilst the CAA would not wish to comment on such plans, where officially safeguarded aerodromes lie within the Council's area of jurisdiction, we recommend that the Council considers the need of such aerodrome(s) within your development plan and consult with the aerodrome operator(s)/licensee(s) directly.	<p>Noted.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
43	1	RPS Planning & Development on behalf of Costco Wholesale UK Ltd	4 The Vision - where we want to be Strategic Objectives to deliver The Vision SO15	Support	Support SO15	<p>Support welcomed.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
43	2	RPS Planning & Development on behalf of Costco Wholesale UK Ltd	Appendix 4 Glossary	Observation	The definition of employment land/sites on page 163 of the Core Strategy glossary should be amended to recognise that sui generis uses may be an appropriate use for employment land.	<p>Agree.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Glossary entry for employment land/site to be amended to include 'and appropriate sui generis uses.'</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
44	1	Y&WDTCAG	Core Strategy Consultation Draft General	Object	The document is mainly of an aspirational nature and on that point it is difficult not to commend the Core Strategy. However, even on a second reading, it is difficult to determine what the wider implications will be for the community. With respect to all concerned, the document, in part, is too vague.	<p>Support welcomed.</p> <p>The Core Strategy's vision, strategic objectives and spatial policies set out an appropriate basis for a Local Development Framework. It aims to reflect national and regional policy requirements and apply these at the local level and to formulate local policies and proposals based on a sound local evidence base.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
44	2	Y&WDTCAG	1 Introduction Consultation	Object	<p>1.The consultation process for such an important document leaves a lot to be desired. On hindsight participation may have been better served by including community focus groups in the process. This may have achieved a better understanding of the Core Strategy, its relationship with the London Plan and the wider implications for the community.</p> <p>2.It has been noted that there has been no response or resolution to the request, made at the Residents Forum meeting held on 24th June 2010, for the consultation period to be extended.</p>	<p>1.The range of methods to involve and inform the public in the preparation of LDF documents are outlined in the Statement of Community Involvement (SCI). The SCI has in itself been subject to public consultation and scrutiny by an Independent Inspector prior to its adoption in November 2006. The methods followed for this consultation have been consistent with the SCI. With over 143 responses from individuals and various groups being received, it is considered that the publicity methods followed have been effective in reaching all sectors of the community.</p> <p>2.This Regulation 25 consultation has been carried out in line with the Town and Country Planning Regulations 2004 (as amended). Whilst the regulations do not specify a particular time period for representations on Regulation 25, Hillingdon's Statement of Community Involvement (SCI) adopted in November 2006 sets out a minimum of six weeks for public consultations for each of the stages in the plan making process. In line with previous consultations on the Core Strategy, a six week consultation period was planned for the draft Core Strategy to be consistent with Hillingdon's SCI. The consultation stage was planned between 16th June to 30th July as August was considered to be the main holiday period when people would be unavailable to comment on the document. Any extension to this period would therefore have run into September and would compromise the statutory timetable for adoption of the documents contained in the Council's Local Development Scheme (LDS).</p> <p>For the reasons stated above, the consultation period was not extended.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
----	---------	---------------------------	-------------------------------	------------------------------	---------------------------	--------------------

44	3	Y&WDTCAG	3 A Portrait of Hillingdon - where we are now Major Infrastructure Projects	Observation	Update Heathrow Expansion section.	Agree, Heathrow Expansion section to be updated in Major Infrastructure section.
----	---	----------	---	-------------	------------------------------------	--

Council's Proposed Action

Delete paras 3.5 -3.7 and replace with 'In March 2010 the High Court ruled that the previous Government's decision on the proposed third runway at Heathrow does not hold any weight. As such, this proposal is not considered further in this Core Strategy.'

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
44	4	Y&WDTCAG	3 A Portrait of Hillingdon - where we are now Major Infrastructure Projects	Object	Update the HS2 section and para 9.27	<p>Currently the High Speed Rail 2 (HS2) route is only indicative. The coalition government has put back the public consultation on HS2 until early 2011 in order to do further work on the Heathrow connection. The Mawhinney Review, published in July 2010, investigated potential HS2 connections to Heathrow Airport. It concluded that a 'Heathrow Hub' would be too costly for the government to pursue. Until the consultation and beyond, issues like the final route, phasing and connections will remain uncertain.</p> <p>The public consultation will be an opportunity for everyone with an interest to find out more about the proposals and to put forward their views. The London Borough of Hillingdon will assess the impacts on the borough and local residents and will look closely at mitigation of local impacts. The Council will work with local residents and in partnership with other organizations as part of the consultation process.</p> <p>The Core Strategy consultation says: "In principle, the Council is supportive of high speed rail. However, this support will be very much conditional upon climate change objectives and local community aspirations being met. The Council will not support any proposals that could lead to an increase in demand for flights from Heathrow, an increase in road congestion or significant adverse local environmental impacts." This remains the Council's position.</p> <p>It is proposed to update the HS2 section in the Core Strategy to reflect the direction taken by the coalition government, and to strengthen the wording to reflect the Council's intention to mitigate local impacts and expectation of an integrated approach to public transport. It is also proposed to similarly update paragraph 9.27 in the Transport chapter. However, it would be pre-emptive to include any details of the route or phasing at this stage.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend paragraphs 3.9 - 3.11 to read:</p> <p>The High Speed 2 (HS2) Company was set up in January 2009 to work on the feasibility of a new rail route between London and the West</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
----	---------	---------------------------	-------------------------------	------------------------------	---------------------------	--------------------

Midlands. The Department of Transport issued a paper on 11th March 2010 which sets out the then Government's proposed strategy for High Speed Rail(11). The proposed preferred London-Birmingham route would run from London Euston via Old Oak Common (near Wormwood Scrubs prison) then via Ruislip, through the Chilterns to Birmingham. A connection to Heathrow is proposed to be provided by an interchange with Crossrail at a new Old Oak Common station.

In principle, the Council is supportive of a high speed rail network, although it does not support the preferred route (Chiltern line option). It considers that there is still a considerable amount of work to be undertaken on reviewing possible route options and that the review be dealt with in a way that fully takes into account more strategic and environmental issues, such as climate change objectives, as well as the impacts on residents and local community aspirations. The Council will not support any proposals that could lead to an increase in demand for flights from Heathrow, an increase in road congestion or significant adverse local environmental impacts.

The Coalition Government intends to begin an extensive consultation public consultation on HS2 early in 2011. The proposal is to start pre-construction works in 2015 and begin construction in 2017. Given the uncertainty about HS2, particularly in terms of the preferred route and timescales for implementation, the implications of the proposal have not been fully considered in the Core Strategy at this stage.

Amend paragraph 9.27 to read:

The proposed preferred London-Birmingham route for HS2 would run from London Euston via Old Oak Common (near Wormwood Scrubs prison) then via Ruislip, through the Chilterns to Birmingham. A connection to Heathrow is proposed to be provided by an interchange with Crossrail at a new Old Oak Common station. The proposal is to start pre-construction works in 2015 and begin construction in 2017. Given the uncertainty about HS2, particularly in terms of the preferred route and timescales for implementation, the implications of the proposal

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
						have not been fully considered in the Core Strategy at this stage.
44	5	Y&WDTCAG	5 Core Policies - The Economy Map 5.1 Locations for Economic Growth	Object	Map on page 30 indicates a blanket coverage for growth of hotels and offices in Yiewsley, West Drayton & Hayes. No detail as to planning implications and protection for the communities in the designated areas.	Agree map is unclear. <u>Council's Proposed Action</u> Changes to the Key Diagram and Map 5.1 are proposed to clarify growth areas in the Hayes-West Drayton Corridor. Add overarching sentence to the beginning of Table 5.3 which makes clear that growth in the Heathrow Opportunity Area will be focused on sustainable locations such as town centres and areas with good access to public transport.
44	6	Y&WDTCAG	3 A Portrait of Hillingdon - where we are now Hillingdon's Key Facts Policy E7: Raising Skills	Observation	Given the statistics on page 9 how many of the 9,000 TO 11,000 jobs will be taken up by the local workforce? What training opportunities will be made available to ensure the local workforce attain the skills that may/will be needed?	The Council will ensure local people have access to new jobs through Policy E7: Raising Skills. This will be done by ensuring training opportunities are linked with the development of major sites, workforce development initiatives and training programmes reflect skill requirements in the workplace, engaging with local businesses and universities, and promoting tourism-related industries. <u>Council's Proposed Action</u> No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
44	7	Y&WDTCAG	5 Core Policies - The Economy Map 5.3: Town Centre Improvements	Object	Map 5.3 should allocate (1) support specialist retail/independent shops and (2) strengthen core shopping area to Yiewsley & West Drayton.	<p>The Retail Study, on which Policy E5 is based, does not consider Yiewsley & West Drayton to have a strong specialist retail function. This is why specialist retail/independent shops are not allocated to the centre on Map 5.3.</p> <p>Yiewsley & West Drayton is a District Centre which is a strategic designation both locally and London-wide. The characteristics for District Centres are set out in Annex 2 of the Replacement London Plan (2009) as typically containing 10,000-50,000 sq.m of retail floorspace. As a District Centre Yiewsley & West Drayton has primary and secondary shopping frontages rather than core shopping areas which are a way of managing smaller centres. It is therefore not appropriate to strengthen the core shopping area at Yiewsley & West Drayton and show this on Map 5.3.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
44	8	Y&WDTCAG	6 Core Policies - New Homes Housing Growth	Object	Concerns regarding development in Yiewsley/West Drayton, Unclear definition of affordable housing.	<p>The Core Strategy does not allocate specific sites for housing. It proposes growth in the Yiewsley/West Drayton Corridor and notes that any such growth will need to be supported by an appropriate amount of social, physical and green infrastructure.</p> <p>A definition of affordable housing in accordance with PPS3 can be included in the glossary.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Insert the following definition of affordable housing in the glossary and include an appropriate reference in the text.</p> <p>Affordable housing is: 'Affordable housing includes social rented and intermediate housing, provided to specified eligible households whose needs are not met by the market. Affordable housing should:</p> <ul style="list-style-type: none"> – Meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices. – Include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision'. <p>Social rented housing is: 'Rented housing owned and managed by local authorities and registered social landlords, for which guideline target rents are determined through the national rent regime. The proposals set out in the Three Year Review of Rent Restructuring (July 2004) were implemented as policy in April 2006. It may also include rented housing owned or managed by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Housing Corporation as a condition of grant.'</p> <p>Intermediate affordable housing is: 'Housing at prices and rents above those of social rent, but below market price or rents, and which meet the criteria set out above. These can include shared equity products (eg HomeBuy), other low</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
44	9	Y&WDTCAG	7 Core Policies - Historic and Built Environment Heritage Built Environment	Object	In the past the preservation of the Historic and Built Environment was not as it should be. The inclusion of a definitive policy, which will be strictly implemented, should be welcomed.	<p>cost homes for sale and intermediate rent.'</p> <p>The Council considers that policies HE1 and BE1 are sufficiently robust to preserve and enhance the borough's historic and built environment.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
44	10	Y&WDTCAG	8 Core Policies - Environmental Management Water, Air and Noise Management	Object	This section is too vague as to how the Council intends to improve, for example, air quality. A definitive policy should be included.	<p>Noted. The general approach set out in the Core Strategy on the location of development, and the need to provide modal shifts away from cars will help reduce impacts from new development - as will improvements to public transport.</p> <p>The policies in the Council's Development Management Development Plan Document and Local Implementation Plan will address these strategic policy objectives.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
44	11	Y&WDTCAG	9 Core Policies - Transport and Infrastructure	Object	No firm policies to deliver transport and community infrastructure.	<p>In accordance with Government Planning Guidance, the Core Strategy establishes the principle that planned growth in the Core Strategy will need to be underpinned by an appropriate amount of social, physical and green infrastructure.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed changes</p>
44	12	Y&WDTCAG	Appendix 2 Infrastructure Schedule	Support	Content of SIP schedule have been noted.	<p>Comments noted.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
44	13	Y&WDTCAG	Core Strategy Consultation Draft General	Observation	The following question has been raised: 'In future will the London Plan take precedence over the LDF in the consideration of planning applications?'	<p>Planning guidance from central Government defines that whichever is the later adopted document will normally take precedence.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
45	1	Metropolis PD on behalf of Mr Denis Oates	6 Core Policies - New Homes Care Homes	Object/ Observation	Document fails to acknowledge aging population or provide a suitable Care Home policy	<p>The Council accepts that the percentage of the population aged over 65 will increase over the period of the Core Strategy. The needs of this group should be recognised in the document. More detailed policies, specifically related to Care Homes will be identified in the Council's emerging Development Management DPD.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Proposed amendment to fourth bullet point in Population section of Hillingdon's Key Facts:</p> <p>Those aged 65 and over currently represent 15% of the borough-wide population . This population group will increase to 17.65% of the population between 2011-2026.</p> <p>Add new sentence to paragraph 9.41 to read:</p> <p>' The provision of social infrastructure will need to reflect the changing needs of the population over the period of the Core Strategy. Policies in subsequent DPDs will need to make provision for the facilities required by an ageing population.'</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
45	2	Metropolis PD on behalf of Mr Denis Oates	8 Core Policies - Environmental Management Green Belt, Metropolitan Open Land and Green Chains	Object	<p>A Care Home proposal at the objector's site (Greensleeves) can be justified under a special circumstances case based on the overwhelming need for such a facility and the owner's proposal to provide for a nature reserve area for a local school.</p> <p>The care home development proposal will be sited on the existing footprint of the building. As such it will remain a proposal on brownfield land and is therefore unaffected by the Government recent policy change to PPS3 (Housing) removing gardens from brownfield classification.</p> <p>A detailed case will be put forward at the forthcoming Site Allocations DPD consultation including a sustainability appraisal highlighting the site's sustainable location close to local facilities. In the meantime, however, we contend that the Core Strategy should acknowledge the ability to amend boundaries at the local level to respond to individual site characteristics and special circumstances consistent with Government advice in PPG2 (Greenbelts). Paragraph 8.22 (as set out above) should therefore be amended to reflect this.</p>	<p>The objector raises detailed site proposals outside the context of the strategic planning policies set out in the draft Core Strategy which will more properly be dealt with when a Site Allocations DPD is prepared.</p> <p>No amendment is proposed to paragraph 8.22 as it is unnecessary to repeat national planning guidance within the Core Strategy.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
45	3	Metropolis PD on behalf of Mr Denis Oates	4 The Vision - where we want to be Strategic Objectives to deliver The Vision	Object	<p>Recommendation 1: It is recommended that an additional strategic policy objective is added to either Chapter 4 or Chapter 6 of the Core Strategy, as follows:-</p> <p>'The Council will plan for the existing and growing need for elderly care provision in the Borough. This will be achieved by adopting LDF Development Management Policies that protect existing facilities and by allocating new sites through the forthcoming LDF Site Allocations DPD.' The supporting commentary and statistical analysis for this policy has been provided by the Pinders Report.</p>	<p>The Core Strategy has been amended to reflect the needs of Hillingdon's ageing population. The method of addressing this proposed objective is unclear, however it is unlikely to involve the allocation of specific sites as suggested.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
45	4	Metropolis PD on behalf of Mr Denis Oates	8 Core Policies - Environmental Management Green Belt, Metropolitan Open Land and Green Chains Para 8.22	Object	<p>Recommendation 2: It is recommended that paragraph 8.22 is amended to add the words shown in bold below:- 'The Green Belt Study (2006) is being reviewed and recommendations for minor adjustments to identify those sites with special circumstances to justify development proposals and to address boundary anomalies to the Green Belt, Metropolitan Open Land and Green Chains will be contained in the emerging Study. Minor adjustments will be undertaken in the Site Allocations DPD with more detailed policies in the Development Management DPD'.</p> <p>These amendments should then inform the forthcoming LDF Site Allocations Document which should specifically identify the 'Greensleeves' site for a residential care home. Further representations by the land owner will be made at the appropriate time.</p>	<p>The purpose of the study is to identify green belt anomalies. Very special circumstances to justify the release of specific sites would need to be made through the Site Allocations Development Plan Document.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
46	1	Government Office for London	Core Strategy Consultation Draft General	Observation	<ul style="list-style-type: none"> - There are no major issues with soundness - Overall the document is good. - An audit of option development is essential 	<p>Support welcomed - comments noted.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
46	2	Government Office for London	Appendix 2 Infrastructure Schedule	Object	Where development is reliant on infrastructure, a contingency plan is essential. Risks to delivery should be set out in the infrastructure schedule	<p>Contingencies have been identified wherever possible. The Infrastructure Schedule will be updated to identify risks as necessary.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
46	3	Government Office for London	8 Core Policies - Environmental Management Green Belt, Metropolitan Open Land and Green Chains	Observation	Major greenbelt changes should be included in the Core Strategy, minor changes can be dealt with in other DPDs.	<p>Noted - no major Green Belt changes are currently proposed. Any minor changes will be put forward in the Site Allocations Development Plan Document.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
46	4	Government Office for London	Core Strategy Consultation Draft General	Observation	There don't seem to be many area-based policies.	<p>Area-based policies are included where appropriate, e.g. Heathrow Opportunity Area and Uxbridge Metropolitan Centre. Many borough-wide issues, for example air quality, housing and transport links cannot be treated in the same way. After due consideration, the Core Strategy has therefore been divided by theme rather than area.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
47	1	Preston Bennett Holdings Ltd on behalf of ACS International Schools	8 Core Policies - Environmental Management C11: Community Infrastructure Provision EM2: Green Belt, Metropolitan Open Land and Green Chains	Object	<p>School sites should be recognised alongside other facilities in the green belt that offer services for the benefit of communities as suitable locations for an appropriate scale of additional development to meet future expansion and improvement needs.</p> <p>As such ACS Hillingdon International School seeks site designation as a new 'Major Developed Site' (MDS) under Policy EM2.</p> <p>If the MDS designation is not supported, ACS International Schools advocates amending Policies EM2 and C11 to recognise the role that improved facilities on green belt school sites can have in the borough, while fully respecting the openness and character of the green belt.</p>	<p>Policy C1 1 already provides recognition of the importance of schools to the community. It will be for the Development Management process to determine the suitability of individual expansion proposals as they come forward. Planning Policy Guidance 2 on Green Belts already provide guidance on the criteria that will be taken into account with expansion proposals.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
48	1	Harmodsworth and Sipson Residents' Association	8 Core Policies - Environmental Management Water, Air and Noise Management	Object	To encourage more hotels with 'park and fly' facilities, more airport-related businesses such as freight companies should be totally out of the question.	<p>The Council are aware of the need to control development near Heathrow Airport so as to avoid adverse environmental effects from unwanted noise and traffic generation.</p> <p>A detailed Heathrow Area Development Plan Document. will be brought forward later as part of work on the Local Development Framework, and will consider detailed local development options for the area.</p> <p>The Core Strategy sets overall objectives at present of steering further development to existing town centre sites or areas with high public transport accessibility so as to minimise any potential adverse environmental impacts.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
48	2	Harmondsworth and Sipson Residents' Association	5 Core Policies - The Economy Strategy for the Heathrow Opportunity Area	Object	<p>Heathrow Opportunity Area and Jobs – we acknowledge that it is not just our villages in this area but once again we would bring your attention to more pollution. The area attracts low paid jobs such as hotel / airport workers, which in turn encourages buy to let landlords and houses of multiple occupation, which in turn contributes to the decline of the communities living in the last of the English Middlesex Villages, therefore history lost. Local businesses are already losing monies, especially those in the Heathrow Villages due to the blight left by the proposed third runway at Heathrow (although a major victory it has come at an immense cost to the businesses and communities of the villages of Harlington, Sipson and Harmondsworth. Stockley Park – is a very successful business park but unfortunately does not provide many local jobs as those with the more well paid jobs commute to the park, as proved by the heavy traffic in the rush hour.</p>	<p>Concerns noted. Detailed proposals and management for the Heathrow Opportunity Area will be considered through the Heathrow Area Development Plan Document (DPD). The DPD will include measures to improve air quality and manage areas of hotel growth, and there will be opportunity to comment on this and other planning documents. The Council recognises the issues related to local accessibility to jobs in Stockley Park and seeks to address this through Policy E7.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Additional wording added to Table 5.3 (Heathrow Airport and the Perimeter), which acknowledges the need to address the issues of employment growth in Heathrow Villages - to read:</p> <p>'The Council is aware of the particular issues associated with employment growth in the 'Heathrow Villages' of Sipson and Harmondsworth and will seek to address these in the forthcoming Heathrow Area DPD.'</p>
48	3	Harmondsworth and Sipson Residents' Association	9 Core Policies - Transport and Infrastructure Accessible Local Destinations	Object	<p>Roads in this area are already heavily congested.</p> <p>There is not a designated cycle link from the villages into London.</p> <p>Safe and secure cycle parking should also be available to encourage cycle use.</p>	<p>Paragraph 9.13 states that the Council will encourage walking and cycling initiatives and notes that facilities for cyclists (which might include secure parking) should be included in new developments and through retrofitting.</p> <p>Detailed local provision will be considered as part of work on the Heathrow Area Development Plan Document.</p> <p>Off-road cycle routes already link the villages and central London alongside the A4.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
48	4	Harmondsworth and Sipson Residents' Association	9 Core Policies - Transport and Infrastructure Community Infrastructure Built Environment	Object	Concerns regarding growth plans and lack of infrastructure in Yiewsley/ West Drayton. Additional concerns regarding buy to let landlords and back garden development.	<p>New homes will need to be supported by an appropriate amount of social, physical and green infrastructure. The Council's Strategic Infrastructure Plan in Appendix 2 identifies the infrastructure that is expected to come forward over the period of the Core Strategy. As part of the production of this document, providers were consulted on the infrastructure required to support growth. Responses to this consultation were limited.</p> <p>The Core Strategy recognises the need for additional primary places in the south of the borough to support population growth and measures to address this increase will be supported. Additional secondary places are also supported (but will be dependant on changes to the Government's BSF programme).</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
48	5	Harmondsworth and Sipson Residents' Association	9 Core Policies - Transport and Infrastructure Policy C12: Leisure and Recreation	Object	Villages lack leisure facilities, closure of swimming pool in West Drayton	<p>Policy C12 seeks to provide good quality well maintained leisure facilities to address local deficiencies and reflects the Council's wider leisure strategy that has delivered to new leisure facilities at Hayes (Botwell Leisure Centre) and Uxbridge. The Core Strategy seeks to promote improved access to these facilities.</p> <p>Specific sites for 'new' leisure facilities would be identified through the Site Allocations Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
48	6	Harmondsworth and Sipson Residents' Association	8 Core Policies - Environmental Management Open Spaces, Rivers and Canal Corridors	Object	Green spaces, we would expect to keep all the green spaces left in the villages and not expect any of the land to be earmarked for development.	<p>Noted. The Council may only allow the loss of any existing green space subject to the criteria set in PPG17, which states that 'Existing open space, sports and recreational buildings and land should not be built on unless an assessment has been undertaken which has clearly shown the open space or the buildings and land to be surplus to requirements.'</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
48	7	Harmondsworth and Sipson Residents' Association	5 Core Policies - The Economy Location of Employment Growth	Object	Concern that concentration of hotels around Heathrow are impacting negatively on local communities.	<p>Concerns recognised and noted. Detailed proposals and management for the Heathrow Opportunity Area will be considered through the Heathrow Area Development Plan Document (DPD). Additional controls on hotel development will be considered through the Development Management DPD. Both documents will be available for public consultation.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Additional wording added to Table 5.3 (Heathrow Airport and the Perimeter), which acknowledges the need to address the issues of employment growth in Heathrow Villages.</p>
49	1	Drivers Jonas Deloitte on behalf of CEMEX Ltd	6 Core Policies - New Homes H1: Housing Growth	Support	CEMEX supports the Council's aim to ensure the provision of 3,650 additional homes 2007-2017 and the replacement London Plan target of 620 new homes per annum.	<p>Support welcomed</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change</p>
49	2	Drivers Jonas Deloitte on behalf of CEMEX Ltd	8 Core Policies - Environmental Management Green Belt, Metropolitan Open Land and Green Chains	Object	CEMEX proposes that the site at Frog's Ditch Farm in Harlington should be used to meet future housing needs in the Borough and should be released from the Green Belt. The site provides an opportunity to enable the Borough to help meet their housing targets in a sustainable location.	<p>Site specific issues will be addressed through the Site Allocations Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
50	1	Ruislip Resident's Association	1 Introduction Consultation	Object	<p>1.Consultation process: Six weeks is insufficient time for a Residents Association to give proper consideration to this document. Many local people are unaware that a consultation was even taking place. Publicity appears to be minimal e.g. a small feature in Hillingdon People, on library notice boards and the Council website but nothing really eye-catching e.g. local press adverts or on the Council's high street advertisement boards etc.</p> <p>Our association, like many others, publishes a bulletin three times a year followed by a public meeting. This means that to engage with our members on such an important issue is virtually impossible with a timescale of only six weeks.</p> <p>With limited resources and minimal time we have not been able to study the document in the detail we would have wished. Listed below are just a few of the issues we believe need further consideration by the Council.</p>	<p>This Regulation 25 consultation has been carried out in line with the Town and Country Planning Regulations 2004 (as amended). Whilst the regulations do not specify a particular time period for representations on Regulation 25, Hillingdon's Statement of Community Involvement (SCI) adopted in November 2006 sets out a minimum of six weeks for public consultations for each of the stages in the plan making process. In line with previous consultations on the Core Strategy, a six week consultation period was planned for the draft Core Strategy to be consistent with Hillingdon's SCI.</p> <p>Involvement of the public and key stakeholders in preparing the Core Strategy Consultation Draft has followed the approach set out in the Council's Statement of Community Involvement (SCI) adopted in November 2006. Various publicity methods were used with the aim of raising awareness of the LDF and informing as many people as possible. These included information being made available on the Council's website, at all borough libraries and One-stop-shop in Hayes, 6 public drop-in sessions, 7 press notices, an article in Hillingdon People magazine, poster displays at Post Offices, GP surgeries and schools, public exhibitions at Uxbridge Library and Civic Centre, audio advertisement in the Hillingdon Talking Newspaper for the visually impaired, attendance at representative group meetings. A total of 2970 letters/ emails were sent to a wide range of groups and individuals on the LDF consultation database including 50 randomly selected residents per ward from the electoral register (1100) and to 197 randomly selected businesses from the 2008 Hillingdon Business Directory.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
50	2	Ruislip Resident's Association	4 The Vision - where we want to be Table 4.1 Summary of Growth in Hillingdon 2011-2026	Object	It is important that the increase in population is carefully monitored so that the Council and other local agencies can ensure they provide adequate community services.	<p>Comments noted. Changes in Hillingdon's population will result from increased birth rates, migration to and from the borough and increased life expectancy.</p> <p>To include reference to ageing population in the Population section of the Hillingdon's Key Facts section of Chapter 3 and at paragraph 9.41.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Proposed amendment to the Population section of the Hillingdon's Key Facts section of Chapter 3 at fourth bullet point - to read:</p> <p>'Those aged 65 and over currently represent 15% of the borough-wide population . This population group will increase to 17.65% of the population between 2011-2026.'</p> <p>Add new sentence to paragraph 9.41 to read:</p> <p>'The provision of social infrastructure will need to reflect the changing needs of the population over the period of the Core Strategy. Policies in subsequent DPDs will need to make provision for the facilities required by an ageing population.'</p>
50	3	Ruislip Resident's Association	5 Core Policies - The Economy Map 5.1 Locations for Economic Growth	Object	In Map 5.1, the sites at Harefield and Stonefield Way, South Ruislip site are described as both Locally Significant Industrial Sites and as Potential areas for managed release of employment land. If they are significant industrial sites it is not clear why they should be suitable for release for other uses.	<p>For clarification: the land release proposed in South Ruislip is at the Braintree Road industrial area only.</p> <p>Proposals for employment land release are based on the assessment and recommendations in the Employment Land Study which has been used as the evidence base for the Core Strategy.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
50	4	Ruislip Resident's Association	5 Core Policies - The Economy Table 5.5: Net Additional Comparison Goods Floorspacee Req (sq.m)	Observation	In Table 5.5 it is difficult to see how the additional retail floor space quoted for Ruislip could be achieved without redeveloping part of the centre. Reference is made in Policy E5 of working in partnership with town centre managers but in District Centres, where unit ownerships and operations are fragmented, consideration needs to be given on how this would be achieved.	<p>There are no plans to expand any of the town centre boundaries, except for Uxbridge. All new retail floorspace will be accommodated within the existing boundaries (see para 5.3). This can be achieved through new development on existing sites, refurbishment of existing units or intensification of floorspace. The comparison floorspace figures are produced by the Greater London Authority who are responsible for the strategic growth and management of the bigger town centres throughout London. Through the Core Strategy and other planning documents Hillingdon will also manage the borough's town centres through the 'hierarchy' to ensure appropriate growth. The growth figures are not strict targets but indicate the likely scale of growth, and will be subject to monitoring.</p> <p>The Council already works with town centre businesses through, for example, Chambers of Commerce and other working groups. However, it is agreed that the Policy E5 Implementation could be more expansive.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Additional sentences added to section on implementation of policy E5 to state:</p> <p>In addition to the expansion of town centre boundaries proposed in this plan, increases in retail floor space identified in Table 5.5 will be achieved through the redevelopment of existing sites, refurbishment of existing units or the intensification of floorspace. Sites to be redeveloped will be identified in the Site Allocations DPD as appropriate.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
50	5	Ruislip Resident's Association	6 Core Policies - New Homes Housing Growth	Object	The Housing Trajectory shows up to 2021 a significant number of new homes being provided above the target figure. It is assumed this is due to the major redevelopment of previously owned government sites at Eastcote, West Ruislip, Uxbridge and West Drayton. Such large opportunities are unlikely to occur again and it would be preferable if this surplus could be spread over the whole period up to 2026	<p>The Council's housing trajectory will be reviewed as part of the production of the revised Annual Monitoring Report, which is due for publication in December.</p> <p>Hillingdon is required to meet annual monitoring targets for housebuilding contained in the Replacement London Plan. These targets are minimum figures. If the annual target is exceeded, it does not result in reduction in the target for subsequent years.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Update policy H1 to reflect proposed Replacement London Plan annual monitoring target of 425 units per annum.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
50	6	Ruislip Resident's Association	6 Core Policies - New Homes Housing Growth Affordable Housing	Object	In recent years there have been a large number of flats built in the area whilst the Document recognises a need for affordable/family homes. In a suburban area flats are not the right environment in which to raise children. In future the emphasis should be on providing family homes with adequate garden space where children can play with minimum supervision. This is important for both health and sociological reasons.	The need for different types of unit will be reflected in the Council's emerging Housing Market Assessment and incorporated into the 'housing needs' section of the 'New Homes' Chapter.

Council's Proposed Action

Amend paragraph 6.10 to read:

The draft HMA indicates an annual requirement to provide 2,623 affordable dwellings, based on the definition of affordable housing contained in Planning Policy Statement 3 (PPS 3). The Sub Regional study calculates a total housing need (market and affordable properties) for the seven boroughs in the West London Region of 35,924 units. Hillingdon's calculated total annual need of 415 units forms part of this figure. Overall, the draft borough-wide HMA concludes that 50% of all new housing should be affordable and 50% should be provided as market accommodation. Within the affordable sector, about 78% should be provided as social rented accommodation and the remaining 22% as intermediate housing, if the latter is priced at the usefully affordable point. Notwithstanding these conclusions, the study makes clear that HMAs are part of the wider evidence base for policy and do not form part of policy itself. It recommends that the outputs should be viewed alongside the latest information on the viability of housing development when determining policy. Accordingly, Hillingdon has undertaken an Economic Viability Study to support policy H2 on affordable housing .

Dwelling Type

The draft HMA notes that the Council may wish to pursue a split of 40% smaller one and two bed dwellings and 60% larger three and four bed dwellings. It makes the following comments on the type of properties required to meet housing needs in Hillingdon:
 Around half of the requirement for new housing is for market accommodation;
 Almost all new market housing should have three or more bedrooms;
 Almost 45% of new intermediate housing should have three bedrooms; and

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
						Almost three quarters of social rented dwellings should have three or more bedrooms.
50	7	Ruislip Resident's Association	7 Core Policies - Historic and Built Environment Map 7.1 Hillingdon's Heritage	Object	Hillingdon's Heritage-In Map 7.1 it is not clear whether two sites of national importance are included i.e. the Polish War Memorial, West End Road and the Battle of Britain bunker at RAF Uxbridge.	Map 7.1 does not show statutorily listed buildings and, therefore, does not include the mentioned sites. <u>Council's Proposed Action</u> No proposed change.
50	8	Ruislip Resident's Association	7 Core Policies - Historic and Built Environment Policy BE1: Built Environment Paras 7.9 and 7.10	Support/ Object	Tall buildings-We welcome the restraint on tall buildings (Clauses 7.9/7.10). However we are concerned that these may be acceptable in certain situations (Cl 7.10). In Ruislip there are two examples of buildings which are not only out of scale with their surroundings but also impact on the skyline i.e. Kings Lodge and Thomas Moore House. It would be unfortunate if at some future date these were quoted as precedents and similar developments were then permitted as a result.	Support welcomed for restraint on tall buildings. All planning applications are considered on their merits. Agree, further consideration will be given to the development of a Character Study including inappropriate locations for tall buildings. <u>Council's Proposed Action</u> Add reference to the consideration of a Character Study to Point 11 of Policy BE1 and Implementation section.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
50	9	Ruislip Resident's Association	8 Core Policies - Environmental Management Policy EM1: Climate Change Adaptation and Mitigation Water, Air and Noise Management	Object	More encouragement should be given to solar/wind energy generation and recycling of rain and waste water.	<p>The emphasis in the replacement London Plan consultation and within the Core Strategy is on energy efficiency and reducing carbon emissions. Both documents need to maintain flexibility in the approach to be taken by developers without favouring one technology over another.</p> <p>Both solar and wind energy have their role to play, but in some instances they may not be the most appropriate option for a developer. The Core Strategy sets an ambitious target of emissions reduction taking the lead from the Replacement London Plan consultation.</p> <p>The point on water efficiency and recycling is noted and supported. The London Plan requires water efficiency targets of 105 litres per person per day and this is also a requirement of meeting the Code for Sustainable Homes standards.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>To amend policy EM1 by including two new points to read after point 7 'Encouraging the installation of renewable energy for all new developments in meeting the carbon reduction targets savings set in the London Plan. Identify opportunities for new sources of electricity generation including anaerobic digestion, hydroelectricity and a greater use of waste as a resource.' and after point 8 'Requiring major development proposals to consider the whole water cycle impact which includes flood risk management, foul and surface water drainage and water consumption.'</p>
50	10	Ruislip Resident's Association	8 Core Policies - Environmental Management Green Belt, Metropolitan Open Land and Green Chains	Object	Open Spaces Clause 8.64 refers to the Council's Open Space Study to be published in spring 2010 - it would have been helpful if this document had been available for this consultation.	<p>Noted. Work on the Open Space study is continuing as part of the evidence base for Core Strategy.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>When work on the Open Space study is completed it will be made available for public information as soon as possible.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
50	11	Ruislip Resident's Association	8 Core Policies - Environmental Management Green Belt, Metropolitan Open Land and Green Chains	Object	Green Chains Map 8.1 shows the River Pinn corridor as a Green Chain. We understand that in the earlier versions of the LDF it was intended to upgrade the land at Kings College Fields to Metropolitan Open Land Status. We trust that intention will be repeated in the forthcoming Site Allocations DPD. A similar upgrading should apply to the Green Chain at the Yeading Brook corridor.	The area of land mentioned by the objector will be subject of the pending Metropolitan Open Land (MOL) and Green Chain review and will be considered under the proposed Site Allocation DPD. <u>Council's Proposed Action</u> No proposed change.
50	12	Ruislip Resident's Association	8 Core Policies - Environmental Management Policy EM5: Sport and Leisure Map 8.1 Open Spaces, Rivers and Canal Corridors	Object	Sport and Leisure Spaces Policy EM5 recognises the need to safeguard, enhance and extend the network of leisure spaces. Both Map 8.1 and the forthcoming Site Allocations DPD should identify all council and privately owned playing fields and sports facilities, which it is considered warrant protection.	Noted. <u>Council's Proposed Action</u> No proposed change.
50	13	Ruislip Resident's Association	8 Core Policies - Environmental Management River and Canal Corridors	Object	The borough has substantial areas of inland water and greater emphasis should be placed on these.	Agree that greater emphasis should be given in the Environmental Management chapter to the value of the borough's Blue Ribbon Network. <u>Council's Proposed Action</u> Para 8.31 has been amended to highlight the roles played by the Canal, for example, its importance as a walking, cycling and recreational resource. Individual opportunities to develop sites alongside the Canal which could help fund improvements to its condition and access to it are likely to be identified in the Site Allocations Development Plan Document. The Development Management Development Plan Document will also include policies to ensure canal and riverside development incorporate the waterside and access to it.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
50	14	Ruislip Resident's Association	8 Core Policies - Environmental Management Policy EM8: Water, Air and Noise	Object	Policy EM8 should note the water quality at Ruislip Lido, which is below an acceptable standard.	<p>Noted - the policy sets out a general objective which the Council will pursue when considering planning proposals affecting the Ruislip Lido. Matters of detailed water quality control are beyond the remit of the Core Strategy.</p> <p>Noted - the policy sets out a general objective which the Council will pursue when considering planning proposals affecting the Ruislip Lido. Matters of detailed water quality control are beyond the remit of the Core Strategy.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
50	15	Ruislip Resident's Association	8 Core Policies - Environmental Management Water, Air and Noise Management	Object	Air quality might not be considered 'good and clean' in the urban areas (south and east into Harrow) although the Core Strategy refers to the north as being largely rural and therefore with better air quality.	<p>Agree that the wording of paragraph 8.96 should be amended to give greater emphasis to air quality.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Further sentence to be added at end of paragraph 8.96 which will now read:</p> <p>"The northern part of the borough is largely rural, with an abundance of green areas and open space. There are fewer major road routes, and industrial activity is relatively light. Overall, this has a positive impact on air quality where people can reap the benefits of good clean air. Nonetheless it is important to ensure that air quality impacts are still carefully considered in the north of the borough as they are in the south, particularly in the urban areas around Ruislip and Northwood."</p>
50	16	Ruislip Resident's Association	8 Core Policies - Environmental Management Minerals and Waste	Observation	No mention is made of the possible effect of the civic amenity sites at South Ruislip and Harefield or the West London Compost site in New Years Green Lane.	<p>Noted. Detailed matters regarding the siting of waste facilities and the development management considerations will be taken into account when considering waste facility proposals within the Development Management and West London Waste Plan Development Plan Documents.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
50	17	Ruislip Resident's Association	8 Core Policies - Environmental Management Minerals and Waste	Object	Any proposal to develop Civic Amenity sites located at South Ruislip and Harefield require adequate provision to mitigate impacts from any further traffic generated from the site.	<p>The LDF seeks to provide for sustainable waste development and aligns with national planning policy in the identification and procurement of existing waste sites in London, as a means of diverting waste from landfill and mitigating the impacts associated with its contribution to climate change.</p> <p>While environmental constraints such as traffic generation have been identified in the plan in terms of their impacts on surrounding landuses, should any person wish to develop or add to an existing waste facility they would be required to submit an application subject to the full planning application process. Once submitted affected parties would be able to make representations for or against the proposal.</p> <p>The Development Management Development Plan Document will set priorities that ensure traffic mitigation is included within planning applications.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
50	18	Ruislip Resident's Association	8 Core Policies - Environmental Management Minerals and Waste	Object	Council should explore options involving Waste to Energy facilities to generate heat for local homes.	<p>As part of the LDF Hillingdon Borough Council is preparing a joint waste plan with other West London Boroughs titled the West London Waste Plan (WLWP). The WLWP will provide a planning policy framework for the management of waste produced in West London, the rationale being the diversion of waste from landfill as a means of reducing the contribution landfill gases make to climate change.</p> <p>In accordance in the London Plan the WLWP identifies modern waste technologies including waste-to-energy plants.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
50	19	Ruislip Resident's Association	9 Core Policies - Transport and Infrastructure Map 9.1	Object Transport infrastructure	Transport Map 9.1 shows an east west distributor road north of the A40 as a class B road - this under estimates the volume of traffic carried at peak times. Other important local distributor roads are not shown on the map.	The Strategic Road Network is classified at a national level and the Core Strategy simply reflects that national classification. <u>Council's Proposed Action</u> No proposed change.
50	20	Ruislip Resident's Association	9 Core Policies - Transport and Infrastructure Map 9.1	Object Transport Infrastructure	The congestion hot spots are not a true indication of the traffic congestion. For example on occasions Ruislip High Street will be completely blocked with a tailback on the approach roads. Similarly West End, Victoria and Field End Roads are regularly subject to columns of slow moving traffic at peak times. Expensive engineering work at the junctions is unlikely to alleviate the problem.	The congestion hotspots are taken from the Local Implementation Plan (LIP) which sets out the Council's transport projects, proposals and programmes. This is currently being revised and your comments will be passed on to the LIP coordinator. <u>Council's Proposed Action</u> No proposed change.
50	21	Ruislip Resident's Association	9 Core Policies - Transport and Infrastructure Accessible Local Destinations	Object	A major problem in the Ruislip area is the routing of HGVs through residential areas, particularly at night. Although the document discounts the possibility of any new roads, further consideration should be given to improving access from the A40 to the South Ruislip retail park and industrial area. Another problem is the obstruction to traffic flow resulting from HGVs delivering to small local shops e.g. Tesco in Ruislip and Ruislip Manor.	The Council is aware that this issue was raised at the Residents Drop in session on 14th July 2010. The Core Strategy is a strategic planning document and does not address detailed matters such as HGV movements. This comment will be passed on to the relevant Council service for consideration. <u>Council's Proposed Action</u> No proposed change.
50	22	Ruislip Resident's Association	4 The Vision - where we want to be Map 4.1 Key diagram	Object	Map 4.1 proposes improved public transport links between the north of the Borough and the Heathrow area through Uxbridge. For many people travelling from Eastcote, Ruislip, Northwood and beyond a far more direct route would be via South Ruislip towards the Hayes By Pass, avoiding Uxbridge altogether.	The proposed improved north/south public transport links reflect the Council's discussions with Transport for London (TfL) and options are being considered to upgrade and improve services. The borough supports measures for improved public transport and will take forward these and other suggestions to inform discussions with TfL. Improvements such as new bus routes are influenced by TfL's strategic transport priorities and are reliant on funding. <u>Council's Proposed Action</u> No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
50	23	Ruislip Resident's Association	9 Core Policies - Transport and Infrastructure Public Transport Network	Object	A further improvement of the north-south link would be the completion of TfL's plans to extend the Metropolitan line through Northwood to central Watford. No mention of this appears in the document. The Council should be supporting this proposal, as it would encourage greater use of public transport in the area.	<p>The London Borough of Hillingdon is involved in regular discussions with Transport for London (TfL). The borough supports measures for improved public transport and will take forward this and other suggestions to inform discussions with TfL. Improvements such as an extension to the Metropolitan Line are influenced by TfL's strategic transport priorities and are reliant on funding.</p> <p>TfL was consulted on the production of the Infrastructure Schedule at Appendix 2 of the Core Strategy and did not highlight this extension as a key infrastructure project.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
50	24	Ruislip Resident's Association	9 Core Policies - Transport and Infrastructure Public Transport Network	Support	We support the proposed upgrade of West Ruislip Station together with the provision of adequate parking space. A similar provision should be made at Hillingdon Station.	<p>Comments noted.</p> <p>The upgrade to Ruislip Station is reliant on TfL funding, which is currently being sought and will be subject to a feasibility study. Local residents will be consulted as part of work on the feasibility study.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
50	25	Ruislip Resident's Association	9 Core Policies - Transport and Infrastructure Community Infrastructure	Object	How will additional infrastructure be delivered by the Core Strategy?	<p>The Core Strategy contains policies to ensure that sufficient social and community infrastructure is provided to support planned growth. The actual delivery of infrastructure will be undertaken by other agencies. In particular, policy C11 provides policies to facilitate the development of additional schools to address recent birth rate increases.</p> <p>Infrastructure providers were consulted on planned growth in the borough as part of the production of the Council's strategic infrastructure plan. No significant concerns or needs were raised in relation growth projections, however it was noted that developers would be expected to fund utility provision resulting from proposed development.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend paragraph 9.43 to read:</p> <p>Birth rates in Hillingdon have risen for several consecutive years with record highs in 2006, 2007 and 2008. Births in 2008 were exceptionally high at 4,126 children and demographic projections indicate a prolonged period of births at or around this level. Hillingdon's primary and secondary school provision will need to react to changing demographics and this Core Strategy supports proposals to address the needs arising from an increase in the school age population. In the short term the most pressing need is to provide an estimated 18 new forms of entry in Hillingdon's primary schools. The Council recognises that the capacity of existing school sites is becoming increasingly limited and that these exceptional circumstances may necessitate the release of greenfield sites through the production of the Site Allocations DPD. In addition to primary and secondary provision, Hillingdon contains highly respected places of further and higher education. Policies will be developed in subsequent DPDs to ensure that a high standard of teaching can continue to be provided in these establishments over the period of the Core Strategy.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
50	26	Ruislip Resident's Association	9 Core Policies - Transport and Infrastructure Community Infrastructure	Object	Concerns regarding enlarged population on education and healthcare facilities.	<p>Plans are already progressing to address the needs associated with the increase in births that has occurred in recent years. The Core Strategy supports the principle of further proposals to address this need. The need for secondary school provision is less certain as a proportion of pupils will attend schools outside of the borough.</p> <p>The need for social infrastructure provision is recognised and the proposed wording change is accepted.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Proposed Change: Paragraph 9.41.</p> <p>Replace 'Wherever possible' with 'It is essential that..'</p>
50	27	Ruislip Resident's Association	8 Core Policies - Environmental Management EM2: Green Belt, Metropolitan Open Land and Green Chains	Object	<p>We note the reference to Mount Vernon and Harefield Hospitals as Major Developed Sites in the Green Belt (Policy EM2). Any attempt to develop these sites for anything other than associated medical facilities should be resisted.</p> <p>(Note Harefield Hospital is not mentioned in Community Facilities on page 11).</p>	<p>Should proposals for alternative uses of these sites come forward during the Plan period, they will be considered against the relevant framework of national and regional planning policies and guidance - and the Hillingdon Local Development Framework.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
50	28	Ruislip Resident's Association	9 Core Policies - Transport and Infrastructure Community Infrastructure	Object	<p>Leisure and Recreation</p> <p>Clause 9.49 refers to a Sport and Physical Activity Strategy up to 2012. It is not clear whether there needs to be further consideration of this Strategy to ensure adequate development of facilities up to 2026.</p> <p>The supply of adequate water is going to be a major challenge in the future. Whilst this is outside the Council's control they should ensure the water authorities are aware of residents concerns.</p>	<p>The primary evidence base for sport and leisure provision is Active Hillingdon, the Council's Sport and Leisure Strategy. This document covers the period up to 2012.</p> <p>Subsequent versions of Council's Leisure Strategy will be considered as key parts of the Core Strategy evidence base and a material consideration in the determination of planning applications.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
50	29	Ruislip Resident's Association	8 Core Policies - Environmental Management Policy EM1: Climate Change Adaptation and Mitigation	Object	Hydro-Power -Hillingdon has several low power potential sites but there appears to be no reference to this in the Document.	<p>Policy EM1 can be amended to encourage the use of alternative means of electricity generation, including hydro-power, in new developments.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Additional point to be added at policy EM1 to read that the Council will ensure that climate change mitigation is addressed at every stage of the development process by:</p> <p>'Encouraging the installation of renewable energy for all new development in meeting the carbon reduction targets savings set in the London Plan. Identify opportunities for new sources of electricity generation including anaerobic digestion, hydroelectricity and a greater use of waste as a resource.'</p>
50	30	Ruislip Resident's Association	9 Core Policies - Transport and Infrastructure Community Infrastructure	Object	No reference to the Council's aim of providing a new theatre and local museum on the RAF site.	<p>Paragraph 9.55 refers to the development of a cultural quarter at RAF Uxbridge.</p> <p>This issue is addressed in detail in the Council's SPD for RAF Uxbridge.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
51	1	Rapleys LLP on behalf of Hyde Park GP Ltd	4 The Vision - where we want to be Map 5.1 Locations for Economic Growth Strategic Objectives to deliver The Vision Table 5.2 Projected Hotel Growth SO14	Support	<p>It is noted that the boundaries of future designations are broad-brush and indicative within the Core Strategy, as befitting its strategic nature. However, my client welcomes the apparent identification of Hyde Park Hayes within the Heathrow Opportunity Area and Yiewsley/West Drayton growth corridor.</p> <p>My client also supports Strategic Objective 14, confirming that the Council will seek 9,000 new jobs and accommodate most employment growth in, inter alia, the Heathrow Opportunity Area. This figure should be considered a minimum. My client also supports the aim of the Core Strategy to secure significant new growth in hotel bedrooms in the Borough during the plan period.</p>	<p>Support welcomed.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
51	2	Rapleys LLP on behalf of Hyde Park GP Ltd	5 Core Policies - The Economy Policy E5: Town and Local Centres	Support	In addition, my client supports the proposal to expand Hayes town centre, in these terms, the potential contribution that Hyde Park Hayes can make to the growth of Hayes town centre should be recognised, and as such HPH should be recognised as forming part of the town centre.	<p>There are no plans to expand Hayes Town Centre. All new retail floorspace will be accommodated within the existing boundaries (see para 5.3).</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
51	3	Rapleys LLP on behalf of Hyde Park GP Ltd	6 Core Policies - New Homes Policy H1: Housing Growth Policy H2: Affordable Housing	Support	Welcomes housing growth and caveated H2. Site specific affordable housing targets will need to be assessed locally.	<p>The implementation section for policy H2 refers to the allocation of sites in the Site Allocations DPD, from which a percentage of affordable homes will be achieved.</p> <p>Policy H2 will set a borough-wide target based on the viability and housing needs evidence base. Site specific proposals will be required to meet these targets, or provide evidence that they are not viable.</p> <p>The Site Allocations DPD may refer to targets for some specific sites where these have been agreed in advance.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
51	4	Rapleys LLP on behalf of Hyde Park GP Ltd	9 Core Policies - Transport and Infrastructure Strategic Objectives to deliver The Vision SO12	Support	Support Strategic Objective 12. Parking standards - particularly for offices - should be sensitively formulated and applied to encourage investment in the Hayes area. An onerous and inflexible approach to parking in Hayes may discourage potential occupiers and investment, thereby hampering prospects for regeneration.	<p>Support welcomed.</p> <p>Detailed parking standards will not be included in the Core Strategy. They will be prepared and form part of the Development Management Development Plan Document - which will be subject to public consultation at a later date.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
51	5	Rapleys LLP on behalf of Hyde Park GP Ltd	5 Core Policies - The Economy Map 5.1 Locations for Economic Growth	Object	Finally as previously mentioned, it is recognised that designations are general and indicative within the Core Strategy. However, in any revisions to the proposals map, the allocation of the Hyde Park Hayes site for office-led mixed use development should be reflected and the site should not be indicated as being a Strategic Employment Location or a Locally Significant Employment Site.	<p>Any revisions to boundaries for employment land will be considered through the Site Allocations and Heathrow Area Development Plan Documents.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
52	1	CgMs Ltd on behalf of Henry Streeter Automotive Ltd	5 Core Policies - The Economy Table 3.1 Main Planning Challenges for Hillingdon Table 5.2 Projected Hotel Growth	Support	<p>We support the challenge for the Council required of them by the London Plan hotel growth.</p> <p>Our concern is how and where the Council intend to deliver the number of bedrooms identified in Table 5.2 of between 3,800 - 5,600 additional hotel bedrooms by 2026.</p>	<p>Support welcomed. Hotel growth is encouraged in Uxbridge, Hayes and sites outside of designated employment land on the Heathrow perimeter. This will be delivered through the planning application process.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
52	2	CgMs Ltd on behalf of Henry Streeter Automotive Ltd	5 Core Policies - The Economy Table 5.2 Projected Hotel Growth Para 5.19	Support	<p>We support the need to look at the higher number of bedrooms identified in the Hillingdon Tourism Study of 5,600 rooms by 2026. The Core Strategy recognises that hotel development in Hillingdon and in particular in the Heathrow Opportunity Area is needed. Our concern is how and where the Council intend to deliver the number of bedrooms identified.</p>	<p>Hotel growth is encouraged in Uxbridge, Hayes and sites outside of designated employment land on the Heathrow perimeter. This will be delivered through the planning application process.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
52	3	CgMs Ltd on behalf of Henry Streeter Automotive Ltd	5 Core Policies - The Economy Map 5.1 Locations for Economic Growth Para 5.20	Support / Object	<p>We support the broad key location of Heathrow as one for hotel growth. However the areas of growth identified on Map 1 identify Uxbridge and a ribbon of designation north of the M4, rather than closer to Heathrow and the A4.</p>	<p>Hotel requirement in Hillingdon is not limited to Heathrow, for example the university and office functions in Uxbridge may support provision of further hotel facilities there.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
52	4	CgMs Ltd on behalf of Henry Streeter Automotive Ltd	5 Core Policies - The Economy Location of Employment Growth Para 5.21	Object	The inference here is that future hotel development will be directed away from Heathrow. Modern air handling technology means that this need not be the case.	<p>The Council are aware of the need to control development near Heathrow Airport so as to avoid adverse environmental effects from unwanted noise and traffic generation.</p> <p>A detailed Heathrow Area Development Plan Document will be brought forward later as part of work on the Local Development Framework, and will consider detailed local development options for the area.</p> <p>The Core Strategy sets overall objectives at present of steering further development to existing town centre sites or areas with high public transport accessibility so as to minimise any potential adverse environmental impacts.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Para 5.21 to be changed to read:</p> <p>"Emissions from transportation are much higher in Hillingdon than the London average which has led to poor air quality in certain parts of the Borough. In particular, the activities associated with Heathrow Airport and the surrounding development of hotels, offices, industrial and commercial uses have resulted in the designation of an Air Quality Management Area. Further development is required around the airport to enhance this economic and employment hub. However, this must not be at the expense of further adverse impacts on air quality. The Development Management Document will set out policies that ensure new development in areas of poorer air quality will be as close to air quality neutral as possible with an aim to provide positive impacts where appropriate.</p>
52	5	CgMs Ltd on behalf of Henry Streeter Automotive Ltd	5 Core Policies - The Economy Policy E2: Location of Employment Growth Map 5.1 Locations for Economic Growth	Support / Object	We support the intention to accommodate a minimal of 3,800 additional hotel bedrooms in the Borough. The policy however refers to provision being made "on the Heathrow perimeter". However the policy does not specify where the "Heathrow Perimeter" is and the closest plan, Map 5.1, only identifies land significantly to the north of the M4 from West Drayton to Hayes.	<p>Site-specific proposals will be brought forward through the Site Allocations and Heathrow Area Development Plan Documents.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
52	6	CgMs Ltd on behalf of Henry Streeter Automotive Ltd	5 Core Policies - The Economy Table 5.3 Heathrow Opportunity Area - Future of Key Sub-Areas	Object	<p>This refers to "Heathrow Airport and Perimeter" area. It recognises that "hotels are located around the perimeter just outside the airport boundary". We agree with this and logically with an existing cluster of hotels with excellent direct access to the airport this location long the M4 is the most sustainable location for growth.</p> <p>Where there is no impact on employment land provision outside the airport boundary the opportunity arises for small roll backs of areas of Green Belt that currently serve no strategic function yet provide infill opportunities amongst existing built development.</p> <p>The Core Strategy therefore fails to adequately consider other opportunities on the Bath Road for hotel growth.</p>	<p>The Bath Road Area and Heathrow Perimeter will be considered through the Development Management, Site Allocations and Heathrow Area Development Plan Documents.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change</p>
52	7	CgMs Ltd on behalf of Henry Streeter Automotive Ltd	8 Core Policies - Environmental Management Para 8.1	Object	Not all the Green Belt in Hillingdon performs a strategic feature of the Borough.	<p>This will be addressed in the forthcoming review of the Council's Green Belt and MOL, following the assessment criteria as set under PPG2 and London Plan respectively.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
52	8	CgMs Ltd on behalf of Henry Streeter Automotive Ltd	8 Core Policies - Environmental Management Climate Change Adaptation and Mitigation Para 8.8	Object	There are areas of Green Belt on the north side of Bath Road that do not contribute to the character and identity of settlements in the Borough.	<p>This will be addressed in the forthcoming review of the Council's Green Belt and MOL, following the assessment criteria as set under PPG2 and London Plan respectively.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
52	9	CgMs Ltd on behalf of Henry Streeter Automotive Ltd	8 Core Policies - Environmental Management Map 8.1 Open Spaces, Rivers and Canal Corridors Para 8.22	Object	It is noted that the Council intends to review the Green Belt through other LDF documents. However if changes are made at that stage this will put them in conflict with Map 8.1 of the Core Strategy. The broad strategic function of the Green Belt means that land that doesn't contribute to its function now should be removed.	<p>No significant releases of greenbelt are required to accommodate growth. Site specific releases of greenbelt will be undertaken through the Site Allocations Development Plan Document.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
52	10	CgMs Ltd on behalf of Henry Streeter Automotive Ltd	8 Core Policies - Environmental Management Policy EM2: Green Belt, Metropolitan Open Land and Green Chains Policy E2: Location of Employment Growth Para 8.22	Object	We have identified above that the Council intends to use other LDF documents to reassess Green Belt boundaries. However Policy EM2 sets out an intent "to maintain the current extent" of the Green Belt. There is accordingly a conflict between what is said in paragraph 8.22 and Policy E2. Indeed there is conflict within the policy itself as it indicates the Council will maintain the current extent but also undertake minor adjustment later.	<p>The Core Strategy sets an overall strategy to accommodate growth in the borough up to 2026. No significant releases of Green Belt land are considered necessary and which would need to be included in the Core Strategy.</p> <p>However, the Council may identify the need for some detailed, small scale adjustments during preparation of its Ste Allocations Development Plan Document. These will be subject to later public consultation.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
53	1	Northwood Residents' Association	1 Introduction Consultation	Object	<p>We are very disappointed with the way that LBH has conducted the consultation process. Residents' Associations, which represent a very large number of residents, were not represented in the parties to the formulation of the strategy. HAV does not represent Residents' Associations, nor did the organisation seek our views. Secondly, the actual period of formal consultation of 6 weeks was insufficient to carry out adequate consultation with our members.</p> <p>We therefore believe that LBH officers have failed in their duty (a) to consult all interested parties in the formulation of the strategy and (b) to give adequate time for residents to comment.</p> <p>After the General Election, large pieces of legislation have been, or will be, changed by the new Government. We believe that the Core Strategy document should be delayed so that this new legislation can be taken into account. There is no valid reason for continuing with a 15 year strategy which uses out-of-date legislation as its starting point.</p>	<p>This Regulation 25 consultation has been carried out in line with the Town and Country Planning Regulations 2004 (as amended). Whilst the regulations do not specify a particular time period for representations on Regulation 25, Hillingdon's Statement of Community Involvement (SCI) adopted in November 2006 sets out a minimum of six weeks for public consultations for each of the stages in the plan making process. In line with previous consultations on the Core Strategy, a six week consultation period was planned for the draft Core Strategy to be consistent with Hillingdon's SCI.</p> <p>Changes to national policy made by the new Coalition Government will be considered during the further preparation of the Core Strategy and other Development Plan Documents..</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
53	2	Northwood Residents' Association	9 Core Policies - Transport and Infrastructure Community Infrastructure	Object	Plan does not provide sufficient policies to address needs of older people.	<p>Comments noted. The needs of older people should be recognised in the Core Strategy.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Proposed amendment to fourth bullet point in Population section of Hillingdon's Key Facts:</p> <p>Those aged 65 and over currently represent 15% of the borough-wide population . This population group will increase to 17.65% of the population between 2011-2026.</p> <p>Add new sentence to paragraph 9.41 to read:</p> <p>'The provision of social infrastructure will need to reflect the changing needs of the population over the period of the Core Strategy. Policies in subsequent DPDs will need to make provision for the facilities required by an ageing population.'</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
53	3	Northwood Residents' Association	5 Core Policies - The Economy Table 5.5: Net Additional Comparison Goods Floorspacee Req (sq.m) Map 5.3: Town Centre Improvements Town and Neighbourhood Centres Pages 47, 48, 49	Object	<p>Map 5.3 shows that no provision is being made for supporting Green Lane, Northwood.</p> <p>Many local businesses have disappeared and been replaced with charity shops, building societies, estate agents.</p> <p>Parking fees for non LBH residents has driven visitors away.</p> <p>Each town should have specific polices suited to its needs as a blanket solution will not work in such a varied borough.</p> <p>You do not say in policy E5 how you will revitalise the high street and local parades.</p>	<p>The vitality and viability of all town centres are being supported through Policy E5, and through development management policies. Map 5.3 shows specific improvements above and beyond this support. The Retail Study which, provides an evidence base for the Core Strategy, did not make any specific recommendations for Northwood.</p> <p>The Core Strategy is a high-level plan for the borough. While the document recognises the strategic importance of town centres, detailed mechanisms to protect and manage centres will largely be detailed in the Development Management DPD. These include ensuring proposals do not result in less than 70% retail in primary areas and 50% in secondary areas or have an adverse effect on the remaining retail activities.</p> <p>In terms of implementing Policy E5, the Council already works with town centre businesses through, for example, Chambers of Commerce and other working groups. However, it is agreed that the Policy E5 Implementation could be more expansive.</p> <p>Parking fees do not form part of the Core Strategy, however your comments will be passed on to the appropriate department.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Additional section to be added at end of Implementation section for Policy E5 to read:</p> <p>In addition to the expansion of town centre boundaries proposed in this plan, increases in retail floor space identified in Table 5.5 will be achieved through the redevelopment of existing sites, refurbishment of existing units or the intensification of floorspace. Sites to be redeveloped will be identified in the Site Allocations DPD as appropriate.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
53	4	Northwood Residents' Association	5 Core Policies - The Economy Small and Medium-Sized Enterprises (SME) Page 50	Object	SME's - policies neglect the North of the borough. SME's are vital to the well-being of every town and there is nothing in the Strategy that provides space or inducement for SME's to set up north of the A40.	<p>There is nothing in Policy E6 which prevents SMEs locating in the north of the borough, nor specific encouragement for them in the south of the borough. However, for clarity an addition to the policy is suggested as follows:</p> <p>"Hillingdon will encourage the development of affordable accommodation for small and medium sized businesses in appropriate locations throughout the borough."</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Add "throughout the borough" to the end of Policy E6.</p>
53	5	Northwood Residents' Association	5 Core Policies - The Economy Policy E7: Raising Skills Page 52	Object	E7 Raising skills -there is no guarantee that Hillingdon residents will benefit from this policy.	<p>Through the Planning Obligations SPD, the Council is able to obtain funding for training courses and jobs with providers in the borough. This means that Hillingdon residents have excellent access to these jobs and training opportunities, however it would be contrary to EU policy to make these available exclusively to Hillingdon residents.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
53	6	Northwood Residents' Association	6 Core Policies - New Homes Affordable Housing Page 60	Object	Affordable Housing - there is a huge deficit in the provision of affordable housing. No detail is provided on making good the shortfall.	<p>The draft Replacement London Plan indicates that affordable housing targets should be agreed between boroughs and the GLA. Such targets can either be a percentage figure or a specific number of units. Targets will need to take account of borough wide needs and also the economic viability of provision.</p> <p>Policy H2 is being amended to reflect the position the Council will take on affordable housing provision in the light of revised policy in the draft Replacement London Plan.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend policy H2 to read:</p> <p>Housing provision is expected to include a range of housing to meet the needs of all types of households and the Council will seek to maximise the delivery of affordable housing from all sites over the period of the Core Strategy. For sites with a capacity of 10 or more units the Council will seek to ensure that:</p> <p>i.) subject to viability and if appropriate in all circumstances, 35% of all new units are delivered as affordable housing, with a tenure mix of 70% housing for social rent and 30% intermediate housing; and</p> <p>ii) The affordable housing mix reflects housing needs in the borough, particularly the need for larger social rented family units.</p>
53	7	Northwood Residents Association	7 Core Policies - Historic and Built Environment Policy BE1: Built Environment Page 65	Object	Inconsistent approach to what plans are recommended for approval. Until there is a consistent approach, it is difficult to see how LBH will have a robust policy to protecting the distinct nature of our towns, a good example, is the approval of a hideous building on the old Reindeer site in Northwood.	<p>Under the implementation of Policy HE1 it includes the preparation of Character Appraisals and Management Plans for Conservation areas along with Design guidance for designated areas. These documents would assist consistency in decision making.</p> <p>Policy BE1 seeks to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
53	8	Northwood Residents' Association	8 Core Policies - Environmental Management Waste Management Page 118	Object	<p>Waste management-the conclusions of the West London Waste Plan have still to be produced and are fundamental to this part of the core strategy. As Hillingdon is one of the few West London boroughs with adequate space to provide any necessary facilities, it is likely there will be pressure on green space. There will also be pressure on local roads to provide access to these facilities. It is important that the results of the Plan are included in the Strategy.</p> <p>Little mention is made of using waste to generate heat/energy or in reducing waste generally.</p>	<p>The LDF is a strategic policy document providing 'broad brush' policies for Hillingdon borough. Detailed site proposals for waste facilities have still to be developed during preparation of the West London Waste Plan (WLWP) - but the primary focus for these sites will be existing designated industrial land (i.e. To comply with London Plan policy).</p> <p>The WLWP proposes policies specific to issues associated with waste management facility location and the impact on transport routes and green space. It is unlikely that proposals for new waste facilities in LB Hillingdon will come forward on existing green space. Were they to do so, they would be assessed in the context of prevailing national, London Plan and Hillingdon Core Strategy policies protecting existing green space.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
53	9	Northwood Residents Association	9 Core Policies - Transport and Infrastructure Page 120	Object	<p>Transport-the report makes mention of north/south bus routes. Unless roads are improved and congestion points removed, these services will be very slow. Also, if they do not link up with other public transport, there will be little incentive for people to stop using their cars. Fares will also have to be subsidised to get people on the buses. In fact, there is little in the transport policy which will lead to a reduction in congestion or the use of cars. The policy of providing all the economic development in the south of the Borough will exacerbate the problem.</p>	<p>The London Borough of Hillingdon is involved in regular discussions with Transport for London (TfL) and options are being considered to upgrade and improve services. These include transport hubs (see Policy T2) to create better links for all modes of public transport.</p> <p>TfL is currently undertaking a traffic smoothing study. This will provide options for improvements to enable informed decisions at a local level through the Local Implementation Plan (LIP) which sets out the Council's transport projects, proposals and programmes.</p> <p>The Council already provides subsidised and free bus services.</p> <p>Any substantial new development proposal is required to submit a travel plan as part of the planning application process.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
53	10	Northwood Residents' Association	9 Core Policies - Transport and Infrastructure	Object	Free parking 2 hour should be provided in local town centres to encourage people not to travel long distances to shop.	Local Parking controls are not dealt with in the Core Strategy. Comments will be passed on for consideration by the appropriate Council service. <u>Council's Proposed Action</u> No proposed changes.
53	11	Northwood Residents' Association	5 Core Policies - The Economy Policy E4: Uxbridge	Object	The development of additional shopping space on the RAF Uxbridge site will add to traffic in and around the town centre which is already grid-locked at rush hour.	A travel plan will form part of the new development at RAF Uxbridge and upgrades will be carried out prior to work starting on site. <u>Council's Proposed Action</u> No proposed change.
53	12	Northwood Residents' Association	9 Core Policies - Transport and Infrastructure	Object	The current cycle lanes disappear rather abruptly in many locations. No mention is made as to how cycle lanes will be improved, especially at road junctions. Parking should also be banned on cycle lanes.	Local cycle lane provision is not dealt with in the Core Strategy. Comments will be passed on for consideration by the appropriate Council service. <u>Council's Proposed Action</u> No proposed change.
53	13	Northwood Residents' Association	9 Core Policies - Transport and Infrastructure Policy CI1: Community Infrastructure Provision Page 133	Object	Has land been identified for new schools and where will they be built?	Any sites for new schools will be identified through the Site Allocations Development Plan Document. <u>Council's Proposed Action</u> No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
53	14	Northwood Residents Association	4 The Vision - where we want to be The Vision for Hillingdon 2026 General	Object	Summary-The document lacks vision, contains much wishful thinking and many methods of measuring success are very vague. Residents' Associations should be involved in the document's revision and the fact that a new Government is in office recognised.	<p>Resident's Associations will continue to be involved in the consultation process for further stages in the preparation of the Core Strategy and other Development Plan Documents - in line with the Council's adopted Statement of Community Involvement.</p> <p>In order to prepare a sound Core Strategy the Council is aware of the need to reflect central Government planning guidance.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
54	1	CMA Planning Ltd on behalf of Kingshott Holdings Ltd	4 The Vision - where we want to be Map 4.1 Key diagram The Spatial Strategy Map 5.1 Locations for Economic Growth	Support / Object	<p>Our client supports the strategic objective (Map 4.1 – Key Diagram) which identifies 'growth' of the Hayes District Centre and within the Hayes and West Drayton Corridor.</p> <p>Given the broad geographic nature of the corridor boundary we suggest that the spatial strategy should make it clear that growth will be focused upon sustainable locations such as town centres and areas with good access to public transport.</p> <p>We would request the Key Diagram is adjusted to more accurately reflect the boundary of the current designated employment areas.</p>	<p>Agree that Core Strategy should make it clear that growth will be focused in sustainable locations. Policy E2: Location of Employment Growth states that "The Council will promote development in highly accessible locations that support sustainable travel behaviour..." It is worth reiterating this with particular reference to the Heathrow Opportunity Area, and it is proposed to add an overarching sentence to the beginning of Table 5.3 to this effect.</p> <p>The key diagram and other maps are deliberately high-level so they do not pre-empt the Site Allocations DPD designations. However the key diagram and Map 5.1 will be reviewed to see if they can be made clearer.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Add overarching sentence to the beginning of Table 5.3 which makes clear that growth in the Heathrow OA will be focused on sustainable locations such as town centres and areas with good access to public transport.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
54	2	CMA Planning Ltd on behalf of Kingshott Holdings Ltd	5 Core Policies - The Economy Policy E1: Managing the Supply of Employment Land Map 5.1 Locations for Economic Growth SO15, SO16	Support / Object	<p>Support for the Council's strategic objective of ensuring a sufficient supply of employment land to meet needs of different sectors whilst also releasing surplus employment land for other uses.</p> <p>Request that Map 5.1 is adjusted to reflect the current employment designations and town centre uses boundary.</p>	<p>Map 5.1 is a strategic level diagram covering the whole borough and does not cover detailed designations for employment or town centre boundaries. These will be brought forward in the Site Allocations Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
54	3	CMA Planning Ltd on behalf of Kingshott Holdings Ltd	6 Core Policies - New Homes Map 6.1 Distribution of units from large SHLAA sites (2011-2021) Policy H1: Housing Growth SO19	Object	<p>Question whether the Core Strategy is sufficiently robust to accommodate the additional units that may arise as a result of the Replacement London Plan and would suggest that sufficient flexibility is built into the draft Core Policies.</p> <p>Map 6.1 identifies the distribution of new homes across the borough and states that 483 units will be accommodated within the Hayes and West Drayton corridor. Suggested that the Core Policies should make clear that provision will be focused in sustainable locations.</p> <p>Core Strategy should acknowledge the potential for higher densities in sustainable locations.</p>	<p>Hillingdon's proposed annual monitoring target has been significantly reduced to 425 units per annum.</p> <p>The distribution of housing in the borough will be determined through the availability of suitable sites. Figures in Map 6.1 are based on the capacity of large sites identified in the SHLAA and the Council will draw on this evidence base to allocate sites in the forthcoming Site Allocations Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend policy 6.13 to reflect that annual monitoring target will be met through the identification of sustainable sites. Update policy H1 to reflect revised proposed annual monitoring target.</p>
55	1	BNP Paribas Real Estate on behalf of Arla Foods UK plc	4 The Vision - where we want to be The Vision for Hillingdon 2026	Support	<p>Arla Foods support the Vision as set out in the Core Strategy, in particular "Improved accessibility to local jobs, housing and facilities to improve the quality of life of residents".</p> <p>The redevelopment of the Arla Foods former dairy site for a mix of uses, including housing, retail and employment will meet this objective as well as promoting social inclusion through equality of access to jobs, houses and other facilities whilst also strengthening the retail offer in South Ruislip.</p>	<p>Support welcomed.</p> <p>Specific sites for development will be allocated through the Site Allocations DPD.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
55	2	BNP Paribas Real Estate on behalf of Arla Foods UK plc	5 Core Policies - The Economy Policy E1: Managing the Supply of Employment Land	Object	Policy E1 seeks to manage the supply of employment land within the Borough and whilst this policy is supported as it relates to the land adjoining the site at Braintree Road it is noted that the Arla Food site is not identified as an employment site to be retained under this policy and has been listed as a site that can be redeveloped in both the Hillingdon Employment Land study 2009 and the Council's Position Statement on employment land and comparison retail floor space published in June 2010.	<p>Part of Braintree Road area is proposed for release in paragraph 5.11. Details of boundary changes will be brought forward through the Site Allocations Development Plan Document. Map 5.1 contains an error by showing Stonefield Way and not Braintree Road for release and will be amended.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend Map 5.1 to show proposed land release at Braintree Road area and that Stonefield Way is also subject to limited release.</p>
55	3	BNP Paribas Real Estate on behalf of Arla Foods UK plc	5 Core Policies - The Economy Policy E2: Location of Employment Growth	Object	There is potential for the Former Dairy site to create a mixed use development on the site that will create new jobs and potentially additional hotel bedrooms in accord with Policy E2.	<p>The Employment Land Study states "Part of the Arla Food part of the site provides an opportunity to develop South Ruislip local centre through an appropriate mixed-use scheme including a mix of B1 class business uses." Release of employment land will be brought forward through the Site Allocations DPD and any proposal for the site will be considered as part of the planning application process.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
55	4	BNP Paribas Real Estate on behalf of Arla Foods UK plc	5 Core Policies - The Economy Policy E5: Town and Local Centres	Support / Object	South Ruislip needs to be re-designated as a 'Minor Centre'.	<p>Disagree. The Retail Study assesses Hillingdon's town centre hierarchy across the borough and recommends South Ruislip retains its status as a Local Centre. This evidence base has informed the Core Strategy. The town centre hierarchy will be assessed in the future and any changes will be reflected in Development Plan Documents.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
55	5	BNP Paribas Real Estate on behalf of Arla Foods UK plc	5 Core Policies - The Economy Policy E6: Small and Medium-Sized Enterprises (SME)	Support	We support Policy E6 to encourage the development of accommodation for small and medium-sized businesses in appropriate locations and suggest that there may be an opportunity to include an element of employment within the mix of uses on the Dairy site at south Ruislip.	<p>Support welcomed. The Employment Land Study recommends a mixed-use scheme, including a mix of B1 class business uses, for the Arla Foods site. Any proposal for the site will be considered as part of the planning application process.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
55	6	BNP Paribas Real Estate on behalf of Arla Foods UK plc	6 Core Policies - New Homes Policy H1: Housing Growth	Support	Support and encourage the Council in Policy H1 in meeting and exceeding their minimum strategic dwelling requirement and would submit that the brownfield Arla site in South Ruislip will contribute to this policy.	Support welcomed. Specific sites for residential development will be allocated through the Site Allocations DPD.

Council's Proposed Action

No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
55	7	BNP Paribas Real Estate on behalf of Arla Foods UK plc	6 Core Policies - New Homes Policy H2: Affordable Housing	Object	Policy H2 should be supported by viability studies.	<p>The Council is currently preparing an economic viability assessment and Housing Market Assessment, to inform borough-wide affordable housing targets.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend paragraph 6.23 for clarification to read:</p> <p>The Council is currently preparing an Economic Viability Assessment (EVA) to inform borough-wide affordable housing targets. The study has tested the deliverability of affordable housing against a range of variables, including the availability of affordable housing grant, density mix and tenure split. Early results of this study show that in the current economic circumstances and regardless of needs identified in the draft HMA, a target to provide 50% of all new housing as 'affordable' could not be supported on economic viability grounds. Based on the evidence contained in the EVA and draft HMA the Council will seek to achieve a borough wide affordable housing target of 35%, on the understanding that this may be subject to site specific viability considerations. In addition, the Council is minded to continue to support targets related to tenure split in the London Plan 2008. Proposed targets in policy H2 will be discussed and agreed with the GLA.</p> <p>Policy H2 to be amended to read:</p> <p>Housing provision is expected to include a range of housing to meet the needs of all types of households and the Council will seek to maximise the delivery of affordable housing from all sites over the period of the Core Strategy. For sites with a capacity of 10 or more units the Council will seek to ensure that:</p> <ul style="list-style-type: none"> i.) subject to viability and if appropriate in all the circumstances, 35% of all new units are delivered as affordable housing, with a tenure mix of 70% housing for social rent and 30% intermediate housing; and ii) The affordable housing mix reflects housing needs in the borough, particularly the need for larger social rented family units.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
55	8	BNP Paribas Real Estate on behalf of Arla Foods UK plc	7 Core Policies - Historic and Built Environment Policy BE1: Built Environment	Support/ object	Support the general principles behind Policy BE1 and the desire of the Council to promote and achieve high quality developments across the Borough. However we do have concerns that the imposition of CSH 4 and BREEAM Very Good in policy could have an impact upon development viability and would be more appropriately included in an SPD.	Support welcomed. The inclusion of Code for Sustainable Homes Level 4 and BREEAM Very Good standards in the Core Strategy provides clarity for developers and ensures that new housing meets minimum standards. Further details will be provided in the Development Management Development Plan Document. <u>Council's Proposed Action</u> No proposed change.
55	9	BNP Paribas Real Estate on behalf of Arla Foods UK plc	8 Core Policies - Environmental Management Policy EM1: Climate Change Adaptation and Mitigation	Support	We support the general principles of Policy EM1.	Support welcomed. <u>Council's Proposed Action</u> No proposed change.
55	10	BNP Paribas Real Estate on behalf of Arla Foods UK plc	9 Core Policies - Transport and Infrastructure Policy T1: Accessible Local Destinations	Support	Supports Policy T1.	Support welcomed. <u>Council's Proposed Action</u> No proposed change.
55	11	BNP Paribas Real Estate on behalf of Arla Foods UK plc	9 Core Policies - Transport and Infrastructure Policy CI1: Community Infrastructure Provision	Object	The redevelopment of the Arla Food site with a mixed use development will provide a range of facilities for the area, in one strategic location reducing the need to travel and promoting the use of sustainable modes of transport.	Proposed sites for major new development will be identified in the forthcoming Site Allocations Development Plan Document. <u>Council's Proposed Action</u> No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
55	12	BNP Paribas Real Estate on behalf of Arla Foods UK plc	Core Strategy Consultation Draft General	Object	<p>The redevelopment of the Arla Foods former dairy site at Victoria Road, South Ruislip for a mixed use development coupled with the location of the site close to South Ruislip railway and tube station, a major transport hub, in an area also well served by buses, will meet the aspirations of the Core Strategy and the policies contained therein.</p> <p>Generally in support of the policies in the plan but would urge more flexibility in those areas that could impact upon development viability particularly when the development proposed involves the reuse of brownfield land and the additional costs associated with bringing such land forward for development.</p>	<p>Specific sites for development will be allocated through the Site Allocations DPD.</p> <p>Support welcomed.</p> <p>The Council is currently preparing an economic viability assessment to support affordable housing policies.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
56	1	Nathaniel Lichfield and Partners on behalf of Capital Shopping Centres	4 The Vision - where we want to be The Vision for Hillingdon 2026 Strategic Objectives to deliver The Vision	Support	CSC supports the Vision and Strategic Objectives as set out in the Core Strategy, particularly in terms of defining Uxbridge, Heathrow and Hayes/West Drayton as the focus for future economic growth in the Borough and the intention of the Council to strengthen Uxbridge's role as the main urban centre in Hillingdon through the development of RAF Uxbridge, an improved public transport interchange and fast underground links to London.	<p>Support welcomed.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed action</p>
56	2	Nathaniel Lichfield and Partners on behalf of Capital Shopping Centres	4 The Vision - where we want to be The Spatial Strategy Policy E4: Uxbridge	Support	CSC supports the designation of Uxbridge as the main urban centre within Hillingdon and a Metropolitan Centre within London. However, the Council should remain pragmatic in their approach to short term retail proposals and consider them based on their merits.	<p>Support welcomed. Any proposal for Uxbridge town centre will be considered as part of the planning application process.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
56	3	Nathaniel Lichfield and Partners on behalf of Capital Shopping Centres	5 Core Policies - The Economy Policy E4: Uxbridge	Support	<p>CSC supports the proposed expansion of the town centre boundary to include RAF Uxbridge and the office component of the North Uxbridge Industrial Estate.</p> <p>CSC agrees that Uxbridge is the most sustainable location in the Borough to focus new development and is pleased to note the Council's intention to secure this position by promoting improvements in transport infrastructure.</p>	<p>Support welcomed</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
56	4	Nathaniel Lichfield and Partners on behalf of Capital Shopping Centres	5 Core Policies - The Economy Policy E4: Uxbridge	Support	<p>CSC is pleased to note that other major retail centres (Westfield, High Wycombe and Brent Cross) have been considered as a threat to the status of Uxbridge.</p> <p>CSC welcomes the extension of the town centre boundary to reduce the need for out of town business and retail parks. The retention of the location of the Primary Shopping Frontage is also supported.</p> <p>CSC supports Policy E4. It is hoped the Council will demonstrate a pragmatic approach to applications for retail development and will not be fixed on the 800sqm of retail floorspace per annum target set out in the monitoring section.</p>	<p>Support welcomed. Any proposal for Uxbridge town centre will be considered as part of the planning application process. Primary and secondary frontages in town centres will be considered as part of the Site Allocations DPD.</p> <p>While the AMR includes an annual monitoring target for retail floorspace, it is recognised that retail development often comes in a series of steps over a period of time rather than regular annual increments.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
56	5	Nathaniel Lichfield and Partners on behalf of Capital Shopping Centres	5 Core Policies - The Economy Map 5.2 Strategic Site (indicative): Boundary Changes to Uxbridge Town Centre Policy E5: Town and Local Centres	Support	<p>CSC supports the settlement hierarchy set out in Map 5.2 and Policy E5. CSC strongly supports the intention to improve public transport in Uxbridge.</p>	<p>Support welcomed.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
56	6	Nathaniel Lichfield and Partners on behalf of Capital Shopping Centres	9 Core Policies - Transport and Infrastructure Policy T1: Accessible Local Destinations	Support	<p>CSC supports Policy T1 and the intention to steer development towards the most sustainable locations in terms of transport infrastructure. It is considered that Uxbridge is currently the most sustainable location in Hillingdon for retail development due to its public transport connections, and therefore retail development should be focused there.</p> <p>However, CSC does consider that the public transport infrastructure in Uxbridge requires significant enhancement in order to compete effectively with other Metropolitan Centres across London into the future and is pleased to note that the Council have identified this deficiency.</p>	<p>Support welcomed. The hierarchy of town centres enables Hillingdon to support the important local retail function of smaller centres in the borough, as well as main town centres.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
56	7	Nathaniel Lichfield and Partners on behalf of Capital Shopping Centres	9 Core Policies - Transport and Infrastructure Policy T2: Public Transport Interchanges	Support	CSC strongly supports Policy T2 which aims to improve the public transport interchange at Uxbridge.	Support welcomed. <u>Council's Proposed Action</u> No proposed change.
57	1	Hayes Town Partnership	4 The Vision - where we want to be The Vision for Hillingdon 2026	Support	It is considered that as well as seeking to close Hillingdon's inequality gaps the vision needs a clearer commitment to actively promote cohesion between the Borough's increasingly diverse communities.	Amendments have been made to the introduction to reflect the Council's wider vision. It is considered that the Vision to reduce inequality is consistent with the Sustainable Community Strategy. <u>Council's Proposed Action</u> No proposed change.
57	2	Hayes Town Partnership	4 The Vision - where we want to be The Vision for Hillingdon 2026 Para 4.17	Object	It is noted that the document makes no reference to the Council's current review of its strategy for a sustainable economy. Paragraph 4.17 on page 24 records that traditional manufacturing has declined and the logistics and distribution sector has strengthened. However it is suggested that in the view of the structural challenges facing the national economy as a result of the banking crisis that the strategy should not simply accept the decline of manufacturing. Instead it should examine ways in which this sector could be supported and adapted to make best use of local skills especially in Hayes.	The Core Strategy was informed by the Council's emerging economic and regeneration strategy: Sustain Renew Prosper. Likewise, Sustain Renew Prosper was developed in line with the Core Strategy. The Core Strategy is high-level strategic planning document for the next 15 years. It does not directly influence long-term market trends such as the decline in manufacturing, but does seek to support new businesses, for example by ensuring there is a range of available employment land and encouraging small affordable business units in the borough. The Strategy also links new jobs to skills training to ensure residents have access to local jobs. <u>Council's Proposed Action</u> No proposed change

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
57	3	Hayes Town Partnership	5 Core Policies - The Economy Strategy for the Heathrow Opportunity Area	Object	The note on page 41 rightly cautions that Greater London Authority projections for additional retail floor space are based on pre-recession data and will need to be reviewed. However the document does not consider the impact on the retail sector of the phenomenal growth in internet shopping.	<p>The GLA retail figures factor 'e-tailing' in their modelling. The Consumer Expenditure Report uses a broad strategic model to distribute future growth and estimates need to be treated with caution.</p> <p>The Report acknowledges that evidence for the growth trends and market share of e-tailing is not yet complete as we are in the early phases in the spread of e-tailing in the UK. There are also considerations to be taken into account such as speed of internet access and issues with the delivery and receipt of goods. It is a complex picture and impact will probably become clearer over time. The flexibility box enables the figures to be regularly reviewed.</p> <p>The Council recognises that internet shopping will be a key issue affecting the viability of town centres. The Council is proposing a number of measures to address this issue, such locating social infrastructure in town centres to increase footfall.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
57	4	Hayes Town Partnership	5 Core Policies - The Economy Policy E2: Location of Employment Growth Strategic Objectives to deliver The Vision SO14	Support	Objective 14 and related policy E2 is supported by the Partnership subject to the important proviso that local people receive a fair share of the jobs.	<p>Support welcomed. Through the Planning Obligations SPD, the Council is able to obtain funding for training courses and jobs with providers in the borough. This means that Hillingdon residents have excellent access to these jobs and training opportunities, however it would be contrary to EU policy to make these available exclusively to Hillingdon residents.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
57	5	Hayes Town Partnership	5 Core Policies - The Economy Policy E1: Managing the Supply of Employment Land Para 5.11	Object	Paragraph 5.11 proposes the managed release of employment land and this includes parts of the Pump Lane and Blyth Road areas in Hayes Town. The Partnership would welcome further discussions on how the amount of land to be released has been determined and how these areas have been selected. It would also see benefits in examining whether other options might be considered including sites with canal frontages that could be suitable for mixed use developments in support of the strategy for making better use of the environment offered by the Grand Union Canal.	<p>The recommendations of Hillingdon's Employment Land Study (2009) was used as the evidence base for proposed release of employment land. Site-specific options will be brought forward through the Site Allocations Development Plan Document which will also be available for consultation. However, the importance of the Grand Union Canal is recognised</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
57	6	Hayes Town Partnership	5 Core Policies - The Economy Location of Employment Growth Para 5.17	Support	Paragraph 5.17 identifies Hayes Town Centre as a suitable location for smaller scale office development, particularly as part of mixed-use regeneration schemes. This objective is supported but it is noted that some existing offices in places such as Clayton Road have experienced very long term vacancies. It is to be hoped that the improved transport connections offered by Crossrail will assist but again it is important to ensure that local people are able to take advantage of the jobs available.	<p>Support welcomed and comments noted.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
57	7	Hayes Town Partnership	5 Core Policies - The Economy Table 5.2 Projected Hotel Growth Policy E2: Location of Employment Growth Paras 5.18 and 5.20	Object	It is noted from paragraph 5.18 that policy E7 proposes to link tourism development with regeneration in Hayes and the wider Heathrow Opportunity Area and to provide access to training and new jobs for local people. Paragraph 5.20 lists Hayes as a key location for hotel growth as identified by the Hillingdon Tourism Study. The Partnership does not have any objections to these aims but is wary about the predicted demand. As well as the new hotels currently being built or planned on the Hayes and Harlington Station goods yard site and along the Bath Road there are further proposals as part of the Stockley Park phase 3 scheme and the development of the Southall Gas Works site. Some of the current interest and activity may be generated by the Olympics and it will be important to re-visit the projections in due course. The identification of suitable sites in Hayes will also need further study.	<p>The Flexibility boxes acknowledge that growth figures will be treated with caution and reviewed on a regular basis through the Annual Monitoring Report.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
57	8	Hayes Town Partnership	5 Core Policies - The Economy Table 5.3 Heathrow Opportunity Area - Future of Key Sub-Areas	Support	The description of Hayes Town Centre on page 39 refers to regeneration opportunities offered by Crossrail and its potential to be a location for small and emerging businesses. This view is endorsed by the Partnership. The units provided at the Hayes Campus of Uxbridge College show that there is a clear need for this sort of local provision but considerable work and resources were needed to get that scheme off the ground and robust plans will be needed if it is to be replicated in other locations.	Support welcomed and comments noted. <p style="text-align: center;"><u>Council's Proposed Action</u></p> No proposed change.
57	9	Hayes Town Partnership	5 Core Policies - The Economy Table 5.3 Heathrow Opportunity Area - Future of Key Sub-Areas Table 5.5: Net Additional Comparison Goods Floorspace Req (sq.m)	Object	The same page states that Hayes has been identified as having capacity for an additional 3,350 sqm of retail floorspace but as already noted above there is a need to be cautious about this figure. The document also recognises that the major shopping provision planned for the Southall Gas Works site is another potentially negative factor. Nevertheless it is clear that while Hayes Town is currently a thriving local centre that meets many of the needs of local residents it must also attract more High Street retailers if it is to improve the shopping offer. A planned approach and a concerted effort will be necessary by both the Council and the Partnership in order to achieve that objective.	Noted. Tables 5.3 and 5.5 along with Map 5.3 show the Council's policy direction and intention for Hayes town centre. The implementation of Policy E5 : Town and Local Centres will be expanded to clarify how the Council intends to deliver support for town centres. <p style="text-align: center;"><u>Council's Proposed Action</u></p> Add following text at end of Implementation section for policy E5: In addition to the expansion of town centre boundaries proposed in this plan, increases in retail floor space identified in Table 5.5 will be achieved through the redevelopment of existing sites, refurbishment of existing units or the intensification of floorspace. Sites to be redeveloped will be identified in the Site Allocations DPD as appropriate.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
57	10	Hayes Town Partnership	6 Core Policies - New Homes SO7	Object	SO17 supported subject to the pressing need for affordable housing in Hayes, particularly family units. Need to clarify statement relating to densities reflecting the character of the area. The price of affordable homes must be genuinely affordable.	<p>The Core Strategy acknowledges the need for family homes and additional information on the need for housing types is included at paragraph 6.10. The subsequent Development Management Development Plan Document will provide more detailed information on the type and size of units that should be provided in new housing development.</p> <p>The Core Strategy and subsequent Development Plan documents will not provide information on the price of affordable housing.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Additional information on need for housing types is included at paragraph 6.10.</p>
57	11	Hayes Town Partnership	9 Core Policies - Transport and Infrastructure Policy C11: Community Infrastructure Provision	Support	<p>Welcome Policy C11, particularly point 7. However, the range of community facilities listed is very limited and there is no specific reference to youth centres in the Policy or other community 'services' such as restaurants, cinemas or faith centres.</p> <p>Building schools for the future will no longer take place and the impending spending review will clearly have an impact on proposals that will come forward.</p>	<p>Policy C11 sets a general presumption in favour of the provision of community infrastructure facilities.</p> <p>Detailed information on the growth plans for Hayes, including the mix of uses, will be included in the Heathrow Area Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
57	12	Hayes Town Partnership	8 Core Policies - Environmental Management Policy EM3: River and Canal Corridors	Object	<p>Further emphasis should be given to the redevelopment of the Grand Union Canal with particular focus on:</p> <ul style="list-style-type: none"> •Development of a vibrant water front •Potential to replace old and worn out buildings with modern well designed schemes •Exploitation of local heritage and retention and sensitive development of old features such as Shackles Dock •Temporary moorings for visitors and permanent fully serviced moorings for people to live in the heart of the town centre •Use of the canal for freight transport, trip boats, water taxis and canoes •Improved access for pedestrians and cyclists •Recycling of canal water for sustainable cooling 	<p>Agree that greater emphasis will be given to the value of the borough's Blue Ribbon Network in Policy EM3 and supporting text.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend Para 8.31 to read 'The Blue Ribbon Network also plays important roles in transport, recreation and education. It can provide a much needed respite from the built-up nature of the towns, and also provides important linear walking and cycling routes. They are also important for providing habitat and wildlife corridors, and fulfill other environmental functions such as drainage.'</p> <p>Amend Policy EM3 to read 'The Council will continue to enhance the local character, visual amenity, ecology, transportation, leisure opportunities and sustainable access to rivers and canals.'</p> <p>Amend Implementation of Policy EM3 to read 'Working with the Environment Agency, British Waterways, Natural England, English Heritage and other partners to develop a strategy for the Grand Union Canal and other blue ribbon networks</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
57	13	Hayes Town Partnership	9 Core Policies - Transport and Infrastructure	Object	The more that the jobs and homes go to those in the deprived areas in and close to the Opportunity Area the less impact there will be on the congested road network and the overcrowded public transport system. There is a pressing need to improve north to south communication. Improvements to public transport and other methods of transport such as cycling is supported. It must be emphasised that to achieve a substantial increase in the numbers of people cycling and walking the Council will have to take a more proactive role than it has to date.	<p>The Council actively promotes improved public transport measures through the Core Strategy, to reduce congestion on the road network.</p> <p>The Council's policy on cycling is to use the river and canal network to encourage additional cycling opportunities. The Council is also working with schools to introduce sustainable measures to and from schools.</p> <p>Other measures are also proposed to encourage walking and cycling, such as improved street signage and incorporating cycle facilities into new development.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
57	14	Hayes Town Partnership	9 Core Policies - Transport and Infrastructure Para 9.22	Object	In order to achieve the full benefits of Crossrail and the other schemes described above the Partnership believes that there is an urgent need for an area-based strategy for the regeneration of Hayes Town Centre which would form a component part of the Council's overall core strategy.	<p>Comments noted. The Heathrow Area Development Plan Document will include detailed proposals for Hayes Town centre.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
58	1	DP9 on behalf of Royal Brompton and Harefield NHS Foundation Trust (RBHT)	8 Core Policies - Environmental Management Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Object	<p>At Harefield Hospital, the majority of the hospital buildings are in a poor state of repair and are at the end of their useful life. It is recognized that Harefield Hospital is identified within the Draft Core Strategy as an existing Major Developed Site in the Green Belt (Policy EM2) where any proposals for development will be assessed against national and London Plan policies. The recognition of the hospital as an existing major development site is welcomed, subject to more detailed site specific policies which will be set out in the Site Allocations DPD.</p> <p>Taking into account the emerging proposals for the site, we would welcome the opportunity to meet with your Planning Officers in order to discuss the opportunity to update the site specific allocation for Harefield Hospital within the LDF. We would also welcome the opportunity to provide input into the revised Green Belt Study, which is currently being undertaken by the Council as part of the LDF process.</p>	<p>The Core Strategy does not identify site specific development proposals. These will be taken forward in the Site Allocations Development Plan Document and the Council will continue to liaise with RBHT as their future proposals for Harefield Hospital are brought forward.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
59	1	Ickenham Residents' Association	1 Introduction Para 1.14	Object	The consultation period was insufficient for a document of this importance. Ask that consultation on the revised document that is extended to at least 12 weeks in accordance with the Code of Practice on Consultation and general good practice for a consultation of this type.	<p>The 'Code of Practice on Consultation' does not prevail over statutory or mandatory requirements. Consultation on the Core Strategy is a statutory requirement covered by the Town and Country Planning Regulations 2004 (as amended). This Regulation 25 consultation has been carried out in line with these Regulations. Whilst the regulations do not specify a particular time period for representations on Regulation 25, Hillingdon's Statement of Community Involvement (SCI) adopted in November 2006 sets out a minimum of six weeks for public consultations for each of the stages in the plan making process. In line with previous consultations on the Core Strategy, a six week consultation period was planned for the draft Core Strategy to be consistent with Hillingdon's SCI.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
59	2	Ickenham Residents' Association	3 A Portrait of Hillingdon - where we are now Table 3.1 Main Planning Challenges for Hillingdon Page 15	Object	Public transport improvements are also required in Ickenham and particularly public transport links between West Ruislip, Ickenham, Hillingdon and the South of the Borough. A North-South bus route along the High Road and Long Lane, Ickenham is essential.	<p>The London Borough of Hillingdon is involved in regular discussions with Transport for London (TfL) and options are being considered to upgrade and improve services. The borough supports measures for improved public transport and will take forward these and other suggestions to inform discussions with TfL. Improvements such as new bus routes are influenced by TfL's strategic transport priorities and are reliant on funding.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
59	3	Ickenham Residents' Association	4 The Vision - where we want to be The Vision for Hillingdon 2026 Para 4.2	Object	As 3.1 above. Improved public transport is required through Ickenham.	<p>The London Borough of Hillingdon is involved in regular discussions with Transport for London (TfL) and options are being considered to upgrade and improve services. The borough supports measures for improved public transport and will take forward these and other suggestions to inform discussions with TfL. Improvements such as new bus routes are influenced by TfL's strategic transport priorities and are reliant on funding.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
59	4	Ickenham Residents' Association	4 The Vision - where we want to be The Spatial Strategy Para 4.27	Object	Include reference to continued protection of the Colne Valley Regional Park.	<p>Noted. The protection of the Colne Valley Regional park is included within policies concerning protection of sites of nature conservation importance and Green Belt land.</p> <p>However, given the strategic importance of the Colne Valley Regional Park, separate acknowledgement will be included at policy EM 7.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend policy EM7(1) to read:</p> <p>The conservation and enhancement of the natural state of:</p> <p>Harefield Gravel Pits Colne Valley Regional Park Fray's Farm Meadows Harefield Pit</p>
59	5	Ickenham Residents' Association	4 The Vision - where we want to be Map 4.1 Key diagram	Object	Improved public transport links are required along the route West Ruislip - High Road, Ickenham -Long Lane, Ickenham – Hillingdon Circus – Uxbridge. At present the map suggests that the route from Hillingdon Circus solely continues into the south of the Borough, bypassing Uxbridge.	<p>The London Borough of Hillingdon is involved in regular discussions with Transport for London (TfL) and options are being considered to upgrade and improve services. The borough supports measures for improved public transport and will take forward these and other suggestions to inform discussions with TfL. Improvements such as new bus routes are influenced by TfL's strategic transport priorities and are reliant on funding.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
59	6	Ickenham Residents' Association	5 Core Policies - The Economy Location of Employment Growth Para 5.20	Object	Consider including Hillingdon Circus as a potential site for hotel growth, namely the former Master Brewer site due to proximity to London Underground, park 'n ride facilities and motorway network.	<p>Detailed site-specific proposals will be considered and brought forward during preparation of the Site Allocations Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
59	7	Ickenham Residents' Association	5 Core Policies - The Economy Map 5.3: Town Centre Improvements	Support	We support the intention to strengthen Ickenham's core shopping area. We ask that this be achieved through initiatives that support small businesses, provision of funding for the Association's full parking scheme, improved planning enforcement and joined up thinking as regards planning approvals, for example to restrict any further permission for any fast food or restaurant premises. We invite LBH to discuss initiatives with the Residents' Association and the Traders' Association.	<p>Support noted. Detailed proposals for individual town centres will be considered and brought forward during preparation of the Site Allocations Development Plan Document.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
59	8	Ickenham Residents' Association	5 Core Policies - The Economy Table 5.5: Net Additional Comparison Goods Floorspace Req (sq.m)	Object	We object to the inclusion of Ickenham as a District Centre. It is a Local Centre. No additional comparison goods floorspace is required; just support of existing businesses to ensure continuity of trade. We therefore challenge the findings of the GLA report in this respect.	<p>As noted at paragraph 5.5, Ickenham is identified in the London Plan evidence base as a district centre. The table is taken from : "Consumer Expenditure and Comparison Goods Retail Floorspace Need in London (Greater London Authority, March 2009)": Table 5.5 is an extract from Table 14in that report: "Net additional comparison goods floorspace requirements by town centre (2011 - 2031) using 2.2% growth".</p> <p>While Ickenham functions as a Local Centre, it is still identified by the GLA as a District Centre. As growth figures are available for Ickenham they have been included in the Core Strategy, in line with policy EC1.3a in PPS4.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
59	9	Ickenham Residents' Association	5 Core Policies - The Economy Policy E5: Town and Local Centres	Support	Support E5 provided the amendment to Table 5.5 is made.	<p>As noted at paragraph 5.5, Ickenham is identified in the London Plan evidence base as a district centre. The table is taken from : "Consumer Expenditure and Comparison Goods Retail Floorspace Need in London (Greater London Authority, March 2009)": Table 5.5 is an extract from Table 14in that report: "Net additional comparison goods floorspace requirements by town centre (2011 - 2031) using 2.2% growth".</p> <p>While Ickenham functions as a Local Centre, it is still identified by the GLA as a District Centre. As growth figures are available for Ickenham they have been included in the Core Strategy, in line with policy EC1.3a in PPS4.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
59	10	Ickenham Residents' Association	6 Core Policies - New Homes Policy H2: Affordable Housing	Object	There needs to be greater flexibility in the policy. Rather than simply "Subject to viability..." suggest "Subject to viability and if appropriate in all the circumstances,..."	<p>Comments noted.</p> <p>Policy H2 sets a benchmark for the provision of affordable housing across the borough. Developers submitting planning applications for housing development above the threshold will be required to provide affordable housing in accordance with the policy, unless it can be demonstrated that such provision makes the scheme unviable.</p> <p>Future affordable housing targets will need to be discussed and agreed with the GLA.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Proposed change:</p> <p>Insert words:" subject to viability and if appropriate in all other circumstances" at the beginning of subsection i), policy H2.</p>
59	11	Ickenham Residents' Association	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision	Object	Further information is required as to the sites under consideration.	<p>The Core Strategy does not allocate specific sites for development. Detailed site proposals will be brought forward in the Site Allocations Development Plan Document..</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
59	12	Ickenham Residents' Association	7 Core Policies - Historic and Built Environment Map 7.1 Hillingdon's Heritage	Object	Please confirm which "Scheduled Ancient Monument" is being referenced in this plan as we have more than 1 in the village.	<p>There are 5 Scheduled Ancient Monuments within the borough. The two in Ickenham are the Manor Farm Moat, off Long Lane and the Moated site on west bank of River Pinn, both of which have been shown on the map.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
59	13	Ickenham Residents' Association	8 Core Policies - Environmental Management Table 8.1 : Parks for Green Flag Status in 2010	Object	Suggest expand list to include Parks for Green Flag Status in 2011 to include Swakeleys Park.	<p>Noted - Map 8.1 is included for information. The Green Flag designation has no formal planning status. Details have been included here for comparison purposes only. It is not proposed to further update the Core Strategy with future Green Flag award designations.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
59	14	Ickenham Residents' Association	8 Core Policies - Environmental Management Water, Air and Noise Management Para 8.96	Object	The north of the Borough includes the A40/M40 with the resultant impact on air quality in the vicinity of the road. Map 8.5 reflects this, therefore the reference to the "northern part of the Borough" is misleading in this paragraph.	<p>The northern part of the Borough refers to the Area to the north of the A40. To amend opening sentence of paragraph 8.96 for clarification.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend first sentence of 8.96 to read: "Air Quality: North of the A40/M40, the borough is largely ..."</p>
59	15	Ickenham Residents' Association	9 Core Policies - Transport and Infrastructure Map 9.1 Transport Infrastructure	Object	The Association assumes that the congestion hotspot identified in Ickenham relates to the Long Lane/High Road and the Swakeleys Road areas.	<p>The congestion hotspots are taken from the Local Implementation Plan (LIP) which sets out the Council's transport projects, proposals and programmes. This is currently being revised and these comments will be passed on to the appropriate Council service for consideration.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
59	16	Ickenham Residents' Association	9 Core Policies - Transport and Infrastructure Public Transport Network Para 9.24	Object	The facilities at West Ruislip Station need to be improved - in particular parking facilities. Should a new station be considered the impact on Ickenham residents MUST be taken into account. The potential changes envisaged by HS2 should the high speed rail route be approved will need to be factored in.	<p>The London Borough of Hillingdon is involved in regular discussions with Transport for London (TfL) and options are being considered to upgrade and improve services. The borough supports measures for improved public transport and will take forward these and other suggestions to inform discussions with TfL.</p> <p>Currently the High Speed Rail 2 (HS2) route is only indicative. The coalition government has put back the public consultation on HS2 until early 2011 in order to do further work on the Heathrow connection. The public consultation will be an opportunity for everyone with an interest to find out more about the proposals and to put forward their views. The London Borough of Hillingdon will assess the impacts on the borough and local residents and will look closely at mitigation of local impacts. The Council will work with local residents and in partnership with other organizations as part of the consultation process.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
59	17	Ickenham Residents' Association	9 Core Policies - Transport and Infrastructure Policy C13: Culture	Support	We support the promotion of the Compass Theatre, Ickenham as a key cultural centre.	<p>Support noted.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
59	18	Ickenham Residents' Association	Appendix 2 Infrastructure Schedule	Support	We support the redevelopment of Hillingdon Hospital.	<p>Support noted.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
60	1	Gerald Eve LLP on behalf of Co-operative Insurance Society (managed by AXA REIM)	5 Core Policies - The Economy Policy E1: Managing the Supply of Employment Land Para 5.11	Support	We support the release of "part of Pump Lane area, Hayes", and specifically the Chailey Industrial Estate (1.85ha) from employment uses as part of a mixed use redevelopment incorporating both housing and employment uses.	Support welcomed. Detailed site-specific allocations will be brought forward during preparation of the Site Allocations Development Plan Document. <u>Council's Proposed Action</u> No proposed change.
61	1	Hillingdon Traveller Forum	Core Strategy Draft Consultation	Object	The Hillingdon Traveller Forum (the Forum) makes the point that it was informed very late in the day about this consultation. It would be crucial that further consultation gains the views of the Irish Traveller, Roma and Gypsy communities in Hillingdon.	Comments noted. The consultation process for the Core Strategy was raised at two previous meetings of the Forum. Care will be taken to ensure that the Forum is aware of further consultation stages for the Core Strategy and other Development Plan Documents at the earliest possible stage. <u>Council's Proposed Action</u> No proposed change.
61	2	Hillingdon Traveller Forum	6 Core Policies - New Homes	Object	It is the experience of the Forum that there is a negative effect on Mental Health with a community being forced to live in housing, being separated from their family and removed from their culture and way of life.	Comments noted. <u>Council's Proposed Action</u> No proposed change.
61	3	Hillingdon Traveller Forum	6 Core Policies - New Homes Para 6.27	Object	Given the recent Letter update from the Secretary of State (6th July 2010) and the statement by the Mayor of London as part of the Draft Replacement London Plan EiP (19th July 2010) this introductory statement needs updating.	Section b) of policy H3 will be amended in the light of the recent announcement on targets for additional pitch provision. <u>Council's Proposed Action</u> Section b) of policy H3 will be amended to state that the Council will ensure: "Targets for additional pitch provision take account of need and the availability of suitable sites"

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
61	4	Hillingdon Traveller Forum	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision Para 6.26	Support	Policy H3 Point a- the Forum welcomes Hillingdon's commitment to protect Colne Park for its current use	<p>Comments noted.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
61	5	Hillingdon Traveller Forum	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision Para 6.26	Object	Policy H3 Point bi, the Forum opposes the stated position, whereby "a need for such accommodation which is not being met in the Borough or elsewhere in London."	<p>No proposed change on the basis that the issue is already addressed in policy.</p> <p>Policy H3 states that proposals for sites to accommodate the specific needs of travellers:</p> <p>"...should:</p> <p>i) meet a need for such accommodation which is not being met in the borough or elsewhere in London."</p> <p>Additional pitch provision will need to reflect the availability of suitable sites, as well as local needs.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
61	6	Hillingdon Traveller Forum	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision Para 6.26	Support	Policy H3 Point b ii, the Forum supports Hillingdon's commitment to provide land that is "environmentally acceptable for residential occupation." However would suggest that "environmentally acceptable" should be defined in more detail.	<p>The environmental acceptability of sites for gypsy and traveller accommodation would be the same as those for other forms of development. It is not considered necessary to define these further.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change</p>
61	7	Hillingdon Traveller Forum	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision Para 6.26	Object	Policy H3 Point b iii, the wording here is inappropriate. Why would the building of a new site have any "significant adverse effects on the amenity of occupiers of adjoining land"?	<p>The impact on local amenity applies to the assessment of proposals for gypsy and traveller pitches, in the same way as it does to all other development proposals. Planning applications for development proposals that result in an adverse impact local amenity will be refused.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
61	8	Hillingdon Traveller Forum	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision Para 6.26	Support	Policy H3 Point b iv and v, all communities require access to services and the Forum support that this right be given careful consideration when building any new site provision.	Criteria iv) supports access to a range of community facilities. <u>Council's Proposed Action</u> No proposed change.
61	9	Hillingdon Traveller Forum	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision Para 6.27	Object	Gypsy and traveller targets are now out of date.	Section b) of policy H3 will be amended in the light of the recent announcement on targets for additional pitch provision. <u>Council's Proposed Action</u> Section b) of policy H3 will be amended to state that the Council will ensure: "Targets for additional pitch provision take account of need and the availability of suitable sites"
61	10	Hillingdon Traveller Forum	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision Para 6.28	Object	The decision to wait on the West London Housing Partnership report, before allocating land is inappropriate. As stated there is already a need identified by Hillingdon Homes. The Hillingdon Traveller Inter Agency Forum is ideally placed to help inform this Core Strategy, ensuring Traveller participation and voice in the decisions that affect them. The Forum recommends that it be seen as a critical friend to the council when considering and developing new Traveller site provision.	Consideration will be given to how best to involve the Forum in the preparation of the Site Allocations Development Plan Document which will examine the need and potential designation of further sites for Gypsies and Travellers in the borough. <u>Council's Proposed Action</u> No proposed change.
61	11	Hillingdon Traveller Forum	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision Flexibility	Object	Hillingdon should acknowledge the local need for Gypsy and Traveller accommodation based on an official consultation with the local Gypsy and Traveller community and inter agency forum.	Any new policy on gypsy and traveller provision will need to be based on sound evidence. Comments made by gypsy and traveller groups will be taken into account. <u>Council's Proposed Action</u> No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
62	1	Boyer Planning Limited on behalf of Thorney Farm Development Limited	6 Core Policies - New Homes Policy H1: Housing Growth Paras 6.11-6.20	Object	We are concerned about the lack of flexibility in and rigidity of Policy H1, which at present solely targets a market housing growth figure. The Council recognizes there is a serious concern over the deficit of affordable housing as identified within evidence and stipulated within the SA. This has transpired into the 'Main challenges to be addressed' within the CS table 1.3 (page 13). However, this is not tackled within policy or stressed to be a major issue throughout the strategy. Policy H1 is the lead policy on housing growth and needs to take account of how the deficit will be addressed.	<p>Policy H1 reflects Hillingdon's annual monitoring target in the London Plan. This is a target for all housing types, not just market housing growth. The Council's Annual Monitoring Report shows that the current target of 365 units will be met over the plan period. As such the plan is considered to be sound.</p> <p>Hillingdon's proposed annual monitoring target in the Replacement London Plan has been reduced to 425 units per annum.</p> <p>The main evidence base for meeting the revised target is the GLA's SHLAA. The sites identified in this document will be investigated as part of the production of the Site Allocations Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Update policy H1 and paragraph 6.7 to reflect amended Replacement London Plan annual monitoring target.</p>
62	2	Boyer Planning Limited on behalf of Thorney Farm Development Limited	6 Core Policies - New Homes Policy H2: Affordable Housing Paras 6.21-6.25	Object	Policy H2 does not address the severity of the deficit of affordable housing and demand required for the future growth of the Borough. At present Policy H2 is considered arbitrary and does not take account of the 'actual' annual need, that being 2,623 units per annum. As such we consider a minimum affordable housing requirement needs to be accounted for to make the strategy sound.	<p>Policy H2 will be updated to reflect the latest evidence in the Council's Housing Market Assessment and Economic Viability Assessment.</p> <p>Policies on affordable housing will be amended to reflect the emerging Housing Market Assessment and the emerging affordable housing Economic Viability Assessment, to ensure that the policy is deliverable.</p> <p>In accordance with the London Plan, Affordable Housing targets will be discussed and agreed with the GLA.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Proposed change:</p> <p>Insert words:" subject to viability and if appropriate in all other circumstances" at the beginning of subsection i), policy H2.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
62	3	Boyer Planning Limited on behalf of Thorney Farm Development Limited	8 Core Policies - Environmental Management Policy EM2: Green Belt, Metropolitan Open Land and Green Chains Paras 8.17-8.22	Object	Policy EM2 needs to take account of special circumstances, specifically to aid the economic growth and sustainable future development of Major Development Sites (MDS) in the Green Belt. It is not reasonable to rely on brownfield land for the future expansion of MDS. The Green Belt needs to be respected, however, for the future Plan to become sound the boundaries need to be revisited and amended to ensure future development is sustainable, specifically where there has already been a recognized impact on the Green Belt.	<p>Retail development in Uxbridge will take place either within the existing town centre boundary, or within the areas of town centre extension identified on map 5.2.</p> <p>Discussions with Brunel do not indicate that Brunel will be bringing forward further large scale development proposals over the period of the Core Strategy.</p> <p>As such, significant releases of Green Belt land are not considered to be appropriate and would not be supported.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
62	4	Boyer Planning Limited on behalf of Thorney Farm Development Limited	4 The Vision - where we want to be The Vision for Hillingdon 2026	Object		<p>Specific references where changes are required have not been included. As such comments cannot be actioned.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
63	1	Surrey County Council	9 Core Policies - Transport and Infrastructure Policy T3: North-South Sustainable Transport Links	Object	Policy T3: North-South Sustainable Transport Links Hillingdon might wish to consider including improved north-south links both inside and outside the borough as policy priorities. For example, Staines is strategically placed as a regional sub-hub and residents of Hillingdon would benefit from improved public transport links to the town in order to access the many services and facilities on offer.	<p>The borough supports measures for improved public transport and will take forward these and other suggestions to inform discussions with Transport for London.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
63	2	Surrey County Council	9 Core Policies - Transport and Infrastructure Policy T4: Heathrow Airport	Object	Heathrow Airport is of major significance to Surrey as a generator of employment, traffic and driver of economic growth. In the text accompanying policy T4 Surrey County Council should be mentioned as a key consultee with regard to any large scale development plans which could impact on Surrey or proposals to improve access from the south.	<p>Agreed - to add additional sentence at the end of paragraph 9.31 that the Council will work with and consult adjoining authorities as appropriate on development in the Heathrow Opportunity Area.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Add additional sentence at the end of para 9.31 stating:</p> <p>Where appropriate, Hillingdon will work and consult with adjoining authorities on improved cross boundary sustainable transport links.</p>
64	1	Drivers Jonas Deloitte on behalf of London Fire and Emergency Planning Authority (LFEP)	7 Core Policies - Historic and Built Environment Policy BE1: Built Environment	Object	Future growth within Hillingdon will create additional risks from fire and other emergencies across the Borough. The LFB urges that the Core Strategy specifically mentions the links between future development proposals and maintaining community safety. Specifically, it asks the Core Strategy to address the need to grasp opportunities offered by new developments in Hillingdon to designing out risks from fire, particularly in residential accommodation. This would include giving consideration to installing hard wired smoke alarms and sprinkler systems where the risks justify it. Efforts to try and reduce crime such as arson through good design should also be promoted.	<p>Agree, whilst Point 8 of Policy BE1 seeks to 'create safe and secure environments that reduce crime and fear of crime, anti-social behaviour and fire', this could be clarified to include 'risks from arson'.</p> <p>The suggested requirements of designing out the risks from fire in residential accommodation are covered under building regulations.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend Policy BE1 point 8 to include 'risks from fire and arson'.</p>
64	2	Drivers Jonas Deloitte on behalf of London Fire and Emergency Planning Authority (LFEP)	9 Core Policies - Transport and Infrastructure Policy C11: Community Infrastructure Provision	Support	<p>Resistance to the loss of community facilities is supported.</p> <p>In order to continue providing a fast, effective and resilient emergency response, financial contributions towards improving and expanding current fire stations facilities and services should be identified within Section 106 agreements for development schemes.</p> <p>LFB wishes to be kept informed of the progress of the Strategic Infrastructure Plan.</p>	<p>Supported noted.</p> <p>The scope of what constitutes an appropriate Planning Obligation is covered in Government Guidance and would not be repeated in the Core Strategy.</p> <p>The Council will ensure that LFEP is kept informed regarding the emerging Strategic infrastructure Plan.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
65	1	South Bucks District Council	9 Core Policies - Transport and Infrastructure	Object	SBDC considers HGV movement to be an important cross-boundary issue which we share with LB Hillingdon, and for which there is an opportunity to maximise improvements through a collaborative cross-boundary approach in our LDFs	<p>Comments noted and these issues will be considered in work on the borough's Local Implementation Plan (LIP).</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
65	2	South Bucks District Council	5 Core Policies - The Economy Policy E1: Managing the Supply of Employment Land Map 5.1 Locations for Economic Growth	Object	We are concerned with the supportive policy approach to growth on sites bordering South Bucks, without any explicit recognition of the HGV issue, and corresponding policy approaches to manage or even reduce HGV movements in inappropriate minor roads and residential areas.	<p>The Council's Employment Land Study identified areas of potential employment land release and the sites/parts of sites that should be retained as locally significant industrial and employment sites. This document will form the evidence base for the Site Allocations DPD. The implications of specific site allocations will be examined at this stage.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
65	3	South Bucks District Council	9 Core Policies - Transport and Infrastructure Policy T1: Accessible Local Destinations	Object	Policy T1 sets a broad policy approach on Accessible Local Destinations. There is currently no indication that implementation will extend to a corresponding approach towards existing sites which currently do not have good or appropriate access to the strategic road network, for example a preference for gradual changes in use involving reduced HGV movements, similar to the approach proposed in our own Core Strategy.	<p>The Council notes the proposed policy approach on existing sites and HGV movements by South Buckinghamshire District Council but does not propose a similar approach in this borough at present.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
65	4	South Bucks District Council	8 Core Policies - Environmental Management Policy EM3: River and Canal Corridors	Object	The Core Strategy should include recognition of the role the canal can play in freight transportation.	<p>Agree that greater emphasis should be given in the Environmental Management chapter to the value of the borough's Blue Ribbon Network.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend Para 8.31 to read 'The Blue Ribbon Network also plays important roles in transport, recreation and education. It can provide a much needed respite from the built-up nature of the towns, and also provides important linear walking and cycling routes. They are also important for providing habitat and wildlife corridors, and fulfill other environmental functions such as drainage.'</p> <p>Amend Policy EM3 to read 'The Council will continue to enhance the local character, visual amenity, ecology, transportation, leisure opportunities and sustainable access to rivers and canals.'</p> <p>Amend Implementation of Policy EM3 to read 'Working with the Environment Agency, British Waterways, Natural England, English Heritage and other partners to develop a strategy for the Grand Union Canal and other blue ribbon networks'</p>
65	5	South Bucks District Council	5 Core Policies - The Economy Policy E4: Uxbridge	Object	We acknowledge the proposed policy approaches to reducing impacts on the transport network and promoting sustainable travel, SBDC feels the Hillingdon Core Strategy should recognise the potential for future development at Uxbridge to contribute to impacts on Junction 1 of the M40. The impacts on Junction 1 will need to be kept under review, and if it is determined that improvement works are needed, a cross-boundary approach (including potentially a combined approach to developer contributions) may be needed.	<p>Comments noted - information to be passed to the appropriate council service for consideration in preparation of the Local Implementation Plan (LIP).</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
65	6	South Bucks District Council	Appendix 2 Infrastructure Schedule	Support	Protection of water passage service is noted. Interest in pursuing links to Court Lane site.	<p>Interest noted. Projects in the infrastructure schedule will need to be updated to reflect current priorities of infrastructure providers. The Council would welcome the opportunity to work with South Bucks District Council on this project.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
65	7	South Bucks District Council	8 Core Policies - Environmental Management Policy EM4: Open Space and Informal Recreation	Support	SBDC supports the commitment to pursue key aims of the Colne Valley Park in Policy EM4, and the recognition that implementation of EM3 regarding River and Canal Corridors will involve working to achieve improvements in the Colne Valley Park.	Support noted. <u>Council's Proposed Action</u> No proposed change.
65	8	South Bucks District Council	8 Core Policies - Environmental Management	Support	Support proactive approach to noise and air quality issues and welcome a partnership approach to future work e.g Heathrow Opportunity Area.	Support welcomed and note interest of South Buckinghamshire District Council in being involved with future work on the Heathrow Area Action Plan and Heathrow Opportunity Area Planning Framework. <u>Council's Proposed Action</u> No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
66	1	RPS Planning & Development	5 Core Policies - The Economy Policy E5: Town and Local Centres Table 4.1 Summary of Growth in Hillingdon 2011-2026 Table 5.5: Net Additional Comparison Goods Floorspacee Req (sq.m) Paras 5.50-5.34	Object	<p>As currently drafted the Core Strategy makes no reference to borough wide retail floorspace needs for comparison goods.</p> <p>Furthermore, the Core Strategy is silent upon convenience goods retail needs within the borough.</p> <p>The Core Strategy should reasonably include an assessment of the wider retail floorspace needs of the borough (comparison and convenience goods) in order to set the scene and assess the need to allocate sufficient suitable and appropriately located sites. The detail of which would be assessed as part of the Council's Site Allocations DPD.</p>	<p>Agree borough-wide comparison retail growth figure can be included to reflect:</p> <p>a) The Council's Position Statement: Employment Land and Comparison Retail Floorspace (June 2010) provides a comparison goods floorspace requirement for the entire borough of 44,961sqm net for the period 2006-2026.</p> <p>b) Hillingdon's Retail Study assessed the borough's convenience floorspace requirements and concluded 415 sq m would be needed across the borough up to 2016. There is no current deficiency of convenience floorspace in the borough.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend start of paragraph 5.33 to read:</p> <p>"The Council's Position Statement: Employment Land and Comparison Retail Floorspace (June 2010) provides a comparison goods floorspace requirement for the entire borough of 44,961sqm net for the period 2006-2026."</p> <p>Amend third sentence of paragraph 5.34 to read:</p> <p>"Hillingdon's Retail Study assessed the borough's convenience floorspace requirements and concluded 415 sq m would be needed across the borough up to 2016 and that local shops are particularly susceptible to closure and pressure for change of use."</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
66	2	RPS Planning & Development	5 Core Policies - The Economy Policy E5: Town and Local Centres Map 4.1 Key diagram Supply of Employment Land Paras 5.30-5.34	Object	We consider that the Core Strategy fails to give proper justification in respect of the retail hierarchy and why certain district and local centres have been singled out for growth and improvement. Furthermore, the Core Strategy should reasonably address sites such as those at North Hillingdon because of their potential significance both in respect of individual centres and meeting the residual retail needs of the borough.	<p>Policy E5 will be amended to include reference to the retail hierarchy.</p> <p>GLA figures for strategic town centres (Metropolitan and District) have been specifically referred to in the Core Strategy, on the advice of Government Office for London. The GLA acknowledge that these figures are the likely scale and scope for growth rather than targets.</p> <p>While Ickenham functions as a Local Centre, it is still identified by the GLA as a District Centre. As growth figures are available for Ickenham they have been included in the Core Strategy, in line with policy EC1.3a in PPS4.</p> <p>There is no evidence base to forecast comparison retail growth (which is based on expenditure) for centres below District level. Convenience retail is based on population growth rather than spending levels. Hillingdon's Retail Study recommends a growth of 415 sq.m net of convenience growth across the whole borough to 2016. It is therefore not considered a strategic priority.</p> <p>Changes to town centre boundary and specific sites will be considered as part of the Development Management and Site Allocations Development Plan Documents.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Include reference to retail hierarchy in Policy E5.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
67	1	Individual	6 Core Policies - New Homes Strategy for the Heathrow Opportunity Area 6 Core Policies - New Homes	Object	We have a very real need to house Hillingdon residents and with our responsibilities to Heathrow we should look at how we are going to house everyone, especially the elderly and ageing population together with how health, schooling and jobs are going to be created to support all these residents. We can't build these huge developments (the new garden city development in West Drayton has over 900 units – but where are these people going to work?).	<p>Opportunity Areas are designated in the London Plan as areas of employment and housing growth. Hillingdon has submitted representations to the GLA as part of the Consultation Draft Replacement London Plan EiP, noting specific concerns regarding the figures for the Heathrow Opportunity Area. In particular, it is unclear where proposed housing growth will be accommodated.</p> <p>The Heathrow Opportunity Area extends across Hillingdon's borough boundary into Hounslow, however the extent of the Opportunity Area has not been defined.</p> <p>The Replacement London Plan indicates that the Opportunity Area boundary issues should be determined through the production of a Planning Framework: In Hillingdon's case this would involve working with Hounslow to prepare a document that sets out the Opportunity Area boundaries and how growth figures in the London Plan would be split between the two boroughs.</p> <p>Changes to Opportunity Area policy will be progressed through the Replacement London Plan EiP and in the subsequent production of a Heathrow Opportunity Area Planning Framework.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
68	1	Ballymore Group	4 The Vision - where we want to be Strategic Objectives to deliver The Vision Table 5.3 Heathrow Opportunity Area - Future of Key Sub-Areas	Support	Policies SO23 and SO24 relate to the Heathrow Opportunity Area, which includes Hayes Town Centre. As noted in Table 5.3, there has been significant investment in Hayes, including the Ballymore Group's High Point development and investment at the Blyth Road site. Growth in Hayes Town Centre is supported by the Ballymore Group, however appropriate growth should be managed so that it does not affect the amenity of existing developments.	<p>Support welcomed.</p> <p>The Council would note that site-specific details will be considered as part of the Site Allocations and Heathrow Area Development Plan Documents. Issues of amenity will be dealt with through the planning application process.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
68	2	Ballymore Group	6 Core Policies - New Homes Strategic Objectives to deliver The Vision Housing Growth	Object	The Council should be flexible in the amount of new housing it delivers in any given year, especially if a development comes forward where the amount of new homes proposed exceeds the annual target.	<p>The figure of 365 new homes is a minimum target to be delivered in the borough.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Proposed wording change to policy H1:</p> <p>The borough's current target is to provide a minimum of 3,650 dwellings, annualised as 365 dwellings per year, for the ten year period between 1 April 2007 and 31 March 2017.</p> <p>Rolled forward, this target equates to a minimum provision of 5,475 dwellings over the period of the Core Strategy. Sites that will contribute to the achievement of this target will be identified in the Site Allocations DPD.</p>
68	3	Ballymore Group	6 Core Policies - New Homes Policy H2: Affordable Housing	Object	Site specific affordable housing contributions should be assessed on a case-by-case basis. Need for family homes is noted, but assessments should be made against most up-to-date housing needs assessments.	<p>Policy H2 sets borough wide targets that reflect those in the current London Plan. It is expected that these targets will be amended in accordance with emerging evidence base and the London Plan EiP. The policy notes that any targets will be applied subject viability.</p> <p>Planning applications for development proposals that depart from the targets in policy H2 would require special justification.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Proposed change:</p> <p>Amend part ii) of the policy as follows:</p> <p>The affordable housing mix reflects housing needs in the borough, particularly the need for larger social rented family units.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
69	1	Planning Perspectives LLP	4 The Vision - where we want to be Table 4.1 Summary of Growth in Hillingdon 2011-2026	Object	Until there is greater certainty on the housing requirement for the Borough it is premature to develop the Spatial Strategy on the adopted housing requirements.	<p>Policy H1 reflects Hillingdon's London Plan housing monitoring target of 365 units per annum. This targets will be amended through the Replacement London Plan EIP.</p> <p>The proposed target has been formulated through the GLA's SHLAA. In addition to trend based figures for small sites and NSCs, this contains a list of sites that will be assessed as part of the production of the Site Allocations DPD.</p> <p>The GLA has given verbal confirmation that targets for NSC's will be revised down and the overall target will broadly reflect the Council's housing trajectory. It therefore not premature to progress the Core Strategy in Line with the Replacement London Plan.</p> <p>Paragraph 6.7 to be amended to provide clarification on current position.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend paragraph 6.7 to read:</p> <p>The London Plan (2008) sets a target for Hillingdon to provide 365 new dwellings per annum. In accordance with Government guidance, this target has been rolled forward to cover the Core Strategy period up to 2026. At the time of its publication in October 2009 the Replacement London Plan (2009) contained a revised target for Hillingdon to provide 6,200 dwellings up to 2021, based on the GLA's Strategic Housing Land Availability Assessment (SHLAA). It should be noted that the proposed target has not been agreed with GLA and is expected to change as a result of the EIP process.</p> <p>In August 2010, the Mayor published a Housing Technical Note to assist participants at the Replacement London Plan EIP sessions. The paper noted that since the publication of the proposed housing targets a small number of errors and inaccuracies had been identified through the consultation process. This resulted in a proposed reduction in the pan-London target and a proposed reduction in Hillingdon's annual monitoring target from 620 to 470 dwellings per annum. Following representations prepared by the</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
						<p>Council as part of the EiP process, a further amendment has been made to Hillingdon's annual monitoring target and the figure now stands at 425 units.</p> <p>Notwithstanding recent changes to PPS 3 the Mayor proposes to retain borough wide housing targets in the London Plan. The Technical Paper states that the current methodology is not considered to be the most effective way forward and a review of housing targets will be brought forward as an early alteration to the London Plan.</p>
69	2	Planning Perspectives LLP	2 A Summary of The Vision	Support	The acknowledgement of the need to improve access to open spaces, key employment areas and community facilities for residents of Hayes End and Yeading is welcomed.	<p>Support welcomed.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
69	3	Planning Perspectives LLP	6 Core Policies - New Homes Policy H1: Housing Growth	Object	The Spatial Strategy fails to demonstrate how the Borough's housing requirement will be delivered over the entire plan period.	<p>The evidence base for housing targets is contained in the Annual Monitoring Report and GLA' s SHLAA. Specific sites identified in this document will form the basis of the Site Allocations DPD. In accordance with PPS 3 the Site Allocations DPD will identify specific sites to cover the period up to 2021. General areas of growth will be identified thereafter.</p> <p>In accordance with advice from the Government, targets have been rolled forward to cover the period of the Core Strategy. Previous trend data shows that Hillingdon has not had significant issues in meeting the current London Plan target.</p> <p>Housing policies will need to take account of revised housing supply figures in the Replacement London Plan, the latest housing trajectory and emerging evidence base documents: Housing Viability and Housing Market Assessment.</p> <p>Hillingdon's proposed annual monitoring target in the Replacement London Plan has been reduced to 425 units per annum.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Update policy H1 to reflect amended Replacement London Plan annual monitoring target.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
69	4	Planning Perspectives LLP	6 Core Policies - New Homes Para 6.18	Object	The Core Strategy indicates that housing completions will reduce significantly beyond the first five year period of the Core Strategy which will make meeting the existing housing target extremely challenging over the plan period. Consideration will need to be given to the release of green field land in order to meet the Borough's housing requirement beyond 2014.	<p>The existing London Plan target can be met over the plan period. The proposed target is considered challenging and will be discussed and agreed through the Replacement London Plan EIP.</p> <p>Current London Plan figures will remain in policy H1 until revised targets have been tested through the EIP process.</p> <p>Housing policies will need to take account of revised housing supply figures in the Replacement London Plan and emerging evidence base documents, including the Housing Viability and Housing Market Assessment.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Update policy H1 to reflect proposed Replacement London Plan Housing Monitoring targets of 425 units per annum.</p>
69	5	Planning Perspectives LLP	8 Core Policies - Environmental Management Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Object	<p>It is premature to state that the current extent of Green Belt, Metropolitan Open Land and Green Chains will be maintained in circumstances where the Core Strategy fails to demonstrate how the housing requirement for the 15 year period will be met on previously developed land over the entire plan period. If the housing requirement cannot be met over the plan period then consideration needs to be given to strategic releases of green field sites in order to meet the housing target. Also, the Green Belt Study has not been updated which means that the Strategy does not have a "sound" evidence base.</p> <p>It is considered that the extent of Green Belt, Metropolitan Open Land and Green Chains need to be reviewed to ensure that they meet the priorities for which they were first designated. The Core Strategy does not demonstrate that this work has been adequately undertaken.</p> <p>Policy EM2 seeks to encourage public access and recreational facilities within the Green Chain. However, it fails to demonstrate how this will be delivered when large swathes of the Borough's Green Chains are in private ownership and either have limited or no public access . This Policy need to be reconsidered in order to demonstrate how the objective may be delivered.</p>	<p>The Core Strategy demonstrates that current housing monitoring targets can be met.</p> <p>Emerging housing targets are based on evidence contained in the GLA's SHLAA. Evidence of the potential to meet emerging targets is contained in the Council's housing trajectory.</p> <p>In accordance with PPS 3 it is anticipated that the Site Allocations Development Plan Document will allocate specific sites for growth for the first 10 years of the LDF and general locations for growth for the final five year period.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
69	6	Planning Perspectives LLP	8 Core Policies - Environmental Management Para 8.18	Object	<p>Paragraph 8.18 fails to acknowledge that a number of the Borough's existing communities are isolated from services, jobs and publicly accessible open space due to existing Green Belt designations.</p> <p>The implication of the Green Belt on existing communities needs to be considered as part of the Core Strategy to address existing problems with isolated or unsustainable residential communities.</p>	<p>The Core Strategy seeks to address the isolation of communities in a number of ways, including the implementation of improved north/south public transport links and the development of community infrastructure. The Council maintains the policy that green belt sites will only be released in very special circumstances.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
69	7	Planning Perspectives LLP	8 Core Policies - Environmental Management Para 8.20	Object	<p>The Green Chain is identified on Map 8.1 of the Core Strategy. It is unclear whether the extent of the Green Chain is based on a "sound" evidence base. It is considered that the Green Chain needs to be carefully reviewed to ensure that it fulfils its objectives within Hillingdon.</p>	<p>Green chain designations are carried forward from the current Unitary Development Plan which has been subject to a previous examination in public.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
69	8	Planning Perspectives LLP	8 Core Policies - Environmental Management Policy EM4: Open Space and Informal Recreation	Object	<p>There are significant areas of private open space within the Borough which perform no public function, as they are not publicly accessible. This means that there are communities which are close to areas of open space but are actually within areas of open space deficiency. The Core Strategy needs to provide a coherent and deliverable strategy for increasing access to open space within the Borough.</p> <p>The Green Arc Study identifies significant areas of the Borough which do not have easy access to strategic public open spaces in excess of 20 hectares and 60 hectares. The Core Strategy needs to set out a flexible and deliverable strategy for meeting this deficiency through the provision of new strategic areas of open space. Policy EM4 fails to demonstrate how this existing deficiency will be addressed.</p> <p>Given the constraints on Public Sector finances the Core Strategy needs to look at alternative models to create new strategic open spaces without imposing a greater burden on public finances. In this regard, deliverable strategic open spaces need to be identified with consideration given to the public/private partnerships that are needed to bring them forward during the plan period.</p>	<p>The Council is currently preparing an Open Space Study to identify access to Green Space in the borough. This study will inform the Core Strategy and the allocation of sites in the Site Allocations Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
69	9	Planning Perspectives LLP	8 Core Policies - Environmental Management Policy EM5: Sport and Leisure	Object	The Core Strategy fails to demonstrate how the existing network of sports and leisure spaces will be enhanced and extended. The Core Strategy needs to consider alternative methods of providing and improving sport and leisure spaces within the Borough.	<p>The Core Strategy provides a broad framework and includes policies for sport provision and leisure enhancement. The Open Space Study will identify areas deficient in a broad range of sport and recreation provision as well as access to general open space. This will then allow sites to be allocated in the forthcoming Site Allocations DPD.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Paragraph 8.69 to be amended to read:</p> <p>"The Council is committed to providing excellent opportunities for sport and leisure through its "Active Hillingdon - A sport and Physical Activity Strategy 2007-12 (revised July 2009). This includes enhancing the borough's cultural offer (including sport and leisure) as well as making further improvements to sports provision, increasing the participation of residents in active recreation and using the 2012 Olympics as a springboard to encourage the uptake of healthy lifestyles."</p>
70	1	Transport for London (TfL) Corporate Finance – Property Development	Core Strategy Consultation Draft General	Observation	This response is submitted on behalf of Transport for London (TfL) Corporate Finance Property Development (CFPD) in its capacity as landowner of properties affected by the Core Strategy.	<p>Noted.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
70	2	Transport for London (TfL) Corporate Finance – Property Development	8 Core Policies - Environmental Management Policy EM1: Climate Change Adaptation and Mitigation	Support	<p>CFPD welcomes the production of the Core Strategy and overall, supports the aims and objectives of the Strategy. More specifically, CFPD supports Policy EM1 (Climate Change Adaptation and Mitigation).</p> <p>The Policy makes reference to promoting a modal shift from private car use to more sustainable forms of transport, in addition to requiring new development to reduce car dependency, which CFPD supports.</p>	<p>Support welcomed.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
70	3	Transport for London (TfL) Corporate Finance – Property Development	5 Core Policies - The Economy Map 4.1 Key diagram Policy E5: Town and Local Centres	Support	CFPD agrees with the Council's approach regarding the enhancement of Northwood as a district centre (Map 4.1 of the Strategy). Policy E5: Town and Local Centres recognises the need for additional retail growth of district centres including Northwood, which CFPD supports. Furthermore, CFPD supports residential growth within the Borough.	Support welcomed. <u>Council's Proposed Action</u> No proposed change.
70	4	Transport for London (TfL) Corporate Finance – Property Development	9 Core Policies - Transport and Infrastructure Car parks sites	Object	CFPD understands that the Core Strategy deals specifically with strategic issues, however, we would welcome the opportunity to promote a number of car park sites for mixed use development.	Noted. <u>Council's Proposed Action</u> No proposed change.
70	5	Transport for London (TfL) Corporate Finance – Property Development	8 Core Policies - Environmental Management Policy EM7: Biodiversity and Geological Conservation	Object	CFPD appreciates the current designation of TfL owned land at Ruislip Depot (see enclosed plan) as a 'Nature Conservation Sites of Metropolitan or Borough Grade 1 Importance'.	Noted. The site designation will be a matter for the Site Allocations Development Plan Document. <u>Council's Proposed Action</u> No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
71	1	Highways Agency	9 Core Policies - Transport and Infrastructure	Object	<p>M25 Junctions 14 to 17, the M4 Junctions 3 to 4b, the M40 Junctions 1 to 1a and the A3113. Sections of the M4 and M25 are currently congested during peak periods. Consequently, we would be concerned if any material increase in traffic were to occur on these sections of the SRN as a result of new development in Hillingdon, without careful consideration of appropriate mitigation measures.</p> <p>In meetings with Hillingdon we emphasised the need to demonstrate that existing and planned infrastructure is sufficient to deliver growth and is identified to support the Core Strategy. There was discussion on the appropriate methodology for the Borough's evidence to demonstrate the impact and mitigation of new development proposals. During the October 2009 meeting the borough indicated it was broadly content with the methodology discussed and would be meeting with TfL to discuss similar traffic implications.</p>	<p>Comments noted. Infrastructure providers were consulted on the Council's growth plans in 2009. No significant further infrastructure requirements were raised in the course of this consultation process.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
71	2	Highways Agency	5 Core Policies - The Economy The Vision for Hillingdon 2026 SO15	Object	<p>It should be noted that intensification of employment and mixed use should be directed towards areas with good access to public transport, particularly in instances where development is likely to be travel intensive. This approach would help to reduce dependence on the private car, and would be in line with the recommendations of PPG13.</p>	<p>Noted. Policy E2 directs development in highly accessible locations that supports sustainable travel behaviour and reduces impacts on climate change. It is also proposed to add an overarching sentence to the beginning of Table 5.3 which makes clear that growth in the Heathrow OA will be focused on sustainable locations such as town centres and areas with good access to public transport.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
71	3	Highways Agency	5 Core Policies - The Economy Strategy for the Heathrow Opportunity Area Strategic Objectives to deliver The Vision Policy E3: Strategy for Heathrow Opportunity Area SO23, SO24	Object	<p>The HA is particularly concerned that any growth within the Heathrow OA boundary shown on Map 5..1 could lead to an adverse impact on the operation of the SRN, without consideration of appropriate mitigation measures.</p> <p>The borough has previously indicated that a Transport Strategy will be produced to provide the transport evidence base for the LDF. This is referenced in paragraph 9.32 as the Strategic Infrastructure Plan (SIP). The HA expect that the SIP will be made available alongside the Core Strategy Submission as part of the evidence base.</p> <p>The HA welcome engagement on the forthcoming Local Implementation Plan (LIP), and would be interested how the LIP might inform the Core Strategy and subsequent Local Development Documents produced by Hillingdon.</p>	<p>The Strategic Infrastructure Plan will be made available alongside the Core Strategy Submission as part of the evidence base; the next LIP will be available for consultation in early 2011.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
71	4	Highways Agency	5 Core Policies - The Economy Policy E5: Town and Local Centres	Object	<p>We are concerned with the current policy wording which states "...while recognising the importance of parking provision for accessibility to local services and amenities".</p> <p>We suggest Policy E5 is reworded to read: "...while ensuring an appropriate level of parking provision is provided for accessibility to local services and amenities".</p>	<p>Agreed.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Reword Policy E5 to read: "...while ensuring an appropriate level of parking provision is provided for accessibility to local services and amenities".</p>
71	5	Highways Agency	8 Core Policies - Environmental Management Minerals and Waste	Object	<p>16.As previously noted in our response to the Core Strategy Preferred Options consultation there are 3 sites identified in the borough for providing defined aggregates, all of which are located close to the M4. Such sites have the potential to generate a high number of HGV trips transporting extracted minerals. Consequently, it will be vital that sustainable road haulage strategies are developed for the sites to mitigate the traffic impacts to the SRN. Strategies should include measures to both minimise the number of lorry movements generated at sites and limit the number of lorry movements occurring during peak hour periods. Travel Plans and Transport Impact Assessments should be required to accompany road haulage strategies and to illustrate how operators propose to deal with the travel pattern of staff and HGV trips to and from the sites.</p>	<p>The Development Management Development Plan Document will set priorities that ensure traffic mitigation is included within planning applications.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
71	6	Highways Agency	9 Core Policies - Transport and Infrastructure Policy T1: Accessible Local Destinations	Support/ Object	<p>The Highways Agency welcomes Policy T1.</p> <p>However, to further ensure development is directed to the most suitable locations emerging policy should specify that a full Transport Assessment should be produced to support any development likely to have significant transport implications. In addition, the Agency expects that any development producing a full Transport Assessment should also produce a Travel Plan.</p>	<p>Support welcomed. The suggested detailed policy for Transport Assessments will be considered as part of work for the Council's Development Management Development Plan Document.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
72	1	Drivers Jonas Deloitte on behalf of Universities Superannuation Scheme (USS)	Core Strategy Consultation Draft	Object	USS has a commercial assets in Hillingdon and therefore has an active interest in the formulation of planning policy in the borough.	<p>Noted.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
72	2	Drivers Jonas Deloitte on behalf of Universities Superannuation Scheme (USS)	5 Core Policies - The Economy Strategy for the Heathrow Opportunity Area Policy E1: Managing the Supply of Employment Land	Support	The Hillingdon Core Strategy aims to protect allocations as identified in the London Plan and also supports their growth. USS supports the recognition of the allocations.	<p>Support welcomed</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
72	3	Drivers Jonas Deloitte on behalf of Universities Superannuation Scheme (USS)	4 The Vision - where we want to be The Vision for Hillingdon 2026 Strategic Objectives to deliver The Vision SO14, SO15	Support	USS continues to support the Councils vision to concentrate economic growth in Uxbridge, Heathrow and the Hayes/West Drayton Corridor, without ignoring local centres. In particular, USS support strategic objectives 14 and 15 which seek to provide 9,000 new jobs and accommodate most economic growth in Uxbridge and the Heathrow Opportunity Area and protect land for employment uses to meet the needs of different sectors of the economy.	<p>Support welcomed.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
72	4	Drivers Jonas Deloitte on behalf of Universities Superannuation Scheme (USS)	5 Core Policies - The Economy Policy E1: Managing the Supply of Employment Land	Support / object	USS supports Policy E1: Managing the Supply of Employment Land through the designation of Locally Significant Industrial Sites (LSIS) and Locally Significant Employment Locations (LSEL). However, a greater emphasis should be placed on sites which are no longer suitable or needed for industrial or commercial uses and are shown to be unviable. In such situations, consideration should be given to other uses such as housing or alternative uses outside of the B classes that have job generation potential. This approach is supported by PPS3 (June 2010) which encourages local authorities to consider whether employment sites would be more efficiently used for other uses, including housing.	<p>The London Plan requires Hillingdon to adopt a 'Limited Approach' to the transfer of industrial sites to other uses. The borough's portfolio of employment land has been assessed through the Employment Land Study and potential land for release has been identified. The Core Strategy is a plan for the next 15 years and looks beyond the current economic cycle to ensure a range of employment land is available in the future. Any application for non-employment uses on employment land will be assessed through the planning application process.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
72	5	Drivers Jonas Deloitte on behalf of Universities Superannuation Scheme (USS)	5 Core Policies - The Economy Policy E2: Location of Employment Growth	Support	USS supports Policy E2: Location of Employment Growth which seeks to accommodate 9,000 new jobs during the plan period directed towards suitable sites in the Heathrow Opportunity Area, Locally Significant Employment Locations (LSEL), Locally Significant Industrial Sites (LSIS) and Uxbridge town centre.	<p>Support welcomed.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
72	6	Drivers Jonas Deloitte on behalf of Universities Superannuation Scheme (USS)	5 Core Policies - The Economy Policy E3: Strategy for Heathrow Opportunity Area	Support	USS remains in support of the strategy for Heathrow Opportunity Area (Policy E3) which seeks to help manage development and protect land within Heathrow and balance demand for hotel and employment uses, and ensure that local people benefit from sustainable economic growth.	<p>Support welcomed.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
72	7	Drivers Jonas Deloitte on behalf of Universities Superannuation Scheme (USS)	5 Core Policies - The Economy 5 Core Policies - The Economy	Support / Object	USS welcomes the location of a range of B class uses in the Strategic Employment Locations, Locally Significant Industrial Sites and Locally Significant Employment Locations and designated allocated sites. However, in order to capitalise on job creation, the emerging policy should acknowledge the contribution that other forms of employment other than those within the B classes, can have on the economic prosperity and wider regenerative effect of Hillingdon.	<p>Agreed. It is proposed to add sentences at end of paragraph 5.14 on the contribution that sectors such as retail, tourism, education and other institutions make to the economic prosperity of the borough.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Paragraph 5.14 - add sentences at end to read:</p> <p>This Core Strategy notes that the majority of new jobs are expected to be delivered through office based employment growth. However, the contribution of other sectors to economic prosperity, such as retail, tourism and education, should not be underestimated.</p>
72	8	Drivers Jonas Deloitte on behalf of Universities Superannuation Scheme (USS)	5 Core Policies - The Economy	Support / Object	USS welcomes the discussion of trade centres and uses such as car dealerships in the paper and understands the effect that such uses can have upon industrial uses and employment. However, USS considers that applications for alternative uses outside the B-classes can in some cases provide a greater number of jobs benefiting the economy especially when existing B class uses are economically successful. Therefore USS considers that applications for other employment uses should be judged on a case by case basis allowing economic, environmental, transport impacts to be assessed in relation to specific sites.	<p>Glossary entry for employment land/site will be amended to include appropriate sui generis uses.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Glossary entry for employment land/site will be amended to read:</p> <p>"Land / sites defined by the Council for employment uses (usually B class uses) and appropriate sui generis uses."</p>
72	9	Drivers Jonas Deloitte on behalf of Universities Superannuation Scheme (USS)	Core Strategy Consultation Draft General	Observation	USS is pleased to have the opportunity to comment on the emerging Local Development Framework at this stage, and would request that USS continues to be updated on the programme for the various Local Development Documents.	<p>Agreed, representor is already on the LDF Consultation Database and will be notified of future consultations.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
73	1	Gregory Gray Associates on behalf of Hillingdon Garden Centre	4 The Vision - where we want to be The Vision for Hillingdon 2026	Object	The Vision could be strengthened however by providing further details of the vision for those areas outside of the 'Growth Areas' Metropolitan and District Centres.	Detailed site / area proposals will be brought forward in the Proposals Map and Site Allocations Development Plan Documents..
<u>Council's Proposed Action</u>						
No proposed change.						
73	2	Gregory Gray Associates on behalf of Hillingdon Garden Centre	4 The Vision - where we want to be Strategic Objectives to deliver The Vision Para 4.3, SO16	Support	We consider it is imperative that the deliverability of housing, hotel accommodation and employment is a key objective for the Core Strategy to achieve. Objective SO16 however should refer to those brownfield sites outside of the main centres as having potential to meet the proposed growth figures.	Housing and hotel accommodation will be delivered from sites in sustainable locations, identified through the Site Allocations process. This presumption in favour of developing brownfield sites is established in national policy and does not need to be reinforced through an amendment to SO16.
<u>Council's Proposed Action</u>						
No proposed change.						
73	3	Gregory Gray Associates on behalf of Hillingdon Garden Centre	5 Core Policies - The Economy Policy E1: Managing the Supply of Employment Land	Support / Observation	The suggested framework for the retention of existing employment sites is supported. This policy should be reviewed on a regular basis to ensure that sites are not retained for potential employment use where there is no market demand. If provision needs decreasing to reflect changes in the market there should be a mechanism in place to secure this.	Support welcomed. The Strategy looks beyond the current economic cycle to the long-term rather than immediate market demand. Regular monitoring via the Annual Monitoring Report will enable the Council to bring forward possible policy alterations as necessary.
<u>Council's Proposed Action</u>						
No proposed change.						
74	1	Nathaniel Lichfield and Partners on behalf of GlaxoSmithKline (GSK)	3 A Portrait of Hillingdon - where we are now Major Infrastructure Projects Paras 3.8, 3.10	Support	From a West London business perspective GSK welcomes Council's "in principle" support for HS2.	Support welcomed.
<u>Council's Proposed Action</u>						
No proposed change.						

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
75	1	BAA Heathrow on behalf of Heathrow Airport Ltd	Core Strategy Consultation Draft General	Object	Once the Council has had the opportunity to consider our representations, we would welcome the opportunity to meet with policy officers to discuss some of the key challenges associated with Heathrow.	Noted. <u>Council's Proposed Action</u> No proposed change.
75	2	BAA Heathrow on behalf of Heathrow Airport Ltd	4 The Vision - where we want to be Strategic Objectives to deliver The Vision Para 4.3, SO25, SO26	Support	Heathrow Airport Limited (HAL) supports the inclusion of the objective that "Hillingdon has continued to prosper from the presence of Heathrow".	Support welcome.. <u>Council's Proposed Action</u> No proposed change.
75	3	BAA Heathrow on behalf of Heathrow Airport Ltd	3 A Portrait of Hillingdon - where we are now Hillingdon's Key Facts Para 3.3	Object	HAL would suggest some minor amendments to the Key Facts in respect of the Economy. In particular, at bullet 9 – it should be clarified that only 61% of the workforce travelling to Heathrow travel as single car occupants (not the 68% as identified which includes car sharers source: Heathrow Employment Survey 2008/09: summary report).	The bullet point does not specify single or multiple car occupants, but states that around 68% of the workforce travel to work by car, ie 61% single occupants and 7% car share (from data in Heathrow Employment Survey 2008/09: summary report p11). <u>Council's Proposed Action</u> No proposed change.
75	4	BAA Heathrow on behalf of Heathrow Airport Ltd	3 A Portrait of Hillingdon - where we are now Hillingdon's Key Facts Para 3.3	Object	HAL would suggest a factual correction to the Key Facts in respect of the Built Environment and Heritage. In particular, the number of locally listed buildings is referred to as 107. It is our understanding that following adoption of the new local list, there are a total of 292 locally listed buildings.	Agree. The Local List was adopted 27th May 2010 and there are now 292 Locally listed buildings in the borough. The Core Strategy will be updated accordingly. <u>Council's Proposed Action</u> Update Key Facts box on 'Built Environment and Heritage' to read '409 statutory listed buildings and 292 locally listed buildings'.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
75	5	BAA Heathrow on behalf of Heathrow Airport Ltd	3 A Portrait of Hillingdon - where we are now Hillingdon's Key Facts Para 3.3	Object	HAL propose an additional box in the Key Facts section to set out the contribution of Heathrow to the Borough and to the wider London and national economy.	<p>The Core Strategy already contains a significant amount of information on the Heathrow Airport. It is not considered that additional facts would contribute to the document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
75	6	BAA Heathrow on behalf of Heathrow Airport Ltd	Appendix 2 Infrastructure Schedule	Object	Updates required to SIP schedule.	<p>Updates will be incorporated</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>The infrastructure schedule at Appendix 2 will be amended to reflect BAAs latest capital programme.</p>
75	7	BAA Heathrow on behalf of Heathrow Airport Ltd	3 A Portrait of Hillingdon - where we are now Table 3.1 Main Planning Challenges for Hillingdon Paras 3.50- 3.8	Object	<p>HAL object to the proposed inclusion in Table 3.1 Main Planning Challenges for Hillingdon of the issue "continued pressure for expansion at Heathrow Airport with economic benefits at a national level but significant adverse local impacts." It is suggested these paragraphs are amended to represent the latest policy position in respect of Heathrow.</p> <p>HAL also object to the proposed inclusion in Table 3.1 Main Planning Challenges for Hillingdon of the issue "Pressures on the road and public transport network from the high volume of vehicles associated with Heathrow Airport." Heathrow Airport has been very successful in encouraging modal shift.</p> <p>Table 3.1 needs to recognise the important contribution that Hillingdon can make to maintaining and enhancing London's global competitiveness and connectivity through the adoption of policies supporting the programme of renewal at Heathrow Airport.</p>	<p>While the current government have rejected proposals for a third runway at Heathrow Airport, there continues to be pressure for expansion which is acknowledged in this section.</p> <p>While Heathrow Airport has had success in encouraging modal shift, there continues to be pressure on the road network from the high volume of associated vehicles which is acknowledged in this section.</p> <p>Table 3.1 sets out the main high-level planning challenges for the borough. Policies related to renewal at Heathrow Airport are more appropriately dealt with in the Development Management and Heathrow Area Development Plan Documents.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
----	---------	---------------------------	-------------------------------	------------------------------	---------------------------	--------------------

75	8	BAA Heathrow on behalf of Heathrow Airport Ltd	3 A Portrait of Hillingdon - where we are now Major Infrastructure Projects Paras 3.5 to 3.8	Object	The Government's policy position has changed since publication of this document for consultation and section on Heathrow Expansion should be updated. Suggested wording.	Paragraphs 3.5 - 3.7 to be updated to reflect current position on the Third Runway.
----	---	--	--	--------	--	---

Council's Proposed Action

Delete paragraphs 3.5 - 3.7 and replace with:

In March 2010 the High Court ruled that the previous Government's decision on the proposed third runway at Heathrow does not hold any weight. As such, this proposal is not considered further in this Core Strategy.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
75	9	BAA Heathrow on behalf of Heathrow Airport Ltd	3 A Portrait of Hillingdon - where we are now Major Infrastructure Projects Para 3.11 High Speed 2	Object	<p>It is suggested that the Draft Core Strategy document is amended to acknowledge the study into a High Speed Rail connection to Heathrow has been undertaken by Lord Mawhinney. Therefore, it is suggested that an additional paragraph is added as follows:</p> <p>“Former Transport Secretary Lord Mawhinney was appointed to undertake the Heathrow Airport High Speed Rail Access Review, investigating potential options for High Speed Rail connections to Heathrow Airport. HAL have provided technical input into this process and are supportive of a direct HSR connection to Heathrow.</p> <p>The Mawhinney Review was published on 21st July 2010, and was in favour of a High Speed link to Heathrow via a connection at Old Oak Common in West London, once the line is extended to the north of England. HAL remains fully supportive of the HSR concept and will work closely with all stakeholders in the coming years to help secure its development.”</p>	<p>It is proposed to update the HS2 section in the Core Strategy to reflect the direction taken by the coalition government, and to strengthen the wording to reflect the Council's intention to mitigate local impacts and expectation of an integrated approach to public transport. It is also proposed to similarly update paragraph 9.27 in the Transport chapter. However, it would be pre-emptive to include any details of the route or phasing at this stage.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend paragraphs 3.9 - 3.11 to read:</p> <p>The High Speed 2 (HS2) Company was set up in January 2009 to work on the feasibility of a new rail route between London and the West Midlands. The Department of Transport issued a paper on 11th March 2010 which sets out the then Government's proposed strategy for High Speed Rail 2. The proposed preferred London-Birmingham route would run from London Euston via Old Oak Common (near Wormwood Scrubs prison) then via Ruislip, through the Chilterns to Birmingham. A connection to Heathrow is proposed to be provided by an interchange with Crossrail at a new Old Oak Common station. In principle, the Council is supportive of a high speed rail network, although it does not support the preferred route (Chiltern line option). It considers that there is still a considerable amount of work to be undertaken on reviewing possible route options and that the review be dealt with in a way that fully takes into account more strategic and environmental issues, such as climate change objectives, as well as the impacts on residents and local community aspirations. The Council will not support any proposals that could lead to an increase in demand for flights from Heathrow, an increase in road congestion or significant adverse local environmental impacts. The Coalition Government intends to begin an extensive consultation public consultation on HS2 early in 2011. The proposal is to start pre-construction works in 2015 and</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
						<p>begin construction in 2017. Given the uncertainty about HS2, particularly in terms of the preferred route and timescales for implementation, the implications of the proposal have not been fully considered in the Core Strategy at this stage.</p> <p>Amend paragraph 9.27 to read:</p> <p>The proposed preferred London-Birmingham route for HS2 would run from London Euston via Old Oak Common (near Wormwood Scrubs prison) then via Ruislip, through the Chilterns to Birmingham. A connection to Heathrow is proposed to be provided by an interchange with Crossrail at a new Old Oak Common station. The proposal is to start pre-construction works in 2015 and begin construction in 2017. Given the uncertainty about HS2, particularly in terms of the preferred route and timescales for implementation, the implications of the proposal have not been fully considered in the Core Strategy at this stage.</p>
75	10	BAA Heathrow on behalf of Heathrow Airport Ltd	4 The Vision - where we want to be The Vision for Hillingdon 2026 Para 4.2	Object	<p>In order to underpin the 7th point of the vision more clearly, HAL propose the inclusion of an additional Strategic Objective 25 (SO25) as follows:</p> <ul style="list-style-type: none"> • "Support a programme of renewal at Heathrow Airport to secure improvements in passenger experience and operational reliability and ensure Heathrow's status as a global hub is maintained. Environmental impacts from Heathrow are to be minimised and where possible reduced." 	<p>Agree to the inclusion of proposed Strategic Objective 25 to recognise that the Council supports operational development within the existing airport boundary and seeks to minimise the environmental impacts from the airport wherever possible.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Proposed inclusion of the following strategic objective as SO25:</p> <p>SO25: Maintain support for operational uses within the existing airport boundary and seek to minimise the environmental impacts from the airport wherever possible.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
75	11	BAA Heathrow on behalf of Heathrow Airport Ltd	4 The Vision - where we want to be Strategic Objectives to deliver The Vision Para 4.3	Object	<p>HAL propose the inclusion of an additional Strategic Objective 25 (SO25) as follows:</p> <ul style="list-style-type: none"> • "Support a programme of renewal at Heathrow Airport to secure improvements in passenger experience and operational reliability and ensure Heathrow's status as a global hub is maintained. Environmental impacts from Heathrow are to be minimised and where possible reduced." <p>This objective would provide policy support for the established capital investment programme at Heathrow to improve the airport in line with the Government's objectives and thus helping to underpin the vision that "Hillingdon has continued to prosper from the presence of Heathrow".</p> <p>HAL also propose the inclusion of an additional Strategic Objective 26 (SO26) with regards to point 6 of the vision (public transport):</p> <ul style="list-style-type: none"> • SO26 – Improved public transport connections to Heathrow to encourage sustainable travel for staff and passengers, as well as providing an additional multi-modal interchange for west London. This includes support for Airtrack and Crossrail and enhanced bus and coach links in the medium term and High Speed Rail services over the long term. <p>It is suggested that this objective could then delivered through amendments to Policy T4.</p>	<p>Agree to the inclusion of proposed Strategic Objective 25 to recognise that the Council supports operational development within the existing airport boundary and seeks to minimise the environmental impacts from the airport wherever possible.</p> <p>Do not agree to the proposed Strategic Objective 26. The proposed amendments to policy T 4 are considered sufficient by the Council if the policy now reads:</p> <p>"This Core Strategy will support the function sustainable operation of Heathrow and growth in the Heathrow Opportunity Area by facilitating improvements to public transport and cycle links, enhancing the public transport interchange to provide the opportunity for a modal shift from the use of private cars and from short haul air to sustainable transport modes and providing transport infrastructure to accommodate economic and housing growth whilst improving environmental conditions, for example noise and local air quality for local communities."</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Proposed inclusion of the following strategic objective as SO25:</p> <p>SO25: Maintain support for operational uses within the existing airport boundary and seek to minimise the environmental impacts from the airport wherever possible.</p>
75	12	BAA Heathrow on behalf of Heathrow Airport Ltd	4 The Vision - where we want to be Table 4.1 Summary of Growth in Hillingdon 2011-2026	Object	<p>HAL seek additional clarification on what proportion of the adopted London Plan figure of 9-11,000 jobs are to be provided in the Heathrow Opportunity Area (HOA).</p> <p>HAL also seek clarification on the location and strategy for providing additional hotel rooms.</p>	<p>The employment figures are considered by the GLA to be the likely scale and scope of growth and will be tested through the Heathrow Area DPD.</p> <p>Additional hotel growth will be accommodated in Uxbridge, Hayes and sites outside designated employment land on the Heathrow perimeter. Site-specific and boundary details will be provided through the Proposals Map and Development Management Development Plan Documents.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
75	13	BAA Heathrow on behalf of Heathrow Airport Ltd	4 The Vision - where we want to be The Spatial Strategy Para 4.11	Object	<p>It has previously been suggested that a text box relating to Heathrow be included setting out the key facts in relation to Hillingdon in the section "Portrait of Hillingdon" (chapter 3). It is suggested that a cross reference to this in para 4.11 to articulate Heathrow's important contribution.</p> <p>The paragraph should then set out how policies supporting the renewal of Heathrow in line with our proposed Strategic Objective will help maintain Heathrow's global hub status and secure the benefits of Heathrow's presence in the longer term.</p>	<p>Several references are already made to Heathrow in the Economy, Environmental Status and Transport text boxes in the Hillingdon's Key Facts Section of Chapter 3. A specific text box on Heathrow as suggested is considered unnecessary by the Council.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p style="text-align: right;">No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
75	14	BAA Heathrow on behalf of Heathrow Airport Ltd	4 The Vision - where we want to be The Spatial Strategy Paras 4.11 - 4.14	Object	<p>Paragraph 4.11 should be reworded as Heathrow Airport is not the only factor contributing to poor local air quality in the Heathrow area, with the M4, A4 and M25 also making significant contributions.</p> <p>It is suggested that the first two paragraphs are rewritten to state, "This Core Strategy sets out specific aims to tackle the air pollutant emissions associated with the airport. Heathrow's contribution at sites close to the airport adds to the concentrations present in the local area due to Hillingdon's proximity to the rest of London and the presence of major transport routes, such as the M4, M25 and west coast mainline rail."</p> <p>To identify that local air quality issues are distinct and should be considered separately from carbon emissions which contribute to climate change. In this paragraph the two terms appear to be used interchangeably which is misleading. Air quality (usually meaning NOX or NO2 and sometimes PM10) is a local issue whereas climate change (mainly considering emissions of carbon dioxide) is a global issue.</p>	<p>Agreed - the addition of the word Airport in the title prior to paragraph 4.11 would give better clarification.</p> <p>Climate change emissions are distinct from considerations purely regarding local air quality and for clarification paragraph 4.14 should be amended.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>The sub heading above Paragraph 4.11 to read:</p> <p>Heathrow Airport.</p> <p>Paragraph 4.14 to be changed to read:</p> <p>"Heathrow Airport is a major source of adverse air quality emissions in the borough through aviation activities and associated infrastructure and transport. These emissions include nitrogen dioxide which can be harmful to human health, as well as greenhouse gasses that are now accepted as contributing to climate change. The growth of employment and housing in this area will be carefully managed so it does not have a detrimental impact on climate change initiatives.</p> <p>Heathrow Airport is not yet at its recognised capacity for a five Terminal airport. The 'Adding Capacity at Heathrow Airport' states that the airport receives 63million passengers per annum (mppa). This is predicted to rise to 80mppa by 2015 with the inclusion of a fully operational Terminal 5. The Government has ruled out the development of a third runway, but has committed to looking at a 'better not bigger' approach to the Airport. In 2012, the Airport is likely to see a rise in the number of larger aircraft helping to increase the passenger numbers per year. The continued growth of the airport will be within the existing</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
						<p>permissions but it will have an impact on the amount of vehicles on the road, and the supporting infrastructure. More hotels, office space, industrial and commercial uses will all be attracted to the Heathrow Opportunity area. This growth needs to be managed carefully to ensure there are no further adverse impacts on local air quality, and that greenhouse gasses can be minimised to reduce impacts on climate change."</p>
75	15	BAA Heathrow on behalf of Heathrow Airport Ltd	4 The Vision - where we want to be The Spatial Strategy Para 4.15	Object	HAL request that the Submission Core Strategy includes additional detail about the HOA DPD to provide the framework for the document.	<p>Hillingdon will be liaising with the GLA and London Borough of Hounslow on the planning framework for the Heathrow Opportunity Area and further details will be available after this stage. This work will inform preparation of the Heathrow Area Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
75	16	BAA Heathrow on behalf of Heathrow Airport Ltd	4 The Vision - where we want to be Map 4.1 Key diagram	Object	<p>HAL object to the Core Strategy key diagram. The purpose of the key diagram should be to establish key strategic objectives/issues affecting the Borough. However, it appears that the plan is seeking to apply specific designations across the Borough, which would be done more appropriately by the Proposals Maps. The scale does not allow for easy identification of where the boundaries to such designations might fall and could cause confusion.</p> <p>It is noted that in the 2005 consultation draft Preferred Options, detailed Proposals Maps were included to show specific designations applicable in the northern, central and southern parts of the Borough. It is understood that this is now to be provided in conjunction with the Site Allocations DPD. Our particular concern relates to the proposed inclusion of land at the former Perry Oaks Sludge Treatment Works (now Terminal 5) and Longford Meadows in the Green Belt. It is noted that in the 2005 draft Core Strategy (Preferred Options) these areas were to be excluded from the Green Belt on the Proposals Maps at that time.</p> <p>It is strongly contended that it is inappropriate to designate these areas as Green Belt as they do not meet any of the objectives of Green Belt designations as set out in PPG2 and referred to in paragraph 8.18 of the Draft Core Strategy. Both of these areas in fact now form part of the Airport's operational land and therefore benefit from permitted development rights under Part 18 of the GPDO.</p> <p>For reference, our previous representations with regards to Green Belt designations (November 2005) were as follows: "We support the proposed removal of land at Perry Oaks Sludge Works and Longford Meadows from the Green Belt. However, this support is subject to an amendment of the Proposals Map to more accurately reflect the land that can effectively be removed from the Green Belt at Longford Meadows as a result of the proposed N3 Car Park extension. The attached plan LC00000002 shows the proposed layout of the site with the N3 extension and we suggest that the Green Belt boundary is amended to follow the line of the realigned Duke of Northumberland River, i.e. land to the north and west of the river is retained as Green Belt. In addition, the area of land that BAA is giving over as a public park (to the north of the river with the text 'Longford Bridge' on it as shown on the Proposals Map) could also be included within the Green Belt." It is not clear to us why the Council has changed its position on Green Belt designations from the previous consultation draft.</p>	<p>The Core Strategy does not propose changes to areas of designated Green Belt. Any amendments to Green Belt boundaries will be undertaken through the Site Allocations process.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p style="text-align: right;">No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
75	17	BAA Heathrow on behalf of Heathrow Airport Ltd	5 Core Policies - The Economy Supply of Employment Land Paras 5.1-5.4	Object	Although chapter 5 "employment" considers the spatial aspects of employment in the Borough, it does not provide much context about the type of employment and the key economic drivers in the Borough. Whilst this is covered in part in the "Portrait of Hillingdon" at chapter 3, HAL believe that additional clarity should be provided regarding the importance for Heathrow in providing employment, both directly and indirectly. The importance of the contribution of Heathrow to the local, regional and national economy should not be underplayed. It has been suggested that an additional box is included at section 3 setting out the key contribution of Heathrow.	<p>The importance of Heathrow is identified in Table 5.3.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
75	18	BAA Heathrow on behalf of Heathrow Airport Ltd	5 Core Policies - The Economy Map 5.1 Locations for Economic Growth	Object	Given the scale of Map 5.1, it is very difficult to articulate the designations applicable and to relate these to sensible application of the policies. It is considered that the plan is unhelpful in clarifying locations where different employment generating uses may be acceptable or are protected. Again, our view is that these would be better illustrated on the detailed Proposals Maps.	<p>The Core Strategy is a high-level strategic document and details of specific sites and boundaries will be considered through the Site Allocations process.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
75	19	BAA Heathrow on behalf of Heathrow Airport Ltd	5 Core Policies - The Economy Supply of Employment Land Para 5.9	Object	The second sentence of this paragraph makes reference to the HOA being within an Air Quality Management Area (AQMA) and refers to Map 8.4. The LDF also contains a number of references to the AQMA boundary as presented in Map 8.4. The map does not contain any reference to the AQMA and no graphical representation of it could be found in the document and it is considered that this should be rectified.	<p>The reference should be to Map 8.5 which shows the AQMA.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Change Map 8.4 to reference Map 8.5 in paragraph 5.9.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
75	20	BAA Heathrow on behalf of Heathrow Airport Ltd	5 Core Policies - The Economy Location of Employment Growth Paras 5.12-5.13	Object	In considering Regionally Significant Areas, the plan fails to recognise the contribution of Heathrow Airport which is the single biggest economic driver in the Borough. Suggest additional text at paragraphs 5.12 and 5.13.	<p>Additional emphasis on the regional significance of Heathrow to be added at paragraph 5.12.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Add new second sentence at paragraph 5.12 to read:</p> <p>'In particular, the presence of Heathrow is considered to be a key driver for economic growth in the sub-region and in London as a whole.'</p>
75	21	BAA Heathrow on behalf of Heathrow Airport Ltd	5 Core Policies - The Economy Location of Employment Growth Para 5.17	Support	We support the need to identify suitable locations for office growth. However, the Heathrow Perimeter is identified in this paragraph but this is not carried through to Map 5.1.	<p>The detailed Heathrow Perimeter will be defined through the Proposals Map Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
75	22	BAA Heathrow on behalf of Heathrow Airport Ltd	5 Core Policies - The Economy Location of Employment Growth Para 5.20	Object	Additional clarity is required at para 5.20 as to potentially acceptable locations for hotel development. Map 5.1 identifies (purple hatching) proposed areas of growth for hotel and office accommodation. HAL strongly contend that this hatching should include appropriate sites along the Heathrow perimeter where hotel sites may be deemed acceptable. Policy E2 should extend to support hotel accommodation within the airport boundary. The position regarding hotel development should be made clear within Table 5.3 and Policy E2.	<p>Changes to the Key Diagram and Map 5.1 will be made to clarify growth areas in the Heathrow Opportunity Area. An overarching sentence will be added to the beginning of Table 5.3 which makes clear that growth in the Heathrow OA will be focused on sustainable locations such as town centres and areas with good access to public transport.</p> <p>Detailed site-specific proposals will be considered and brought forward during preparation of the Site Allocations Development Plan Document.</p> <p>Specific development management policies related to hotels and development within the airport boundary will be brought forward through the Development Management Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Changes to the Key Diagram and Map 5.1 are proposed to clarify growth areas in the Heathrow Opportunity Area. An overarching sentence will be added to the beginning of Table 5.3 which makes clear that growth in the Heathrow OA will be focused on sustainable locations such as town centres and areas with good access to public transport.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
75	23	BAA Heathrow on behalf of Heathrow Airport Ltd	5 Core Policies - The Economy Location of Employment Growth Para 5.21	Object	The first sentence confuses emissions of CO2 and local air pollutants and therefore, needs to be rewritten to rectify this error. HAL's position it respect of air quality and Heathrow's contribution is set out in our response to paragraph 4.14.	<p>Agree.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Para 5.21 to be changed to read:</p> <p>"Emissions from transportation are much higher in Hillingdon than the London average which has led to poor air quality in certain parts of the Borough. In particular, the activities associated with Heathrow Airport and the surrounding development of hotels, offices, industrial and commercial uses have resulted in the designation of an Air Quality Management Area. Further development is required around the airport to enhance this economic and employment hub. However, this must not be at the expense of further adverse impacts on air quality. The Development Management Document will set out policies that ensure new development in areas of poorer air quality will be as close to air quality neutral as possible with an aim to provide positive impacts where appropriate."</p>
75	24	BAA Heathrow on behalf of Heathrow Airport Ltd	5 Core Policies - The Economy Policy E2: Location of Employment Growth	Object	HAL object to this policy on the basis that it does not provide clarity regarding appropriate locations for hotel development. Map 5.1 needs to be amended to demonstrate that sites outside of the protected employment sites along the Heathrow Perimeter will be appropriate for hotel uses as well as potentially appropriate locations on airport.	<p>Map 5.1 is not designed to show detailed areas for hotel growth within the Heathrow Opportunity Area. However, it is proposed to amend Map 5.1 and the Key Diagram for clarity. It is also proposed to add an overarching sentence to the beginning of Table 5.3 which makes clear that growth in the Heathrow OA will be focused on sustainable locations such as town centres and areas with good access to public transport. Specific development management policies related to hotels and development within the airport boundary will be considered during preparation of the Development Management Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Changes to the Key Diagram and Map 5.1 are proposed to clarify growth areas in the Heathrow Opportunity Area.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
75	25	BAA Heathrow on behalf of Heathrow Airport Ltd	5 Core Policies - The Economy Strategy for the Heathrow Opportunity Area Para 5.22	Object	In line with our comments in respect of paragraphs 3.5 to 3.8, it is suggested that paragraph 5.22 is deleted as it is no longer relevant.	<p>While the current government have rejected proposals for a third runway at Heathrow Airport, there continues to be pressure for expansion which is acknowledged in this section.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
75	26	BAA Heathrow on behalf of Heathrow Airport Ltd	5 Core Policies - The Economy Strategy for the Heathrow Opportunity Area Para 5.23	Support	We support the clarity provided by paragraph 5.23 that the area within and around Heathrow Airport is included within the HOA.	<p>Changes to the Key Diagram and Map 5.1 will be made to clarify growth areas in the Heathrow Opportunity Area. An overarching sentence will also be added to the beginning of Table 5.3 which makes clear that growth in the Heathrow OA will be focused on sustainable locations such as town centres and areas with good access to public transport.</p> <p>It is also proposed to reflect these changes in paragraph 5.23.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Reflect changes to Map 4.1 and 5.1 in paragraph 5.23.</p>
75	27	BAA Heathrow on behalf of Heathrow Airport Ltd	5 Core Policies - The Economy Table 5.3 Heathrow Opportunity Area - Future of Key Sub-Areas	Object	Table 5.3 Heathrow Opportunity Area - Future of Key Sub-Areas needs to be updated to reflect the change in Government policy. Suggested text.	<p>The Core Strategy will be updated to reflect new government policy direction, including major infrastructure projects and Heathrow Airport.</p> <p>Policies for hotel development will be set out in the Development Management DPD.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Reflect new government policy direction in Table 5.3.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
75	28	BAA Heathrow on behalf of Heathrow Airport Ltd	5 Core Policies - The Economy Strategy for the Heathrow Opportunity Area Para 5.25	Object	Subject to confirming the targets for jobs, homes and hotel bed spaces to be provided in the HOA and the general policies to be set out in Table 5.3, HAL believe that the Core Strategy should provide additional detail on the likely content of the HOA DPD. This paragraph cites current uncertainty around Heathrow expansion as a reason why little detail is included as to the content of the DPD. Now the policy position regarding expansion is clear, we would seek additional clarity about how the Council propose to work with partners to prepare the DPD and to set out the key objectives of the document.	<p>The content of the HOA DPD has not yet been defined and will dependant on the outcome of the Replacement London Plan EiP sessions on Opportunity Areas and discussions with adjoining boroughs.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
75	29	BAA Heathrow on behalf of Heathrow Airport Ltd	5 Core Policies - The Economy Policy E3: Strategy for Heathrow Opportunity Area	Object	Policy E3 should be reworded to make a clear distinction between climate change (total carbon emissions) and local air quality. As such, we suggest reordering the wording of the final sentence of the policy as follows: "The DPD will also set requirements for climate change mitigation and adaptation through a low carbon emission strategy and measures to improve local air quality."	<p>Comments noted. Policy to be amended.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Final sentence of policy E3 reworded to incorporate the following:</p> <p>The DPD will also set requirements for climate change mitigation and adaptation through a low carbon emission strategy and measures to improve local air quality</p>
75	30	BAA Heathrow on behalf of Heathrow Airport Ltd	5 Core Policies - The Economy Raising Skills Para 5.39	Support	Consideration should be given to replicating this approach in other parts of the borough. We would therefore propose that paragraph 5.39 be extended to include the sentence: "The London Borough of Hillingdon and Heathrow Airport have collaborated on programmes that have successfully increased the number of Hillingdon residents gaining airport employment. The Council will investigate how those programmes can be replicated at other strategic employment sites."	<p>The Council acknowledges the work undertaken with Heathrow. Further opportunities for joint working will be taken forward as appropriate, however it is not considered that this needs to be identified in the Core Strategy.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed action</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
75	31	BAA Heathrow on behalf of Heathrow Airport Ltd	6 Core Policies - New Homes Table 6.5 : Proposed delivery of units from large SHLAA sites, by area	Object	<p>Table 6.5 identifies delivery of 745 homes within the HOA for the period 2011-2016. Further clarity required on location.</p> <p>Consideration should be given to noise exposure categories when considering housing allocations. Advice should be sought on this issue from BAA Flight Evaluation unit.</p>	<p>Appropriate sites will be allocated for additional housing through the Site Allocations DPD.</p> <p>Information on noise from the Flight Evaluation Unit is noted and welcomed. The offer of information will be passed on to the relevant Council department.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change on the basis that specific sites for housing will be identified through the Site Allocations and Heathrow Area DPD. Issues in relation to noise exposure categories will be considered in the Development Management Development Plan Document.</p>
75	32	BAA Heathrow on behalf of Heathrow Airport Ltd	6 Core Policies - New Homes Map 6.1 Distribution of units from large SHLAA sites (2011-2021)	Object	Repeat of previous comment.	<p>Sites for additional housing will be identified through the site allocations DPD.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>See previous comment.</p>
75	33	BAA Heathrow on behalf of Heathrow Airport Ltd	7 Core Policies - Historic and Built Environment Heritage Para 7.3	Object	The number of locally listed buildings (289) differs to the "portrait of Hillingdon" at chapter 3 and 292 as adopted on the local list. This needs to be consistent.	<p>Agree. The Local List was adopted in May 2010 and there are now 292 Locally listed buildings in the borough. The Core Strategy will be updated accordingly.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Update paragraph 7.3 to reflect the adopted Local List.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
75	34	BAA Heathrow on behalf of Heathrow Airport Ltd	7 Core Policies - Historic and Built Environment Map 7.1 Hillingdon's Heritage	Object	<p>As with comments on Maps 4.1, 5.1 and 6.1, it is considered that the scale of the plan makes the designations difficult to determine at a site specific level. We believe this is more appropriate to be articulated on the Proposals Map.</p> <p>Clarification is required as to the definition of and spatial distribution of:</p> <ul style="list-style-type: none"> • Archaeological Priority Areas; • Proposed Archaeological Priority Areas; • Proposed Archaeological Priority Zones. <p>As drafted, it is confusing where these designations apply (given the scale of the plan) or the difference in the meaning/purpose of these designations and their relevance to development projects.</p>	<p>The Core Strategy is a high-level strategic document and details of specific sites and boundaries will be considered through the Site Allocations DPD and Proposals Map.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
75	35	BAA Heathrow on behalf of Heathrow Airport Ltd	7 Core Policies - Historic and Built Environment Para 7.10	Object	<p>It is noted that this paragraph identifies that "appropriate locations for tall buildings are parts of the Uxbridge and Hayes". Suggest deletion of the word "the" in front of Uxbridge.</p> <p>The location of tall buildings should have regard to safeguarding implications from Heathrow Airport. As such, we would suggest amendments to the wording as follows: "Appropriate locations for tall buildings are parts of Uxbridge and Hayes, subject to considering the Obstacle Limitation Surfaces for Heathrow Airport."</p> <p>By way of example, the Aerodrome Safeguarding Map for London Heathrow Airport identifies that any development in Hayes at or above 15m Above Ground Level (AGL) will require consultation with BAA Safeguarding. Any development in this location at or above 67.93m AOD would infringe the Obstacle Limitation Surface. This must be taken into account when considering locations for tall buildings.</p>	<p>Agree, deletion of 'the' in front of Uxbridge.</p> <p>Agree, locations for tall buildings need to have regard to Safeguarding requirements of Heathrow Airport. Policy BE1 amended to reflect this.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Amend Policy BE1 point 11 to read 'Appropriate locations for tall buildings will be defined in a Character Study and include parts of Uxbridge and Hayes, subject to considering the Obstacle Limitation Surfaces for Heathrow Airport.'</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
75	36	BAA Heathrow on behalf of Heathrow Airport Ltd	7 Core Policies - Historic and Built Environment Policy BE1: Built Environment	Object	Whilst recognising and supporting the objectives of encouraging sustainable building design, we object to the Council's proposal that "all new non-residential development should achieve BREEAM Very Good". The policy wording should be sufficiently flexible to acknowledge that such standards may not always be achievable/applicable. As such, it should not apply to "all" non-residential development.	Disagree. <u>Council's Proposed Action</u> Policy BE1(point 10) to be changed to read 'Maximise the opportunities for all new homes to contribute to tackling climate change and reducing emissions of local air quality pollutants. All new residential development should achieve at least Code for Sustainable Homes level 4. All new non-residential development should achieve BREEAM Very Good standard. In addition, all new development should be able to demonstrate compliance with the prevailing energy reduction requirements set out in the London Plan. All refurbishment development should aim to achieve the highest levels of new quality designs appropriate to the work being carried out.'
75	37	BAA Heathrow on behalf of Heathrow Airport Ltd	8 Core Policies - Environmental Management Climate Change Adaptation and Mitigation Para 8.7	Object	Fifth bullet point should be reworded to state:"Helping to improve air quality"	Part agree. <u>Council's Proposed Action</u> Fifth bullet point to be reworded to read 'Improving local air quality'.
75	38	BAA Heathrow on behalf of Heathrow Airport Ltd	8 Core Policies - Environmental Management Policy EM1: Climate Change Adaptation and Mitigation	Object	The sixth bullet refers to the need for "targeting areas of poor air quality for additional carbon emissions reductions." It is important to distinguish between factors contributing to poor air quality and those affecting climate change.	Agree. <u>Council's Proposed Action</u> Amend sixth bullet point at Policy EM1 to read 'Targeting areas of poor air quality for additional emissions reductions'.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
75	39	BAA Heathrow on behalf of Heathrow Airport Ltd	8 Core Policies - Environmental Management Green Belt, Metropolitan Open Land and Green Chains Map 4.1 Key diagram Para 8.17	Object	Given our comments regarding the designation of the former Perry Oaks Sewage Treatment Works (now Terminal 5) and Longford Meadows under map 4.1, the figure for total Green Belt should be adjusted to reflect the removal of these areas from the Green Belt. Indeed, this paragraph does not acknowledge that part of the Heathrow Airport Boundary is designated as Green Belt on Map 4.1.	The site remains designated Green Belt. Amendments to Green Belt boundaries will be undertaken through the Site Allocations Development Plan Document. <u>Council's Proposed Action</u> No proposed change.
75	40	BAA Heathrow on behalf of Heathrow Airport Ltd	8 Core Policies - Environmental Management Map 8.1 Open Spaces, Rivers and Canal Corridors	Object	As per our comments on Map 4.1 and paragraph 8.17 we object to the inclusion of land at Terminal 5 and Longford Meadows in the Green Belt.	The site remains designated Green Belt. Amendments to Green Belt boundaries will be undertaken through the Site Allocations DPD. <u>Council's Proposed Action</u> No proposed change.
75	41	BAA Heathrow on behalf of Heathrow Airport Ltd	8 Core Policies - Environmental Management Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Object	We object to policy EM2 which seeks to "maintain the current extent of the Green Belt." We reiterate our comments to Map 4.1. It is noted that the Draft Core Strategy proposes inclusion of land at the former Perry Oaks Sludge Treatment Works (now Terminal 5) and Longford Meadows in the Green Belt. It is noted that in the 2005 draft Core Strategy proposed that these areas were to be excluded from the Green Belt as set out on the Proposals Map at that time. We strongly contend that it is inappropriate to designate these areas as Green Belt as they do not meet any of the objectives of Green Belt designations as set out in PPG2 and referred to in paragraph 8.18 of the Draft Core Strategy. Both of these areas now form part of the Airport's operational land and therefore benefit from permitted development rights under Schedule 2, Part 18 of the GPDO.	These areas are already designated as Green Belt. Policy EM2 notes that minor alterations to Green Belt and Metropolitan Open Land will be undertaken in the Site Allocations DPD. <u>Council's Proposed Action</u> No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
75	42	BAA Heathrow on behalf of Heathrow Airport Ltd	8 Core Policies - Environmental Management Policy EM6: Flood Risk Management	Object	Object to the proposal that all development should consider SUDS, as this may not be considered appropriate in some instances particularly due to high groundwater and contaminated nature of run.	<p>Disagree. SUDS come in a number of different forms, from infiltration techniques to hard engineering such as storage tanks. This means that if infiltration does not work because of high groundwater levels there is always likely to be an alternative solution. Similarly, storage tanks can store contaminated water (as they do in a number of industrial operations) where early filtration can remove many contaminants.</p> <p>The intention is to attenuate run-off to avoid flooding in times of heavy or prolonged rain. The locations of most concern are large scale unattenuated areas of hardstanding. These generally direct large quantities of run-off to sewage systems and watercourses in a short space of time in storm events. These areas are the most important to target for attenuation to avoid increasing the risk of flooding to people and property.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
75	43	BAA Heathrow on behalf of Heathrow Airport Ltd	8 Core Policies - Environmental Management Water, Air and Noise Management Paras 8.97-8.100	Object	<p>1 - Paragraph 8.97 is inaccurate. As set out above in respect of our representation for para 4.14, background sources dominate across this part of Hillingdon borough. Road traffic is the next dominant source at all monitoring sites, whereas direct Heathrow emissions have a lesser impact than road traffic.</p> <p>2 - Paragraph 8.98 is an accurate statement, but Map 8.4 does not show the boundary of Hillingdon's Air Quality Management Area. Emissions from rail are not mentioned in this section and this omission should be corrected. The diesel trains that operate on the west coast mainline have a major impact on local air quality.</p> <p>3 - Paragraph 8.99 needs to be corrected. Heathrow is a large source of emissions, but the impact these have on local air quality is not as great as emissions from road traffic.</p> <p>4 - The last sentence has no factual basis and needs to be reworded. The only NO2 monitoring site close to the airport which exceeds the EU limit value (Oxford Avenue) was 2.5Ug/m3 above it last year; where background and transport emissions predominate. Comparing this roadside site to one in central London; the measured concentrations of NO2 on the King's Road, for example, were 50Ug/m3 above the limit value.</p> <p>5 - Paragraph 8.100 is not supported by evidence. How many Hillingdon residents find air quality has affected their health to a point where they are unable to use the sustainable modes of walking and cycling?</p> <p>6 - We also object to the second sentence in paragraph 8.100 that "schools closest to Heathrow are particularly vulnerable with outside play compromised by worsening air quality." There is no evidence to suggest that schools are particularly affected by air quality arising from Heathrow nor that air quality is worsening.</p>	<p>Para 8.97 Comments noted - the addition of the following would clarify this paragraph – "In addition, the presence of Heathrow, the world's busiest international airport, adds to the poor air quality burden in this area and contributes to levels in air quality exceeding European standards. Agree map 8.4 is not the AQMA, the text should refer to Map 8.5.</p> <p>8.98 and 8.99 comments noted, these paras could be combined to state: The southern two-thirds of the borough was designated an Air Quality Management Area (AQMA) in September 2003. The boundary of the AQMA is shown in Map 8.5. It is clear that the road network in the AQMA carries a very high volume of traffic and congestion which are major contributors to poor air quality in the area. In addition, the operation of the diesel trains on the Great Western Mainline adds a source of emissions in the southern part of the borough. Along with the operation of Heathrow Airport, all these different activities result in areas in the south of the borough subject to levels of pollution worse than many other UK towns and cities. With regard to the comment about the King's Road monitoring station, as the LDF does not actually compare Hillingdon with Central London it is fair to keep the comment re: worse than many other UK towns and cities.</p> <p>8.100 Agree; the Council is unaware of any evidence to suggest poor air quality undermines incentives to increase sustainable modes of travel.</p> <p>8.100 Agree that outside play at schools is compromised more by noise than local air quality levels.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Text to be revised as follows:</p> <p>Paragraph 8.97 - to add the following wording for clarification:</p> <p>"In addition, the presence of Heathrow, the world's busiest international airport, adds to the poor air quality burden in this area and contributes to levels in air quality exceeding European standards."</p> <p>Delete paragraph 8.99 - this is no longer required with the additional wording proposed for</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
						<p>paragraph 8.97.</p> <p>Text at paragraph 8.98 to be edited to clarify that Map 8.5 covers the Air Quality Management Area - not Map 8.4.</p> <p>Paragraphs 8.98 to be amended to read:</p> <p>“The southern two-thirds of the borough was designated an Air Quality Management Area (AQMA) in September 2003. The boundary of the AQMA is shown in Map 8.5. It is clear that the road network in the AQMA carries a very high volume of traffic and congestion which are major contributors to poor air quality in the area. In addition, the operation of the diesel trains on the Great Western Mainline adds a source of emissions in the southern part of the borough. Along with the operation of Heathrow Airport, all these different activities result in areas in the south of the borough subject to levels of pollution worse than many other UK towns and cities.”</p> <p>Paragraph 8.100 to be amended to read:</p> <p>Poor air quality can lead to adverse impacts on health and can undermine incentives to increase sustainable modes of travel, such as walking and cycling. The borough needs to continue to promote sustainable forms of transportation which also consider the impacts of poor air quality.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
75	44	BAA Heathrow on behalf of Heathrow Airport Ltd	8 Core Policies - Environmental Management Water, Air and Noise Management Para 8.104	Object	<p>We believe that this paragraph is out of context within the document. It would seem that it would be more appropriate within the section 8.116 -8.119 where the Environmental Noise Directive action planning process is more broadly discussed.</p> <p>It is also suggested that the document may benefit from describing the noise mapping results for the various noise sources so as to demonstrate that Heathrow is just one factor contributing to noise. Incorporation of the noise mapping results of Tables 1 and 2 is suggested.</p>	<p>1 - Paragraph 8.104 - Agree We agree that paragraph 8.104 would be more appropriate within the section 8.116 – 8.119 since this is the main section where the Environmental Noise Directive is discussed.</p> <p>2 - Noise mapping results - Disagree It can be misleading to compare results for different noise sources because of the different factors applying to road, rail and aircraft noise. Also, the results for road and rail noise apply to the London agglomeration whereas the results for aircraft noise apply both within and outside London. None of the results apply directly to the geographic area covered by Hillingdon Borough. The results therefore do not seem appropriate in the Core Strategy document that relates specifically to Hillingdon Borough.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Paragraph 8.104 will be relocated to section 8.116 – 8.119.</p> <p>2 - No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
75	45	BAA Heathrow on behalf of Heathrow Airport Ltd	8 Core Policies - Environmental Management Water, Air and Noise Management Paras 8.111-8.113	Object	Negative wording of paragraph. There is no reason why development should "invariably lead to greater impacts on air quality", especially as the council plans to have a low emissions development strategy which can be used to restrict vehicles in terms of emissions and to mitigate the impacts of construction.	<p>Disagree although changes do need to be made to paragraph to clarify.</p> <p>All new development is likely to lead to greater impacts on air quality, unless it can be considered to have no additional emissions which would mean zero carbon housing, and with no transport emissions at all. Whilst the plan can minimise the impacts of new development, it is not likely reduce impacts to absolute zero.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend first sentence of paragraph 8.111 to read :</p> <p>"Increasing development and commercial activity around Heathrow is required to sustain the economic competitiveness of the borough; however, this will invariably lead to greater impacts on air quality through increased traffic and usage of existing services."</p> <p>Paragraph 8.112 - replace current wording :</p> <p>"Airports are a major source of carbon dioxide and nitrogen oxide emissions which adversely impact on air quality. Travelling to and from Heathrow impacts on the borough regardless of the destination. Heathrow attracts a number of new businesses and commercial enterprises which also increases the impacts on air quality."</p> <p>To read:</p> <p>"Airports are a major source of emissions that can have a damaging impact on local air quality as well as contributing to climate change. These impacts can be generated directly by aircraft, as well as the associated activities that occur on the ground. Heathrow is the busiest international airport and attracts a significant amount of visitors each year. It also attracts significant amounts of associated office and commercial uses."</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
75	46	BAA Heathrow on behalf of Heathrow Airport Ltd	8 Core Policies - Environmental Management Policy EM8: Water, Air and Noise	Object	Whilst acknowledging the need to improve air quality in AQMA's, the location of any new planting should have regard to potential bird hazards in proximity to Heathrow.	<p>Noted. Although within 13km of Heathrow lies some of the most bird habitats across London, including the Thames and the West London Water Bodies.</p> <p>The Advice Note contains no background study information or supporting evidence. The Council's ability to promote and enhance biodiversity is hindered by full application of the Advice Note, particularly given that Heathrow is not the only aerodrome in the Borough.</p> <p>Given that some of the incentives for biodiversity improvements can be implemented on a permitted development basis and out of the control of the Council it is difficult to rule out any such improvements within 13km of Heathrow.</p> <p>The Council notes further discussions are needed with BAA, GLA and the CAA regarding the role of the advice note.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
75	47	BAA Heathrow on behalf of Heathrow Airport Ltd	9 Core Policies - Transport and Infrastructure Accessible Local Destinations Para 9.14	Object	<p>Suggest inclusion in the Strategic Objectives box of proposed additional SO25 and SO26:</p> <p>"SO25: Support a programme of renewal at Heathrow Airport to secure improvements in passenger experience and operational reliability and ensure Heathrow's status as a global hub is maintained. Environmental impacts from Heathrow are to be minimised and where possible reduced."</p> <p>"SO26 – Improved public transport connections to Heathrow to encourage sustainable travel for staff and passengers, as well as providing an additional multi-modal interchange for West London. This includes support for Airtrack and Crossrail and enhanced bus and coach links in the medium term and High Speed Rail services over the long term."</p>	<p>The Council supports operational development within the existing airport boundary - and this is recognised by the proposed addition of Strategic Objective SO25 (see also representation reference 75/11).</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Proposed inclusion of the following strategic objective as SO25:</p> <p>SO25: Maintain support for operational uses within the existing airport boundary and seek to minimise the environmental impacts from the airport wherever possible</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
75	48	BAA Heathrow on behalf of Heathrow Airport Ltd	9 Core Policies - Transport and Infrastructure Heathrow Airport Para 9.28	Object	<p>We object to the fourth bullet point, which cites high dependency on private car and low proportion of trips by public transport. The recent Heathrow Employment Survey 2008/2009 demonstrates that the proportion of staff travelling by single occupancy car journeys has reduced from 71% to 61% since 2004 (exceeding the 2012 target of reducing this to 65%).</p> <p>We would also suggest a further bullet supporting the connection of Heathrow to Crossrail and Airtrack which will help encourage sustainable travel to the airport and meet the objective of continuing to reduce car dependency, in line with proposed SO26 and amendments to Policy T4.</p>	<p>The fourth bullet point represents the current situation in relation to the dependency on private car use as key challenge. Paragraph 9.29 represents the measures that are being undertaken to address this issue and the progress that has been made.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
75	49	BAA Heathrow on behalf of Heathrow Airport Ltd	9 Core Policies - Transport and Infrastructure Heathrow Airport Para 9.29	Object	<p>We object to the wording with regards to travel patterns to Heathrow. The recent Heathrow Employment Survey 2008/2009 demonstrates that the proportion of staff travelling by single occupancy car journeys has reduced from 71% to 61% since 2004 (exceeding the 2012 target of reducing this to 65%).</p> <p>Given Heathrow's strategic significance, it attracts staff from a wide area covering much of the south-east and Home Counties, which makes the task of constraining vehicle trips more challenging, yet also more important. HAL is committed to reducing car trips to the airport over the medium and longer term as various public transport interventions come on stream.</p>	<p>The measures being undertaken to reduce car dependency are acknowledged.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Insert the following sentence in para. 9.29:</p> <p>'The target will be revisited as the next Surface Access Strategy for Heathrow is developed and will undoubtedly strive for a further improvement on these figures.'</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
75	50	BAA Heathrow on behalf of Heathrow Airport Ltd	9 Core Policies - Transport and Infrastructure Heathrow Airport Para 9.31	Object	It would appear that the figure of 620 units per annum is incorrect and inconsistent with the housing section of the document which indicates 745 houses in the HOA for the plan period (Map 6.1). Greater clarity is required on how the HOA will accommodate such growth.	<p>Hillingdon's annual monitoring target for housing and the proposed housing figures for Opportunity Areas will be discussed and agreed as part of the draft Replacement London Plan Examination in Public.</p> <p>The Heathrow Opportunity Area Framework will need to be discussed with the GLA and adjoining boroughs. The content of this document has yet to be agreed.</p> <p>Content of the Heathrow Area Development Plan Document will be subject to the usual public consultation procedures as set out in the Council's Statement of Community Involvement.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
75	51	BAA Heathrow on behalf of Heathrow Airport Ltd	9 Core Policies - Transport and Infrastructure Policy T4: Heathrow Airport	Object	<p>Given the strategic importance of Heathrow Airport, policy T4 should not only support improvements to its functioning through enhanced public transport connectivity but through renewal of the airport facilities to enhance passenger experience and improve operational reliability.</p> <p>Amend policy T4 to read:</p> <p>"This Core Strategy will support the programme of renewal at Heathrow Airport and growth in the Heathrow Opportunity Area by facilitating improvements to public transport and cycle links, enhancing public transport interchanges, including connections to Crossrail and Airtrack, and providing transport infrastructure to accommodate economic and housing growth."</p>	<p>Policy T 4 has been amended to state that the Core Strategy will support sustainable operation of Heathrow Airport, seek a modal shift away from the use of private cars and short haul flights to the airport and improve local environmental conditions for local communities.</p> <p>Detailed policies related to operational development at Heathrow will be included in the forthcoming Development Management Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>To amend policy T 4 to read:</p> <p>"This Core Strategy will support the sustainable operation of Heathrow and growth in the Heathrow Opportunity Area by facilitating improvements to public transport and cycle links, enhancing the public transport interchange to provide the opportunity for a modal shift from the use of private cars and from short haul air to sustainable transport modes and providing transport infrastructure to accommodate economic and housing growth whilst improving environmental conditions, for example noise and local air quality for local communities."</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
75	52	BAA Heathrow on behalf of Heathrow Airport Ltd	9 Core Policies - Transport and Infrastructure Community Infrastructure Para 9.33	Support	Update on BAA projects should be incorporated in the infrastructure schedule.	Support noted. Table will be updated in accordance with suggestion. <u>Council's Proposed Action</u> Updates to the infrastructure schedule will be incorporated.
76	1	Nathaniel Lichfield and Partners on behalf of SEGRO plc	4 The Vision - where we want to be The Vision for Hillingdon 2026 Strategic Objectives to deliver The Vision The Spatial Strategy	Support	SEGRO supports the proposed Vision and Strategic Objectives of the draft CS. We are particularly pleased to note that the Council will consider opportunities for delivering an improved public transport interchange and fast underground links into central London. SEGRO supports the target to create up to 11,000 jobs in Hillingdon over the period 2011-2026. It suggests that the Council should consider opportunities offered by intensification of uses on existing employment sites and the potential to extend these, where possible, prior to designating new sites for employment development to support strategic growth.	Support welcomed <u>Council's Proposed Action</u> No proposed change
76	2	Nathaniel Lichfield and Partners on behalf of SEGRO plc	5 Core Policies - The Economy Policy E1: Managing the Supply of Employment Land	Object	SEGRO supports the Council's strategy to accommodate growth by protecting existing employment land but objects to the proposed designation of North Uxbridge Industrial Estate as a Locally Significant Industrial Site (LSIS). The designation of the Riverside site as an LSIS has the potential to restrict the range of employment generating uses approved at the site and fundamentally undermine its capacity to contribute towards the employment generating objectives of the CS. It is considered that creating such an artificial distinction between LSIS and LSELS would unduly fetter potential investors, unnecessarily narrowing development options and consequently detracting from the employment land resource of the Borough.	The Council's employment land study identifies sites to be allocated as LSES and LSIS. Any representations seeking to change this designation should be made during preparation of the Site Allocations Development Plan Document. <u>Council's Proposed Action</u> No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
76	3	Nathaniel Lichfield and Partners on behalf of SEGRO plc	5 Core Policies - The Economy Policy E2: Location of Employment Growth	Object	Policy E2: Location of Employment Growth As explained in our response to Policy E1, North Uxbridge Industrial Estate, including Riverside Way, is located in an accessible area with sustainable transport links. SEGRO considers, therefore, that it is suitable for accommodating a range of employment generating uses, including office, research and development, industrial and warehousing uses and other non-traditional class uses that create significant employment opportunities.	Site specific representations should be made as part of the production of the Site Allocations DPD. <u>Council's Proposed Action</u> No proposed change.
76	4	Nathaniel Lichfield and Partners on behalf of SEGRO plc	5 Core Policies - The Economy Policy E4: Uxbridge	Support	Policy E4: Uxbridge SEGRO supports policy E4 and is pleased to note that the Council will continue to promote growth in Uxbridge to help strengthen its status as the main urban centre in Hillingdon and a Metropolitan Centre in London.	Support welcomed <u>Council's Proposed Action</u> No proposed change
76	5	Nathaniel Lichfield and Partners on behalf of SEGRO plc	9 Core Policies - Transport and Infrastructure Policy T2: Public Transport Interchanges	Support	Policy T2: Public Transport Interchanges SEGRO supports the need to improve the public transport interchange at Uxbridge, as identified in the draft policy.	Support welcomed. <u>Council's Proposed Action</u> No proposed change.
77	1	Drivers Jonas Deloitte on behalf of Buccleuch Property	4 The Vision - where we want to be The Vision for Hillingdon 2026	Support	Buccleuch Property support the broad Vision for Hillingdon as set out within the Core Strategy and in particular the level of growth which is proposed. In particular, one of the objectives identified within the broad vision is that employment growth will be encouraged within specific areas including the Hayes / West Drayton Corridor.	Support welcomed <u>Council's Proposed Action</u> No proposed change

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
77	2	Drivers Jonas Deloitte on behalf of Buccleuch Property	4 The Vision - where we want to be The Vision for Hillingdon 2026 Policy E3: Strategy for Heathrow Opportunity Area Table 5.3 Heathrow Opportunity Area - Future of Key Sub-Areas	Support	<p>Sustainable urban growth based around good public transport links should be more clearly represented and reflected within the Vision for the Borough. In particular, the emphasis within the Growth Area should be focused upon the existing centres such as Yiewsley, West Drayton and Hayes to ensure sustainable and appropriate growth within the Borough.</p> <p>The significant potential for hotel development (3,800-5,600 bedrooms) is noted and supported (Table 4.1). These uses should be directed to highly accessible mainly town centre locations.</p>	<p>Agree that Core Strategy should make it clear that growth will be focused in sustainable locations. Policy E2: Location of Employment Growth states that "The Council will promote development in highly accessible locations that support sustainable travel behaviour..." It is worth reiterating this with particular reference to the Heathrow Opportunity Area, and it is proposed to add an overarching sentence to the beginning of Table 5.3 to this effect.</p> <p>Improved transport interchanges are identified on the Key Diagram and reflect the following parts of the Core Strategy Vision :</p> <p>'Improved accessibility to local jobs, housing and facilities is improving the quality of life for local residents'</p> <p>'Hillingdon has a reliable network of north/south public transport routes and improved public transport interchanges.'</p> <p>It is therefore considered that the principle of good public transport links is established in the Vision.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Add overarching sentence to the beginning of Table 5.3 which makes clear that growth in the Heathrow OA will be focused on sustainable locations such as town centres and areas with good access to public transport.</p>
77	3	Drivers Jonas Deloitte on behalf of Buccleuch Property	5 Core Policies - The Economy Policy E1: Managing the Supply of Employment Land Strategy for the Heathrow Opportunity Area Para 5.11	Support	<p>Possible locations for employment land release are suggested at paragraph 5.11 and Buccleuch Property supports the identification of Hayes as just such a location. However, Buccleuch Property feels that full consideration has not been given to land around all of Hayes, in particular land adjoining Hayes Town Centre, Station Road and Nestles Avenue. Buccleuch Property supports Policy E1 and the release of land, subject to a full and detailed review of land at Hayes.</p>	<p>Support welcomed.</p> <p>Proposed employment land release is identified through the Council's Employment Land Study. Specific sites in Hayes will be considered through the Site Allocations and Heathrow Area DPD process.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
77	4	Drivers Jonas Deloitte on behalf of Buccleuch Property	5 Core Policies - The Economy Map 5.1 Locations for Economic Growth	Object	Map 5.1 needs to be amended to reflect the release of land to the south of Hayes. Therefore the purple circle should be placed centrally to reflect the location generally.	<p>The two areas represented by the two purple circles and proposed for release in Hayes are Pump Lane area and Blyth Road area.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
77	5	Drivers Jonas Deloitte on behalf of Buccleuch Property	5 Core Policies - The Economy Policy E2: Location of Employment Growth	Support/ Object	Broad support for SO14 and Policy E2. However, Policy E2 should be expanded to include specific reference to Hayes Town Centre as this represents one of the most sustainable location within the Heathrow Opportunity Area. In particular, the proposed new Crossrail Station will greatly enhance the accessibility and sustainability of Hayes Town Centre and this should be reflected in the supporting policy text.	<p>Agree.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Amend policy E2 to include Hayes town centre and include qualification wording: "with a particular focus around transport nodes".</p>
77	6	Drivers Jonas Deloitte on behalf of Buccleuch Property	5 Core Policies - The Economy Policy E3: Strategy for Heathrow Opportunity Area	Support	Buccleuch Property notes the Council's commitment to the production of a separate Heathrow Area Development Plan Document that will provide a clearer definition of the Heathrow Opportunity Area boundary and specific growth figures (para 5.15). Buccleuch Property welcomes this and wishes to be involved in this process.	<p>Noted</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
77	7	Drivers Jonas Deloitte on behalf of Buccleuch Property	6 Core Policies - New Homes Housing Growth	Object	Whilst the identification of specific sites is accepted as premature at this stage, further strategic guidance for the location of new residential development should be identified. In particular, emphasis should be placed on the provision of high density residential development within central locations.	<p>The Council supports the principle of higher densities in sustainable locations and the Core Strategy will be amended to reflect this.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Proposed change:</p> <p>Insert the following sentence at the end of paragraph 6.20:</p> <p>Higher densities will be most appropriate in sustainable locations with high levels of public transport accessibility.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
77	8	Drivers Jonas Deloitte on behalf of Buccleuch Property	6 Core Policies - New Homes Policy H2: Affordable Housing Policy H1: Housing Growth	Support	Flexibility in policy H2 is supported.	Support noted. <u>Council's Proposed Action</u> No proposed change.
77	9	Drivers Jonas Deloitte on behalf of Buccleuch Property	5 Core Policies - The Economy Supply of Employment Land Para 5.3	Object	<p>Buccleuch Property are the freehold owners of a considerable area of land on the edge of Town Centre and adjacent to the proposed Crossrail Station. We recommend that greater emphasis is placed upon Hayes Town Centre and in particular the opportunities presented by the Crossrail station for expansion of the core area to the south.</p> <p>Buccleuch Property notes at paragraph 5.3 that the "Council will allocate land for mixed use employment, residential and transport led regeneration schemes". This is supported.</p>	<p>The Heathrow Area DPD will look at opportunities in Hayes town centre in more detail. Support welcomed.</p> <p><u>Council's Proposed Action</u> No proposed change.</p>
78	1	Barton Willmore on behalf of Waitrose	5 Core Policies - The Economy Table 3.1 Main Planning Challenges for Hillingdon Policy E5: Town and Local Centres	Observation	<p>We note the main challenges to be addressed in the Core Strategy and consider we can work collaboratively to respond to a number of these, including the threat to the vitality and viability of town and neighbourhood centres, the need to generate new jobs and meet the overall housing needs in the Borough referred to in Table 3.1.</p> <p>The Key diagram and Map 5.3 Town Centre Improvements identify Ruislip as a District Centre i.e. a Town Centre as recognised by Policy E5 and in accordance with PPS4. This is in recognition of its important role in the Borough.</p>	<p>Noted.</p> <p><u>Council's Proposed Action</u> No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
78	2	Barton Willmore on behalf of Waitrose	4 The Vision - where we want to be Strategic Objectives to deliver The Vision Town and Neighbourhood Centres	Support	We support the strategic objective SO16 to manage appropriate growth, viability and regeneration of town and neighbourhood centres, which would include Ruislip.	Support welcomed
<u>Council's Proposed Action</u>						
No proposed change.						
78	3	Barton Willmore on behalf of Waitrose	5 Core Policies - The Economy Policy E5: Town and Local Centres	Object	We are concerned that Policy E5 refers to net additional comparison goods floorspace requirement to 2026 (which in the context of Ruislip is low) and there is no recognition of the opportunity for increases in convenience floorspace. There is however some reference to the monitoring of policy E5 and a target of (i) 800 sqm of retail development per annum, (ii) up to 8,100 sqm of comparison goods floorspace and 1,300 sqm of additional convenience goods floorspace by 2016. Further clarification is requested in relation to these figures in particular, whether they relate to all the District Centres, which they appear to and how the comparison and convenience goods floorspace are derived.	Hillingdon's Retail Study assessed the borough's convenience floorspace requirements and concluded 415 sq m would be needed across the borough up to 2016. There is no current deficiency of convenience floorspace in the borough and applications for convenience retail floorspace will be assessed individually. A sentence will be added to clarify this position.
<u>Council's Proposed Action</u>						
Clarification added at paragraph 5.33:						
The Council's Position Statement: Employment Land and Comparison Retail Floorspace (June 2010) provides a comparison goods floorspace requirement for the entire borough of 44,961sqm net for the period 2006-2026.						
Amend following section on Flexibility to read:						
The figures for additional comparison goods floorspace requirement in Hillingdon's District Centres are taken from a report published by the Greater London Authority in March 2009. The report uses a broad strategic model to distribute future growth and therefore estimates need to be treated with caution. The Council will monitor these targets through the Annual Monitoring Report and will keep the targets under review.						

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
78	4	Barton Willmore on behalf of Waitrose	5 Core Policies - The Economy Town and Neighbourhood Centres Para 5.33	Observation	We would like to discuss our Client's proposals for their Ruislip store in more detail.	Noted. <u>Council's Proposed Action</u> No proposed change.
78	5	Barton Willmore on behalf of Waitrose	Core Strategy Consultation Draft S106 SPD	Observation	We note reference is made to the revised SPD on Planning Obligation and we would welcome the opportunity to review and comment, if required on this draft SPD.	Revisions to Chapter 4 'Education Facilities' of the Planning Obligations SPD were subject to consultation at the same time as the Core Strategy. The consultation is now closed. <u>Council's Proposed Action</u> No proposed changes.
78	6	Barton Willmore on behalf of Waitrose	6 Core Policies - New Homes Policy H1: Housing Growth	Support	We support the Council's housing target at policy H1.	Support noted. <u>Council's Proposed Action</u> No proposed change.
78	7	Barton Willmore on behalf of Waitrose	6 Core Policies - New Homes Policy H2: Affordable Housing	Object	We consider Policy H2 needs to be reviewed in the context of the London Plan Interim Supplementary Planning Guidance (April 2010)	The Core Strategy sets a policy on the need for affordable housing, the proposed split and the amount of tenure required by the Council. The Mayor's housing SPG provides detailed information on affordable housing such as how to implement the policy in relation mixed use development, incorporating affordable housing into town centres and issues related to density and dwelling type. It is considered that these issues of detail will be addressed in the Development Management DPD.. <u>Council's Proposed Action</u> No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
78	8	Barton Willmore on behalf of Waitrose	7 Core Policies - Historic and Built Environment Policy BE1: Built Environment Policy EM4: Open Space and Informal Recreation	Object	Point 9 in BE1 and the third paragraph of EM4, each case should be considered on its individual circumstances and object to the blanket approach being taken, as this may not be appropriate in all cases. There is a need for the character and role of an area to be taken in to account, including the relationship to adjoining uses, planning history and the social and economic benefits of the proposed development.	<p>Disagree, the Draft Replacement London Plan and Policy 3.4 accordingly support the presumptions against development on back gardens where locally justified. No change proposed to Policy BE1.</p> <p>Policy EM4 third paragraph seeks to protect existing tree and landscape features and enhance openspaces with new areas of vegetation cover (including the linking of existing fragmented areas) including front and back gardens for the benefit of wildlife and a healthier lifestyle, mitigating climate change.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
78	9	Barton Willmore on behalf of Waitrose	Appendix 2 Infrastructure Schedule	Support	<p>Appendix 2 sets out the Draft infrastructure Schedule and we assume this reflects the Planning Obligations tests.</p> <p>We would welcome the opportunity to meet with you to discuss our Client's comments in more detail and will contact you in this regard.</p>	<p>The offer to meet and discuss infrastructure requirements is noted.</p> <p>The draft infrastructure schedule reflects planned infrastructure and that which is required to accommodate future planned growth.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
79	1	Lichfield Planning on behalf of British Airways	3 A Portrait of Hillingdon - where we are now Major Infrastructure Projects Para 3.8	Object	British Airways endorses the Core Strategy policies seeking "to maximise the economic benefits of Heathrow and reduce any negative environmental impacts of the airport", but finds a clear inconsistency between this aim and the opening statement of this policy "The Council strongly opposes any further capacity increase at Heathrow, including mixed mode and any further runway expansion."	<p>The Council will seek to accommodate operational uses within the existing airport boundary and appropriate policies will be included in the emerging DMDPD.</p> <p>The Council also proposes an improved transport interchange. This is identified on the key diagram.</p> <p>The Council will continue to oppose any capacity increases in the form of runway expansion</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
79	2	Lichfield Planning on behalf of British Airways	4 The Vision - where we want to be The Vision for Hillingdon 2026 Page 20	Support	Support Vision "Hillingdon has continued to prosper from the presence of Heathrow"	<p>Support welcomed.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
79	3	Lichfield Planning on behalf of British Airways	4 The Vision - where we want to be Strategic Objectives to deliver The Vision Para 4.3	Object	"4.3 The following Strategic Objectives are the stepping stones to deliver the Vision and form the basis of policies contained in chapter 5-9." BA regards a 'Strategy' as requiring not just objectives but also broad consideration of resources and deliverability. BA is concerned that the objective of a flourishing local economy and employment does not take into account the implications of restricting Heathrow's operations.	<p>The deliverability of individual policies is identified in each of the chapters. Economic growth will be encouraged by a range of measures in the Core Strategy, as outlined in Chapter 5 of the document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
79	4	Lichfield Planning on behalf of British Airways	4 The Vision - where we want to be Strategic Objectives to deliver The Vision SO14	Support	Support SO14	<p>Support welcomed.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
79	5	Lichfield Planning on behalf of British Airways	4 The Vision - where we want to be 4 The Vision - where we want to be SO15	Support/ Object	Taking a long-term view, land that had been designated for the third runway development should be safeguarded and not be released for any other uses. If Government policy towards Heathrow expansion changes, and it becomes necessary to reintroduce the third runway, then the option to do so should remain. This would support Heathrow's position as the main economic enabler of the area.	<p>The Council strongly opposes any further capacity increase at Heathrow, including any further runway expansion.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
79	6	Lichfield Planning on behalf of British Airways	4 The Vision - where we want to be Strategic Objectives to deliver The Vision SO20	Support/ Object	Support SO20 with addition: Provide and improve existing and future rail infrastructure, including interchanges with Airtrack, Crossrail and High-Speed Rail.	<p>Crossrail is identified on the Core Strategy key diagram and the document will be updated to reflect the latest position on Crossrail. Improved public transport interchanges are also identified on the key diagram.</p> <p>Infrastructure improvements will be identified in the Council's Strategic infrastructure Plan.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Appendix 2 Infrastructure Schedule updated to include appropriate references to rail infrastructure.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
79	7	Lichfield Planning on behalf of British Airways	4 The Vision - where we want to be Strategic Objectives to deliver The Vision SO21	Support	Support SO21	Support welcomed. <u>Council's Proposed Action</u> No proposed change.
79	8	Lichfield Planning on behalf of British Airways	4 The Vision - where we want to be Strategic Objectives to deliver The Vision SO23	Support	BA wishes to be part of the team preparing the development strategy, which will require good understanding of potential impacts on Heathrow's and BA's operations. BAA should also be represented. Suggested additional text: SO23: Develop and implement a strategy for the Heathrow Opportunity Area based on realistic assessment of potential growth or decline in airport related activities opportunities to ensure that local people benefit from economic and employment growth without detrimental social and environmental impacts.	Comments noted. The Heathrow Area Development Plan Document will be prepared following the production of the Site Allocations Development Plan Document. The scope of this document has not yet been determined and would be premature to amend SO 23 as proposed. <u>Council's Proposed Action</u> No proposed change.
79	9	Lichfield Planning on behalf of British Airways	9 Core Policies - Transport and Infrastructure 9 Core Policies - Transport and Infrastructure SO24	Support	BA provides the Community Learning Centre to the benefit of local residents, schools and community groups. Its continued operation depends on the viability and financial performance of the airport and BA.	Noted. <u>Council's Proposed Action</u> No proposed change.
79	10	Lichfield Planning on behalf of British Airways	4 The Vision - where we want to be Table 4.1 Summary of Growth in Hillingdon 2011-2026	Object	If Heathrow does not grow but declines it will be necessary to differentiate between airport related growth and other sources, so that realistic adjustments can be made to the figure from time to time.	Noted. <u>Council's Proposed Action</u> No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
79	11	Lichfield Planning on behalf of British Airways	4 The Vision - where we want to be The Spatial Strategy 4.11	Support	<p>"Heathrow 4.11 The role of Heathrow Airport as a key employment area will be strengthened and the continuing demand for associated freight handling and commercial floorspace will be met..."</p> <p>BA supports the general intention of this policy, but questions the inclusion of the word continuing demand. Demand for associated freight handling and commercial floorspace depends on growth in transport movements and will not be "continuing" if the airport's expansion is constrained.</p>	<p>Operational development within the airport boundary will not be constrained.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
79	12	Lichfield Planning on behalf of British Airways	4 The Vision - where we want to be Map 4.1 Key diagram 4.13	Object	<p>The Core Strategy key diagram shows the HOA as holding in total 3316 Ha. This policy quotes 821 Ha, and the revised London Plan has total area 700 Ha, The various land areas, employment and housing figures in this document are inconsistent, confusing, and require clarification. It is also necessary to clarify average density and land take of homes and employment, to indicate roughly where the additional homes are expected to be. This will avoid prejudicing potential land needed for future airport operations.</p> <p>Suggested addition to 4.13: "Land previously identified as the site for the third runway should retain its current designation, e.g. housing, Green Belt etc., and not be available for alternative development".</p>	<p>Changes to the Key Diagram and Map 5.1 will be made to clarify growth areas in the Heathrow Opportunity Area.</p> <p>The figures for housing and employment growth will be tested through the Heathrow Area Development Plan Document which will include issues of density.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Changes to the Key Diagram and Map 5.1 are proposed to clarify growth areas in the Heathrow Opportunity Area.</p>
79	13	Lichfield Planning on behalf of British Airways	4 The Vision - where we want to be The Spatial Strategy Para 4.14	Observation	<p>BA requests that the phrase "primary source" is replaced with "major source".</p> <p>Change 'Heathrow is the primary source of adverse air quality emissions through aviation activities and associated infrastructure and transport.'</p> <p>suggested change with 'Heathrow is one of a number of major sources including local road traffic and the M4 and M25 that impact the area.'</p>	<p>Agree.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Change words "the primary source" to "a major source" in paragraph 4.14.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
79	14	Lichfield Planning on behalf of British Airways	4 The Vision - where we want to be The Spatial Strategy Para 4.15	Support/ Object	BA recognises the need for and supports the preparation of a HOA strategy with careful definition of boundaries and general location of plan usages. However such planning activity requires the participation of BA (and BAA) who is able to understand the implications of the HOA strategy for efficient airport operations at Heathrow.	Stakeholder involvement in the consultation process will be determined when the document is produced. <u>Council's Proposed Action</u> No proposed change.
79	15	Lichfield Planning on behalf of British Airways	5 Core Policies - The Economy Policy E2: Location of Employment Growth	Object	<p>"The Council will accommodate a minimum of 3,800 additional hotel bedrooms, and new hotels and visitor facilities will be encouraged in Uxbridge, Hayes and sites outside of designated employment land on the Heathrow perimeter."</p> <p>The 'minimum' quota is inconsistent with Policy E3 (below). A constrained Heathrow will reduce demand for hotels and employment land. Replace the first sentence with: "The Council will accommodate additional hotel bedrooms in line with anticipated demand taking account of demand generated by Heathrow and other sources. The same is true for employment land".</p>	<p>Advice received by Hillingdon from Government Office for London was to incorporate specific targets where available. Policy E2 states the Council will accommodate a minimum of 3,800 hotel additional hotel bedrooms over the plan period. Given the two different targets in Table 5.2, it is considered appropriate to set a minimum growth benchmark of the lower figure which does not preclude achieving the higher number. The Flexibility boxes acknowledge potential future changes in demand and enable a review of these targets through the Annual Monitoring Report.</p> <p><u>Council's Proposed Action</u> No proposed change.</p>
79	16	Lichfield Planning on behalf of British Airways	5 Core Policies - The Economy Policy E3: Strategy for Heathrow Opportunity Area	Object	<p>BA wishes to be represented on the team preparing the DPD. BA supports the intention to prepare a DPD for realistic management of development in the HOA. This policy is better formulated than others we have commented on. However land must be protected not only "within Heathrow for airport-related activities" but also around Heathrow for potential expansion of both directly related and other related activities. BA insert "...consistent with national policy targets..."</p> <p>Suggested addition to E3: "...The DPD will also set requirements for climate change mitigation and adaptation consistent with national policy targets and to help deliver air quality improvements through a low carbon emission strategy."</p>	<p>The Council's current policy is to protect land within the airport boundary for airport related uses. This policy will be carried through into the site allocations DPD. Expansion of airport uses outside the Heathrow boundary area is not considered appropriate.</p> <p><u>Council's Proposed Action</u> Final sentence will be added to policy E3 as follows: The DPD will also set requirements for climate change mitigation and adaptation through a low carbon emission strategy and measures to improve local air quality.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
79	17	Lichfield Planning on behalf of British Airways	6 Core Policies - New Homes Table 6.5 : Proposed delivery of units from large SHLAA sites, by area	Support	Support for Table 6.5: Proposed delivery of units from large SHLAA sites, by area Highest no. of houses in Heathrow Opportunity Area (until 2016 anyway)	Noted. <u>Council's Proposed Action</u> No proposed change.
79	18	Lichfield Planning on behalf of British Airways	6 Core Policies - New Homes 6 Core Policies - New Homes 6.19	Support	Land previously identified as the site for the third runway should retain its current designation, e.g. housing, Green Belt etc., and not be available for alternative development.	Any previous identification of land for the third runway will not determine future designations in the Core Strategy or subsequent development plan documents. <u>Council's Proposed Action</u> No proposed change.
79	19	Lichfield Planning on behalf of British Airways	8 Core Policies - Environmental Management Strategic Objectives to deliver The Vision SO12	Support/ Object	Environmental Management -Support for SO12 BA will continue to work to reduce single-occupancy vehicle trips as part of its integrated Company Travel Plan, and in wider forums with LB Hillingdon, BAA and the Heathrow Area Transport Forum. BA has a particular issue with parking restrictions at Waterside. These restrictions require the provision of remote parking and a shuttle bus service that results in additional vehicle miles on local Hillingdon roads. Further these restrictions result in fly-parking in Hillingdon residential areas with associated impacts. Consideration should be given to determining appropriate parking solutions that do not result in additional vehicle trips and local impacts.	Issues of parking provision will be addressed in the forthcoming Development Management DPD. <u>Council's Proposed Action</u> No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
79	20	Lichfield Planning on behalf of British Airways	8 Core Policies - Environmental Management Policy EM1: Climate Change Adaptation and Mitigation Point 6	Object	<p>1 - High density developments should not be allowed in existing noise sensitive areas.</p> <p>2 - Point 6 assumes a direct relationship between carbon and air quality.</p>	<p>1 - Noted. The Core Strategy and future development decisions will consider PPG24 as a matter of good practice.</p> <p>2 - Noted - carbon emissions should be sought borough-wide not just in the areas of poor air quality.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>1 - No proposed change</p> <p>2 - EM1 Point 6 to be reworded to read 'Targetting areas with high carbon emissions for additional reductions through low carbon strategies. These strategies will also have an objective to minimise other pollutants that impact on local air quality. Targetting areas of poor air quality for additional emissions reductions'.</p>
79	21	Lichfield Planning on behalf of British Airways	8 Core Policies - Environmental Management Climate Change Adaptation and Mitigation	Support	<p>Support for monitoring "LO17 (Local) Indicator: Annual average concentrations of nitrogen dioxide (NO2) in specific parts of the Borough. Target: 40g/.m³."</p> <p>See BA comment on Policy EM1 above.</p>	<p>Noted</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
79	22	Lichfield Planning on behalf of British Airways	8 Core Policies - Environmental Management Policy EM3: River and Canal Corridors	Object	<p>LB Hillingdon can act as a catalyst for this policy by establishing a cooperative network with local landowners within the borough to promote the management of habitats for biodiversity, especially those who manage areas of special interest.</p>	<p>Noted. The Biodiversity Action Plan will aim to identify areas for further enhancements and improvements.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
79	23	Lichfield Planning on behalf of British Airways	8 Core Policies - Environmental Management Open Spaces, Sport and Leisure Para 8.46	Object	Quiet areas should not be singled out for protection to the exclusion of adjacent areas. Quiet areas should be considered as part of the overall noise environment, i.e. noise protection in one area should not result in noise disbenefits elsewhere, and should not be pursued in isolation. Designation of quiet areas needs to recognise existing and potential airport operations around Heathrow's environs.	Noted. <u>Council's Proposed Action</u> No proposed change.
79	24	Lichfield Planning on behalf of British Airways	8 Core Policies - Environmental Management Water, Air and Noise Management 8.98	Object	"8.98 Emissions from road traffic are recognised to be a major contributor to poor air quality in the area." See BA comments on para 4.14 above.	Paragraph 4.14 to be amended as suggested. <u>Council's Proposed Action</u> Change words "the primary source" to "a major source" in paragraph 4.14.
79	25	Lichfield Planning on behalf of British Airways	8 Core Policies - Environmental Management Water, Air and Noise Management 8.106	Object	"8.106 As such, noise remains a main challenge in the borough." BA would expect to continue to work with Hillingdon to deliver noise improvement as part of existing schemes and development of future schemes such as the DPD.	Noted. <u>Council's Proposed Action</u> No proposed change.
79	26	Lichfield Planning on behalf of British Airways	8 Core Policies - Environmental Management Policy EM8: Water, Air and Noise	Object	Monitoring: Number of electric vehicle charging points established in the borough In response to car technology developments provision of charging points could be encouraged in planning conditions or Section 106 requirements.	Noted. <u>Council's Proposed Action</u> No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
79	27	Lichfield Planning on behalf of British Airways	9 Core Policies - Transport and Infrastructure Policy T2: Public Transport Interchanges	Support	Support T2 with addition: Provide and improve existing and future rail infrastructure, including interchanges with Airtrack, Crossrail and High-Speed Rail.	<p>Crossrail is identified on the Core Strategy key diagram and the document will be updated to reflect the latest position on Crossrail. Improved public transport interchanges are also identified on the key diagram.</p> <p>Infrastructure improvements will be identified in the Council's Strategic infrastructure Plan.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Additional references added at Transport and Connectivity section in Appendix 2 (Infrastructure Schedule) to underground and surface rail infrastructure improvements in the borough (including Airtrack, Crossrail and High-Speed Rail).</p>
79	28	Lichfield Planning on behalf of British Airways	9 Core Policies - Transport and Infrastructure Policy T3: North-South Sustainable Transport Links	Support	Support policy T3	<p>Support welcomed.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
79	29	Lichfield Planning on behalf of British Airways	9 Core Policies - Transport and Infrastructure Policy T4: Heathrow Airport	Object	Policy T4 needs to include support for redevelopment of the airport in its current two runway configuration. This strategy should not preclude Runway 3 or Mixed Mode.	<p>Upgrades to operational infrastructure at Heathrow Airport have now been included in the Infrastructure Schedule at Appendix 2.</p> <p>Policy T 4 has been amended to state that the Core Strategy will support the sustainable operation of Heathrow Airport.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Appendix 2 Infrastructure Schedule amended to include references to operational infrastructure for Heathrow in the section covering "Physical Infrastructure : BAA".</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
80	1	Turley Associates on behalf of Stockley Park Consortium Ltd	4 The Vision - where we want to be The Vision for Hillingdon 2026	Support	We generally support the Council's 'Vision for Hillingdon 2026' i.e. to improve the environment and infrastructure as well as fostering economic growth and accessibility to jobs and to prosper from the presence of Heathrow Airport. We also support Stockley Parks continued role as a strategy employment site with the potential to contribute a significant proportion of the new employment proposed as part of the Heathrow Opportunity Area (Paragraph 4.18).	Support welcomed <u>Council's Proposed Action</u> No proposed change.
80	2	Turley Associates on behalf of Stockley Park Consortium Ltd	4 The Vision - where we want to be Map 4.1 Key diagram	Object	Map 4.1- Key Diagram needs to be amended to reflect a recent resolution and extant outline planning permission for Stockley Park Phase 3 in terms of land contained within the Green Belt and to extend the strategic employment site designation to include the site.	The key diagram is indicative and is not intended to be site-specific. Employment land and green belt boundaries will be considered through the Site Allocations DPD process. <u>Council's Proposed Action</u> No proposed change.
80	3	Turley Associates on behalf of Stockley Park Consortium Ltd	4 The Vision - where we want to be Strategic Objectives to deliver The Vision Supply of Employment Land Map 5.1 Locations for Economic Growth	Support/ Object	We support the strategic objective of Policy SO15 and the designation of Locally Significant Employment Locations (LSEL), which includes Stockley Park. Nevertheless, and given that an extant outline planning permission for the development of Phase 3 exists, we consider that the Proposed LSEL should be extended to include Stockley Park Phase 3 and Phase 4. We also support the inclusion of Stockley Park within a proposed area of office and hotel growth. However, we consider that this designation should be expanded to include complementary uses such as retail/restaurant and other ancillary uses.	The key diagram is indicative and is not intended to be site-specific. Employment land boundaries will be considered through the Site Allocations DPD process. Uses within designated employment sites will be dealt with through development management policies. <u>Council's Proposed Action</u> No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
80	4	Turley Associates on behalf of Stockley Park Consortium Ltd	8 Core Policies - Environmental Management Policy EM1: Climate Change Adaptation and Mitigation Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Object	<p>1 - Policy EM1 (1) should be amended to include Strategic Employment sites and Proposed Locally Significant Employment Locations as areas capable of providing higher density development.</p> <p>2 - Policy EM1 (2) should be amended to take into account specific site by site merits and constraint and therefore should be amended to read ..."require a modal shift away from private car use where specific initiatives proposed through site specific Travel Plans are appropriate and reasonable".</p> <p>3 - In respect of Policy EM2, it is considered that the current Green Belt designations which are the subject of extant planning permissions or recent resolutions to grant planning permission, should be removed through the Development Plan Documents. In particular, it is considered that the Green Belt designation forming part of Stockley Park Phase 3 should be removed.</p> <p>4 - Moreover, and in order to secure the future growth of Stockley Park, in particular on land known as Phase 4, consideration should be given to amending the Green Belt and Green Chain designations in this location, or providing a more flexible approach whereby Strategic Employment site and LSEL designations can coexist, provided that development proposals maintain the positive contribution of the Green Chain and Green Belt in providing a visual and physical break in the built up area.</p> <p>5 - When considered against the requisite criteria for assessing Green Belt designations contained within Planning Policy Guidance Note 2, development within this location would be appropriate given the Borough's commitment to providing improved north/south transport links (as shown on Map 4.1). Moreover, the proposed Cross rail link will also enhance the sustainable nature of this location in terms of delivering sustainable economic development through the future development of Phase 4 for employment uses and reinforcing the area's designation within the Heathrow Opportunity Area.</p>	<p>1 - Disagree. The requirements of EM1 provide a broad strategy basis, and also help set goals for future designations. The current wording of the policy is appropriate to the level of the Core Strategy.</p> <p>2 - Disagree. The policy provides an aspirational objective for all developments to seek solutions to sustainable modes of transportation. Further detailed policy will be brought forward in the Development Management Development Plan Document.</p> <p>3 / 4 / 5 - Disagree. All these detailed matters will be considered during preparation of the Site Allocations Development Plan Document rather included in the Core Strategy - which deals with overall objectives and policies for the borough.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
80	5	Turley Associates on behalf of Stockley Park Consortium Ltd	9 Core Policies - Transport and Infrastructure Policy T1: Accessible Local Destinations	Object	<p>Policy T1 should take account of Strategic Employment sites and LSEs, and should be amended to reflect the importance of these designations to the economic growth of the Borough.</p> <p>In addition, the Heathrow Opportunity Area should also be reflected. Development, should be required to encourage access by sustainable modes.</p>	<p>It is proposed to add an overarching sentence at paragraph 5.24 which makes clear that growth in the Heathrow Opportunity Area will be focused on sustainable locations such as town centres and areas with good access to public transport. New development over a certain threshold will require Travel Plans at application stage.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Add sentence at end of paragraph 5.24 to state :</p> <p>"Growth in the Heathrow OA will be focused on sustainable locations such as town centres and areas with good access to public transport."</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
80	6	Turley Associates on behalf of Stockley Park Consortium Ltd	9 Core Policies - Transport and Infrastructure Policy T2: Public Transport Interchanges Policy T3: North-South Sustainable Transport Links	Object	In respect of policies T2 and T3, consideration should be given to how improved or new public transport interchanges will be financed and how proposals will be considered that come forward in advance of any strategies being developed in the Development Plan Documents.	<p>The London Borough of Hillingdon is involved in regular discussions with Transport for London (TfL). The borough supports measures for improved public transport and will take forward these and other suggestions to inform discussions with TfL. Improvements such as improved or new public transport interchanges are influenced by TfL's strategic transport priorities and are reliant on funding.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
81	1	Planner, Peacock and Smith on behalf of Wm Morrison Supermarkets plc	5 Core Policies - The Economy Policy E5: Town and Local Centres	Object	The Town Centres and Retail Study, indicates that there is very limited capacity available to support additional convenience goods floorspace, with only 415 sq.m net for the whole of the Borough at 2016. The Retail Study is now out-of-date, and we consider that, in terms of retail floorspace capacity, the Core Strategy should reflect the findings of an up-to-date Retail Study, as required by the guidance set out in PPS4.	<p>The Council's Retail Study identifies 415 sq.m of convenience floorspace need in the borough, not capacity.</p> <p>Where more up to date figures are available, for instance comparison floorspace, these have been reflected in the Core Strategy. See the Position Statement on employment land and comparison retail floorspace for further information.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change</p>
81	2	Planner, Peacock and Smith on behalf of Wm Morrison Supermarkets plc	8 Core Policies - Environmental Management Climate Change Adaptation and Mitigation	Object	Concerned that the promotion of renewable energy offers little flexibility and does not take into consideration possible viability or feasibility of technologies.	<p>The Core Strategy sets the overall approach the Council will take towards encouraging renewable energy use in new developments. Additional wording is to be added to Policy EM1 drawing attention to the London Plan targets for this.</p> <p>The Council will consider whether it will set detailed local targets as part of work towards a Development Management Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Additional bullet point added to policy EM1 to read: 'Encouraging the installation of renewable energy for all new developments in meeting the carbon reduction targets savings set in the London Plan. Identify opportunities for new sources of electricity generation including anaerobic digestion, hydroelectricity and a greater use of waste as a resource.'</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
82	1	Mineral Products Association	8 Core Policies - Environmental Management Policy EM9: Safeguarding Mineral Resources	Object	<p>We suggest that your policies EM9 and 10 do not meet the Strategic Objective SO5 in that they do not “Safeguard and promote areas of geological importance...” Neither do the policies provide in a coherent way, for the future needs for construction materials.</p> <p>Policy EM9, the situation in respect of mineral safeguarding has changed since the apparently last consultation with the minerals industry over mineral resources in 2003 (Jacobs Report, para 6.4.1 (2)).</p> <p>In 2008 the BGS document A Guide to Mineral Safeguarding in England was produced to facilitate a more sustainable approach to mineral safeguarding. This allows a variety of local conditions to be taken into account but according to a common format and approach. This approach starts with the assumption that all minerals of economic importance should be safeguarded against development and identified so that mineral issues can be taken into account in the development process. In other words, safeguarding should be resource driven rather than constraint driven.</p> <p>Consequently, we cannot agree with the proposal to exclude environmental designations or urban areas from safeguarding and merely to concentrate on existing or likely future workings, which is contrary to the advice of the BGS. The BGS document states that, “Effective safeguarding of mineral resources for the long term requires their definition be based principally upon the best available geological information. Mineral safeguarding should not be curtailed by other planning designations, such as urban areas and environmental designations without sound justification. Defining MSAs alongside environmental and cultural designations will ensure that the impact of any proposed development on mineral resources will be taken into account alongside other planning considerations. In urban areas, MPAs should define MSAs where they consider this will be of particular value. This might comprise highlighting the potential for extracting valuable or scarce minerals (such as Etruria Formation clays, coal or river terrace sand and gravel resources) beneath large regeneration projects, brownfield sites and reservoirs.” (page 15)</p> <p>We appreciate that your approach follows The London Plan 2008 (policy 4A.31) but we would observe that the policy requires Boroughs to “identify and safeguard aggregate resources suitable for extraction”. In our view, this would not preclude the BGS recommended approach of identifying and safeguarding deposits of economic importance whether constrained or not. The BGS description of sand and gravel as a valuable and scarce mineral resource is certainly applicable to London.</p> <p>We therefore believe that you should begin with the mapped resource of sand and gravel in the Borough and only exclude those areas that have already been fully worked out. This would include the sites you have identified as potentially available and suitable for extraction, but more importantly, it would also include all the remaining resource so that prior extraction of mineral can be fully evaluated in major planning proposals.</p>	Detailed site allocations for minerals and other uses in the borough will be brought forward as part of the Site Allocations and Proposals Map Development Plan Documents.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
----	---------	---------------------------	-------------------------------	------------------------------	---------------------------	--------------------

We also support a criteria based management policy for MSAs with two caveats.

First, that discussion about prior extraction should take place as early in the development planning process as possible to give adequate time for extraction to be carried out. Once the application has been made it is usually too late to think seriously about minerals. This means that potential conflicts need to be addressed at the LDF stage. This is for three reasons; developers will benefit from the additional certainty that the potential for prior extraction provides when built into their investigation and design of the site; developers will be able to factor in the revenue and valuation consequences in their acquisition strategies; and the economics of development can more easily accommodate the delay inherent in potential prior extraction of minerals the earlier it is considered.

Second, that the proposed assessment of the potential impacts on underlying mineral resources will be more clearly specified for the assistance of developers who may not have the relevant expertise to evaluate mineral deposits. It is imperative for the local authority to specify that investigation of the resource should be to the same standards that our members employ to evaluate a deposit.

You indicate proposed buffers for sand and gravel resources of 250 m. We agree that this is a sensible distance since MPS2 indicates that the amenity effects of mineral working usually extend no further than this from most sensitive land uses. However, this should not be taken as evidence that mineral working cannot be successfully undertaken at closer distances if mitigation is employed; merely that for the purposes of safeguarding such a distance would tend to capture most proposals that if permitted, might affect the ability of a mineral site to be worked.

Proposed Changes

We therefore believe that Map 8.6 Mineral Areas for Safeguarding should be amended to show the entire sand and gravel resource for the Borough as the MSA.

Suggested changes for Policy EM9:

"The Council will safeguard mineral resources in Hillingdon from other forms of development that would prejudice future mineral extraction. The Council will define the 'Mineral Safeguarding Area' in the Site Allocations DPD based on the geologically mapped sand and gravel resource that is considered to be of current and future economic importance. Major developments in the Area will only be permitted where it has been demonstrated that

- a.the mineral concerned is no longer of any value or potential value, or
- b.the mineral can be extracted prior to the development taking place, or
- c.the development will not inhibit extraction if required in the future, or
- d.there is an overriding need for the development and prior extraction cannot be reasonably undertaken, or
- e.the development is allocated in a local development plan document, or
- f.the development is not incompatible.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
----	---------	---------------------------	-------------------------------	------------------------------	---------------------------	--------------------

The Council will also safeguard areas within 250m of the 'Mineral Safeguarding Area as a buffer for the future extraction of the sand and gravel reserve, to safeguard the resource from the impact of 'proximal development'."

Council's Proposed Action

No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
82	2	Mineral Products Association	8 Core Policies - Environmental Management Policy EM10: Mineral Extraction	Object	<p>We suggest that your policies EM9 and 10 do not meet the Strategic Objective SO5 in that they do not “Safeguard and promote areas of geological importance...” Neither do the policies provide in a coherent way, for the future needs for construction materials.</p> <p>Policy EM10-We support your intention to maintain a contribution to the apportionment for West London. However, given that you do not indicate how big a proportion this is going to be, it does not appear that the strategy can be justified, nor is it capable of being monitored as it stands. Justification is also lacking because the sites in policy EM9 are not presented with any indication of their yield, nor of any assessment of what role they might play in meeting the requirements of the West London apportionment area. The sites were apparently derived from a canvassing exercise carried out in 2003. Has there been any updating of the evidence base to confirm that the sites identified are still capable of being developed and are in the control of the mineral industry? In addition, you provide for no commitment to even a contribution to a minimum seven year landbank in accordance with MPS1 and The London Plan.</p> <p>Moreover, we do not follow the remainder of the policy since although this ostensibly refers to MSAs it is actually a set of criteria for the permission of applications submitted for mineral development. We therefore request some changes to clarify what is meant.</p> <p>Proposed Changes to Policy EM10: “The Council will make an appropriate contribution towards the West London apportionment figure in the London Plan in the form of mineral working at the principal Broad Locations and will aim to maintain a minimum land bank equivalent to seven years’ production for the West London area at a rate of 0.5 million tonnes per annum.</p> <p>The principal Broad Locations for mineral development are</p> <ul style="list-style-type: none"> • <input type="checkbox"/> land west of the present Harmondsworth Quarry, • <input type="checkbox"/> land north of the village of Harmondsworth, and • <input type="checkbox"/> land at Sipson Lane, east of the M4 spur. <p>Outside the allocated areas identified in this Plan mineral extraction will not be permitted except where:</p> <ul style="list-style-type: none"> • <input type="checkbox"/> it is demonstrated that the proposal is sustainable, essential to maintain the West London land bank in accordance with national policy, and necessary to maintain apportioned provision for West London as set out in the London Plan • <input type="checkbox"/> suitable measures and controls can be put in place to ensure there is not an unacceptable adverse impact on the environment or human health • <input type="checkbox"/> the mineral workings can be restored to the highest standards using progressive restoration techniques, and secure a beneficial and acceptable after use in line with Green Belt objectives.” 	<p>Comments noted - the Council considers that detailed site development proposals are best considered in the Site Allocations Development Plan Document rather than the Core Strategy (at which time the agreed apportionment figure for the Draft Replacement London Plan should be known).</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p style="text-align: right;">No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
82	3	Mineral Products Association	8 Core Policies - Environmental Management Minerals and Waste Paras 8.120 - 8.129	Object	<p>Other Matters, the Core Strategy does not include policies for the provision of secondary and recycled aggregates in accordance with The London Plan (policies 4A.30 & 31), nor for the identification, support and safeguarding of railhead capacity in accordance with MPS1 Practice Guide, para 34 and The London Plan paragraphs 4.92 & 4.93. This should be remedied. Recommend a new policy should be inserted to deal with secondary and recycled aggregates, as follows:</p> <p>The Council will give priority to the production and supply of recycled and secondary aggregates. Provision will be made through the Site Allocations DPD for a network of permanent and long term temporary recycling facilities across the Borough which will make a significant contribution to the production of recycled and secondary aggregates.</p> <p>Suitable locations for permanent recycled and secondary aggregates facilities include:</p> <ul style="list-style-type: none"> •general industrial land •waste transfer stations •permanent waste management sites •railheads <p>Suitable locations for temporary recycled and secondary aggregates facilities include:</p> <ul style="list-style-type: none"> •mineral sites •major development areas (brownfield land) <p>Also, a new policy should be inserted to deal with railhead capacity, as follows:</p> <p>The sustainable transport of minerals will be encouraged. New railheads and ancillary facilities and other forms of sustainable transport will be identified, encouraged and safeguarded. Within such safeguarded areas there will be a presumption against any development that could prejudice the potential use of the protected transport facility for the transport of minerals.</p>	<p>Comments noted - to be used to inform the drafting of the West London Waste Plan for the six west London boroughs.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
83	1	CgMs Consulting on behalf of Metropolitan Police	4 The Vision - where we want to be Strategic Objectives to deliver The Vision	Support	<p>The MPA/MPS support Strategic Objective 2 which seeks to create neighbourhoods that are safe, and Strategic Objective 4 which seeks to ensure that development contributes to a reduction in crime and disorder, is resilient to terrorism, and delivers safe and secure buildings, spaces and inclusive communities. This accords with the principles of PPS1.</p>	<p>Support welcomed.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
83	2	CgMs Consulting on behalf of Metropolitan Police	5 Core Policies - The Economy Policy E1: Managing the Supply of Employment Land Para 5.10	Support	The MPA/MPS welcomes the flexibility within this Policy to allow a managed release of surplus industrial land for other uses, on the proviso that 'other uses' would incorporate policing facilities. The MPA/MPS have indicated a potential interest in the Braintree Road, Blyth Road and Warwick Road sites listed at paragraph 5.11. More detailed representations will be made to the Site Allocations and Development Management Development Plan Documents in due course. The MPA/MPS also support the approach set out in paragraph 5.10 which is that the release of surplus industrial land should provide employment or support regeneration.	Support welcomed <u>Council's Proposed Action</u> No proposed change.
83	3	CgMs Consulting on behalf of Metropolitan Police	8 Core Policies - Environmental Management Policy EM6: Flood Risk Management Flood Risk Management	Object	The MPA/MPS note that the Policy nor its supporting refer to the vulnerability of land uses, as set out in Table D.2 of PPS25, which is important in undertaking the Sequential and Exception Tests. We would wish to highlight that PPS25 (2010), has been amended to consider Police, ambulance and fire stations which are not required to be operational during flooding as a less vulnerable use. The MPA/MPS therefore recommends that reference is included in the Core Strategy to the flood risk vulnerability classification set out in Table D.2 of PPS25.	Disagree. Planning Policy Statement 25 forms part of the overall development plan framework. There is strict guidance on not repeating national and regional policy. The vulnerability classifications are outlined clearly in PPS25 and therefore do not need to be reproduced within the Core Strategy. <u>Council's Proposed Action</u> No proposed change.
83	4	CgMs Consulting on behalf of Metropolitan Police	7 Core Policies - Historic and Built Environment Policy HE1: Heritage	Object	This Policy seeks to actively encourage the regeneration of historic buildings and assets. The MPA/MPS supports this approach if this in turn supports the re-use of redundant historic buildings for alternative uses.	In accordance with the objectives of the new National Guidance on Historic Environment (PPS 5), Policy HE1 of the Core Strategy supports the the active regeneration of historic assets. <u>Council's Proposed Action</u> No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
83	5	CgMs Consulting on behalf of Metropolitan Police	9 Core Policies - Transport and Infrastructure Policy CI1: Community Infrastructure Provision	Support	Support for a number of policy objectives. Consequently the MPA wish to ensure that the Core Strategy allows the potential for the provision of police facilities in town centre locations.	<p>The Core Strategy generally supports the provision of social infrastructure - part 7 of the policy will be amended to specify "police facilities" - i.e. so that it does not preclude police facilities being located in town centres or other accessible locations.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend opening words of part 7 of policy CI 1 to read:</p> <p>"Locating libraries, health facilities, police facilities, leisure facilities and community centres in town centres...."</p>
83	6	CgMs Consulting on behalf of Metropolitan Police	Appendix 2 Infrastructure Schedule	Object	The MPA/MPS recommends that reference should be made in Appendix 2 to the Metropolitan Police's Estate Strategy.	<p>Reference to the Estates Strategy will be provided in the wider Strategic Infrastructure Plan.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Metropolitan Police Estates Strategy will be referenced in 'Other Community Infrastructure' section of Appendix 2 Infrastructure Schedule.</p>
83	7	CgMs Consulting on behalf of Metropolitan Police	Appendix 4 Glossary	Object	The MPA/MPS therefore recommends that either: a) policing facilities are included within the term infrastructure; or b) a definition is provided for community facilities and/or social infrastructure, which should include policing facilities.	<p>Emergency services are included in the description of social infrastructure contained in paragraph 9.37.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
84	1	Individual	1 Introduction Consultation process	Object	<p>I think that the consultation should have been 12 weeks, which is pretty much standard for national and local government consultations - especially as you've asked for views on about 500 pages of dense text.</p> <p>I was surprised that you didn't publicise the consultation more widely - considering its been so many years in production!</p>	<p>Consultation on the Core Strategy is a statutory requirement covered by the Town and Country Planning Regulations 2004 (as amended). This Regulation 25 consultation has been carried out in line with the these Regulations Whilst the regulations do not specify a particular time period for representations on Regulation 25, Hillingdon's Statement of Community Involvement (SCI) adopted in November 2006 sets out a minimum of six weeks for public consultations for each of the stages in the plan making process. In line with previous consultations on the Core Strategy, a six week consultation period was planned for the draft Core Strategy to be consistent with Hillingdon's SCI.</p> <p>3. Involvement of the public and key stakeholders in preparing the Core Strategy Consultation Draft has followed the approach set out in the SCI. Various publicity methods were used with the aim of raising awareness of the LDF and informing as many people as possible. These have included information being made available on the Council's website, at all borough libraries and One-stop-shop in Hayes, 6 public drop-in sessions, 7 press notices, an article in Hillingdon People magazine, poster displays at Post Offices, GP surgeries and schools, public exhibitions at Uxbridge Library and Civic Centre, audio advertisement in the Hillingdon Talking Newspaper for the visually impaired, attendance at representative group meetings. A total of 2970 letters/ emails were sent to a wide range of groups and individuals on the LDF consultation database including 50 randomly selected residents per ward from the electoral register (1100) and to 197 randomly selected businesses from the 2008 Hillingdon Business Directory.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
84	2	Individual	Core Strategy Consultation Draft	Object	Need to reduce repetition in document.	<p>Comments noted. In essence the Vision and Strategic Objectives constitute an Executive Summary of the key provisions of the document.</p> <p>Many of the central themes in the document, such as improving north/south transport connectivity, relate to a number of policy objectives.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
84	3	Individual	8 Core Policies - Environmental Management Flood Risk Management	Object	Despite numerous references to climate change adaptation and river flooding, the only references to surface water flooding come in reference to new build. Recent flood events in Britain have predominantly come from surface water events. Surprised at the lack of reference to understanding and addressing the threat posed by surface water flooding, given that the likelihood of a surface water flood event in Hillingdon is overwhelming more likely than a fluvial one, and potentially massively more damaging. Granted there is a vague commitment to an SFRA review at some point, but given the potential risks and uncertainties, this is pretty weak.	<p>Noted. The Council will prepare a Surface Water Management Plan to ascertain where any problem drainage areas are and the specific risks related to them. However, the flood risk chapter can be strengthened to include more emphasis on surface and foul water drainage.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>New section added after para. 8.83 on 'Surface and Foul Water Drainage' to read 'The mismanagement of surface water flooding can also result in the increased risk of flooding. Sewage and drainage systems struggle to keep pace with the rate of development. The unchecked loss of natural drainage areas through increased hardstanding puts significant pressure on drainage systems, particularly in times of heavy rain. As development progresses and/or urban areas expand these systems become inadequate for the volumes and rates of storm water they receive, resulting in increased flood risk and/or pollution of watercourses. Allied to this are the implications of climate change on rainfall intensities, leading to flashier catchment/site responses and surcharging of piped systems. The impacts of climate change will add to the pressure on the drainage systems and it is therefore essential that all new development is managed to minimise the problems. The management of surface water drainage for new development comes in the form of Sustainable Urban Drainage Systems (SUDS). These seek to manage storm water as close to its source as possible, mimicking storm water flows arising from the site, prior to the proposed development. Typically this approach involves a move away from piped systems to softer engineering solutions inspired by natural drainage processes. SuDS should be designed to take into account the surface run-off quantity, rates and also water quality ensuring their effective operation up to and including the 1 in 100 year design standard flood including an increase in peak rainfall of up to 30% to account for climate change. SUDS come in a variety of different types, from infiltration techniques through to water</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
						<p>harvesting. Wherever possible, a SuDS technique should seek to contribute to each of the three goals identified below with the favoured system contributing significantly to each objective. Where possible SuDS solutions for a site should seek to:</p> <ul style="list-style-type: none"> -Reduce flood risk (to the site and neighbouring areas); -Reduce pollution; and -Provide landscape and wildlife benefits. <p>Foul water flooding is also a problem that occurs where there is a lack of capacity or blockages within the receiving system. The Council will continue to work with the water authorities to identify problem drainage areas, particularly where new development could worsen the impacts. Further surface and foul water studies will complement the existing strategic flood risk assessment and will be a material consideration in formulating planning decisions.'</p>
84	4	Individual	Core Strategy Consultation Draft	Object	Nothing in any of the documents leapt out at me as something to be proud of; something to tell people about, it's just business as usual.	<p>Comments noted. This issue could be addressed in a foreword to the document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Appropriate foreword to be written for the document.</p>
84	5	Individual	Core Strategy Consultation Draft	Object	The Government's 'big society' policy objective should be reflected in the document.	<p>The document was prepared prior to the election of the Coalition government. Consideration of how to implement the localism agenda will be undertaken in accordance with Government guidance as work progresses on the Local Development Framework.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
85	1	Planning Potential Ltd on behalf of ADSA Stores Ltd	5 Core Policies - The Economy Policy E5: Town and Local Centres	Object	<p>The Core Strategy does not provide figures for additional convenience floorspace within retail centres nor has this been addressed in the position statement "Hillingdon's Employment and Comparison Retail Floorspace" published by the Council in June 2010 (the Position Statement).</p> <p>We consider that additional convenience retail provision is required in the borough that the evidence base does not meet the criteria as set out in PPS4 Policy EC1.3, and for that reason the Core Strategy is unsound.</p>	<p>The Position Statement sets out up to date figures where they are available, for instance comparison floorspace, and these have been reflected in the Core Strategy.</p> <p>The most up to date figures for convenience retail are from Hillingdon's Retail Study which concludes 415 sq m will be needed across the borough up to 2016. In terms of PPS4 Policy EC1.3, there is no identified deficiency of convenience floorspace in the borough. A sentence will be added to clarify the position on convenience retail growth.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Revise third sentence of paragraph 5.34 to read:</p> <p>Hillingdon's Retail Study assessed the borough's convenience floorspace requirements and concluded 415 sq m would be needed across the borough up to 2016 and that local shops are particularly susceptible to closure and pressure for change of use.</p>
85	2	Planning Potential Ltd on behalf of ADSA Stores Ltd	Appendix 4 Glossary Town and Neighbourhood Centres	Object	<p>The glossary in Appendix 4 defines the centres within the retail hierarchy as Minor, Local, District and Metropolitan centres. Neighbourhood centres is used in the Core Strategy to refer collectively to District, Local and Minor centres. These definitions do not conform to the definitions in Annex B of PPS4 or the adopted and emerging London Plan.</p>	<p>Local centre designation will remain.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
85	3	Planning Potential Ltd on behalf of ADSA Stores Ltd	Appendix 4 Glossary Town and Neighbourhood Centres	Object	The draft Core Strategy defines Hayes and Ruislip as a District Centres. We consider that this definition as 'District Centre' needs clarification as it does not reflect the definitions in Annex B of PPS4.	<p>The definition in the Core Strategy Glossary is taken from the London Plan 2008. PPS4 Annex B states that district centres identified in the London Plan typically perform above district centres as defined in PPS4. Consideration will be given to using the definition of District Centres provided in the draft replacement London Plan 2009.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>In Glossary delete previous definition of 'District Centre' and replace with 'Distributed more widely than the Metropolitan and Major centres, providing convenience goods and services for more local communities and accessible by public transport, walking and cycling. Typically they contain 10,000 –50,000 sq.m of retail floorspace. Some District centres have developed specialist shopping functions'.</p>
85	4	Planning Potential Ltd on behalf of ADSA Stores Ltd	5 Core Policies - The Economy Town and Neighbourhood Centres	Object	The definition of a District Centre within the glossary of the draft Core Strategy specifically states that “developing the capacity of District centres for convenience shopping is critical to ensure access to goods and services at the local level”. We consider that all the centres and Hayes in particular have the potential to offer greater convenience provision and strengthen the centre’s position in the retail hierarchy to the benefit of shopping patterns across the borough as a whole.	<p>Hillingdon's Retail Study assessed the borough's convenience floorspace requirements and concluded 415 sq m would be needed across the borough up to 2016. There is no current deficiency of convenience floorspace in the borough and applications for convenience retail floorspace will be assessed individually. A sentence will be added to clarify this position.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Revise third sentence of paragraph 5.34 to read:</p> <p>Hillingdon's Retail Study assessed the borough's convenience floorspace requirements and concluded 415 sq m would be needed across the borough up to 2016 and that local shops are particularly susceptible to closure and pressure for change of use.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
86	1	GL Hearn on behalf of Tesco Stores Ltd	5 Core Policies - The Economy Policy E5: Town and Local Centres Map 5.3: Town Centre Improvements	Object	<p>Whilst Tesco fully supports the Council's objectives for North Hillingdon as identified through Map 5.3 and Option 1 the Council has a) failed to acknowledge the contribution that the development of the former Master Brewer site can make to the Local Centre and b) the Council's aspirations for the area surrounding Hillingdon Station.</p> <p>It is suggested that the Town Centre Improvements envisaged for North Hillingdon Local Centre, as identified through Map 5.3, is changed to Option 2 – Strengthen core shopping area.</p>	<p>The Master Brewer site is within the North Hillingdon local centre and there are no plans to change the boundary. The Retail Study notes the contribution of specialised retail and service provision in attracting shoppers and therefore supporting the viability of the centre. It is therefore not appropriate to change option 1 to option 2 on Map 5.3. The Retail Study also recognises in principle appropriate locations for supermarkets. The Core Strategy is a high-level strategic document and details of specific sites will be considered through the Site Allocations process.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
87	1	Fullerong Planning Consultants	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision	Object	<p>Amend part B(ii) of the policy from</p> <p>Proposals for sites to accommodate the specific needs of Travellers (Irish and Scottish), Gypsies, Roma, Sinti and Travelling Show People should:</p> <p>Be located on a site and in an area that is environmentally acceptable for residential occupation</p> <p>to;</p> <p>Be located on a site and in an area suitable to provide such occupation;</p>	<p>The proposed change to clause ii) of the policy is not accepted on the basis that the Council is seeking to avoid the development of sites that are environmentally sensitive.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
87	2	Fullerong Planning Consultants	8 Core Policies - Environmental Management Map 8.1 Open Spaces, Rivers and Canal Corridors Para 8.45	Object	<p>The objection relates to the proposed continuation of the Countryside Character Areas as demarked on Map 8.1. It is important to consider that the Countryside Conservation Areas have no statutory status meaning there is little planning merit in continuing with the designation. By having no statutory status the principles of having a Countryside Conservation Area are impossible to enforce as it involves the protection of hedgerows and other features not afforded protection by the planning system.</p> <p>Further, the Countryside Conservation Area designations also cover areas already washed over by the Metropolitan Green Belt which are thereby subject to the highest level of planning policy. Green Belt policy's fundamental aim is to maintain the openness and visual quality of the Green Belt, which in turn provides the necessary protection and control as sought by the Countryside Conservation Areas.</p> <p>Therefore, as it is unnecessary duplication of Green Belt aims and policy, please delete the Countryside Conservation Area designation from Map 8.1 and any other related maps in the Core Strategy.</p> <p>In view of the above, Para 8.45 which provides a description of the Countryside Conservation Areas should be deleted.</p>	<p>Countryside Conservation Areas serve a different function to Green Belts, by seeking to protect the traditional agricultural landscapes and the character of these particular areas of open space. These designations are subject to statutory policies in the Council's UDP Saved Policies that will be carried forward into the Site Allocations and Development Management Development Plan Documents.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
88	1	Individual	1 Introduction Para 1.3	Support	<p>Qualified support for para. 1.3.</p> <p>However, to have a reasonable prospect of attainment of this ambition, the Strategy should require rather than 'encourage'. Also delete 'helps to'.</p>	<p>To comply with existing national planning guidance the Core Strategy cannot require the sustainable use of land, only encourage its provision. The design of buildings alone will only help to create sustainable communities - a wider series of factors such as transport choices and the siting of development will also help create these.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
88	2	Individual	8 Core Policies - Environmental Management Climate Change Adaptation and Mitigation Policy EM1: Climate Change Adaptation and Mitigation	Object	<p>1 - Throughout the Core Strategy greater heed should be paid to Climate Change, adaptation & mitigation.</p> <p>2 - Making the existing building stock climate change proofed and more resilient is a challenge of a major order.</p>	<p>1 - The Council has to balance the action on Climate Change with all the other duties. Although Climate Change does cut across a wider range of issues. The Core Strategy provides a framework for Climate Change which will provide direction for specific policies within the Development Management Document. The Core Strategy needs to be considered in line with National Planning Policy and the London Plan. The National, Regional (London Plan) and Local (Core Strategy) policy context gives considerable weight to Climate Change in spatial planning.</p> <p>2 - Agree. A flexible approach should be given to providing energy efficiency in new development. If the higher standards cannot be realised in a new development, then there should be scope to provide support to existing development. Policy EM1 to be amended to provide support to using new development to improve the existing housing stock.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>1 - No proposed change.</p> <p>2 - Wording to be incorporated at Policy EM1 after point 7 to read:</p> <p>"Promoting new development to contribute to the upgrading of existing housing stock where appropriate"</p>
88	3	Individual	1 Introduction Policy E3: Strategy for Heathrow Opportunity Area Para 1.5	Support	<p>Expresses support in principle for Heathrow Area DPD and Council should not leave matters to a planning framework handed down by the GLA. Testing of growth figures (housing and employment) should occur through the preparation and scrutiny of the Heathrow DPD which takes on board the borough's and local needs, priorities and aspirations.</p> <p>Such are the challenges facing this part of the Borough – from existing situation, trends and strategic planning requirements – that I do not feel that the Policy responses set out in Chapters 5 to 9 are adequate enough to achieve the ambition, the Vision and Objectives set out in the Core Strategy.</p>	<p>Support for Heathrow Area DPD is welcomed.</p> <p>There are many challenges facing the south of the borough. The Core Strategy is a high level document which covers broad issues including where and how the borough will accommodate new jobs and homes. The Core Strategy will be supported in the delivery of the vision and objectives by other Local Development Framework documents, including the Heathrow Area DPD, Site Allocations DPD and Development Management DPD, as well as other Council strategies such as Sustain Renew Prosper.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
88	4	Individual	1 Introduction Para 1.6	Object	<p>Paragraph 1.6: Certainly the draft Core Strategy has come a long way now that it has a spatial organising approach, but it has only belatedly captured public interest (eg Hayes Gazette, 28th July 2010).</p> <p>Having regard to the Test of Soundness with evidence of participation, I would advise that a more open dialogue be maintained with the residents and stakeholders of the Borough in the run up to the publication of the 'Submission Document' in the Autumn 2010. That the public/ stakeholders be involved in the refinement of the current draft. This would go some way to meeting the Duty to Involve which requires Local Authorities to embed a culture of engagement and empowerment (Local Government & Public Involvement in Health act 2007).</p> <p>As to being based on 'sound evidence', it is disappointing that only a limited number of sources of evidence are accessible via the Council's website. Before publication of the 'Submission Document', I would ask that an evidence library, physical & virtual, be established.</p>	<p>Notices in the local press were placed on 16th June 2010 allowing a 6 week consultation period ending on 30th July.</p> <p>Involvement of the public and key stakeholders in preparing the Core Strategy Consultation Draft has followed the approach set out in the Council's Statement of Community Involvement (SCI) adopted in November 2006. Various publicity methods were used with the aim of raising awareness of the LDF and informing as many people as possible. These included information being made available on the Council's website, at all borough libraries and One-stop-shop in Hayes, 6 public drop-in sessions, 7 press notices, an article in Hillingdon People magazine, poster displays at Post Offices, GP surgeries and schools, public exhibitions at Uxbridge Library and Civic Centre, audio advertisement in the Hillingdon Talking Newspaper for the visually impaired, attendance at representative group meetings. A total of 2970 letters/ emails were sent to a wide range of groups and individuals on the LDF consultation database including 50 randomly selected residents per ward from the electoral register (1100) and to 197 randomly selected businesses from the 2008 Hillingdon Business Directory.</p> <p>Agree, other evidence base documents are currently being prepared/ updated and will be posted on the Council's website on completion.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
89	1	Friends of Lake Farm	5 Core Policies - The Economy Policy EM5: Sport and Leisure	Support	<p>Endorsing Policy EM5 Sport & Leisure: Friends of Lake Farm Country Park at its most recent meeting of 22nd July 2010 requested that I should respond to the draft Core Strategy:</p> <p>We are pleased with the recognition afforded to the Borough's open spaces and parks which make Hillingdon one of the greenest boroughs in London and help define its distinctive strengths. And that the proposed increase in quality of and access to these open spaces is seen as an important component of uplifting amenity, environment, and the well being/ quality of life for all.</p> <p>Lake Farm CP is both a natural area of biodiversity (Borough Grade I) and a venue for sporting & recreational activity. These are not necessarily incompatible as is the case with Lake Farm CP where the sporting & recreational activities and ambitions are proportionate and in balance with protected and managed nature. Indeed, this approach is embraced in the Implementation of Policy EM5 Sport & Leisure. Therefore, we endorse this Policy.</p>	<p>Support noted.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
89	2	Friends of Lake Farm	9 Core Policies - Transport and Infrastructure Policy CI2: Leisure and Recreation	Object	<p>Concern that Policy CI 2 Leisure & Recreation in promoting, community sports hubs, coupled with as a yet unpublished Strategic Infrastructure Plan (SIP) may favour particular sites to the exclusion of others.</p> <p>We favour a more equitable distribution of activities/facilities. This would ensure that Lake Farm CP would continue to excel at BMXing (home to Hayes Hawks BMX Club ranked as No 1 in the nation), and soon, as planned, at skateboarding; and Minet Country Park, Hayes, would also continue to excel at track cycling etc.</p>	<p>Community Sports Hubs are promoted as part of the Council's wider sport and leisure policy.</p> <p>However, the general provisions of the policy seek to secure good quality, well maintained facilities to address local deficiencies and meet the needs of local communities. It does not, therefore rule out an equitable distribution of sports and leisure facilities, to meet local needs.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
90	1	Environment Agency	3 A Portrait of Hillingdon - where we are now Hillingdon's Key Facts Table 3.1 Main Planning Challenges for Hillingdon	Object	<p>Environmental Management- Groundwater protection is not given sufficient weight in the Core Strategy. Large parts of Hillingdon sit above a Principal Aquifer. One abstraction point has been lost to contamination in the past and this should act as a incentive to ensure continued protection.</p> <p>Main Challenges-this section should include a commitment for the improvement of groundwater quality, or even to maintain the current quality.</p>	<p>Agree, information on groundwater protection should be provided.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Add 'large parts of Hillingdon sit above a Principal Aquifer' to Key Facts Environment section. Also add 'The need to maintain and improve the current water resources and quality' in the Table 3.1 Main Challenges for Environmental Issues.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
90	2	Environment Agency	4 The Vision - where we want to be Strategic Objectives to deliver The Vision SO2, SO3, SO8, SO10, SO13	Object	<p>SO2: include a reference to PPS23 to cover the safe redevelopment of previously contaminated land.</p> <p>SO3: Reference to PPS 23 with regard to the redevelopment of brownfield sites on or close to water courses should be included.</p> <p>SO8: As with SO3 above, supporting biodiversity along river corridors will require suitable measures to be taken where historic land use could be affecting groundwater sources entering rivers, streams and other waterbodies.</p> <p>SO10: there are no specific measure proposed, nor targets proposed to measure success. PPS 23 and the Environment Agency document Groundwater Protection: Policies and Procedures(GP3). need to be referenced and GP3 included as part of the Evidence Base.</p> <p>SO13: Like SO10, this needs developing with references to PPS23 and GP3. The recommendations of the SuRF (Sustainable Remediation Forum) Project could also be included and referenced in the Evidence Base.</p>	<p>Comments noted. It is not necessary to carry references to PPS 23 or GP 3 in the Core Strategy as suggested. A test of the soundness of the Document is whether it complies with such national planning guidance and it is not necessary to cross refer to them as proposed here.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
90	3	Environment Agency	6 Core Policies - New Homes Policy H1: Housing Growth	Object	How will policy H1 be implemented, lack of explanation of how contaminant legacy will be addressed.	<p>Comments noted. The percentage of brownfield land to be developed will reflect national policy guidance contained in PPS3.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Proposed amendment to Monitoring section of policy H1:</p> <p>Insert new bullet point: 'Percentage of new homes built on brownfield land.'</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
90	4	Environment Agency	8 Core Policies - Environmental Management Policy EM1: Climate Change Adaptation and Mitigation	Object	<p>1 - The promotion of bioremediation does nothing directly to help Climate Change. Biopiles release carbon dioxide like conventional incineration.</p> <p>2 - Increased emphasis on sustainable drainage and link to policy suggestions in the strategic flood risk assessment</p> <p>3 - Increases emphasis on water quality, both ground and surface is required. Suggested separate policy.</p>	<p>1 - Disagree. The second statement by the Environment Agency contradicts the first. Bioremediation helps to reduce import and exportation of soils which significantly reduces travel. Furthermore, it allows capacity in Landfill sites to be filled by more appropriate waste types.</p> <p>2 - Agree. Supporting text of Flood Risk Management to be strengthened to provide greater emphasis on sustainable drainage and links to the strategic flood risk assessment.</p> <p>3 - Agree. Policy EM8 and supporting text to consider water quality, and water resources in more detail.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <ol style="list-style-type: none"> 1. No proposed change. 2. New section on Surface and Foul Water Drainage added after para 8.83. 3. Add new point to Policy EM1 to read 'Requiring major development proposals to consider the whole water cycle impact which includes flood risk management, foul and surface water drainage and water consumption.' Add new section on 'Surface and Foul water drainage' after para 8.83. Add new supporting text to 'Land, water, air and noise' section after para 8.95 and para 8.108 and amend Policy EM8 to read 'The Council will seek to safeguard and improve all water quality, both ground and surface. Principal Aquifers, and Source Protection Zones will be given priority along with the: <ul style="list-style-type: none"> -River Colne -Grand Union Canal -River Pinn -Yeading Brook -Porter Land Brook -River Crane -Ruislip Lido.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
90	5	Environment Agency	8 Core Policies - Environmental Management Policy EM3: River and Canal Corridors Policy EM2: Green Belt, Metropolitan Open Land and Green Chains Map 8.2 Flood Risk Assessment	Object	<p>1 - Conservation The Crane should be classified as more than 'district importance' due to its relationship with Hounslow, Richmond and Harrow. It should also be considered as part of the Yeading Brook.</p> <p>Page 87 Map 8.2 misses off the Yeading Eastern Arm, the Duke of Northumberland (main river) and the River Longford below Heathrow. All three of these rivers should be given similar protection to the others already identified.</p> <p>2 - Groundwater needs to be considered in perpetuity to surface water drainage due to its role in maintaining and feeding watercourses.</p> <p>3 - Policy EM3 should consider an 8m buffer zone from the top of the bank of main rivers and a 5m wide undeveloped buffer strip from the top of bank of all ordinary watercourses within the borough. This is a policy recommendation within the SFRA.</p> <p>4 - Functional Floodplain</p> <p>Policies EM2 and EM3 should show a commitment to protecting and restoring the functional floodplain in line with the SFRA. It should also have the following addition:</p> <p>'There will be no development within land defined as functional floodplain. Opportunities will be sought to restore existing developed functional floodplain to Greenfield floodplain'</p> <p>5 - River Restoration</p> <p>Policy EM3 needs to include a commitment to river restoration. The SFRA provides policy recommendations which should be carried across to the Core Strategy to formalise them. The current wording on river and canal corridor enhancements is not proactive enough.</p>	<p>1 - Disagree. The River Crane is acknowledged as impacting on other boroughs, but is not considered as being of regional importance in the same way the Colne is. Agree Map 8.2 to be revised to include missing rivers.</p> <p>2.- Agree. Amend Flood Risk and Land, water, air and noise sections to consider the implications of flood risk, and water quality including groundwater in more detail.</p> <p>3 - Disagree. The land drainage byelaws administered by the Environment Agency require consent to be given for all works 8m within, on, under or over a main river or its defence. The protection of river banks is therefore covered by regulatory legislation and it may not be appropriate to have a broad policy objective in the Core Strategy.</p> <p>4 - Disagree. The Core Strategy (not necessarily policy EM3) should have a greater link to the SFRA. However, some of the policy recommendations on Functional Floodplain are not appropriate for the Core Strategy particularly as they are generic ambitions and not spatial objectives. No information has been provided by the Environment Agency as part of their response to highlight where areas of functional floodplain creation will be carried out, or where there are opportunities for making space for water.</p> <p>Disagree with the statement that 'There will be no development within the land defined as functional floodplain'. Some development uses area appropriate in the functional floodplain, such as water compatible uses and essential infrastructure. The Council's SFRA which was developed in conjunction with the Environment Agency does not allow this approach to be adopted as some large urban areas have been identified as being functional floodplain and would not be compatible with the comment made.</p> <p>5 - Noted. River restoration requires more than just enhancements to be delivered alongside new development. This requires a strategic approach, substantial funding, and a plan of implementation. These issues will be considered as part of the Development Management DPD.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
						<p><u>Council's Proposed Action</u></p> <p>1. Revise Map 8.2 to include missing rivers.</p> <p>2. Add new section on 'Surface and Foul water drainage' after para 8.83. Add new supporting text on groundwater and water resources after para 8.95 and para 8.108 in the 'Land, water, air and noise' section and amend Policy EM8 to read 'The Council will seek to safeguard and improve all water quality, both ground and surface. Principal Aquifers, and Source Protection Zones will be given priority along with the:</p> <ul style="list-style-type: none"> -River Colne -Grand Union Canal -River Pinn -Yeading Brook -Porter Land Brook -River Crane -Ruislip Lido. <p>3 - No proposed change.</p> <p>4 . No proposed change.</p> <p>5. No proposed change.</p>
90	6	Environment Agency	8 Core Policies - Environmental Management Policy EM6: Flood Risk Management	Object	<p>1 - EM6 should also consider creation of water storage, or further flood protection and maintenance of existing defences.</p> <p>2 - The policy should provide a policy that commits to targeting specific areas to designate, protect or maintain floodplain, flood storage areas, and flood defences.</p> <p>3 - The policy should include specific targets for flood water management for larger (1hectare+) sites.</p>	<p>1 + 2: The Environment Agency is the lead authority on flood risk and should provide the Council with a programme of works for identified new flood defence works or maintenance of existing schemes. These can then be mapped with a view to helping deliver developer contributions to facilitate the works. However, without this programme it is difficult to justify a policy.</p> <p>3. Disagree.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
90	7	Environment Agency	8 Core Policies - Environmental Management Policy EM8: Water, Air and Noise	Object	<p>There needs to be the inclusion of groundwater in this policy. The requirements of the Groundwater Daughter Directive (see above) cannot be met if there is no commitment to safeguard and improve groundwater quality. Page 112. Implementation - how we will achieve this.</p> <p>We would like to see the word 'groundwater' specifically included. There seems to be some confusion here because Climate Change is again included. The management of water quality and climate change are two separate subjects and should not be mixed.</p> <p>Promoting the use of local supplies without suitable measures to protect abstractions from the effects of past or future development is unsustainable (Hillingdon has already lost one public water supply through groundwater contamination).</p> <p>Page 112. Monitoring - how we will measure success</p> <p>Not granting planning permission where the Environment Agency has issues with water quality is included twice.</p> <p>We would like to see a measure of the number of Section 106 agreements for improvements to ground and/or surface water quality.</p>	<p>Amend policy EM8 and supporting text to be improved to give more weight to Groundwater protection</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend first sentence of policy EM8 to read:</p> <p>"The Council will seek to safeguard and improve the all water quality, of the both ground and surface. Principal Aquifers, and Source Protection Zones will be given priority along with...."</p> <p>Paragraph 8.95 to have additional section reading:</p> <p>"Groundwater provides a third of our drinking water in England and Wales, and it also maintains the flow in many of our rivers. Groundwater quality is also important in food production and agricultural processes. It is crucial that these sources are protected and that potable water is completely safe to drink and to use in the production of food and that surface water features are fed by clean, uncontaminated water."</p>
90	8	Environment Agency	8 Core Policies - Environmental Management Policy EM10: Mineral Extraction	Object	<p>Cross references to GP3, where the Environment Agency sets out policies regarding mineral extraction would be beneficial, see link above.</p>	<p>It is not necessary for the Core Strategy to cross refer here to existing national guidance.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
90	9	Environment Agency	8 Core Policies - Environmental Management Policy EM8: Water, Air and Noise	Object	<p>1 - Ground and surface water protection and remediation will be included in specific Development Plan Documents, they should be underpinned by core policies and strategies.</p> <p>2 - As the Core Strategy document lacks any commitment or even mention of the management of groundwater quality and could attach greater importance to the management of surface water quality it is obvious that the Sustainability Appraisal has overlooked the importance of groundwater with regard to sustainability.</p>	<p>1 - Agree. Groundwater needs to be given more weight.</p> <p>2 - Disagree. The Sustainability Appraisal recommends that Policy EM8 should consider aquifers (implied as Groundwater).</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend first sentence of policy EM8 to read:</p> <p>"The Council will seek to safeguard and improve the all water quality, of the both ground and surface. Principal Aquifers, and Source Protection Zones will be given priority along with...."</p> <p>Paragraph 8.95 to have additional section reading:</p> <p>"Groundwater provides a third of our drinking water in England and Wales, and it also maintains the flow in many of our rivers. Groundwater quality is also important in food production and agricultural processes. It is crucial that these sources are protected and that potable water is completely safe to drink and to use in the production of food and that surface water features are fed by clean, uncontaminated water."</p>
91	1	Individual - standard letter	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision	Object	Disappointment that Hillingdon is only considering a very limited increase in sited provision in the borough and to state my need for new pitch provision.	<p>The need for and location of additional pitches in the borough will be examined and brought forward in the Site Allocations Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
92	1	Individual - standard letter	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision	Object	Disappointment that Hillingdon is only considering a very limited increase in sited provision in the borough and to state my need for new pitch provision.	<p>The need for and location of additional pitches in the borough will be examined and brought forward in the Site Allocations Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
93	1	Individual - standard letter	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision	Object	Disappointment that Hillingdon is only considering a very limited increase in sited provision in the borough and to state my need for new pitch provision.	<p>The need for and location of additional pitches in the borough will be examined and brought forward in the Site Allocations Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
94	1	Individual - standard letter	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision	Object	Disappointment that Hillingdon is only considering a very limited increase in sited provision in the borough and to state my need for new pitch provision.	<p>The need for and location of additional pitches in the borough will be examined and brought forward in the Site Allocations Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
95	1	Individual - standard letter	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision	Object	Disappointment that Hillingdon is only considering a very limited increase in sited provision in the borough and to state my need for new pitch provision.	<p>The need for and location of additional pitches in the borough will be examined and brought forward in the Site Allocations Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
96	1	Individual - standard letter	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision	Object	Disappointment that Hillingdon is only considering a very limited increase in sited provision in the borough and to state my need for new pitch provision.	<p>The need for and location of additional pitches in the borough will be examined and brought forward in the Site Allocations Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
97	1	Individual - standard letter	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision	Object	Disappointment that Hillingdon is only considering a very limited increase in sited provision in the borough and to state my need for new pitch provision.	<p>The need for and location of additional pitches in the borough will be examined and brought forward in the Site Allocations Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
98	1	Individual - standard letter	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision	Object	Disappointment that Hillingdon is only considering a very limited increase in sited provision in the borough and to state my need for new pitch provision.	<p>The need for and location of additional pitches in the borough will be examined and brought forward in the Site Allocations Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
99	1	Individual	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision	Object	I am an Irish Traveller with a large family and I am living in a house that feels like a prison. I cannot cope. I want a plot on a site. I want to stay in Hillingdon. I know my older children also need to live on a site with their children.	<p>The need for and location of additional pitches in the borough will be examined and brought forward in the Site Allocations Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
100	1	Andy Stubbs on behalf of Uxbridge Initiative and LBH Town Centre Managers	2 A Summary of The Vision 2 A Summary of The Vision Para 2.2	Support	The Vision for Hillingdon 2026-The Vision for Hillingdon is welcome and it is appropriate that economic growth is focused in Uxbridge, Heathrow and the Hayes/West Drayton Corridor without ignoring local centres.	<p>Support noted.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Support noted.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
100	2	Andy Stubbs on behalf of Uxbridge Initiative and LBH Town Centre Managers	3 A Portrait of Hillingdon - where we are now Major Infrastructure Projects Para 3.10	Object	While the HS2 rail development and route is not settled at present, its implementation offers the opportunity to better link the borough's main transport hub at Uxbridge with Heathrow, possibly by light rail or other transport modes.	<p>Comment noted - clarification on current position regarding HS2 to be included at paragraph 9.27.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Amend paragraph 9.27 to read:</p> <p>The proposed preferred London-Birmingham route for HS2 would run from London Euston via Old Oak Common (near Wormwood Scrubs prison) then via Ruislip, through the Chilterns to Birmingham. A connection to Heathrow is proposed to be provided by an interchange with Crossrail at a new Old Oak Common station. The proposal is to start pre-construction works in 2015 and begin construction in 2017. Given the uncertainty about HS2, particularly in terms of the preferred route and timescales for implementation, the implications of the proposal have not been fully considered in the Core Strategy at this stage.</p>
100	3	Andy Stubbs on behalf of Uxbridge Initiative and LBH Town Centre Managers	4 The Vision - where we want to be The Spatial Strategy Para 4.16	Support	Hayes / West Drayton-Welcome the statement that some employment sites in the Hayes / West Drayton will be released for mixed use development. This should allow residential development to add to demand for shops and services in the town centres.	<p>Comments noted.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Comments noted.</p>
100	5	Andy Stubbs on behalf of Uxbridge Initiative and LBH Town Centre Managers	4 The Vision - where we want to be The Spatial Strategy Para 4.20	Support	The Crossrail development is welcome and again offers the opportunity to better link the borough's main transport hub at Uxbridge with Crossrail at West Drayton, possibly by light rail or other transport modes.	<p>Support noted.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
100	6	Andy Stubbs on behalf of Uxbridge Initiative and LBH Town Centre Managers	5 Core Policies - The Economy Location of Employment Growth Para 5.20	Support	Hotel development in the locations is welcomed as necessary and beneficial to the visitor offer.	Supported noted. <u>Council's Proposed Action</u> No proposed change.
100	7	Andy Stubbs on behalf of Uxbridge Initiative and LBH Town Centre Managers	5 Core Policies - The Economy Uxbridge Para 5.27	Object	Challenge the statement that Uxbridge “has a night-time economy of regional /sub-regional importance” as it does not seem to fit the existing provision in the town. The night-time offer at present is limited comprising only 11 licensed premises (public houses, some of which have late licences) within the town centre boundary, one 9-screen cinema and one fully fledged nightclub with a capacity around 1,200 persons. Compare that with the situation in Watford or Kingston for example, where the night-time economy caters to in excess of 20,000 people and it can be seen Uxbridge is quite different. Welcome the policy that seeks to improve the hotel offer and the recognition that Uxbridge has the potential to accommodate a wider leisure and cultural offer. The development of the RAF Uxbridge site offers some opportunity here but beyond that it is difficult to see how a wider offer will come about with the low level of churn in the town centre and limited scope for change of use class.	.There is a night time economy in Uxbridge, commensurate with its Metropolitan Centre status. <u>Council's Proposed Action</u> No proposed change.
100	8	Andy Stubbs on behalf of Uxbridge Initiative and LBH Town Centre Managers	5 Core Policies - The Economy Uxbridge Para 5.28	Object	The statement that the market position of Uxbridge is under pressure through competition from other major retail centres is evidenced by CACI's Retail Footprint, where stats for comparison expenditure in London show Uxbridge slipping from its 10th place ranking in 2004-2006 to 15th place in 2008 and 20th in 2010. It is difficult to see where and how the 18,855 sq.m growth in floorspace envisaged could be accommodated given the lack of development sites within the town centre boundary. It is noted that the Civic Centre site is not contemplated for partial redevelopment for other purposes and this is perhaps a missed opportunity.	Potential sites for town centre extensions are identified at RAF Uxbridge and within the Council's 2009 Employment Land Study. Such sites will be brought forward as part of the Site Allocations Development Plan Document. <u>Council's Proposed Action</u> No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
100	9	Andy Stubbs on behalf of Uxbridge Initiative and LBH Town Centre Managers	5 Core Policies - The Economy Uxbridge Para 5.29	Object	<p>The borough needs to continue to apply the PPS6 planning policy (town centres first) and to assess any proposals using the sequential and impact tests.</p> <p>The estimate of 18,855 sq.m of comparison goods floorspace required in Uxbridge should be examined. Apart from floorspace required to support the new community to be built on the RAF Uxbridge site, the new floorspace largely needs to be located in the town centre. Ideally there needs to be corresponding shopper car parking provision as the existing parking stock is insufficient to meet peak demand at weekends and busy times of the year such as Christmas. Traffic generation can perhaps be mitigated through securing s106 contributions from developers to assist with improvements to Parking Guidance Information systems for example.</p> <p>A retail core, enveloped by office, and with a fringe of industrial locations has proved successful, indeed as an office and commercial location Uxbridge (and the wider borough) is one of the success stories of London. However, further development of office space threatens this position if they bring more private cars onto an overloaded and congested road network at morning and late afternoon peak times. New office builds with parking limited by London standards are less attractive to tenants and could make the situation worse.</p> <p>In addition, consideration should be given as to how the borough can assist with the requirement from large retailers for sizeable units rather than small ones. This point notwithstanding, there is also the need to balance large units against smaller units that can provide an entry route for new businesses. On this latter point the borough should consider adopting the recommendations made in the London Assembly July 2010 publication "Cornered shops: London's small shops and the Planning System".</p>	<p>The Core Strategy is a strategic document that sets headline growth figures for the borough. The proposed expansion of comparison retail floorspace is based on evidence contained in Consumer Expenditure and Comparison Goods Retail Floorspace Need in London (Greater London Authority, March 2009) (Table 6).</p> <p>Further detail on how and where this level of growth will be accommodated will be contained in subsequent Development Plan Documents.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
100	10	Andy Stubbs on behalf of Uxbridge Initiative and LBH Town Centre Managers	5 Core Policies - The Economy Policy E4: Uxbridge Para 5.29	Object	<p>Under policy E4 it seems that almost any use is contemplated within Uxbridge. It should be recognised that the success of Uxbridge is surely geared around its office/commercial and retail emphasis. Whilst welcoming a diversity of uses and a strategy for tourism, it has to be recognised that visitor attractions in Uxbridge (and the wider borough) are limited in scope. Moreover they are scattered and there are few "lighthouse" attractions that generate significant visitor numbers. Of more relevance may be support for the Visiting Friends and Relations (VFR) market and focusing on the considerable market opportunities offered by the daily office population.</p>	<p>Whilst the success of Uxbridge will primarily be based around the office and retail offer, other sectors of the economy will also be important. The Core Strategy contains area specific figures for retail and office growth. Other aspects referred to in this policy will be of benefit to areas such as the nighttime economy.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
100	11	Andy Stubbs on behalf of Uxbridge Initiative and LBH Town Centre Managers	5 Core Policies - The Economy Town and Neighbourhood Centres Para 5.32	Support	It is good to see the recognition of threats to town centres. Policy E5 is welcomed for the support it gives to smaller centres and encouragement to them to develop specialist retail and service offers appropriate to their neighbourhoods and communities. It surely makes sense to pursue these routes which will help to resist the creep towards clone towns.	Support noted <u>Council's Proposed Action</u> No proposed change.
100	12	Andy Stubbs on behalf of Uxbridge Initiative and LBH Town Centre Managers	7 Core Policies - Historic and Built Environment Built Environment Para 7.5	Support	Welcome the statement that maintaining and improving the quality of the built environment is of critical importance if the attractive character and identity of Hillingdon is to be retained. Too many streets are scarred through the increasingly common use of poorly designed metal shutters on shopfronts, which lead to a fortified appearance, add to the fear of crime, and are a target for graffiti. Throughout the borough, and particularly in the town centres, it therefore of high importance that the Shopfronts policy and standards are adhered to, as set out in the adopted Supplementary Planning Document, with enforcement action taken where appropriate.	Support welcomed. <u>Council's Proposed Action</u> No proposed change.
100	13	Andy Stubbs on behalf of Uxbridge Initiative and LBH Town Centre Managers	9 Core Policies - Transport and Infrastructure 9 Core Policies - Transport and Infrastructure Para 9.4	Support	It is particularly appropriate that emphasis is placed on developing a reliable network of north/south public transport routes and improvements to interchanges.	Support welcomed. <u>Council's Proposed Action</u> No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
100	14	Andy Stubbs on behalf of Uxbridge Initiative and LBH Town Centre Managers	9 Core Policies - Transport and Infrastructure 9 Core Policies - Transport and Infrastructure Para 9.6	Object	<p>Improvements to north-south movement using additional bus routes should be on a limited stop basis.</p> <p>Routeing buses through Uxbridge will help that town centre but may not suit everyone, particularly those wishing to travel to Heathrow.</p> <p>Three intersections (Swakeleys roundabout, Polish War Memorial, and Target roundabout) are the focus of sizeable peak time traffic congestion.</p> <p>The Metropolitan Line requires new signalling. A key objective remains to link tube travellers using the Central line with those using Metropolitan and Piccadilly lines and the Chiltern Railways line and innovative solutions need to be explored in order to maximise the benefit of these public transport networks.</p> <p>While the HS2 rail development and route is not settled at present, its implementation offers the opportunity to better link the borough's main transport hub at Uxbridge with Heathrow, possibly by light rail or other transport modes.</p> <p>The borough should also examine the feasibility of Park & Ride to alleviate the problem of congestion in town centres such as Uxbridge.</p>	<p>Comments noted and will be passed to the appropriate Council service for consideration</p> <p>Congestion hotspots and other infrastructure issues in the borough will be identified in the Council's Strategic Infrastructure Plan.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p style="text-align: right;">No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
101	1	Individuals-Petition No.1 (194 signatures)	5 Core Policies - The Economy Strategy for the Heathrow Opportunity Area Consultation, High Speed 2	Object	<p>We the undersigned object strongly to the widespread extension of the Heathrow Opportunity Area over the residential areas of West Drayton and much of Yiewsley and within this the designation of most of this area as being suitable for office and hotel development. We ask that:-</p> <p>(i) all commercial development and non-residential development be restricted to existing commercial areas</p> <p>(ii) all existing residential areas and estates in West Drayton be fully protected from any commercial development, transport hubs and infrastructure</p> <p>(iii) the plans and text of Hillingdon's Core Strategy be amended accordingly</p>	<p>A petition hearing was held on 13th October 2010, Officers prepared a report in response to the points raised:</p> <p>Opportunity Areas are a London Plan designation which boroughs are required to include in their Development Plan Documents (DPDs). Opportunity Areas (OA) are the capital's major reservoir of brownfield land and a key spatial priority of the London Plan. They have been identified on the basis that they are capable of accommodating substantial new jobs and homes. Hillingdon is required to accommodate a proportion of 9,000 new jobs and 6750 new homes in the Heathrow OA to 2026; the period of Hillingdon's Core Strategy. The label of 'Heathrow' refers to the area (which extends outside Hillingdon's borough boundary) rather than the Airport. However the Airport is obviously a major economic factor and a source of many local jobs.</p> <p>The Core Strategy covers broad issues including where and how the borough will accommodate new jobs and homes. It therefore indicates the general area of Hillingdon which falls within the OA designation, but does not suggest a defined boundary. This is because it is a high-level strategic document and detailed proposals will be brought forward through the Heathrow Area DPD, cross-boundary working with Hounslow and partnership working with the Greater London Authority and other interested parties. It will be subject to public consultation.</p> <p>Yiewsley & West Drayton forms part of the Heathrow Opportunity Area. Table 5.3 of the Core Strategy sets out future growth for the Heathrow OA and identifies Yiewsley & West Drayton as suitable for regeneration opportunities through the new Crossrail station at West Drayton, the Grand Union Canal, mixed use development schemes, modern business accommodation, and improved public transport. It is important to include Yiewsley & West Drayton in the Heathrow OA so it can benefit from the inter-relationship of the area, for example access to new jobs, affordable homes, and better public transport links.</p> <p>Detailed proposals for the area will be set out in a future Heathrow Area Development Plan</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
----	---------	---------------------------	-------------------------------	------------------------------	---------------------------	--------------------

Document. The Council does not want industrial uses in residential areas and Policy E1 of the Core Strategy protects existing employment land for employment uses for this reason. In addition, development management policies control inappropriate development.

Policy E1 of the Core Strategy also manages the release of surplus industrial land. As part of the regeneration plan set out above (and in Table 5.3 of the Core Strategy), part of the Trout Road industrial site is identified as having potential for release for other uses. This could include mixed use schemes with modern business accommodation. Policy E2 of the Core Strategy proposes hotel growth for Uxbridge, Hayes and sites on the Heathrow perimeter. No hotel growth is planned for Yiewsley & West Drayton.

Areas of Special Local Character and Conservation Areas in Yiewsley & West Drayton are identified and protected in the Core Strategy through Map 7.1 and Policy HE1.

The Heathrow Opportunity Area covers an area of around 700ha. While neither the London Plan nor draft replacement London Plan shows the physical extent of the Opportunity Areas, some indicative working boundaries have been mapped in the London Plan Sub-Regional Development Framework West London 2006. The boundary will be refined through the Heathrow Area DPD and both the key diagram and Map 5.1 in the Core Strategy are intended to show the general areas for growth.

Yiewsley & West Drayton has been included in the area identified for office and hotel growth. This is misleading as it is meant to indicate the capacity of the existing employment areas within the Hayes-West Drayton corridor to accommodate new jobs, supported for example by new Crossrail stations. It is the likely source of concern surrounding the impact on Yiewsley & West Drayton of the Heathrow OA. Changes to the Key Diagram and Map 5.1 are proposed to clarify the areas for growth. An overarching sentence will be added to the beginning of Table 5.3 which makes clear that growth in the Heathrow OA will be focused on sustainable locations such as town centres,

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
----	---------	---------------------------	-------------------------------	------------------------------	---------------------------	--------------------

existing employment areas and sites with good access to public transport.

Council's Proposed Action

Make changes to the Key Diagram and Map 5.1 to clarify the areas for growth, and to add text to Table 5.3 which makes clear that growth in the Heathrow Opportunity Area will be focused on sustainable locations.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
102	1	Individuals- Petition No.2 (32 letters)	5 Core Policies - The Economy Strategy for the Heathrow Opportunity Area Major Infrastructure Projects Consultation period, High Speed 2	Object	<p>1.Concern about the 'Heathrow Opportunity Area' designation and the impact of this on Yiewsley and West Drayton.</p> <p>2.The consultation period was too short and had very little publicity</p> <p>3.The section on High Speed 2 (HS2) should be rewritten to reflect recent changes to the construction timetable.</p>	<p>A petition hearing was held on 13th October 2010, Officers prepared a report in response to the points raised:</p> <p>1. Heathrow Opportunity Area Opportunity Areas are a London Plan designation which boroughs are required to include in their Development Plan Documents (DPDs). Opportunity Areas (OA) are the capital's major reservoir of brownfield land and a key spatial priority of the London Plan. They have been identified on the basis that they are capable of accommodating substantial new jobs and homes. Hillingdon is required to accommodate a proportion of 9,000 new jobs and 6750 new homes in the Heathrow OA to 2026; the period of Hillingdon's Core Strategy. The label of 'Heathrow' refers to the area (which extends outside Hillingdon's borough boundary) rather than the Airport. However the Airport is obviously a major economic factor and a source of many local jobs.</p> <p>The Core Strategy covers broad issues including where and how the borough will accommodate new jobs and homes. It therefore indicates the general area of Hillingdon which falls within the OA designation, but does not suggest a defined boundary. This is because it is a high-level strategic document and detailed proposals will be brought forward through the Heathrow Area DPD, cross-boundary working with Hounslow and partnership working with the Greater London Authority and other interested parties. It will be subject to public consultation.</p> <p>Yiewsley & West Drayton forms part of the Heathrow Opportunity Area. Table 5.3 of the Core Strategy sets out future growth for the Heathrow OA and identifies Yiewsley & West Drayton as suitable for regeneration opportunities through the new Crossrail station at West Drayton, the Grand Union Canal, mixed use development schemes, modern business accommodation, and improved public transport. It is important to include Yiewsley & West Drayton in the Heathrow OA so it can benefit from the inter-relationship of the area, for example access to new jobs, affordable homes, and better public transport links.</p> <p>Detailed proposals for the area will be set out in a</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
----	---------	---------------------------	-------------------------------	------------------------------	---------------------------	--------------------

future Heathrow Area Development Plan Document. The Council does not want industrial uses in residential areas and Policy E1 of the Core Strategy protects existing employment land for employment uses for this reason. In addition, development management policies control inappropriate development.

Policy E1 of the Core Strategy also manages the release of surplus industrial land. As part of the regeneration plan set out above (and in Table 5.3 of the Core Strategy), part of the Trout Road industrial site is identified as having potential for release for other uses. This could include mixed use schemes with modern business accommodation. Policy E2 of the Core Strategy proposes hotel growth for Uxbridge, Hayes and sites on the Heathrow perimeter. No hotel growth is planned for Yiewsley & West Drayton.

Areas of Special Local Character and Conservation Areas in Yiewsley & West Drayton are identified and protected in the Core Strategy through Map 7.1 and Policy HE1.

The Heathrow Opportunity Area covers an area of around 700ha. While neither the London Plan nor draft replacement London Plan shows the physical extent of the Opportunity Areas, some indicative working boundaries have been mapped in the London Plan Sub-Regional Development Framework West London 2006. The boundary will be refined through the Heathrow Area DPD and both the key diagram and Map 5.1 in the Core Strategy are intended to show the general areas for growth.

Yiewsley & West Drayton has been included in the area identified for office and hotel growth. This is misleading as it is meant to indicate the capacity of the existing employment areas within the Hayes-West Drayton corridor to accommodate new jobs, supported for example by new Crossrail stations. It is the likely source of concern surrounding the impact on Yiewsley & West Drayton of the Heathrow OA. Changes to the Key Diagram and Map 5.1 are proposed to clarify the areas for growth. An overarching sentence will be added to the beginning of Table 5.3 which makes clear that growth in the Heathrow OA will be focused on

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
----	---------	---------------------------	-------------------------------	------------------------------	---------------------------	--------------------

sustainable locations such as town centres, existing employment areas and sites with good access to public transport.

2. Consultation period

The minimum requirements for community involvement in the plan making process are set out in the Town and Country Planning Regulations 2004 (as amended). The current stage is Regulation 25: Public Participation in the preparation of a development plan document (DPD). Whilst Regulation 25 does not specify a particular time period for representations, Hillingdon's Statement of Community Involvement (SCI) adopted in November 2006 sets out a minimum of six weeks for public consultations for each of the stages in the plan making process. In line with previous consultations on the Core Strategy, a six week consultation period was carried out for the draft Core Strategy to be consistent with Hillingdon's SCI.

Involvement of the public and key stakeholders in preparing the Core Strategy Consultation Draft has followed the approach set out in the Council's SCI. Various publicity methods were used with the aim of raising awareness of the LDF and informing as many people as possible. These have included information being made available on the Council's website, at all borough libraries and One-stop-shop in Hayes, 6 public drop-in sessions, 7 press notices, an article in Hillingdon People magazine, poster displays at Post Offices, GP surgeries and schools, public exhibitions at Uxbridge Library and Civic Centre, audio advertisement in the Hillingdon Talking Newspaper for the visually impaired, attendance at representative group meetings. Approximately 3000 letters/ emails were sent to a wide range of groups and individuals on the LDF consultation database including 50 randomly selected residents per ward from the electoral register and nearly 200 randomly selected businesses from the 2008 Hillingdon Business Directory.

3. High Speed 2

Currently the High Speed Rail 2 (HS2) route is only indicative. The coalition government has put back the public consultation on HS2 until early 2011 in order to do further work on the Heathrow

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
----	---------	---------------------------	-------------------------------	------------------------------	---------------------------	--------------------

connection. The Mawhinney Review, published in July 2010, investigated potential HS2 connections to Heathrow Airport. Until the consultation and beyond, issues like the final route, phasing and connections will remain uncertain.

The public consultation will be an opportunity for everyone with an interest to find out more about the proposals and to put forward their views. The London Borough of Hillingdon will assess the impacts on the borough and local residents and will look closely at mitigation of local impacts. The Council will work with local residents and in partnership with other organizations as part of the consultation process.

The Core Strategy consultation says: "In principle, the Council is supportive of high speed rail. However, this support will be very much conditional upon climate change objectives and local community aspirations being met. The Council will not support any proposals that could lead to an increase in demand for flights from Heathrow, an increase in road congestion or significant adverse local environmental impacts." This remains the Council's position.

It is proposed to update the HS2 section in the Core Strategy to reflect the direction taken by the coalition government, and to strengthen the wording to reflect the Council's intention to mitigate local impacts and expectation of an integrated approach to public transport. It is also proposed to similarly update paragraph 9.27 in the Transport chapter. However, it would be pre-emptive to include any details of the route or phasing at this stage.

Council's Proposed Action

Amend paragraph 9.27 to read:

The proposed preferred London-Birmingham route for HS2 would run from London Euston via Old Oak Common (near Wormwood Scrubs prison) then via Ruislip, through the Chilterns to Birmingham. A connection to Heathrow is proposed to be provided by an interchange with Crossrail at a new Old Oak Common station. The proposal is to start pre-construction works in 2015 and begin construction in 2017. Given the

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
						uncertainty about HS2, particularly in terms of the preferred route and timescales for implementation, the implications of the proposal have not been fully considered in the Core Strategy at this stage.
103	1	LB Hillingdon Labour Group	Core Strategy Consultation Draft General	Support	We generally support the document	Support welcomed
						<u>Council's Proposed Action</u>
						No proposed change
103	2	LB Hillingdon Labour Group	8 Core Policies - Environmental Management Policy EM1: Climate Change Adaptation and Mitigation	Object	EM1 refers to 'a modal shift away from private car use' but does not mention trying to reduce the number of road traffic movements to and from Heathrow Airport by employees or customers (passengers and cargo) from outside of the borough. There needs to be a commitment to construct many more properly segregated cycle lanes. Not just a white line painted on the roadway. Only then will significant numbers of people feel that it is safe to cycle.	Policy EM8 sets out the strategic measures proposed by the Council to address air quality in the borough. Paragraph 9.29 recognises that Heathrow is the single largest generator of traffic in the UK and has a significant impact on travel patterns in the borough. Policy T4 on page 130 seeks to facilitate the improvements to public transport and cycle links. More specific measures to address congestion in the Heathrow Opportunity Area will be brought forward through the production of the Heathrow Area DPD.
						<u>Council's Proposed Action</u>
						No proposed change.
103	3	LB Hillingdon Labour Group	5 Core Policies - The Economy Policy E2: Location of Employment Growth Policy E3: Strategy for Heathrow Opportunity Area	Object	Policy E2 refers to 9000 new jobs. E3 mentions the proposed 'Development Plan Document' ensuring that local people benefit from economic growth. There is however no detail as to how the policies will ensure that a significant proportion of newly created jobs go to local people. This has been a failing in the past and as the report says only 12% of employees at Heathrow live in Hillingdon	Through the Planning Obligations SPD, the Council is able to obtain funding for training courses and jobs with providers in the borough. This means that Hillingdon residents have excellent access to these jobs and training opportunities, however it would be contrary to EU policy to make these available exclusively to Hillingdon residents.
						<u>Council's Proposed Action</u>
						No proposed change

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
103	4	LB Hillingdon Labour Group	8 Core Policies - Environmental Management River and Canal Corridors Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Object	<p>Preserving the open spaces, rivers and canal corridors that we have and improving access to them. Glad to see commitment to preserving Green Belt and Metropolitan Open Land in policy EM2 and support this fully.</p> <p>Though, policies don't seem to acknowledge that canal side development can improve the condition of the canal and access to it. Examples would be the marinas at Yeading and Grand Union Village.</p>	<p>Support for EM2 welcomed.</p> <p>Agree that greater emphasis should be given in the Environmental Management chapter to the value of the borough's Blue Ribbon Network.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Para 8.31 has been amended to highlight the roles played by the Canal, for example, its importance as a walking, cycling and recreational resource. Individual opportunities to develop sites alongside the Canal which could help fund improvements to its condition and access to it are likely to be identified in the Site Allocations Development Plan Document.</p> <p>The Development Management Development Plan Document will also include policies to ensure canal and riverside development incorporate the waterside and access to it.</p>
103	5	LB Hillingdon Labour Group	9 Core Policies - Transport and Infrastructure Policy T1: Accessible Local Destinations Policy T2: Public Transport Interchanges Policy T3: North-South Sustainable Transport Links	Object	<p>Policies T1, T2 and T3, which seek to address this, all depend on 'partnership working with TfL'. Do we have a good enough working relationship with TfL and a commitment from them to our strategy? Can we put some flesh on these bones?</p>	<p>Hillingdon and TfL officers are in regular day-to-day contact and the Council's officers have bi-monthly meetings with TfL and attend working groups on a variety of projects.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
103	6	LB Hillingdon Labour Group	9 Core Policies - Transport and Infrastructure Policy C1: Community Infrastructure Provision Policy E4: Uxbridge Policy E5: Town and Local Centres	Object	Policy C11 does not address the provision of youth facilities or the night time economy.	<p>The issue of youth provision will be addressed through the strategic infrastructure planning process.</p> <p>There is scope to incorporate references to facilities that will encourage the nighttime economy.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Appendix 2 Infrastructure Schedule updated to reflect that youth centres have now been constructed.</p>
103	7	LB Hillingdon Labour Group	7 Core Policies - Historic and Built Environment Policy BE1: Built Environment Policy H1: Housing Growth	Support	Improving the built environment-Policy BE1 is to be welcomed with it's change of emphasis from simply not making things worse but trying to improve the built environment. This must not however be allowed to impede the policy H1 objective to provide additional dwellings.	<p>Support welcomed.</p> <p>New housing developments would be considered within the context of all policies contained within the Core Strategy. Particularly relevant policies in addition to BE1 are HE1 and EM1.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
103	8	LB Hillingdon Labour Group	5 Core Policies - The Economy Strategy for the Heathrow Opportunity Area	Object	Whilst welcoming measures to improve employment opportunities we object to the widespread designation of the Heathrow Opportunity Area over the Heathrow Villages and the whole of West Drayton.	<p>It is agreed that Map 5.1 and the Key Diagram are confusing.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Changes to the Key Diagram and Map 5.1 are proposed to clarify growth areas in the Heathrow Opportunity Area.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
103	9	LB Hillingdon Labour Group	5 Core Policies - The Economy Location of Employment Growth	Object	We object to the widespread designation of proposed areas of growth for hotel and office development over residential areas of West Drayton, Yiewsley and Hayes in Map 5.1. The designation over established residential areas, Conservation Areas and Areas of Special Character is inappropriate and should be removed. The designation should be confined to existing business areas suitable for such development or town centres.	<p>Map 5.1 is not designed to show detailed areas for hotel and office growth within the Heathrow Opportunity Area. However, it is agreed that Map 5.1 and the Key Diagram are confusing. It is also proposed to add an overarching sentence to the beginning of Table 5.3 which makes clear that growth in the Heathrow OA will be focused on sustainable locations such as town centres and areas with good access to public transport.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Changes to the Key Diagram and Map 5.1 are proposed to clarify growth areas in the Heathrow Opportunity Area. Add overarching sentence to the beginning of Table 5.3 which makes clear that growth in the Heathrow OA will be focused on sustainable locations such as town centres and areas with good access to public transport.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
103	10	LB Hillingdon Labour Group	3 A Portrait of Hillingdon - where we are now Major Infrastructure Projects Para 3.11	Object	Para 3.11 refers to the High Speed Rail proposals as being beyond the 2026 scope of the Core Strategy. However the current government has supported proposals that could be implemented by 2017 that could include a Heathrow Hub with potentially devastating effects on the environment, traffic congestion and Yiewsley and West Drayton Town Centres. The section should be updated to take account of the current situation and protect Hillingdon's residents and environment.	<p>Currently the High Speed Rail 2 (HS2) route is only indicative. The coalition government has put back the public consultation on HS2 until early 2011 in order to do further work on the Heathrow connection. The Mawhinney Review, published in July 2010, investigated potential HS2 connections to Heathrow Airport. Until the consultation and beyond, issues like the final route, phasing and connections will remain uncertain.</p> <p>The public consultation will be an opportunity for everyone with an interest to find out more about the proposals and to put forward their views. The London Borough of Hillingdon will assess the impacts on the borough and local residents and will look closely at mitigation of local impacts. The Council will work with local residents and in partnership with other organizations as part of the consultation process.</p> <p>□ The Core Strategy consultation says: "In principle, the Council is supportive of high speed rail. However, this support will be very much conditional upon climate change objectives and local community aspirations being met. The Council will not support any proposals that could lead to an increase in demand for flights from Heathrow, an increase in road congestion or significant adverse local environmental impacts." This remains the Council's position.</p> <p>It is proposed to update the HS2 section in the Core Strategy to reflect the direction taken by the coalition government, and to strengthen the wording to reflect the Council's intention to mitigate local impacts and expectation of an integrated approach to public transport. It is also proposed to similarly update paragraph 9.27 in the Transport chapter. However, it would be pre-emptive to include any details of the route or phasing at this stage.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend paragraph 9.27 to read:</p> <p>The proposed preferred London-Birmingham route for HS2 would run from London Euston via Old Oak Common (near Wormwood Scrubs prison) then via Ruislip, through the Chilterns to Birmingham. A connection to Heathrow is</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
						<p>proposed to be provided by an interchange with Crossrail at a new Old Oak Common station. The proposal is to start pre-construction works in 2015 and begin construction in 2017. Given the uncertainty about HS2, particularly in terms of the preferred route and timescales for implementation, the implications of the proposal have not been fully considered in the Core Strategy at this stage.</p>
103	11	LB Hillingdon Labour Group	3 A Portrait of Hillingdon - where we are now Strategic Objectives to deliver The Vision Table 3.1 Main Planning Challenges for Hillingdon	Object	<p>SO9 states that it will "Promote healthier and more active lifestyles through the provision of access to a range of sport, recreation, health and leisure facilities." Yiewsley and West Drayton are areas of identified need yet Yiewsley Swimming Pool is apparently to be disposed of with no consultation with local people and in complete contradiction to these core objectives. If the objectives are not strong enough to prevent the loss of one of the few local facilities the area has then they need strengthening.</p>	<p>Paragraph 4.23 refers to the pockets of deprivation in Table 3.1. It states that the Council will develop strategies to address the complex reasons for this deprivation.</p> <p>Leisure policies in the Core Strategy reflect the Council's Leisure Strategy, Active Hillingdon, A Sport and Physical Activity Strategy 2007-2012.</p> <p>Policy C12 sets a presumption against the loss of leisure facilities. Where proposals result in the loss of such facilities, the applicant would be required to demonstrate that appropriate alternative provision of facilities is being made.</p> <p>The Core Strategy covers the period 2011-2026 and would not relate to the closure of facilities before this time. The document looks at the overall provision of facilities across the borough up to 2026 and implements other Council objectives and strategies, including those related to leisure provision.</p> <p>SO9 relates to improving transport links to leisure opportunities, as well supporting the proposals for direct provision of new facilities.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
103	12	LB Hillingdon Labour Group	9 Core Policies - Transport and Infrastructure Policy CI1: Community Infrastructure Provision	Object	<p>There is an increasing shortage of school places in the borough yet no new sites for schools are identified.</p> <p>Also there are schools without playing fields in the borough yet there is no mention in the strategy that this is something that should be addressed anywhere.</p>	<p>The Core Strategy recognises the strategic need for further school provision in the borough. Proposed sites for new schools would be identified in the forthcoming Site Allocations Development Plan Document.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
104	1	CABE	Core Strategy Consultation Draft General	Observation	Unable to comment, refer to guidance which Tell the story, Set the Agenda and Say it clearly.	<p>Noted.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change</p>
105	1	Denham Parish Council	Core Strategy Consultation Draft General	Observation	The Parish Council has no particular comments to make at this stage.	<p>Noted.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
106	1	Drivers Jonas Deloitte on behalf of Legal & General Assurance Society Ltd (L&G)	6 Core Policies - New Homes Policy H1: Housing Growth	Support	L&G welcome that the Council seeks to meet and exceed its minimum strategic target but urge the Council to increase the target in light of the current suggested Replacement London (2009) target of providing 620 dwellings per year. PS12 advised that to be sound, a Core Strategy should be consistent with regional guidance.	<p>Hillingdon's proposed annual monitoring target in the Replacement London Plan has been reduced to 425 units per annum.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Update policy H1 to reflect the proposed annual monitoring target in the replacement London Plan.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
106	2	Drivers Jonas Deloitte on behalf of Legal & General Assurance Society Ltd (L&G)	6 Core Policies - New Homes Policy H1: Housing Growth Map 6.1 Distribution of units from large SHLAA sites (2011-2021)	Object	Implementation of policy H1 should give further consideration to the range of sites which will help the Council to achieve their housing target. At the moment the Core Strategy refers explicitly to the consideration of the potential of brownfield sites within the urban area.	<p>The evidence base for meeting housing growth targets is contained in the Council's housing trajectory and the GLA's SHLAA. The majority of sites identified in these documents constitute previously developed land and it is not considered that a case exists to justify significant release of green belt to meet borough-wide growth targets.</p> <p>Detailed housing site designations will be brought forward in the Site Allocations Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
106	3	Drivers Jonas Deloitte on behalf of Legal & General Assurance Society Ltd (L&G)	8 Core Policies - Environmental Management Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Object	<p>Green Belt Policy EM2 sets out the Council's draft policy relating to Green Belt, Metropolitan Open Land and Green chains.</p> <p>L&G notes the proposal that minor adjustments will be undertaken to the Green Belt and Metropolitan Open Land. However, L&G considers that the council should seriously consider making adjustments that do not just address minor anomalies but also address long term housing requirements. L&G considers that in this context more significant adjustments to Green Belt boundaries should be fully explored through the on-going/emerging Green Belt study. At this stage therefore, the Core Strategy should not rule out significant Green Belt boundary change.</p> <p>There are areas of land which are currently located in the Green Belt which could be used to accommodate development in the future, particularly after 2014 when the Council anticipate that meeting the GLA's proposed housing target will be difficult.</p> <p>L&G seeks clarification on the extent of the Green Chains proposed. Whilst it is understood that the Council will resist development on the Green Chains, L&G considers that the Council should be open to their incorporation within sensitive development proposals.</p>	<p>Hillingdon is confident that it can meet its current London Plan housing target without Greenbelt release. The Replacement Plan target is proposed to be reduced from the figure of 620 units and the Council is confident that sufficient non-Greenbelt sites will be identified through the Site Allocations process to meet this target.</p> <p>The Council anticipates that the Site Allocations DPD will identify broad areas of housing growth over the period 2021-2016.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
106	4	Drivers Jonas Deloitte on behalf of Legal & General Assurance Society Ltd (L&G)	6 Core Policies - New Homes Policy H2: Affordable Housing	Object	The provision of 50% of affordable housing is however a challenging target and policy should acknowledge that development viability will be considered.	<p>Policy H2 sets affordable housing targets in accordance with the current London Plan. These targets will be amended as and when new evidence base documents emerge. Part i) of the policy states that affordable housing targets will be undertaken subject to viability.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend part i) of policy H2 to reflect the provisions of the emerging affordable housing viability study.</p>
106	5	Drivers Jonas Deloitte on behalf of Legal & General Assurance Society Ltd (L&G)	8 Core Policies - Environmental Management Policy EM4: Open Space and Informal Recreation	Object	<p>Countryside Conservation Area and Area of Environmental Opportunity</p> <p>Policy EM4 seeks to safeguard, enhance and extend the network of open spaces. It is also stated that the Council will seek to protect existing tree and landscape features and enhance open space with new areas of vegetation cover.</p> <p>Whilst L&G supports the aims of policy EM4 and notes that Council will seek to protect and enhance areas of Environmental Opportunity L&G considers that policy should be sufficiently flexible to allow for the full assessment of the quality of open space, trees and landscape features and to allow for re-provision of public greenspace back into development schemes.</p> <p>The Core Strategy should also acknowledge that there maybe exceptional circumstances where a development can be justified despite a significant impact on the environment or quality of life because it meets or contributes to an important planning objective. It is accepted practice that a significant environmental impact can be offset through mitigation, such as the provision of compensation habitat or through other measures.</p> <p>We note that the Council will work with DEFA to identify and protect open spaces that provide quiet areas and relative tranquillity L&G seeks clarification on the process for the protection of open spaces and request consultation with potential landowners who maybe affected by any designation.</p>	<p>The Council sets a presumption against the loss of open space and as such it would be necessary for a developer to justify why a development resulting in the loss of open space should go ahead.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
106	6	Drivers Jonas Deloitte on behalf of Legal & General Assurance Society Ltd (L&G)	5 Core Policies - The Economy Policy E5: Town and Local Centres	Support	L&G support that Ruislip and Ickenham continue to be identified in the hierarchy of town, district and local centres identified in the Core Strategy. The proposed growth of District Centres set out in table 5.5. is welcomed, particularly the growth of the centres of Ickenham and Ruislip.	<p>Support welcomed</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
106	7	Drivers Jonas Deloitte on behalf of Legal & General Assurance Society Ltd (L&G)	9 Core Policies - Transport and Infrastructure Policy T2: Public Transport Interchanges	Support	L&G welcomes Policy T2 which seeks to facilitate improvements to transport interchanges.	Support welcomed. <u>Council's Proposed Action</u> No proposed change.
106	8	Drivers Jonas Deloitte on behalf of Legal & General Assurance Society Ltd (L&G)	Core Strategy Consultation Draft Diagrams	Observation	L&G seeks to ensure that designations identifies in diagrams contained within the Core Strategy are indicative and will be subject to further consultation through the Site Allocations Development plan Document.	Confirm diagrams contained within the Core Strategy are indicative and will be subject to further consultation through the Site Allocations Development Plan Document. <u>Council's Proposed Action</u> No proposed change
107	1	Greater London Authority (late submission)	4 The Vision - where we want to be Strategic Objectives to deliver The Vision SO14, SO15, SO16	Support	Support Strategic Objectives SO14, SO15 and SO16	Support welcomed <u>Council's Proposed Action</u> No proposed change
107	2	Greater London Authority (late submission)	4 The Vision - where we want to be The Spatial Strategy Table 4.1 Summary of Growth in Hillingdon 2011-2026 Page 22	Support	Support total new jobs projection, and new jobs in Heathrow Opportunity Area – in line with London Plan and emerging estimates for draft replacement London Plan. Support estimate of new office jobs – in line with London Office Policy Review 2009. Support range for additional hotel bedrooms and new retail floorspace in Uxbridge.	Support welcomed <u>Council's Proposed Action</u> No proposed change

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
107	3	Greater London Authority (late submission)	4 The Vision - where we want to be Table 4.1 Summary of Growth in Hillingdon 2011-2026	Object	<p>Seek clarification on extent of designated industrial/employment land (358ha quoted in Table 4.1 compared to 365ha in URS 2010 Industrial Land Baseline, of which 291.7ha in industrial use and 73.6ha in non-industrial uses). Seek also clarification on total stock of industrial land in Hillingdon: URS 2010 Industrial Land Baseline estimates this to be 430ha including sites outside designated employment areas.</p> <p>Seek clarification that 'Industrial and Employment Land Release' refers to the net total release of land in industrial use (whether designated as SIL, LSIS or non-designated) or does this just refer to protected industrial land?</p> <p>Support range for additional hotel bedrooms and new retail floorspace in Uxbridge.</p>	<p>URS 2010 Industrial Land Baseline Report was published in June, after the final draft of the Core Strategy. The report, therefore, does not form part of the evidence base.</p> <p>The Core Strategy is supported by the background report Position Statement on Hillingdon's employment land and comparison retail floorspace. It sets out key information and figures for employment land with sources. The figure of 358ha of existing designated employment land is taken from Hillingdon's AMR 2008/09 and takes account of release of previously designated employment land. There is no up to date figure available for total designated and non-designated industrial land in the borough.</p> <p>Table 3.5 of the Position Statement shows the net proposed designated employment land release. It shows what releases are proposed for land in SILs.</p> <p>Support welcomed.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
107	4	Greater London Authority (late submission)	4 The Vision - where we want to be The Spatial Strategy Para 4.15	Support	<p>Welcome proposal to define detailed boundary of Heathrow Opportunity Area and specific growth potential in Heathrow Area Development Plan Document to be developed with the GLA and Hounslow Council.</p>	<p>Support welcomed</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change</p>
107	5	Greater London Authority (late submission)	4 The Vision - where we want to be The Spatial Strategy Para 4.19	Object	<p>Does this have affect on any SILs identified in the London Plan? Is the total quantum of release to be included in the 17.58ha identified in Table 4.1?</p>	<p>The Core Strategy is supported by the background report Position Statement on Hillingdon's employment land and comparison retail floorspace. Table 3.5 of the Position Statement shows the proposed designated employment land release. The total net release figure is included in Table 4.1. It shows what releases are proposed for land in SILs.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
107	6	Greater London Authority (late submission)	4 The Vision - where we want to be Map 4.1 Key diagram Para 4.33	Object	The broad locations for the Strategic Industrial Locations (especially Hayes Industrial Area and Victoria Road/Stonefield Way) do not reflect the locations/extent that are anticipated by the GLA and appear to indicate a significant consolidation. There appears to be a mismatch with Map 5.1 in Chapter 5. If the broad extents of SILs as shown in the Key Diagram are retained as shown in Map 4.1, then this could give rise to a general conformity issue. It may, however, be a simple mapping issue, which could be resolved easily through discussions between the GLA and Hillingdon Council.	<p>Agree. Map 4.1 will be changed to more accurately reflect the broad locations of SILs as shown in Map 5.1.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Replace 'key employment sites' in Map 4.1 with Strategic Industrial Location sites from Map 5.1 (in line with London Plan).</p>
107	7	Greater London Authority (late submission)	5 Core Policies - The Economy Supply of Employment Land Para 5.3, page 28	Object	As in point 2 above, seek clarification on extent of designated industrial/employment land (358ha quoted in Table 4.1, compared to 365ha in the 'URS 2010 Industrial Land Baseline', of which 291.7ha in industrial use and 73.6ha in non-industrial uses). Seek also clarification on total stock of industrial land in Hillingdon: the URS 2010 Industrial Land Baseline estimates this to be 430ha, including sites outside designated employment areas.	<p>The Position Statement on Hillingdon's employment land and comparison retail floorspace sets out key information and figures for employment land with sources. The figure of 358ha of existing designated employment land is taken from Hillingdon's AMR 2008/09 and takes account of release of previously designated employment land. There is no up to date figure available for total designated and non-designated industrial land in the borough.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
107	8	Greater London Authority (late submission)	5 Core Policies - The Economy Supply of Employment Land Para 5.6, page 29	Object	Support references to the four SILs in Hillingdon and for the broad types of uses acceptable in each. However, the SILs in Map 5.1 are confusingly mixed up with Locally Significant Industrial Sites and Locally Significant Employment Locations. It is considered that this matter could be resolved easily through discussions between the GLA and Hillingdon Council (see comments on Map 5.1 below).	<p>Support and further discussions welcome. Map 5.1 will be amended to provide more clarity.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change</p>
107	9	Greater London Authority (late submission)	5 Core Policies - The Economy Supply of Employment Land Para 5.7	Object	The London Plan gives support for Locally Significant Industrial Sites (and Locally Significant Employment Locations) these must be distinguished from Strategic Industrial Locations (see point 7 above).	<p>Map 5.1 will be amended to provide more clarity.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend map 5.1 to clarify various employment land allocations.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
107	10	Greater London Authority (late submission)	5 Core Policies - The Economy Supply of Employment Land Para 5.8	Support	The GLA supports the recognition of the Prologis Logistics Park in Stockley but this should be recognised as part of the wider Hayes Industrial Area Strategic Industrial Location, and not as a Locally Significant Industrial Site. The GLA would welcome further discussions with LB Hillingdon on this matter. The Odyssey Business Park in South Ruislip by contrast would appear to be more suitable as a LSEL as proposed.	Support and further discussions welcome. <u>Council's Proposed Action</u> No proposed change
107	11	Greater London Authority (late submission)	5 Core Policies - The Economy Map 5.1 Locations for Economic Growth Pg. 30	Object	Map 5.1 should indicate the broad extents of the Strategic Industrial Locations and distinguish these from LSIS and LSEL. Map 5.1 also illustrates broad proposed areas of growth for hotel and offices, although it is not clear how this broad area relates to promoting such uses in town centres and the London Plan location typology for office development in London Plan paragraph 3.148 and location criteria for hotels in London Plan policy 3D.7. The GLA would welcome further discussion on this matter.	Comments noted; Map 5.1 will be amended as requested. <u>Council's Proposed Action</u> Amend Map 5.1 to show correct locations of Strategic Industrial Locations.
107	12	Greater London Authority (late submission)	5 Core Policies - The Economy Supply of Employment Land Para 5.11	Object	The word 'potential' should be inserted at the beginning of the last sentence to read 'Potential locations proposed for the managed release...' This is because any release at these locations is subject to the Site Allocations DPD, which, as stated, 'will take into account sites that have already been released to other uses' and to match the wording in Map 5.1, which indicates that these sites are 'potential'. The URS 2010 Industrial Land Baseline study indicates that in Hillingdon 9.2ha of industrial land has already been released during the period 2006-2010. This further reinforces the need to insert the word 'potential' in the last sentence of para. 5.11. The GLA would also like to seek clarification as to which parts of SIL would be consolidated (i.e. which sites comprise the 4 ha. net).	The word 'proposed' functions in the same way as the suggested 'potential' - ie proposed, subject to the Site Allocations DPD. It is not felt necessary to have both words. It is suggested therefore that the sentence reads "potential locations for the managed release..." <u>Council's Proposed Action</u> No proposed change

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
107	13	Greater London Authority (late submission)	5 Core Policies - The Economy Policy E1: Managing the Supply of Employment Land	Object	<p>Policy E1 refers only to Locally Significant Industrial Sites and Locally Significant Employment Locations. Policy E1 must refer also to the Strategic Industrial Locations and distinguish these from LSIS and LSEL. This matter could be resolved by inserting reference to the Strategic Industrial Locations. The GLA seeks clarification as to where policy for the different types of uses acceptable in SIL, LSIS and LSEL would be included – in the Core Strategy or in another DPD?</p> <p>The GLA also seeks clarification whether 17.58 ha. refers to surplus industrial land (i.e. including designated and non-designated land) or just designated industrial land?</p>	<p>Policy E1 will be amended to include reference to Strategic Industrial Locations.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend policy E1 to read:</p> <p>The Council will accommodate growth by protecting Strategic Industrial Locations and the designation of Locally Significant Industrial Sites (LSIS) and Locally Significant Employment Locations (LSEL), including the designation of 13.63 hectares of new employment land.</p> <p>The Council will manage the release of 17.58ha of surplus industrial land for other uses over the plan period. (see Map 5.1)</p>
107	14	Greater London Authority (late submission)	5 Core Policies - The Economy Location of Employment Growth Para 5.16	Object	<p>Please note that the 76,950 sq.m. of new office space figure does not make allowance for 8% frictional vacancy, which is considered prudent to allow efficient operation of the market. The figures in LOPR09 do not include this allowance (in contrast to LOPR07). The correct calculation for office floorspace requirements would be 6,413 office jobs x 12sqm net per worker + 8% allowance for frictional vacancy or:</p> <p>$6,413 \times 12 \times 1.08 = 83,112 \text{ esq.}$ or 83,100 sq.m. net office floorspace to nearest 100 sq.m.</p>	<p>Figure on office floorspace in paragraph 5.16 will be amended to take account of frictional vacancy</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Delete figure in third sentence of paragraph 5.16 of 76,950 square metres and replace with 83,100 square metres.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
107	15	Greater London Authority (late submission)	5 Core Policies - The Economy Policy E2: Location of Employment Growth	Object	Policy E2 must refer also to the Strategic Industrial Locations in line with London Plan policy 2A.10 and distinguish these from Locally Significant Industrial Sites (and Locally Significant Employment Locations) in line with London Plan policy 3B.4. Policy E2 as currently worded therefore gives rise to a general conformity issue. The minimum target for 3,800 additional hotel bedrooms is supported.	Amend policy E2 to refer to Strategic Industrial Locations <u>Council's Proposed Action</u> The Council will accommodate 9,000 new jobs during the plan period. Amend first sentence of policy E2 to read: Most of this employment growth will be directed towards suitable sites in the Heathrow Opportunity Area, Strategic Industrial Locations...
107	16	Greater London Authority (late submission)	4 The Vision - where we want to be The Spatial Strategy Para 4.15	Support	The GLA welcomes the Council's commitment to preparing a Heathrow Opportunity Area DPD with the GLA and Hounslow and looks forward to early discussions on options for taking this forward. The GLA welcomes the Council's commitment to preparing a Heathrow Opportunity Area DPD. The policy should reflect earlier statements made that it will work with the GLA and Hounslow to develop this document. The GLA looks forward to early discussions on options for taking this forward.	Support noted <u>Council's Proposed Action</u> No proposed change
107	17	Greater London Authority (late submission)	5 Core Policies - The Economy Policy E4: Uxbridge	Support	Support and welcome policy to strengthen the role of Uxbridge town centre for a range of town centre uses and proactive approach to expanding the town centre boundary to accommodate growth.	Support noted <u>Council's Proposed Action</u> No proposed change

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
107	18	Greater London Authority (late submission)	5 Core Policies - The Economy Table 5.5: Net Additional Comparison Goods Floorspace Req (sq.m)	Object	In the box marked 'flexibility' note that although the report was prepared in 2008-09 the latest consumer expenditure projections from Experian are higher than those used in the 2009 GLA study. As worded the text rather undermines the evidence base that the Council has used leaving it open to challenge. Suggest reword this box: "The figures for additional comparison goods floorspace requirement in Hillingdon's District Centres are taken from a report published by the Greater London Authority in March 2009. The report uses a broad strategic model to distribute future growth and therefore estimates need to be treated with caution. The Council will monitor these targets through the Annual Monitoring Report and will keep the targets under review.	Amend section on Flexibility following paragraph 5.33. <u>Council's Proposed Action</u> Amend section on Flexibility following paragraph 5.33 to read: The figures for additional comparison goods floorspace requirement in Hillingdon's District Centres are taken from a report published by the Greater London Authority in March 2009. The report uses a broad strategic model to distribute future growth and therefore estimates need to be treated with caution. The Council will monitor these targets through the Annual Monitoring Report and will keep the targets under review.
107	19	Greater London Authority (late submission)	5 Core Policies - The Economy Policy E5: Town and Local Centres	Object	Support the general principles of this policy and particularly promoting sustainable access to local retail, services and amenities. Note that the title is 'Town and Local Centres' whereas the section is titled 'Town and Neighbourhood Centres' of which local centres are only one component. Suggest check policy and text to ensure all references to local and neighbourhood centres are consistent.	Comments noted <u>Council's Proposed Action</u> No proposed change.
107	20	Greater London Authority (late submission)	5 Core Policies - The Economy Policy E7: Raising Skills	Support	Support policy E7	Support noted <u>Council's Proposed Action</u> No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
107	21	Greater London Authority (late submission)	6 Core Policies - New Homes	Support	With regard to the proposed new homes target, the GLA accepts Hillingdon Council's current approach. The Council's built-in flexibility to allow for change if the London Plan housing targets are revised is particularly welcome.	<p>Support noted</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
107	22	Greater London Authority (late submission)	6 Core Policies - New Homes	Support	In terms of housing mix, The GLA welcomes Hillingdon's statement that it will aim to achieve 50 per cent affordable housing on all new schemes, with a 70:30 social rented: intermediate split. The Council acknowledges that the draft replacement London Plan proposes to change in split to 60:40. The GLA encourages the Council to allow some flexibility, to help achieve a different mix if required.	<p>The proposed split of affordable housing tenure will reflect the Council's emerging viability study and its Housing Market Assessment.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Additional sentence added to Flexibility section of policy H2.</p>
107	23	Greater London Authority (late submission)	6 Core Policies - New Homes Policy H3: Gypsy and Traveller Pitch Provision	Object	<p>Policy H3:</p> <p>Concern expressed regarding clause b(i), avoid over concentration of facilities...' is not about the selection of sites.</p> <p>Clause b (iii): 'have no significant adverse effects on adjoining' land is poorly defined and is not normally applied to mainstream housing.</p>	<p>Policy H3 will be amended in the light of comments from the GLA relating to additional pitch provision. Hillingdon will take account of a number of factors when allocating additional traveller pitches, including the overall need and the availability of suitable sites. The Council will seek to avoid a situation where it provides significantly more pitches than other London Boroughs or adjoining authorities.</p> <p>All development proposals are assessed in terms of the impact on surrounding land uses. This is not considered to be an unreasonable policy criteria.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Amend subsection b) in policy H3 to read:</p> <p>"Targets for additional pitch provision take account of need and the availability of suitable sites"</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
107	24	Greater London Authority (late submission)	6 Core Policies - New Homes Policy BE1: Built Environment	Object	Given its strategic importance, the requirement for all new homes to meet the 'Lifetime Homes' standard, and for 10% of those to be wheelchair accessible, or easily adaptable to wheelchair accessibility, should be highlighted in the Core Strategy document. Similarly, at least 10% of new hotel bedrooms are expected to be wheelchair accessible.	<p>Policy BE1 recognises that all homes should be designed to Lifetime Homes standards. A requirement that 10% of these to be wheelchair accessible or easily adaptable to wheelchair accessibility will be added to Point 3.</p> <p>Issues relating to wheelchair accessibility of hotel rooms will be identified in the Council's 'accessibility' SPD and in the subsequent Development Management DPD.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend point 3 of policy BE 1 to read:</p> <p>Be designed to include "Lifetime Homes" principles so that they can be readily adapted to meet the needs of those with disabilities and the elderly, 10% of these should be wheelchair accessible or easily adaptable to wheelchair accessibility and encouraging places of work and leisure, streets, neighbourhoods, parks and open spaces to be designed to meet the needs of the community at all stages of people's lives.</p>
107	25	Greater London Authority (late submission)	6 Core Policies - New Homes	Object	Provision of play space should be based on the standard set out in the Mayor's SPG 'Providing for Children and Young People's Play and Informal Recreation', which sets a benchmark of 10 sq.m. of useable child play space per child, with under-5 child play space provided on-site.	<p>The Council recognises the need to ensure that an appropriate amount of children's play space is provided as part of new residential development. However, it is not considered necessary to repeat the content of the Mayor's SPG.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Insert new criteria into policy EM5</p> <p>Ensure that sufficient children's play space is provided to support proposals for new residential development, in accordance with national and local guidance.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
107	26	Greater London Authority (late submission)	8 Core Policies - Environmental Management Policy EM1: Climate Change Adaptation and Mitigation Page 80 - Monitoring E3	Object	<p>1 - EM1 contains policies that are too generic and should be more detailed in line with the London Plan climate change mitigation and adaptation policies, which require developers to maximise energy efficiency, decentralised energy, site-wide heat networks, combined heat & power (CHP) and renewable forms of energy, in line with the Mayor's energy hierarchy.</p> <p>2 - 10% renewable energy targets should be replaced to reflect 20% target in London Plan</p> <p>3 - The Council should require developers to assist in mapping planned networks in partnership with the LDA decentralised energy networks.</p>	<p>1 - Disagree. The comment does not provide an example of the level of detail the Core Strategy should go into. Policy EM1 sets a strategic framework for specific development management policies.</p> <p>2 - Agreed. Monitoring Policy EM1, E3 should replace 10% with 20%.</p> <p>3 - Disagree. The Council is seeking to undertake a decentralised energy mapping study to identify broad strategic areas. The Core Strategy cannot set any specific requirements yet, as the evidence base is not yet in place.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Monitoring Policy EM1, section E3, replace 10% with 20%.</p>
107	27	Greater London Authority (late submission)	8 Core Policies - Environmental Management Policy EM4: Open Space and Informal Recreation	Object	<p>Policy EM4: It is recommended that the wording: "The Council will work with DEFRA to identify and protect open spaces that provide quiet areas and relative tranquillity" be amended to read: "The Council will work with DEFRA to identify and protect open spaces that provide quiet areas, and will also consider whether other areas merit protection of relative tranquillity."</p>	<p>Agree, changes noted.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend Policy EM4 to read 'The Council will work with DEFRA to identify and protect open spaces that provide quiet areas and will also consider whether other areas merit protection of relative tranquillity'</p>
107	28	Greater London Authority (late submission)	8 Core Policies - Environmental Management Policy EM8: Water, Air and Noise Para 8.102	Object	<p>Policy EM8: Given that Policy EM4 on Open Space and Informal Recreation includes reference to quiet areas, it is suggested that Policy EM8 includes wider policies to reduce the adverse impact of noise, as referred to in policy 7.15 of the Draft Replacement London Plan, and reflecting the scope of para 8.102 of the Draft Core Strategy.</p>	<p>Agree, Policy EM8 to be amended to reflect this.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Add to Policy EM8 'The Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.'</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
107	29	Greater London Authority (late submission)	4 The Vision - where we want to be Strategic Objectives to deliver The Vision SO10	Object	Strategic Objective SO10, page 21 and repeated later: "SO10: Improve air and water quality and safeguard quiet areas from noise pollution". It is recommended that the reference to noise is widened, e.g. "reduce adverse impacts of noise, including in quiet areas".	<p>Agree.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Revise SO10 to read: Improve and protect air and water quality, reduce adverse impacts from noise including the safeguarding of quiet areas and reduce the impacts of contaminated land'.</p>
107	30	Greater London Authority (late submission)	3 A Portrait of Hillingdon - where we are now Major Infrastructure Projects Para 3.8	Object	<p>Suggested rewording of the sentence: 'Currently, aircraft at Heathrow are only allowed to take off from one runway and land on the other (spreading the noise burden)'</p> <p>1 - Planes are occasionally allowed to take off on one run way whilst the other is used for landings;</p> <p>2 - 'Spreading the noise burden' should be replaced by 'providing regular and predictable respite' or 'providing regular and predictable relief'</p>	<p>1 - Noted.</p> <p>2 - Noted.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>1 - Revise Paragraph 3.8 to read: Currently, aircraft at Heathrow are only permitted to take off from one runway and land on the other except in certain circumstances. This action helps to regulate noise impacts on the surrounding area.</p>
107	31	Greater London Authority (late submission)	8 Core Policies - Environmental Management Open Spaces, Sport and Leisure Para 8.46, line 4	Object	Para 8.46, line 4: The Environmental Noise (England) Regulations 2006 only refer to "quiet areas". The commendation to local authorities to also consider "relative tranquillity" was introduced by the Mayor of London's Ambient Noise Strategy, and is reflected in the Draft Replacement London Plan.	<p>Agree.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Add to end of Para 8.46 'In addition, consideration will be given to 'relative tranquillity' to accord with the the Mayor's London's Ambient Noise Strategy and intentions in the Draft Replacement London Plan.'</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
----	---------	---------------------------	-------------------------------	------------------------------	---------------------------	--------------------

107	34	Greater London Authority (late submission)	8 Core Policies - Environmental Management Water, Air and Noise Management Para 8.118	Object	Para 8.118: Suggest add at opening - "The Environmental Noise (England) Regulations 2006 require identification of Quiet Areas, which Noise Action Plans should aim to protect." Line 2: It is understood that the process for identifying Quiet Areas is now likely to start towards the end of 2010, rather than in July.	Changes noted.
-----	----	--	---	--------	---	----------------

Council's Proposed Action

Amend as follows:

Paragraph 8.118: add at opening - "The Environmental Noise (England) Regulations 2006 require identification of Quiet Areas, which Noise Action Plans should aim to protect."

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
107	35	Greater London Authority (late submission)	8 Core Policies - Environmental Management Water, Air and Noise Management	Object	DRLP policy 7.14 states that that in preparing their SPDs/DPDs/LDFs London Boroughs should formulate policies that seek reductions in the levels of pollutants referred to in the Government's National Air Quality Strategy and should have regard to the Mayor's Air Quality Strategy. London Boroughs should also take account of the findings of the Air Quality Review and Assessments and Actions plans, in particular where Air Quality Management Areas have been designated.	<p>Agree. Policy EM8 to be amended to reflect this.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Policy EM8 amended to read:</p> <p>'All development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors.</p> <p>All major development within the Air Quality Management Area (AQMA) should demonstrate air quality neutrality (no worsening of impacts) where appropriate; actively contribute to the promotion of sustainable transport measures such as vehicle charging points and the increased provision for vehicles with cleaner transport fuels; deliver increased planting through soft landscaping and living walls and roofs; and provide a management plan for ensuring air quality impacts can be kept to a minimum. The Council seeks to reduce the levels of pollutants referred to in the Government's National Air Quality Strategy and will have regard to the Mayor's Air Quality Strategy. London Boroughs should also take account of the findings of the Air Quality Review and Assessments and Actions plans, in particular where Air Quality Management Areas have been designated.'</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
107	36	Greater London Authority (late submission)	8 Core Policies - Environmental Management Policy EM8: Water, Air and Noise	Object	<p>1 - With regard to specific planning decisions, it is recommended that policy EM8 should refer to minimising emissions from construction and demolition sites by following the GLA and London Councils' Best Practice Guidance on Construction and Demolition.</p> <p>2 - The policy should also refer to air quality assessments and planning decisions in relation to on-site renewable energy sources such as biomass boilers and seek to achieve air quality neutrality in terms of local air quality impacts. Offsetting should be used to mitigate the negative impacts associated with development proposals; it is recommended that this approach be included within policy EM8 of Hillingdon Core Strategy.</p>	<p>1 - Noted. This is a matter for the Development Management Development Plan Document.</p> <p>2 - Paragraph 8.114 acknowledges Biomass and air quality problems and refers to the Development Management Development Plan Document. Propose amending policy EM8 to reflect air quality neutrality.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>1 - No proposed change. Development Management Development Plan Document to include specific criteria on air quality.</p> <p>2 – Policy EM8 amended to read :</p> <p>'All development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors. All major development within the Air Quality Management Area (AQMA) should demonstrate air quality neutrality (no worsening of impacts) where appropriate; actively contribute to the promotion of sustainable transport measures such as vehicle charging points and the increased provision for vehicles with cleaner transport fuels; deliver increased planting through soft landscaping and living walls and roofs; and provide a management plan for ensuring air quality impacts can be kept to a minimum. The Council seeks to reduce the levels of pollutants referred to in the Government's National Air Quality Strategy and will have regard to the Mayor's Air Quality Strategy. London Boroughs should also take account of the findings of the Air Quality Review and Assessments and Actions plans, in particular where Air Quality Management Areas have been designated.'</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
107	37	Greater London Authority (late submission)	8 Core Policies - Environmental Management Policy EM11: Sustainable Waste Management	Object	With regard to waste management, the GLA welcomes Hillingdon Council's commitment to identify and allocate suitable new sites for waste management facilities within the Joint West London Waste Plan, and to provide sufficient capacity to meet the apportionment requirements stated in the London Plan. The GLA is, however, disappointed with the Council's lack of progress in pursuing these objectives and looks forward to joint discussions aimed at moving this forward.	<p>The WLWP is being progressed in accordance with the The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
107	38	Greater London Authority (late submission)	9 Core Policies - Transport and Infrastructure Policy T1: Accessible Local Destinations Para 9.3	Object	TfL wish to ensure that the correct levels of transport improvements are achieved to mitigate the level of development anticipated.	<p>TfL was consulted on the transport infrastructure required to support planned growth. No specific requirements were identified. The results of the consultation process are identified in the Council's infrastructure schedule at appendix 2 of the Core Strategy.</p> <p>The Council welcomes the opportunity to continue to liaise with Transport for London on future infrastructure provision.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
107	39	Greater London Authority (late submission)	9 Core Policies - Transport and Infrastructure Policy T1: Accessible Local Destinations Para 9.4	Object	<p>Hillingdon does have a comprehensive choice of north-south bus routes, linking major centres such as Uxbridge, Heathrow and Ruislip, if not directly, via frequent interchange at bus stations and other centres.</p> <p>An issue for north-south travel is improving and maintaining reliability and journey times. This should be done via improvements involving bus priority on busy roads.</p> <p>This will help address the problem identified in paragraph 9.6 which suggests that Uxbridge has slow connections by public transport.</p>	<p>Comments on bus priority noted.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
107	40	Greater London Authority (late submission)	9 Core Policies - Transport and Infrastructure Policy T1: Accessible Local Destinations Para 9.7	Support	TfL support the objectives set out in paragraph 9.7; in addition the Borough should consider an objective of reducing congestion and smoothing of traffic flow.	<p>Support welcomed; agree to add sentence to paragraph 9.7 to clarify that the Core Strategy also aims to reduce congestion and smooth traffic flow.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>After first sentence of paragraph 9.7 insert this wording:</p> <p>"The policies also aim to reduce congestion and smooth traffic flow."</p>
107	41	Greater London Authority (late submission)	9 Core Policies - Transport and Infrastructure Accessible Local Destinations Strategic Objectives to deliver The Vision SO12	Support	TfL support the Borough's objective to promote sustainable modes of transport and reduce car dependence. This requires implementing demand management measures.	<p>Detailed measures to implement this objective (e.g. parking standards) will be set out in the Development Management Development Plan Document.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
107	42	Greater London Authority (late submission)	9 Core Policies - Transport and Infrastructure Strategic Objectives to deliver The Vision Policy T1: Accessible Local Destinations SO21	Object	TfL acknowledge the Borough's concern about north south links however at present there is no research which quantifies the level of demand that exists. TfL recommend that the Borough provide evidence to support the statement and suggest the text is amended to read: "Continue to improve public transport services and interchanges in the borough to assure that the network reflects the travel requirements of current and potential users."	<p>The Council believes that north/south public transport links are currently slow and need to be improved in order to support planned growth in the south of the borough. Improving these links is a key objective for the Council.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
107	43	Greater London Authority (late submission)	9 Core Policies - Transport and Infrastructure Strategic Objectives to deliver The Vision Public Transport Network SO23	Object	TfL suggest the text in SO23 is amended to read: "Improve journey times and reliability of buses in the borough by continuing investment in public transport priority schemes."	<p>SO23 relates to the Heathrow Opportunity Area. It is unclear why TfL is seeking to change this objective.</p> <p>Existing Strategic Objectives 17, 18, 20, 21 and 22 are already considered to adequately express the Council's objective of encouraging public transport improvements generally in the borough.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
107	44	Greater London Authority (late submission)	9 Core Policies - Transport and Infrastructure Accessible Local Destinations Policy T1: Accessible Local Destinations Para 9.13	Support	TfL welcome the Borough's intention to encourage walking via good street signage and suggests that the Legible London system be used for wayfinding.	<p>Support noted.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
107	45	Greater London Authority (late submission)	9 Core Policies - Transport and Infrastructure Public Transport Network Policy T1: Accessible Local Destinations Para 9.17	Object	Paragraph 9.17 sets out that links between Uxbridge and Heathrow are desired. The A10 and U3 bus services run between these two destinations and a total of 9 buses per hour are provided along these roads.	<p>Comments noted.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
107	46	Greater London Authority (late submission)	9 Core Policies - Transport and Infrastructure Public Transport Network Policy T1: Accessible Local Destinations Para 9.18	Object	TfL recommend that paragraph 9.18 is amended to read: 'Uxbridge is home to a regionally important Underground/bus interchange that cannot accommodate current future demand without significant improvements. The bus station has inadequate capacity for the number of vehicles that currently use it. The surrounding area is in need of upgrading to improve accessibility for people with restricted mobility.'	<p>Agreed - paragraph 9.18 to be amended as requested.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Amend paragraph 9.18 to read:</p> <p>'Uxbridge is home to a regionally important Underground/bus interchange that cannot accommodate current future demand without significant improvements. The bus station has inadequate capacity for the number of vehicles that currently use it. The surrounding area is in need of upgrading to improve accessibility for people with restricted mobility.'</p>
107	47	Greater London Authority (late submission)	9 Core Policies - Transport and Infrastructure Public Transport Network Policy T1: Accessible Local Destinations Para 9.18	Support	The Council has been very supportive in relation to problems regarding Uxbridge Bus Station and standing facilities. The proposed redevelopment of the bus station is appreciated and ideally, substantially more space would be provided through future plans. TfL welcome current plans for more stands on Chippendale Way; although they are reliant on the maintenance of a roundabout at the junction with Park Road in order to maintain turning for buses.	<p>Comments noted</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
107	48	Greater London Authority (late submission)	9 Core Policies - Transport and Infrastructure Public Transport Network Policy T1: Accessible Local Destinations Para 9.20	Observation	Due to the upgrades of the Sub-Surface Lines, which will complete prior to 2026, the Uxbridge branch will benefit from (slightly) increased frequencies and faster services on the Metropolitan line. The Metropolitan line will also benefit from new trains. TfL is not currently planning any further frequency and/or speed increases to Uxbridge, beyond the upgrade of the line.	<p>Comments noted.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
107	49	Greater London Authority (late submission)	9 Core Policies - Transport and Infrastructure Public Transport Network Policy T1: Accessible Local Destinations Para 9.22	Observation	Crossrail will bring extra travellers into the borough's stations who will need to travel on to/from their origin/destination by a feeder mode. TfL will be looking to work with the Council and Crossrail/Network Rail to discuss how the interchange with buses, taxis, cycles and walking at West Drayton can cope with the high volume of passengers from 2017.	<p>Comments noted. The Council will work with Transport for London and Crossrail/Network Rail on how the interchange with buses, taxis, cycles and walking at West Drayton can cope with the expected higher volume of passengers from 2017.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
107	50	Greater London Authority (late submission)	9 Core Policies - Transport and Infrastructure Public Transport Network Policy T1: Accessible Local Destinations Para 9.24	Observation	TfL is currently assessing the business case for an interchange between the Metropolitan and Piccadilly lines and the Central line and Chiltern Railway in the Ruislip area. Initial results suggest that modelled demand for this interchange will not be high enough to warrant the costs of creating an interchange. Pending the results of analysis, and on the condition of third party funding, TfL would consider further work on this scheme. TfL support moves to improve access between West Ruislip and Ruislip stations, and improvements to the interchange with other modes in the area.	<p>Comments noted.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
107	51	Greater London Authority (late submission)	9 Core Policies - Transport and Infrastructure Policy T2: Public Transport Interchanges	Object	<p>Additional infrastructure for increased bus services need to be considered with land and funding secured by various channels, including developer contributions.</p> <p>Additional bus priority measures should be provided.</p>	<p>Comments noted - the Council will continue to liaise with Transport for London on future infrastructure provision and improvements to local bus services.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
107	52	Greater London Authority (late submission)	9 Core Policies - Transport and Infrastructure Policy T2: Public Transport Interchanges Para 9.25	Object	<p>The bus network is consistently reviewed and both macro and micro approaches are taken. It is understood that the geography of Hillingdon means that intra-borough trips will be of a North-South nature. It is also understood that the council's scope is only within Hillingdon. However, bus trips do not necessarily stay within borough boundaries and a London-wide view must be taken. Specific details of links requested by residents would be received well.</p> <p>It is worth noting that if passengers are standing it does not necessarily mean buses are over capacity. On busy routes it is not always possible for all passengers to be seated, and appropriately fitted out standing areas are provided.</p>	<p>Comments noted.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
107	53	Greater London Authority (late submission)	9 Core Policies - Transport and Infrastructure Policy T4: Heathrow Airport	Object	<p>The Mayor's response is centred on the draft Replacement London Plan given the Government's position and outcome from the Third Runway Judicial Review. The Council's policies will need to be updated to reflect this position.</p>	<p>Policy T 4 has been amended to state that the Core Strategy will support sustainable operation of Heathrow Airport, seek a modal shift away from the use of private cars and short haul flights to the airport and improve local environmental conditions for local communities.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>To amend policy T 4 to read:</p> <p>"This Core Strategy will support the sustainable operation of Heathrow and growth in the Heathrow Opportunity Area by facilitating improvements to public transport and cycle links, enhancing the public transport interchange to provide the opportunity for a modal shift from the use of private cars and from short haul air to sustainable transport modes and providing transport infrastructure to accommodate economic and housing growth whilst improving environmental conditions, for example noise and local air quality for local communities."</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
107	54	Greater London Authority (late submission)	8 Core Policies - Environmental Management River and Canal Corridors Page 85	Object	The Council should reference the use of waterways for the transportation of construction materials in accordance with London Plan policies 4C.8 Freight uses on the Blue Ribbon Network and 3C.25 Freight Strategy. TfL strongly supports use of the Blue Ribbon Network for the transport of all freight materials where appropriate.	<p>Noted. The Canal does have a water transportation role to play although further studies are required to be able to ascertain its value. A study of the West London Canal Network was carried out in 2005. This concluded that there is a low demand for freight to be transported along the canal network. This was due to the economics of transferring from canal to road, the journey times and the relative lower cost of alternatives. Furthermore, the report highlighted few places for further infrastructure, which itself would cost.</p> <p>The amount of locks on the Grand Union Canal Main Line from the Thames increases the journey times substantially whilst the Bulls Bridge Junction to Camden Locks (Paddington Branch) is lock free and represents a potentially quicker route to central parts of London.</p> <p>The report also acknowledges that there is no shortage of small, simple loading/unloading points, but there are only a few areas for large freight loading/unloading.</p> <p>The Grand Union Canal does represent a significant asset, however, it is not yet clear what its role can be. Further studies will be required, which would have to be in cooperation with other London Boroughs, TfL and British Waterways.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
107	55	Greater London Authority (late submission)	8 Core Policies - Environmental Management Policy EM11: Sustainable Waste Management	Object	In regards to Sustainable Waste Management, TfL would welcome a reference to minimising the transportation of waste as a key to maximising waste management sustainability.	<p>Sustainable waste management involves the consideration of a number of potential environmental criteria including the transportation of waste. There is no need to repeat the guidance on locational criteria provided in Planning Policy Statement 10 in the Core Strategy.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
107	56	Greater London Authority (late submission)	4 The Vision - where we want to be Table 4.1 Summary of Growth in Hillingdon 2011-2026	Object	TfL note the planned increase in hotel rooms to 5600 between 2011 and 2026 (Table 4.1). As such there will need to be some provision made for coaches, both in terms of pick up/set down as well as parking, at each development. This is particularly important at hotels surrounding Heathrow. Future developments of conference and leisure facilities and at schools would also need to take into account coach requirements.	Comments noted. These issues will be considered as part of the preparation of the subsequent Development Management and Heathrow Area Development Plan Documents.

Council's Proposed Action

No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
108	1	Individual	4 The Vision - where we want to be The Spatial Strategy Policy E2: Location of Employment Growth Policy T3: North-South Sustainable Transport Links Policy BE1: Built Environment	Object	Concern over intensity of proposed development in Yiewsley, West Drayton and Hayes and capacity of existing infrastructure to support growth. In particular, north south links, congestion, need for hotels in Hayes, garden grab, lack of publicity on consultation.	<p>The Core Strategy is a high level strategic plan for the borough which sets out how and where projected growth in retail, employment and housing will be located over the next 15 years. It also sets out how supporting infrastructure such as transport, community facilities and open space will be managed, and mitigation for impacts such as pollution. The Core Strategy will be supported by a number of other documents which include greater detail for specific sites and types of development.</p> <p>New development is most sustainable in areas of existing infrastructure. The plan is for the next 15 years which goes beyond the current economic downturn. Maps 4.1 and 5.1 are indicative and are not intended to show exact boundaries, however it is accepted that these lack clarity and will be amended to more accurately reflect growth in the Hayes-West Drayton corridor. Table 5.3 of the Core Strategy identifies Yiewsley & West Drayton as suitable for regeneration opportunities. Detailed proposals for the area will be set out in a future Heathrow Area DPD.</p> <p>Poor north south links in the borough is recognised as a strategic issue for the borough and Policy T3 commits the Council to improving these. This and other issues such as congestion will be delivered through the Council's Local Implementation Plan which will be available for public consultation early next year.</p> <p>There are now national policies to prevent 'garden grabbing' and Policy BE1 of the Core Strategy states that new development should not result in the inappropriate development of gardens.</p> <p>Your comments about consultation are noted. Hillingdon's Statement of Community Involvement (SCI) adopted in November 2006 sets out a minimum of six weeks for public consultations for each of the stages in the plan making process. In line with previous consultations on the Core Strategy, a six week consultation period was planned for the draft Core Strategy to be consistent with Hillingdon's SCI. There will be further opportunity to comment on a revised Core Strategy early next year.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
						<u>Council's Proposed Action</u>
						Changes to the Key Diagram and Map 5.1 are proposed to clarify growth areas in the Hayes-West Drayton Corridor. Add overarching sentence to the beginning of Table 5.3 which makes clear that growth in the Heathrow OA will be focused on sustainable locations such as town centres and areas with good access to public transport.
109	1	Steamside Gospel Hall Trust	9 Core Policies - Transport and Infrastructure Community Infrastructure	Object	<p>As a Trustee of a local Church Group we would like to see specific provision made for the accommodation of local community groups to include the following considerations.</p> <p>“A commitment to support community organisations throughout the Borough, including diverse faith communities, in recognition of the social, spiritual and moral needs of our communities.”</p>	<p>Policy CI1 notes that community and social infrastructure will be provided to cater for the needs of the existing community and future populations. Paragraph 9.37 notes that social infrastructure includes faith centres and it is considered that the policy provides a sufficient basis for the provision of places of worship to support growth over the period of the Core Strategy.</p> <p>Further policies to address the issue of places of worship will be identified in the Development Management DPD.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
110	1	King Sturge on behalf of Aggregate Industries	8 Core Policies - Environmental Management Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Object	<p>Site in Thorney Mill Road, West Drayton extends into the adjacent planning area of South Bucks, where the majority of the site is developed and operates as an asphalt and coating stone plant. This part of the site also benefits from a rail depot and therefore has good potential for transportation options other than car and lorry bourn movements. The sites future development is however constrained by the existing greenbelt boundary.</p> <p>In order to fully consider options for the site we would request that the Core Strategy provides for some flexibility in terms of greenbelt review, through the allocations documents in order to deliver employment opportunities, housing and other complimentary uses in sustainable location which have alternative transportation options to road bourn movements.</p>	<p>Planning Policy Guidance 2 provides for Mineral Extraction activities within the Green Belt: It states in 3.11 Minerals can be worked only where they are found. Their extraction is a temporary activity. Mineral extraction need not be inappropriate development: it need not conflict with the purposes of including land in Green Belts, provided that high environmental standards are maintained and that the site is well restored.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
111	1	National Grid	9 Core Policies - Transport and Infrastructure Location of Employment Growth	Object	Development of Strategic Employment Areas will need to take account of National Grid Infrastructure, particularly North Hyde Substation and underground cables from Iver sub-station to North Hyde. No permanent structures should be built over these.	<p>The Council's Strategic Infrastructure Plan will be updated to reflect these comments.</p> <p>Detailed policy requirements to protect infrastructure will be delivered through the Development Management Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
111	2	National Grid	Appendix 2 Infrastructure Schedule	Object	National Grid infrastructure should be reflected in Infrastructure Schedule.	<p>The infrastructure schedule will be updated to reflect these proposals.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Update Appendix 2 Infrastructure Schedule to include programme for National Grid infrastructure.</p>
112	1	Individual	Core Strategy Consultation Draft Consultation	Object	Extend consultation period by at least one month. The document is quite long and needs to be read carefully. It is only available on-line, or as a printed document in limited quantities – and the time available for discussion by such bodies as residents' associations has already been eroded by a delay of around two weeks in distributing their copies. It takes a while for such bodies to get committees together and canvass members' views.	<p>The minimum requirements for community involvement in the plan making process are set out in the Town and Country Planning Regulations 2004 (as amended). The current stage is Regulation 25: Public Participation in the preparation of a development plan document (DPD). Whilst Regulation 25 does not specify a particular time period for representations, Hillingdon's Statement of Community Involvement (SCI) adopted in November 2006 sets out a minimum of six weeks for public consultations for each of the stages in the plan making process. In line with previous consultations on the Core Strategy, a six week consultation period was carried out for the draft Core Strategy to be consistent with Hillingdon's SCI.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
113	1	Individual	8 Core Policies - Environmental Management Green Belt, Metropolitan Open Land and Green Chains	Object	Hi, I am referring to 59 Reservoir Road Ruislip HA4 7TT. I have made representations on this site to be deleted out of green belt back in 2006 and make the same representation this year too. This is the only residential site in green belt on the above road. Nothing on this site has changed since.	Small scale amendments to Green Belt boundaries will be considered as part of the production of the Site Allocations Development Plan Document. <u>Council's Proposed Action</u> No proposed change.
114	1	Individual	3 A Portrait of Hillingdon - where we are now Hillingdon's Characteristics Para.3.1	Object	Question about the sweeping view that Hillingdon is a healthy place to live.	The statement reflects the findings of the Joint Strategic Needs Assessment. <u>Council's Proposed Action</u> No proposed action.
115	1	British Waterways Planning	3 A Portrait of Hillingdon - where we are now Hillingdon's Key Facts Para. 3.3	Observation	The Grand Union Canal falls within all the key fact areas - Economy, Housing, Environmental Management, Built Environment and Heritage, Community Facilities, Culture and Leisure and Transport. There is a danger that because of this, the needs of the canal will be covered only thinly across each topic. We therefore consider that to ensure that the canal's maximum potential is achieved, we consider that there should be a separate suite of policies in the Development Management DPD to address the Grand Union Canal specifically.	Comments noted and will be taken into consideration during preparation of the Development Management Development Plan Document <u>Council's Proposed Action</u> No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
115	2	British Waterways Planning	4 The Vision - where we want to be 4 The Vision - where we want to be Para.4.2, The Vision	Object	<p>The unique selling points of both Hayes and West Drayton is the presence of the Grand Union Canal, this should be a positive force in the regeneration of the area and reflected in the forth point of the Core Strategy 'Vision' as follows:</p> <p>...Regeneration in Hayes and West Drayton town centres is under way through new high quality mixed-use development "that addresses and makes better use (or the best use) of the Grand Union Canal".</p>	<p>Agree to amend the Vision section of the Core Strategy to include a reference to the Grand Union Canal.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amendment to section on The Vision for Hillingdon 2026 by inserting a new fourth sentence in the section beginning: "Economic Growth has been concentrated in Uxbridge, Heathrow and the Hayes/West Drayton Corridor, without ignoring local centres:..." to read:</p> <p>'The best use will have been made of the Grand Union Canal'</p>
115	3	British Waterways Planning	4 The Vision - where we want to be 4 The Vision - where we want to be Para.4.2, The Vision	Object	<p>Under the sixth point, regarding transport, we would like to add that the Grand Union Canal also links the Hayes/West Drayton corridor, through, Uxbridge, providing opportunities for waterborne freight and pedestrian and cycle routes.</p>	<p>This aspect of the Vision relates specifically to improved north/south public transport links and should not be subject to amendment.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
115	4	British Waterways Planning	4 The Vision - where we want to be Strategic Objectives to deliver The Vision SO3	Object	<p>Under Strategic Objective 3, we feel that this should be supplemented with " Improve the quality of and accessibility to, the borough's open spaces, including rivers and canals as areas for sports, recreation, visual interest, bio-diversity, education, sustainability and sustainable transport, health and well-being, and tourism."</p>	<p>Agree to amend SO 3 as proposed..</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend SO3 to read:</p> <p>Improve the quality of and accessibility to, the borough's open spaces, including rivers and canals as areas for sports, recreation, visual interest, biodiversity, education, health and well being. In addition, address open space needs by providing new spaces identified in Hillingdon's Open Space Study.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
115	5	British Waterways Planning	4 The Vision - where we want to be Strategic Objectives to deliver The Vision Para 4.3, SO15	Object	<p>Where the waterside is not being used as part of the industry they often now present a poor neighbour, offering no surveillance of the canal, and cutting off views and access to the waterside, which prevents the canal achieving its potential for supporting the aims described above. In these situations we would recommend that waterside land use be relaxed to allow mixed-use developments to open up access and views through to the canal, and provide enhancement so that the wider community can enjoy this asset.</p> <p>We would therefore recommend that this Strategic Objective be amended to read: "SO15: Protect land for employment uses to meet the needs of different sectors of the economy. Manage the release of surplus employment land for other uses where there is more potential to help deliver wider social and environmental benefits, such as along the Grand Union Canal."</p>	<p>Rather than amend the Strategic Objective as proposed, the Council would note that potential for alternative uses of identified development sites alongside the Grand Union Canal will be considered and brought forward during preparation of the Site Allocations Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
115	6	British Waterways Planning	4 The Vision - where we want to be Strategic Objectives to deliver The Vision Para. 4.3, SO21	Object	<p>Under SO21 - the recent Stockley Park Phase 3 proposals include some upgrade of the towpath, which will encourage its new occupiers to walk and cycle between the site and the nearby stations/public transport interchanges. Sustainable modes of transport such as this between public transport hubs should also be included.</p>	<p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
115	7	British Waterways Planning	4 The Vision - where we want to be The Spatial Strategy Para 4.5, Uxbridge	Object	<p>The waterside of the Grand Union Canal, at the edge of Uxbridge, has already attracted recent office development. We are keen that the waterside be addressed in the most positive way by new development so as to maximise its potential for supporting the surrounding community as an asset to the borough.</p>	<p>Comments noted.</p> <p>The Development Management Development Plan Document will set down the Council's detailed approach on the design of new development - and will apply to any proposed schemes alongside the Grand Union Canal.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
115	8	British Waterways Planning	4 The Vision - where we want to be The Spatial Strategy Para. 4.8, Uxbridge	Object	British Waterways feel strongly that despite the historic link between industry and the Grand Union Canal, there is often no longer a physical relationship required. We would recommend that waterside land use be relaxed to allow mixed-use developments to open up access and views through to the canal, and provide enhancement so that the wider community can enjoy this asset.	<p>It will be for the development management process, using the policy framework set out in the London Plan and Hillingdon LDF to determine the most appropriate uses for particular sites as they come forward for development alongside the Grand Union Canal.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
115	9	British Waterways Planning	4 The Vision - where we want to be The Spatial Strategy Para.4.16, Hayes/ West Drayton	Object	British Waterways agree that the Hayes and West Drayton corridor will be a key location for employment growth. In order that future redevelopment achieves the maximum potential for the canal to support its local community, we would recommend that employment growth should include mixed use retail, commercial and office use. We consider that housing forms an important part of redevelopments in locations such as this, in order to support sustainable lifestyles and provide round the clock surveillance and site presence, to avoid no go areas along the canalside outside of typical working hours.	<p>Details of specific sites will be considered through the Site Allocations DPD process and for the Hayes-West Drayton Corridor in the Heathrow Area DPD.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
115	10	British Waterways Planning	4 The Vision - where we want to be The Spatial Strategy Para. 4.17, Hayes/ West Drayton	Object	The waterside within these areas is not a suitable location for promoting storage and distribution uses, which present a poor neighbour to the canalside and prevent its successful regeneration into a sustainable and valuable part of the community.	<p>It will be for the development management process, using the policy framework set out in the London Plan and Hillingdon LDF to determine the most appropriate uses for particular sites as they come forward for development alongside the Grand Union Canal.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
115	11	British Waterways Planning	4 The Vision - where we want to be The Spatial Strategy Para.4.19, Hayes/ West Drayton	Object	As above, British Waterways supports the regeneration of the waterside in Hayes and West Drayton through vibrant mixed use developments that will more effectively address the waterway and help it to support a growing, sustainable community. We therefore consider that the sites considered for release from employment and industrial uses should be focussed along the canal, in order to maximise the potential of this asset to the area.	<p>Details of specific sites will be considered through the Site Allocations DPD process and for the Hayes-West Drayton Corridor in the Heathrow Area Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
115	12	British Waterways Planning	4 The Vision - where we want to be The Spatial Strategy Para.4.21, Hayes/ West Drayon	Object	<p>We would suggest that this be amended to read The Grand Union Canal will be a key open space and blue/green corridor, with improved public access, strong biodiversity habitats, and increased opportunities for recreation and leisure activities.</p> <p>The Grand Union Canal is a man made structure with the primary function of navigation. While we support its role as an important biodiversity habitat, it would not be appropriate to naturalise the canal as with a river environment, and the term 'enhanced natural environment' is therefore misleading. The above amendment supports British Waterways' commitment, as custodian of the Grand Union Canal, to preserve and enhance the canal's biodiversity role.</p>	<p>Agree.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Para 4.21 should be revised to read:</p> <p>The Grand Union Canal will be a key open space and blue/green corridor, with improved public access, strong biodiversity habitats, and increased opportunities for recreation and leisure activities.</p>
115	13	British Waterways Planning	5 Core Policies - The Economy Supply of Employment Land Para. 5.3	Object	<p>This paragraph should make reference to the industrial uses of the area congregating around the Grand Union Canal, as an arterial transport route that supported these former uses and businesses.</p> <p>The "increasing development opportunities" should include mixed uses that can support a sustainable community and better utilise the GUC, which no longer serves an important role in local industry and should be brought back into use as a community amenity facility.</p>	<p>Agree. Make reference to canal in paragraph 5.3. Details of specific sites will be considered through the Site Allocations DPD process and for the Hayes-West Drayton Corridor in the Heathrow Area DPD.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Amend second sentence in paragraph 5.3 to read:</p> <p>While historically much of this area was industrial and reliant on the Grand Union Canal, employment has become increasingly office based with many office parks located on former industrial sites.</p>
115	14	British Waterways Planning	5 Core Policies - The Economy Supply of Employment Land Para 5.4	Object	<p>The provision of appropriate sites and premises for different business needs to protect employment land in the long term from redevelopment for other uses, should be balanced with the importance of enhancing the canal environment and harnessing its potential for supporting education, sustainability, biodiversity, leisure, recreation and tourism.</p>	<p>The Core Strategy contains policies to protect employment land (E1) and enhance canal corridors (EM3).</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
115	15	British Waterways Planning	5 Core Policies - The Economy Supply of Employment Land Para 5.4	Object	The provision of appropriate sites and premises for different business needs to protect employment land in the long term from redevelopment for other uses, should be balanced with the importance of enhancing the canal environment and harnessing its potential for supporting education, sustainability, biodiversity, leisure, recreation and tourism.	<p>The Core Strategy contains policies to protect employment land (E1) and enhance canal corridors (EM3).</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
115	16	British Waterways Planning	5 Core Policies - The Economy Supply of Employment Land Para. 5.5	Object	New investment will also be attracted to high quality mixed use waterside sites, and we are keen that an appropriate mix is achieved, to support regeneration potential, as well as existing business needs.	<p>Details of specific sites will be considered through the Site Allocations DPD process.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
115	17	British Waterways Planning	5 Core Policies - The Economy Supply of Employment Land Para 5.6	Object	While we accept the need for Strategic Industrial land to support a range of industries, its location should respect and be appropriate to its surroundings. This should be balanced with the importance of not sterilising the potential of the GUC. Both Uxbridge Industrial Estate and Hayes Industrial Area abut the GUC, due to the former relationship of the canal as an industrial route, and we are keen that the preservation of these areas should not preclude the ability of the canal to act as a catalyst for positive regeneration schemes that will improve the quality of life of the surrounding community, and be the unique selling point of these growth areas. The London Plan policy 4C.6 states that land alongside the Blue Ribbon network should be prioritised in favour of uses that specifically require a waterside location. It requires the asset of the water should be capitalised on.	<p>Design will be dealt with in the Development Management DPD.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
115	18	British Waterways Planning	5 Core Policies - The Economy Map 5.1 Locations for Economic Growth	Object	<p>We are pleased to note that there appear to be proposed sites for managed release of employment land adjacent to the GUC, and we would like to clarify these locations.</p> <p>We are concerned that the waterside should be enhanced as an asset to the area, and feel that mixed use developments that appropriately address the waterway would offer more regeneration opportunities than industrial, storage a distribution uses.</p>	<p>Proposals for specific sites will be brought forward through the Site Allocations Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
115	19	British Waterways Planning	5 Core Policies - The Economy Supply of Employment Land Para. 5.10	Object	We agree with this statement, that managed release of industrial land can create opportunities for regeneration, housing and employment generation, and feel that this would be best achieved at waterside sites, where this unique selling point will raise the profile of the area above other potential locations.	<p>Details of specific sites will be considered through the Site Allocations DPD process.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
115	20	British Waterways Planning	5 Core Policies - The Economy Location of Employment Growth Para. 5.13	Object	The corridor extends from Paddington to Hillingdon because of the industrial/economic focus around the canal during the development of these areas.	<p>Noted</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
115	21	British Waterways Planning	5 Core Policies - The Economy Location of Employment Growth Para. 5.15	Object	Mixed use schemes along the canal could deliver hotel growth, and could create more jobs than existing outdated and vacant industrial units along the GUC are currently employing. The attraction of the waterside can help create and support an inclusive, sustainable community, improving an otherwise isolated and uninviting environment where existing employment uses are not enhancing the GUC.	<p>Comments noted.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
115	22	British Waterways Planning	5 Core Policies - The Economy Location of Employment Growth Para.5.17	Object	We support the reference to Hayes Town Centre being an appropriate location for smaller-scale office development, particularly as part of mixed-use regeneration schemes, but we also feel that the boundary to the town centre should be extended to include more of the GUC waterside, to really capitalise on this visual, social and economic asset.	<p>Changes to town centre boundaries will be considered through the Site Allocations DPD process.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
115	23	British Waterways Planning	5 Core Policies - The Economy Location of Employment Growth Para. 5.18	Object	More should be made of the GUC as a tourism opportunity, particularly for hotels and cultural activities. As Hillingdon's unique selling point, the tourism draw could be widened from Heathrow, with regeneration in Hayes (and West Drayton) focussed around the waterway. This also provides a link with the area's heritage and development.	Agreed. Sentence to be added to Tables 5.3 about potential of canal. <u>Council's Proposed Action</u> Add sentence to Tables 5.3 about potential of canal.
115	24	British Waterways Planning	5 Core Policies - The Economy Table 5.3 Heathrow Opportunity Area - Future of Key Sub-Areas	Object	With reference to Stockley Park, policy T2 does not look at the pedestrian and cycle route improvements. The recent planning application granted for Stockley Park will include contributions towards towpath improvement works to serve increased use of the towpath between the site and surrounding transport links. Importantly though, the site will contribute to the upgrade of the canal environment through a proportion of annual service charge income. This model should be spread to other waterside sites to encourage use of the towpath for sustainable travel and amenity use, to support surrounding development and existing communities.	Agreed. Add sentence on canal in Table 5.3 Stockley Park and to supporting text for T2 for Hayes & West Drayton. <u>Council's Proposed Action</u> Add sentence on canal in Table 5.3 Stockley Park and to supporting text for T2 for Hayes & West Drayton.
115	25	British Waterways Planning	5 Core Policies - The Economy Table 5.3 Heathrow Opportunity Area - Future of Key Sub-Areas	Object	With regard to the Hayes West Drayton Corridor, we support the inclusion of this paragraph, but would suggest that it be rephrased to avoid reference to the waterfront being a setting, instead stressing the importance for this not to be just a backdrop for development, but for schemes to fully integrate with the waterside. We are keen to see the design process start with the water, in order to improve the offer of recreation and open space, benefit education, sustainability and sustainable travel opportunities, really supporting sustainable growth in this area.	Design will be dealt with in the Development Management DPD. <u>Council's Proposed Action</u> No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
115	26	British Waterways Planning	5 Core Policies - The Economy Table 5.3 Heathrow Opportunity Area - Future of Key Sub-Areas	Object	In Hayes Town Centre, mixed use development is proposed. This would be most effective along the GUC, and we would recommend that the two centre boundary therefore be extended in order to incorporate more of the waterside. The statement regarding the GUC should be amended to read "The Grand Union Canal offers an attractive and sustainable alternative for pedestrian and cycle routes through the area, and also supports open space needs, education, wildlife and waterborne transport opportunities.	<p>Site specific proposals will be considered through the Site Allocations DPD process.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
115	27	British Waterways Planning	5 Core Policies - The Economy Table 5.3 Heathrow Opportunity Area - Future of Key Sub-Areas	Object	The canal and its towpath provides a direct link between Hayes and the approved canalside development at Southall, and more focus on the waterway will help Hayes to compete with Southall and other centres by offering a rejuvenated and active waterfront, particularly with the implementation of proposals described in the West Drayton - Hayes - Bells Bridge Waterspace Strategy scoping document that British Waterways hope to take forward with the LPA.	<p>Additional references to the Canal have been included elsewhere in the document.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
115	28	British Waterways Planning	5 Core Policies - The Economy Table 5.3 Heathrow Opportunity Area - Future of Key Sub-Areas	Object	<p>Under Future Growth for Yiewsley & West Drayton Town Centre, we would again suggest that policy T2 should include reference to the upgrade of the towpath as an important pedestrian cycle link.</p> <p>Mixed use development with modern business accommodation, including affordable units, can be accommodated as part of waterside redevelopment schemes, that will also help to maximise the regeneration potential of the GUC.</p>	<p>Agreed. Add sentence on canal in Table 5.3 Yiewsley & West Drayton Town Centre, in supporting text for T2 for Uxbridge and Hayes & West Drayton.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Add sentence on canal in Table 5.3 Yiewsley & West Drayton Town Centre, in supporting text for T2 for Uxbridge and Hayes & West Drayton.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
115	29	British Waterways Planning	5 Core Policies - The Economy Strategy for the Heathrow Opportunity Area Para. 5.25	Object	The Grand Union Canal also runs through Hounslow, and we would like the canal to be treated with a coordinated approach between neighbouring boroughs, to avoid disjointed strategies that fail to capitalise on the benefits of the waterway, which is unfortunately often used simply as a boundary.	<p>Noted. There will be cross-boundary working with Hounslow on the Heathrow Area DPD.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
115	30	British Waterways Planning	4 The Vision - where we want to be Strategic Objectives to deliver The Vision SO20	Object	With regard to SO20, we consider that this should include enhancements to the Grand Union Canal towpath, which presents a convenient, sustainable link between Uxbridge and the Hayes/West Drayton corridor.	<p>Rivers and canals are already included in Strategic Objective 3 (SO3).</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
115	31	British Waterways Planning	5 Core Policies - The Economy Uxbridge Para. 5.29	Object	The Grand Union Canal provides a unique selling point that could enhance the draw for Uxbridge by capitalising on the social, environmental and economic benefits and potential it presents. We therefore consider that more of the water should be incorporated into the town centre boundary extension.	<p>The proposed extension to Uxbridge town centre reflects the planning application for redevelopment at RAF Uxbridge. A more detailed plan showing the extension will be included in the Site Allocations document.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
115	32	British Waterways Planning	5 Core Policies - The Economy Map 5.2 Strategic Site (indicative): Boundary Changes to Uxbridge Town Centre	Object	The proposed extension fails to capitalise on the opportunities presented by the Grand Union Canal in helping Uxbridge town centre achieve its maximum potential as a destination.	<p>Comments noted - the potential of the Grand Union Canal is already recognised generally in the Plan at policy EM3 and in the supporting text.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
115	33	British Waterways Planning	5 Core Policies - The Economy Town and Neighbourhood Centres Strategic Objectives to deliver The Vision S018	Object	SO18: We consider that the Grand Union Canal should also be included as a local facility that access should be improved to. Well planned routes should also include walking and cycling, such as routes along the towpath.	Disagree. The strategic objective is intentionally broad. The role of the Grand Union Canal is captured within the current wording. <u>Council's Proposed Action</u> No proposed change.
115	34	British Waterways Planning	5 Core Policies - The Economy Town and Neighbourhood Centres Strategic Objectives to deliver The Vision SO20	Object	SO20 should also include accessibility between the growth areas along the towpath and by water.	Noted <u>Council's Proposed Action</u> No proposed change.
115	35	British Waterways Planning	5 Core Policies - The Economy Map 5.3: Town Centre Improvements	Object	The leisure offer of Harefield could be improved by promoting links to the canal. Due to the proximity of Uxbridge to the canal towpath there is potential for improving the pedestrian realm and regeneration opportunities. The towpath at Hayes provides an important pedestrian link, where improved public realm projects are currently being worked up with the help of the Council and the Hayes Town Partnership. There are also opportunities for an improved waterbased and waterside leisure offer in Hayes, which could be developed as part of waterside regeneration proposals.	Noted. <u>Council's Proposed Action</u> Policy EM3 has been amended to reflect the importance of the canal generally in the borough.
115	36	British Waterways Planning	5 Core Policies - The Economy Town and Neighbourhood Centres Para. 5.32	Object	Hayes, Yiewsley and West Drayton have the unique selling point of the Grand Union Canal, which puts them above other areas - canals have sparked exciting and popular regeneration in areas such as Camden and Paddington, and the proposals for mixed-use employment and residential schemes should capitalise on the water as being the central focus of their designs to really exploit its potential.	Agreed. Table 5.3 highlights the regeneration potential of the Grand Union Canal which runs through the Hayes-West Drayton Corridor. <u>Council's Proposed Action</u> No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
115	37	British Waterways Planning	6 Core Policies - New Homes Housing Growth Para. 6.19	Object	The GUC can provide sustainable transportation, access to green infrastructure and social quality, illustrating the importance and benefits of regeneration schemes to be located around the canal. The GUC can support healthy neighbourhoods and new communities.	<p>The role of the Grand Union Canal in the regeneration of Hayes/West Drayton is already recognised in the Core Strategy.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
115	38	British Waterways Planning	6 Core Policies - New Homes Housing Growth Para. 6.20	Object	Need to consider the release of sites along the Grand Union Canal to implement policy H1.	<p>The implementation of policy H1 does not deal with site specific issues.</p> <p>Appropriate sites along or around the Grand Union canal will be allocated through the emerging Site Allocations DPD.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
115	39	British Waterways Planning	7 Core Policies - Historic and Built Environment Built Environment Para.7.18	Object	Canals and waterways were recognised as having a significant role in promoting healthy lifestyles in the Department of Health's strategy 'Be Active, Be Healthy: A plan for getting the nation moving'.	<p>Disagree. Para 7.18 refers to the 'public realm' which includes canals and waterways. Agree to add reference to Department of Health's Strategy 'Be Active, Be Healthy: A plan for getting the nation moving' to Appendix 1:Evidence Base.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Add 'Department of Health's Strategy 'Be Active, Be Healthy: A plan for getting the nation moving' to Appendix 1:Evidence Base.</p>
115	40	British Waterways Planning	7 Core Policies - Historic and Built Environment Built Environment Para 7.19	Object	British Waterways are aware of the anti social behaviour issues around part of the GUC and its towpath within Hillingdon. BW have worked in partnership with the Council and other stakeholders such as the Hayes Town Partnership and West Drayton Town Centre Action Group on projects to address these issues, which is generally due to the nature and layout of development around the canalside, which has presented blank rear walls and industrial units up against the canal, screening it and providing no passive surveillance or inclusive environment. The layout, design and use of development along the GUC is vitally important in influencing the use of the waterway and ensuring that its maximum potential is achieved in supporting sustainable communities.	<p>Agree that the 'layout, design and use of development' around the GUC is important in influencing the use of the waterways and maximising its potential. Design will be dealt with in more detail in the Development Management DPD.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
115	41	British Waterways Planning	7 Core Policies - Historic and Built Environment Built Environment Para 7.21	Object	The GUC is a Nature Conservation Site of Metropolitan Importance, and various methods of enhancement such as fenders, soft bank improvements and planting, bat and bird boxes can help mitigate harm of development and enhance biodiversity. These should be designed appropriately so that they do not affect primary role of the waterways for navigation.	<p>Noted. These recommendations will be explored through work on the Biodiversity Action Plan, Site Allocations and Development Management Development Plan Document.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
115	42	British Waterways Planning	7 Core Policies - Historic and Built Environment Policy BE1: Built Environment	Object	5. The GUC provides excellent opportunities to enhance environmental quality in Hayes, Yiewsley and West Drayton.	<p>Agree, however point 5 is not intended to identify specific sites that would improve these areas, these would be dealt with in the Site Allocations DPD.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
115	43	British Waterways Planning	7 Core Policies - Historic and Built Environment Policy BE1: Built Environment	Object	With reference to the implementation of Policy BE1, and the first point regarding identifying sites where redevelopment would provide an opportunity to improve the local environment, we consider that this should include sites specifically along the GUC, where excellent opportunities exist but need to be exploited. It is very important that uses along the canal are assessed and possibly reconsidered.	<p>Sites for redevelopment will be identified in the Site Allocations DPD.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No change proposed.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
115	44	British Waterways Planning	8 Core Policies - Environmental Management Open Spaces, Rivers and Canal Corridors	Object	<p>1. In order to improve the quality of and accessibility to the borough's open spaces such as rivers and canals, some infrastructure may be required to allow the full use of and access to this asset.</p> <p>2. As well as sports, recreation, visual interest and biodiversity, education can be supported by the GUC, for example with use of the floating classroom Elsdale II.</p> <p>3. A further strategic objective should be to improve the use and design of waterside development so that it integrates with the waterway and makes the best use of its potential benefits.</p>	<p>1. Agree, implementation of Policy EM3 identifies the Council's commitment to developing a strategy for the Grand Union Canal and other blue ribbon networks where they are not currently in place which would address this issue.</p> <p>2. Agree, Paras 8.13 and 8.31 amended to include reference to how the canal can support educational needs.</p> <p>3. Disagree, SO3 already makes reference to improving the quality, access and heritage value of all the borough's open spaces including rivers and canals as areas for sports, recreation, visual interest, bio-diversity, education, health and well being.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>1. No proposed change.</p> <p>2. Add sentence to end of para 8.15 'The Grand Union Canal also promotes education and sustainable transport.'</p> <p>'Amend Para 8.31 to read 'The Blue Ribbon Network also plays important roles in transport, recreation and education. It can provide a much needed respite from the built-up nature of the towns, and also provides important linear walking and cycling routes. They are also important for providing habitat and wildlife corridors, and fulfil other environmental functions such as drainage.'</p> <p>3. No proposed change.</p>
115	45	British Waterways Planning	8 Core Policies - Environmental Management Open Spaces, Rivers and Canal Corridors Para 8.13	Object	<p>The Grand Union Canal originated as an arterial freight route that carried materials between sites from London and links all the way to Birmingham. It is therefore a very important link between boroughs.</p>	<p>Noted.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Add 'the Grand Union Canal originated as an arterial freight route that carried materials between sites from London and links all the way to Birmingham. It is therefore a very important link between boroughs.' at para 8.13.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
115	46	British Waterways Planning	8 Core Policies - Environmental Management Open Spaces, Rivers and Canal Corridors Para 8.15	Object	The Grand Union Canal also promotes education and sustainable transport.	Amend paras 8.15 and 8.31 to reflect this. <u>Council's Proposed Action</u> Add sentence to end of para 8.15 'The Grand Union Canal also promotes education and sustainable transport.' 'Amend Para 8.31 to read 'The Blue Ribbon Network also plays important roles in transport, recreation and education. It can provide a much needed respite from the built-up nature of the towns, and also provides important linear walking and cycling routes. It is also important for providing habitat and wildlife corridors, and fulfils other environmental functions such as drainage.'
115	47	British Waterways Planning	8 Core Policies - Environmental Management Green Belt, Metropolitan Open Land and Green Chains Para 8.20	Object	We consider that the borough's canals and rivers should be identified by reference here to Green/Blue Chains.	Noted. Rivers and canals are referred to as green chains in para 8.20 and as blue chains in 8.13. <u>Council's Proposed Action</u> No proposed change.
115	48	British Waterways Planning	8 Core Policies - Environmental Management River and Canal Corridors Para 8.26	Observation	The 'spurs' are more commonly known as arms - the Paddington Arm and the Slough Arm.	Noted. <u>Council's Proposed Action</u> Paragraph 8.26 - change 'spurs' to 'arms'.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
115	49	British Waterways Planning	8 Core Policies - Environmental Management River and Canal Corridors Para 8.27	Object	<p>The role of the GUC in education should also be mentioned, and sustainable transport.</p> <p>Following "...views and vistas," we would suggest the addition of "...along and into the waterspace".</p>	<p>Agree in part. The paragraph should be reworded.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Revise paragraph 8.27 to read 'Rivers, streams, canals, lakes and their banks, provide habitat for a wide range of flora and fauna. They are often significant in the context of settings and provide a sense of tranquillity. They also have the benefit of being a good source of education from a historic and wildlife perspective as well as providing the opportunity for transport and water based leisure and recreation.'</p>
115	50	British Waterways Planning	8 Core Policies - Environmental Management River and Canal Corridors Para 8.29	Object	<p>The Grand Union Canal is not just a flood channel, and other challenges that need to be addressed include improving the integration between the waterway and waterside developments, to ensure that design begins from the water and development does not turn its back on the canal, or simply use it as a backdrop. Another important challenge is for the GUC to maximise its potential in supporting sustainable communities, in providing inclusive and attractive waterspace environments, for amenity, leisure and recreation, and opportunities for education, sustainability and tourism.</p>	<p>Agree</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>We would suggest the following amendment to this paragraph:</p> <p>Regional importance - as a former industrial artery between London and other parts of the UK, the Grand Union Canal Corridor crosses several local authority boundaries and includes many multi-functional sites, leading all the way to Birmingham.</p>
115	51	British Waterways Planning	8 Core Policies - Environmental Management River and Canal Corridors Para 8.32	Object	<p>We would suggest the following amendment to this paragraph:</p> <p>Regional importance - as a former industrial artery between London and other parts of the UK, the Grand Union Canal Corridor crosses several local authority boundaries and includes many multi-functional sites, leading all the way to Birmingham.</p>	<p>Disagree. The statement in the Core Strategy is a merely a description of its geographical positioning.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
115	52	British Waterways Planning	8 Core Policies - Environmental Management River and Canal Corridors Para 8.28	Object	<p>British Waterways consider that there should be multiple aims to reflect the Grand Union Canal's multiple uses. The Core Strategy should promote:</p> <ul style="list-style-type: none"> - open space; - sustainable transport, including walking and cycling routes, as well as waterborne freight; - other waterway leisure uses, such as boating; - waterside development of appropriate character and scale; - contribute to 'placemaking', attractive for living, working, etc; - minimise any user 'conflicts' such as inconsiderate commuter cycling and safe pedestrian use of the towpath. 	<p>These are already addressed in chapter 8 of the Core Strategy as far as is appropriate in a Core Strategy.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
115	53	British Waterways Planning	8 Core Policies - Environmental Management River and Canal Corridors Para 8.33	Object	<p>We are pleased to note the reference to the river and canal corridors being "multi-functional", which we strongly support. They offer benefits wider than may initially be obvious, to biodiversity, education, transport, tourism, leisure and recreation, and health and well being.</p>	<p>Agree.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Amend Para 8.31 to read 'The Blue Ribbon Network also plays important roles in transport, recreation and education. It can provide a much needed respite from the built-up nature of the towns, and also provides important linear walking and cycling routes. They are also important for providing habitat and wildlife corridors, and fulfil other environmental functions such as drainage.'</p> <p>Amend Policy EM3 to read 'The Council will continue to enhance the local character, visual amenity, ecology, transportation, leisure opportunities and sustainable access to rivers and canals.'</p> <p>Amend Implementation of Policy EM3 to read 'Working with the Environment Agency, British Waterways, Natural England, English Heritage and other partners to develop a strategy for the Grand Union Canal and other blue ribbon networks where they are not currently in place.'</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
115	54	British Waterways Planning	8 Core Policies - Environmental Management River and Canal Corridors Para 8.35	Object	<p>Waterside development should integrate with the waterway, addressing it appropriately rather than simply turning its back on it, or using it as a setting. While British Waterways are very keen to encourage better access to the GUC and increased visits by the local and wider community, waterside development can put significant additional pressure on British Waterways to upgrade and maintain the waterway to the high standards new residents expect. As well as designing waterside developments to better address and include the waterway, therefore, they should also mitigate their impact by contributing to the improvement of the waterway environment. This should also include contributions to a Waterspace Strategy for Hillingdon, which we have been working with the Council and other stakeholders to produce, and will address opportunities and areas for enhancement along the Grand Union Canal that will help it to achieve its potential in supporting sustainable communities.</p> <p>It is important to define the distinct differences between the Grand Union Canal and the borough's other rivers and waterways. Some development, for example, will be appropriate along man-made waterways, while other more natural watercourses will have a very different nature and require a more sensitive design approach.</p>	<p>1. Section on Implementation of Policy EM3 to be amended to include reference to a waterspace strategy.</p> <p>2. The Development Management Development Plan Document will also include policies to ensure canal and riverside development are designed to incorporate the waterside and access to it.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>1. Amend section on Implementation of Policy EM3 to read: 'Working with the Environment Agency, British Waterways, Natural England, English Heritage and other partners to develop a strategy for the Grand Union Canal and other blue ribbon networks where they are not currently in place.'</p> <p>2. No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
115	55	British Waterways Planning	8 Core Policies - Environmental Management Policy EM3: River and Canal Corridors	Object	<p>The policy should be linked to the Waterspace Strategy which is being developed by the Council and British Waterways.</p> <p>We also consider that since the current ability of the GUC to achieve Policy EM3's aims of enhancement and benefit to the community is hindered by the existing waterside uses (which are often poor neighbours) the implementation of the policy should also seek to appropriately consider the change of use of waterside site allocations to mixed use approaches that will maximise its benefits to the local and wider community.</p> <p>The Core Strategy should provide greater emphasis on developer contributions to enhancements on the waterfront.</p>	<p>1. Implementation of Policy EM3 to be amended to include reference to a waterspace strategy. Further discussions will be held with British Waterways on a waterspace strategy.</p> <p>2. Disagree, site specific issues will be considered as part of the Site Allocations Development Plan Document. The Development Management Development Plan Document will also include policies to ensure canal and riverside development incorporate the waterside and access to it.</p> <p>3. Policy EM3 already states developer contributions will be sought where appropriate. Individual opportunities to develop sites alongside the Canal which could help fund improvements to its condition and access to it are likely to be identified in the Site Allocations Development Plan Document.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>1. Amend Implementation of Policy EM3 to read 'Working with the Environment Agency, British Waterways, Natural England, English Heritage and other partners to develop a strategy for the Grand Union Canal and other blue ribbon networks where they are not currently in place.'</p> <p>2. No proposed change.</p> <p>3. No proposed change.</p>
115	56	British Waterways Planning	8 Core Policies - Environmental Management Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Object	<p>With regard to monitoring, British Waterways have pedestrian counters along the Grand Union Canal that can help to monitor the number of visitors to the waterside.</p>	<p>Noted and welcome.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Further contact with British Waterways is required to determine the nature of the records and their relevance and role within the Core Strategy.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
115	57	British Waterways Planning	8 Core Policies - Environmental Management Open Spaces, Sport and Leisure Para.8.45	Object	This paragraph applies to the GUC as well as Hillingdon's other open spaces, and we agree that the GUC provides a unique offer for communities and visitors in Hillingdon.	Noted. <u>Council's Proposed Action</u> No proposed change.
115	58	British Waterways Planning	8 Core Policies - Environmental Management Policy EM4: Open Space and Informal Recreation	Object	In addition to the first point, development should address open space such as the GUC, not turn away and cut of the waterway.	Disagree, it is not appropriate to provide a list of open spaces in Policy EM4; the supporting text does this. The Development Management Development Plan Document will include policies to ensure canal and riverside development incorporate the waterside and access to it. <u>Council's Proposed Action</u> No proposed change.
115	59	British Waterways Planning	8 Core Policies - Environmental Management Open Spaces, Sport and Leisure Para.8.62	Object	In addition to "The need to improve the quality of and access to open spaces, rivers and canals for all groups of people in the community" access also includes that through development that addresses the waterside.	Disagree, para 8.62 refers to the main challenges for the sport and leisure section of the document. It would not be appropriate to list the methods of achieving this within this paragraph. <u>Council's Proposed Action</u> No proposed change.
115	60	British Waterways Planning	8 Core Policies - Environmental Management Policy EM5: Sport and Leisure	Object	In terms of monitoring success, the better use of the GUC for leisure and other uses could also be recorded.	Agree in part. However, the Council does not currently collect data on the leisure use of the canal. Therefore it is difficult to provide monitoring data to determine whether the use of the canal is increasing. <u>Council's Proposed Action</u> No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
115	61	British Waterways Planning	5 Core Policies - The Economy Small and Medium-Sized Enterprises (SME) Para. 5.36	Object	Business barges provide excellent unique workspace for small and medium enterprises, that offer an alternative draw for new businesses, especially in the ITC or creative sector.	This issue would be addressed in other parts of the LDF. <u>Council's Proposed Action</u> No proposed change.
115	62	British Waterways Planning	5 Core Policies - The Economy Small and Medium-Sized Enterprises (SME)	Object	As stated above, the successful redevelopment of waterside sites should not be sterilised by restrictions that prevent mixed use development and opportunities that bring out the best of the GUC and support sustainable communities.	Mixed use development will be encouraged in appropriate locations. <u>Council's Proposed Action</u> No proposed change
115	63	British Waterways Planning	5 Core Policies - The Economy Policy E7: Raising Skills	Observation	The canal can offer opportunities for raising skills, as part of volunteering or Blue Sky projects. British Waterways are keen to develop volunteering opportunities, and should be included in the list of partners.	Comments noted. <u>Council's Proposed Action</u> No proposed change
115	64	British Waterways Planning	6 Core Policies - New Homes 6 Core Policies - New Homes Para. 6.1	Object	The Grand Union Canal can provide opportunities for increased residential moorings, that can offer flexible housing options within the borough.	The Core Strategy recognises the importance of the Grand Union Canal. <u>Council's Proposed Action</u> No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
115	65	British Waterways Planning	6 Core Policies - New Homes Map 6.1 Distribution of units from large SHLAA sites (2011-2021)	Object	The map shows housing sites following the GUC corridor - the waterside presents the best opportunities for residential-led, mixed-use redevelopment schemes, that can enhance the waterside, create attractive hubs for visitors and employees, that support the amenity and leisure requirements of new and existing residents.	Allocation of sites for residential led mixed use development along the GUC will be examined as part of the site allocations DPD. <p style="text-align: center;"><u>Council's Proposed Action</u></p> No proposed change.
115	66	British Waterways Planning	9 Core Policies - Transport and Infrastructure Policy CI2: Leisure and Recreation	Object	This policy should also address the leisure and recreation opportunities presented by the Grand Union Canal. These can be further covered in detail as part of the Waterspace Strategy.	Paragraph 8.38 identifies the strategic leisure and recreation opportunities associated with the borough's rivers and canals. Further detailed policies will be identified in subsequent Development Plan Documents. <p style="text-align: center;"><u>Council's Proposed Action</u></p> No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
----	---------	---------------------------	-------------------------------	------------------------------	---------------------------	--------------------

115	67	British Waterways Planning	8 Core Policies - Environmental Management Flood Risk Management Para 8.77	Object	With reference to the challenge "The need to improve the quality of and access to open spaces, rivers and canals for all groups of people in the community" - the GUC is not highlighted as a flood risk in Map 8.3 FRA, and we would therefore like to clarify the reasoning for canals being mentioned here. We are very happy to work with the Council to address flood risk in locations where the GUC may be able to alleviate this.	Agree.
-----	----	----------------------------	--	--------	---	--------

Council's Proposed Action

Delete first bullet point and reword opening sentence 8.77 to:

Table 3.1 in Chapter 3 identifies one main challenge relating to flood risk management

Also:

Revise Paragraph 8.78 to:

'The key challenge is to balance the demands on growth with the impacts of flood risk. These impacts will become greater in a changing climate with more extreme weather events. In particular rainfall intensity is expected to increase resulting in a greater likelihood of flooding. Furthermore, waterfront development continues to attract developers. These types of development can provide a diverse setting, allowing access to some of the Borough's most attractive natural assets. However, it is also likely to increase the conflict between new development and increasing flood risk.'

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
115	68	British Waterways Planning	8 Core Policies - Environmental Management Map 8.4 Water, Air and Noise	Object	British Waterways are very proud of the biodiversity found within and along our network of waterways, and of improvements that we have been able to undertake to improve its ecological value. Further enhancements should be designed carefully so that they do not hinder the canal's role for navigation.	<p>Noted. Amend Para 8.31, Policy EM3 and Implementation of Policy EM3 to reflect the representation.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend Para 8.31 to read 'The Blue Ribbon Network also plays important roles in transport, recreation and education. It can provide a much needed respite from the built-up nature of the towns, and also provides important linear walking and cycling routes. They are also important for providing habitat and wildlife corridors, and fulfil other environmental functions such as drainage.'</p> <p>Amend Policy EM3 to read 'The Council will continue to enhance the local character, visual amenity, ecology, transportation, leisure opportunities and sustainable access to rivers and canals.'</p> <p>Amend Implementation of Policy EM3 to read 'Working with the Environment Agency, British Waterways, Natural England, English Heritage and other partners to develop a strategy for the Grand Union Canal and other blue ribbon networks where they are not currently in place.'</p>
115	69	British Waterways Planning	8 Core Policies - Environmental Management Policy EM8: Water, Air and Noise	Object	Improvements to the water quality of the GUC can be addressed within the Hillingdon Waterspace Strategy.	<p>Policy EM8 incorporates a requirement to safeguard and enhance the water quality of the Grand Union Canal. The section on the Implementation of Policy EM3 is to be amended to include reference to a waterspace strategy. Further discussions will be held with British Waterways on the waterspace strategy.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend Implementation of Policy EM3 to read:</p> <p>'Working with the Environment Agency, British Waterways, Natural England, English Heritage and other partners to develop a strategy for the Grand Union Canal and other blue ribbon networks where they are not currently in place.'</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
115	70	British Waterways Planning	8 Core Policies - Environmental Management Policy EM11: Sustainable Waste Management	Object	As part of any applications for new development on waterside sites, developers must submit a feasibility study to assess the potential for delivering materials and removing waste by boat, and implement the findings. LB Hackney undertook a Waste By Water project, and there may be opportunities to pursue this in LB Hillingdon.	<p>Policy T1 already aims to steer development to the most appropriate locations to reduce their impact on the transport network. Through the development management process developers will be encouraged to consider the potential use of waterside sites for delivering materials and removing waste by water transport where appropriate - to reduce a development's impact on the transport network.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
115	71	British Waterways Planning	9 Core Policies - Transport and Infrastructure 9 Core Policies - Transport and Infrastructure	Object	The Grand Union Canal can support sustainable north-south links and offers potential for a water passenger service.	<p>Comments noted - chapter 8 notes the value of the borough's Blue Ribbon Network generally for developing opportunities for sustainable transport links.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
115	72	British Waterways Planning	8 Core Policies - Environmental Management Map 9.1 Transport Infrastructure	Object	The canal should be highlighted as a waterborne transport route as well as a pedestrian and cycle route, for both commercial freight and leisure transport.	<p>Agree in part. The Grand Union Canal is shown on Map 8.2. Amend Para 8.31 to highlight the roles played by the Canal for example, transport, recreation, education, its importance as a walking, cycling and recreational resource.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change to Map 8.2. Amend Para 8.31 to read ' The Blue Ribbon Network also plays important roles in transport, recreation and education. It can provide a much needed respite from the built-up nature of the towns, and also provides important linear walking and cycling routes. They are also important for providing habitat and wildlife corridors, and fulfill other environmental functions such as drainage.'</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
115	73	British Waterways Planning	9 Core Policies - Transport and Infrastructure Policy T2: Public Transport Interchanges	Object	This policy should also include the improvement of walking and cycling routes from public transport interchanges.	<p>The policy states that interchanges should include measures to encourage onward journeys for pedestrians & cyclists. Additionally, policy T 1 states that all development should include good cycling and walking provision.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
115	74	British Waterways Planning	9 Core Policies - Transport and Infrastructure Community Infrastructure Para 9.33	Object	Under Recreation, we would suggest this be amended to Provision and improvement of green and blue spaces.	<p>Agree.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>Insert 'and water resources' into fifth bullet on para 9.33.</p>
115	75	British Waterways Planning	9 Core Policies - Transport and Infrastructure Policy T1: Accessible Local Destinations	Object	The design of waterside sites should aim to improve the towpath; freight transport should also consider the use of the canal at appropriate sites.	<p>The Core Strategy already acknowledges the benefits of improvements to the towpath and the potential regeneration benefits (e.g. at Table 5.3) - which might include use of canal sites for more sustainable freight transport.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
115	76	British Waterways Planning	9 Core Policies - Transport and Infrastructure Policy C11: Community Infrastructure Provision	Object	Developments could also contribute towards the provision of community facilities by the adoption of management agreements.	<p>Noted - this suggestion will be considered as part of work on the future Development Management Development Plan Document - and with any future revision of the Planning Obligations Supplementary Planning Document.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
115	77	British Waterways Planning	Appendix 2 Infrastructure Schedule Appendix 2 Infrastructure Schedule	Object	British Waterways has been listed in this table as involved with a water passenger transport service. While we would be happy to promote this along our network, we are not able to deliver or operate this. We would be pleased to discuss our infrastructure requirements in further detail with officers to ensure that the future of the waterways in Hillingdon is secure.	British Waterways provided information as part of the consultation process for SIP in 2009. If it is unlikely that that the project will be implemented it should be removed from the schedule. <u>Council's Proposed Action</u> To remove reference to service from Appendix 2 Infrastructure Schedule.
116	1	English Heritage (late submission)	Core Strategy Consultation Draft	Observation	As the Government's adviser on the historic environment English Heritage is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. English Heritage welcomes the opportunity to comment upon this key planning document. Hillingdon has a rich historic environment evident in its range of designated heritage assets, but also in terms of the historic character embodied in its townscapes. We are keen to ensure that the heritage values of the Borough's built environment are identified and conserved as far as possible within local statutory plans.	Support welcomed. <u>Council's Proposed Action</u> No proposed change.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
116	2	English Heritage (late submission)	Appendix 1 Evidence Base Appendix 1 Evidence Base	Object	<p>It is not clear what evidence has been established regarding the environmental characteristics of the borough as a basis for the spatial strategy and tall buildings locations. If the Borough has already produced such work, this should be made public and listed within the Core Strategy itself. If the Borough hasn't done so already, we recommend that a characterisation study is produced to substantiate the appropriateness of growth locations across the borough as identified within the London Plan, as well as general management of change across the whole Borough. The study should, for example, inform the parameters for optimal residential and non-residential densities in growth areas, and should provide a robust evidence base for character areas, management of heritage assets and defining appropriate and inappropriate locations for tall buildings within the borough. The study should also identify topography, urban form, typology, historic development and any other environmental considerations which might influence the spatial and design policies within the Core Strategy.</p> <p>English Heritage has published guidance on historic characterisation to assist with this called 'Understanding Place: An Introduction'. In collaboration with CABE English Heritage has also published Building in Context which provides urban design guidance relating to historic context available at http://www.building-in-context.org/</p>	<p>5 Conservation Area Appraisals and 2 Management Plans have been completed and the Local List of buildings of architectural and historical importance including 292 entries was adopted by the Council on 27 May 2010. These documents are on the Council's website, Appendix 1: Evidence base will be updated to include reference to these. The Council has also submitted a bid for a grant from English Heritage as part Community Heritage Initiative Project (CHIP) to assist in the development of further appraisals and reviews.</p> <p>Further consideration will be given to the development of a Characterisation Study and guidance provided by English Heritage/ CABE.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Update Appendix 1: Evidence base to include reference to appraisals and management plans, adopted local list and English Heritage/ CABE guidance documents..</p>
116	3	English Heritage (late submission)	7 Core Policies - Historic and Built Environment Built Environment	Object	<p>Tall buildings- An evidence base of borough-wide environmental character should be established to identify areas within the borough which are considered appropriate or inappropriate for tall buildings. This follows EH/CABE Guidance on Tall Buildings (2007) (EH/CABE Guidance) (paragraph 2.4) which places a responsibility on the local planning authority to provide a plan-led approach to the management of tall buildings. This needs to be based upon robust evidence base in line with PPS1 and PPS5. We advise that London Plan designations alone do not in themselves provide a robust basis for tall buildings locations and that the Borough's Core Strategy should interpret the strategic approach in the local context. Clarity at the Core Strategy level on the management of tall buildings can then provide a framework in which to develop further guidance in Development Management Documents and Area Action Plans.</p>	<p>Further consideration will be given to the development of a Character Study including inappropriate locations for tall buildings.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Add reference to the consideration of a Character Study to Point 11 of Policy BE1 and Implementation section.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
116	4	English Heritage (late submission)	2 A Summary of The Vision The Vision for Hillingdon 2026	Object	We are pleased to see that the new PPS 5 is referenced within the evidence base in appendix 1. However, there are a number of places where Core Strategy policy wording could be altered to ensure consistency with PPS5 and its soundness.	Support welcomed. <u>Council's Proposed Action</u> No proposed change.
116	5	English Heritage (late submission)	2 A Summary of The Vision The Vision for Hillingdon 2026	Object	We suggest that the first point of the summary vision should include an explicit reference to the value of the historic environment to help define the Borough's locally distinctive strengths.	Agree. Add reference to heritage to first bullet point. <u>Council's Proposed Action</u> Reference to heritage added to first bullet point in section on The Vision for Hillingdon 2026 to read: 'Hillingdon is taking full advantage of its distinctive strengths with regard to its places, communities and heritage'.
116	6	English Heritage (late submission)	3 A Portrait of Hillingdon - where we are now Table 3.1 Main Planning Challenges for Hillingdon	Object	For clarity, and for consistency with PPS 5 and its introduction of a hierarchy relating to the historic environment, we suggest that the first issue be separated out into two separate points, as follows: · Firstly "The need to maintain the historic character, identity, suburban qualities of the Borough's places and buildings". This encapsulates the need to protect the borough's historic character through contextually responsive new design and managed change in general; and · Secondly "The need to conserve and enhance the historic significance of the Borough's heritage assets and settings". This addresses the need to protect designated assets such as listed buildings and conservation areas, as well as 'other' heritage assets that have been identified as having significance such as such as locally listed buildings, for example, through their physical maintenance, or through appropriate management of their settings.	Agree. For clarity: separate first issue into two separate issues. <u>Council's Proposed Action</u> Under Table 3.1 Main Planning challenges for the Historic and Built Environment delete first issue and replace with two issues. Add 'The need to maintain the historic character, identity, suburban qualities of the Borough's places, buildings and spaces' and 'The need to conserve and enhance the historic significance of the Borough's heritage assets and settings'.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
116	7	English Heritage (late submission)	4 The Vision - where we want to be The Vision for Hillingdon 2026	Object	The Vision for Hillingdon could be made more consistent with PPS5 in terms of its terminology and approach regarding the historic environment. Firstly, the reference to "historic buildings" should be replaced with "heritage assets" to cover all assets, for example, conservation areas, registered parks and gardens, scheduled monuments and archaeological priority areas. Secondly, in response to PPS5 policy HE3.1, the Vision could identify the potential of heritage to be at the heart of regeneration; this will give a clearer indication that Hillingdon's rich historic environment will form a basis for its sustainable future.	<p>1. Agree. First bullet point of The Vision replace 'historic buildings' with 'heritage assets'.</p> <p>2. Agree, fourth bullet point of the Vision to be amended to include reference to the potential of heritage to be at the heart of regeneration.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>1. First bullet point of The Vision replace 'historic buildings' with 'heritage assets'.</p> <p>2. Amend fourth bullet point of the Vision to read: 'Hillingdon has maximised the potential of its heritage assets and continues to retain viable mineral resources within the Opportunity Area'.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
116	8	English Heritage (late submission)	4 The Vision - where we want to be Strategic Objectives to deliver The Vision SO1, SO2, SO3	Object	<p>SO1: The term "conserve" could be used in place of "preserve", so reflecting PPS5.</p> <p>SO2: This objective should include a requirement that high quality sustainable designs have regard for its historic context, this includes support for design and construction approaches that use sustainability principles and which are sensitive and responsive to the significance of the historic environment. This is a requirement of PPS1 (paragraph 33 -39), where sustainable design is defined as being that which responds to local character and reinforces local distinctiveness.</p> <p>SO3: Reference should be made to the heritage value of open spaces.</p>	<p>1. Agree. Replace 'preserve' with 'conserve' in SO1.</p> <p>2. Agree, amend SO2 to include a requirement that high quality sustainable design, have regard for its historic context including using sustainability principles which are sensitive and responsive to the significance of the historic environment.</p> <p>3. Agree, amend SO3 to reflect this.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>1. Replace 'preserve' with 'conserve' in SO1.</p> <p>2. Amend SO2 to read: 'Create neighbourhoods that are of a high quality sustainable design, that have regard for their historic context and use sustainability principles which are sensitive and responsive to the significance of the historic environment, are distinctive, safe, functional and accessible and which reinforce the identity and suburban qualities of the borough's streets and public places, introduce public art to celebrate civic pride and serve the long-term needs of all residents.'</p> <p>3. Amend SO3 to read 'Improve the quality of, and accessibility to, the heritage value of the borough's open spaces, including rivers and canals as areas for sports, recreation, visual interest, bio-diversity, education, health and well being.'</p>
116	9	English Heritage (late submission)	4 The Vision - where we want to be The Spatial Strategy	Object	<p>The Spatial Strategy (page 23)</p> <p>English Heritage welcomes the identification of locations where growth will be managed as part of a plan-led approach to change across the Borough. However, it is unclear how the type and level of growth for these locations have been identified and informed by an understanding of the environmental characteristics, including its historic environment, of the Borough as a whole. We would advise that, in order to inform how development can be managed, a borough-wide characterisation study is produced to provide the necessary evidence for the spatial strategy. This study could then be used as a framework to develop further detailed analysis of local character for each identified spatial area, including its historic environment. This will provide a sound basis on which to ensure all developments respond to their local historic context.</p>	<p>Proposed growth is generally focussed on existing town centre and employment areas, such as Uxbridge and the Hayes/West Drayton Corridor. These areas are generally defined on the key diagram, further definition will take place through the Site Allocations process. Areas of historic and heritage value will be protected through policies in the Development Management Policies Document.</p> <p>Further consideration will be given to the development of a Characterisation Study.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change..</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
116	10	English Heritage (late submission)	5 Core Policies - The Economy Policy E5: Town and Local Centres	Object	There is an opportunity for Policy E5 to include a reference to investment into the historic environment as part of improvements to town centres. This objective is recognised within PPS4 (paragraph 10), which states the Government's intention for "the historic, archaeological and architectural heritage of centres to be conserved and, where appropriate, enhanced to provide a sense of place and a focus for the community and for civic activity."	<p>Disagree. It is not considered appropriate to include reference to the historic environment specifically in Policy E5. Other policies in the Plan seek to preserve and enhance the historic environment and will be taken into account alongside policy E5.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
116	11	English Heritage (late submission)	6 Core Policies - New Homes Housing Growth	Object	Design and density (page59)-Maximising densities (paragraph 6.20) could have adverse impacts unless sufficient checks are in place to consider the potential for overdevelopment. Recognising the reference to design and density being appropriate to context, we would suggest that the policy be amended to "optimise" density to better reflect this consideration. This approach reflects the advice set out in PPS1 (paragraph 36), which encourages planning authorities to ensure developments optimise the potential of sites. To support this process English Heritage/CABE have published Building in Context (2001) which provides case study examples of how schemes can be successfully integrated within the local historic environment. We would advise you to reference this document, along with any available characterisation work (see earlier comments) as a basis for determining appropriate densities.	<p>Noted.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend second sentence of paragraph 6.20 to read:</p> <p>The density of residential development should take account of the need to optimise the potential of sites compatible with local context, while respecting the quality, character and amenity of surrounding uses.</p>
116	12	English Heritage (late submission)	7 Core Policies - Historic and Built Environment Heritage	Object	In general we welcome the provision of a policy to cover the Borough's heritage assets and the wider historic environment, it is important that the terminology used in regard of the historic environment is consistent with PPS5. For example policies should seek to conserve historic significance of heritage assets and value the wider historic environment for its contribution to local character.	<p>Support welcomed.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
116	13	English Heritage (late submission)	4 The Vision - where we want to be Strategic Objectives to deliver The Vision Policy HE1: Heritage SO1	Object	In SO1, high quality design should respond to the historic significance of a heritage asset. Drawing on PPS5 HE1, the Core Strategy should give a clear steer regarding Climate Change and the Historic Environment, by supporting a balanced approach to climate change mitigation which takes into account historic environment objectives.	<p>Agree SO1 amended to include reference to the historic significance of a heritage asset.</p> <p>Amend Policy HE1 to make reference to 'the need to conserve the historic environment when implementing climate change mitigation and adaption measures'</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend SO1 to read 'Conserve and enhance the Borough's heritage and their settings by ensuring new development, including changes to the public realm, are of high quality design, appropriate to the significance of the heritage asset, and sensitive to the wider historic environment.</p> <p>Add Point 4 to Policy HE1 to read "Address the need to conserve the historic environment when implementing climate change mitigation and adaption measures'.</p>
116	14	English Heritage (late submission)	3 A Portrait of Hillingdon - where we are now Table 3.1 Main Planning Challenges for Hillingdon	Object	Main Challenges: in the first bullet point, we suggest including the Borough's "spaces".	<p>Agree. For clarity: separate first issue into two separate issues and include reference to the borough's spaces in the first.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Under Table 3.1 Main Planning challenges for Hillingdon: Historic and Built Environment separate first issue into two issues. Add 'The need to maintain the historic character, identity, suburban qualities of the Borough's places, buildings and spaces' and 'The need to conserve and enhance the historic significance of the Borough's heritage assets and settings'.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
116	15	English Heritage (late submission)	7 Core Policies - Historic and Built Environment Para 7.3	Object	Heritage: alongside the description of the Borough's heritage assets, it would be useful to identify the number of heritage assets currently at risk on English Heritage's Heritage at Risk (updated on 7 July 2010), in order to present a picture of the condition of all heritage assets within the Borough.	<p>Agree the number of heritage assets at risk to be added to para 7.3.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Add to para 7.3 'There are 35 entries in English Heritage's 'Heritage at Risk' Register of which 24 are buildings, 9 are conservation areas and 2 are Scheduled Ancient Monuments'.</p>
116	16	English Heritage (late submission)	4 The Vision - where we want to be Strategic Objectives to deliver The Vision SO1	Object	Suggest following wording for SO1: Conserve the Borough's heritage assets, their settings and wider historic environment, and ensure that new development, including changes to the public realm, is of high quality design and appropriate to its local historic context.	<p>Agree to amend SO1 to read that it will conserve and enhance the Borough's heritage and settings - rather than preserve and enhance these so as to reflect the wording used in Planning Policy Statement 5.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend SO1 to read 'SO1: Conserve and enhance the Borough's heritage and their settings by ensuring new development, including changes to the public realm, are of high quality design, appropriate to the significance of the heritage asset, and sensitive to the wider historic environment.'</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
116	17	English Heritage (late submission)	7 Core Policies - Historic and Built Environment Policy HE1: Heritage	Object	<p>Amend Policy HE1: Heritage to read: The Council will:</p> <ol style="list-style-type: none"> 1. Conserve and enhance Hillingdon's unique historic environment, including its heritage assets such as listed buildings, conservation areas, registered parks and gardens and scheduled monuments, their settings, and the wider historic environment. 2. Actively encourage the sustainable reuse of heritage assets, particularly those which have been including in English Heritage's Heritage at Risk register. 3. Promote increased public awareness, understanding of and access to the Borough's heritage assets and wider historic environment, through Section 106 agreements and via community engagement and outreach activities. 4. Ensure that new development is appropriate to its historic context, and that regeneration proposals make use of heritage assets and reinforce their significance. 5. Address the need to conserve the historic environment when implementing climate change mitigation and adaption measures. 	<p>Part agree, Point 1 amended to include reference to 'conserve', 'settings' and 'wider historic environment'. Point 2, disagree the Council will seek to encourage the 'regeneration' of historic assets. Point 3, no change. Point 4 is more relevant for inclusion in point 5 of Policy BE1. Point 5, agree to add.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Amend Policy HE1 to read: '1. Conserve and enhance Hillingdon's unique historic environment, including its heritage assets such as statutorily Listed Buildings, Conservation Areas, Scheduled Ancient Monuments, Registered Parks and Gardens, Locally Listed Buildings, Areas of Special Local Character, and Archaeological Priority Zones and Areas, their settings and their wider historic environment. 2. Actively encourage the regeneration of heritage assets, particularly those which have been included in English Heritage's 'Heritage at Risk' register. 3. Promote increased public awareness, understanding of and access to the Borough's heritage assets and wider historic environment, through Section 106 agreements and via community engagement and outreach activities. 4. Address the need to conserve the historic environment when implementing climate change mitigation and adaption measures.'</p> <p>Amend Policy BE1 (point 5) to read 'Improve areas of poorer environmental quality, including within the areas of relative disadvantage of Hayes, Yiewsley and West Drayton. All regeneration schemes should ensure that they are appropriate to their historic context, make use of heritage assets and reinforce their significance'.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
116	18	English Heritage (late submission)	7 Core Policies - Historic and Built Environment Policy HE1: Heritage	Object	<p>1. Implementation: there is further scope to reflect PPS5 HE3.1 in requiring that local heritage is put at the heart of regeneration proposals, and there should be a commitment to record and advance the understanding, through dissemination of the significance of a heritage asset where its loss is justified (PPS5 Policy HE12). Copies of records will be deposited with the Greater London Historic Environment Record.</p> <p>2. Monitoring: this section should refer to English Heritage's Heritage at Risk register, rather than the Buildings at Risk register. This was recently updated on 7 July 2010.</p>	<p>1. Agree to add a new point to reflect this in the Implementation of Policy HE1.</p> <p>2. Agree, replace 'Buildings at Risk' with 'Heritage at Risk' register in Monitoring section.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>1. Agree add new point to Implementation of Policy HE1 to read 'Where the loss of a heritage asset is justified, ensure that there will be a commitment to making a record to advance understanding of the heritage asset and copies will need to be deposited with the Greater London Historic Environment Record (HER).'</p> <p>2. Replace 'Buildings at Risk' with 'Heritage at Risk' register in Monitoring section.</p>
116	19	English Heritage (late submission)	7 Core Policies - Historic and Built Environment Policy BE1: Built Environment Para 7.10	Object	<p>Tall buildings: Following EH/CABE Guidance, the Core Strategy should set out a plan-led approach to tall buildings based on a clear understanding of the Borough's environmental characteristics (PPS1). The Core Strategy should identify which areas of the borough that may be considered appropriate or inappropriate, taking into account historic environment and urban design considerations such as the presence of heritage assets, historic character, prevailing building heights and typologies, sight lines, existing landmarks, topography, skylines and views. In areas that may be considered appropriate we would seek to ensure that there is a commitment to further detailed urban design analysis in order to fine tune where within these areas tall buildings may be appropriate or sensitive. There should also be policy links to any more detailed policy documents or any other evidence used to determine which parts of those areas might be considered suitable for tall buildings, based on appropriate definitions of 'tall' (such as Development Management Policies, area-specific policy in AAPs). At present the lack of clarity on how tall buildings will be managed is a significant omission which should be addressed.</p>	<p>Further consideration will be given to the development of a Character Study including inappropriate locations for tall buildings.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Add reference to the consideration of a Character Study to Point 11 of Policy BE1 and Implementation section.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
116	20	English Heritage (late submission)	8 Core Policies - Environmental Management Climate Change Adaptation and Mitigation	Object	It is important that due regard is shown to impacts on the historic environment from climate change mitigation and adaptation measures. English Heritage has published Climate Change and the Historic Environment which sets out potential impacts on the historic environment in this regard, and how to address them. Following PPS5 policy HE1, Core Strategies should promote climate change measures which avoid harm to the historic environment, and where climate change and historic environment objectives conflict, a balanced approach should be taken which best meets the public interest as judged against PPS5 and other relevant policies.	<p>Part agree, Policy HE1 will be amended to make reference to 'the need to conserve the historic environment when implementing climate change mitigation and adaptation measures'.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Add Point 4 to Policy HE1 to read "Address the need to conserve the historic environment when implementing climate change mitigation and adaptation measures'.</p>
116	21	English Heritage (late submission)	8 Core Policies - Environmental Management Open Spaces, Rivers and Canal Corridors Policy EM4: Open Space and Informal Recreation	Object	<p>1. The heritage value of open spaces including Metropolitan Open Land, Green Belt, Green chains and water spaces (e.g. canals) should be identified in this section, along with a cross-reference to Core Strategy heritage policy.</p> <p>2. Water spaces and open spaces can have historic significance and in their own right and therefore have cultural value alongside their leisure and recreation values (see, for example, paragraph 8.27).</p> <p>3. It is important that open spaces are managed with an understanding of their history, so that any historic characteristics and features are conserved in line with PPS5. Similarly, the heritage value should be identified in relation to open spaces and parks. Policy EM4 (page 93) should then ensure that proposals for parks, and development that affects their settings, aims to conserve historic significance.</p>	<p>1. Disagree. Policy HE1 already recognises the value of open space such as registered parks and gardens.</p> <p>2. Agree. SO3 to be amended to refer to the heritage value of open spaces. English Heritage added to the list of groups that the Council will work with to develop a strategy for the Grand Union Canal and other blue ribbon networks under Implementation of Policy EM3.</p> <p>3. It is not considered necessary to refer further to the heritage value of open spaces in Policy EM4.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>1. No proposed change.</p> <p>2. Amend SO3 to read 'Improve the quality of, and accessibility to, the heritage value of the borough's open spaces, including rivers and canals as areas for sports, recreation, visual interest, bio-diversity, education, health and well being. In addition, address open space needs by providing new spaces identified in Hillingdon's Open Space Study.' Add 'English Heritage' to bullet point 1 under Implementation of Policy EM3</p> <p>3. No proposed change</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
116	22	English Heritage (late submission)	9 Core Policies - Transport and Infrastructure Strategic Objectives to deliver The Vision Accessible Local Destinations Page 121	Object	We recommend identifying opportunities for investment into the historic environment as part of transport objectives. This reflects the Mayor's adopted Transport Strategy (2010) (proposal 83) which supports enhancement of the historic environment as part of environmental improvements to streets and public spaces.	<p>Detailed proposals for investment in the local historic environment will be brought forward in other Development Plan Documents as necessary. The Core Strategy already contains an overarching approach to preservation and enhancement of the historic environment at policy HE1.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>
116	23	English Heritage (late submission)	9 Core Policies - Transport and Infrastructure Policy C13: Culture Paras 9.53-9.57	Object	Opportunities to maximise the historic environment as a cultural resource for the borough should be identified within the supporting text to Policy C1 3.	<p>Agreed - to amend paragraph 9.57.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>First sentence of paragraph 9.57 to be amended to read:</p> <p>'Protection and enhancement of existing facilities will remain a key aspect of the future strategy and opportunities to maximise the historic environment as a cultural resource will be identified wherever possible.'</p>
116	24	English Heritage (late submission)	Appendix 2 Infrastructure Schedule Appendix 2 Infrastructure Schedule	Object	Planning obligations can provide an important source of funding for the conservation of the historic environment. We would seek to be involved in the production of any further planning policy on this matter.	<p>The Council's approach to planning obligations is already set out in detail in the Planning Obligations Supplementary Planning Document. The Core Strategy has an overall policy at HE1 which explains the importance attached to the preservation and enhancement of the borough's historic environment.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p>No proposed change.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
116	25	English Heritage (late submission)	Appendix 1 Evidence Base Appendix 1 Evidence Base	Object	Evidence base (pages 139 – 145) The evidence base should include any available characterisation work. We welcome the reference to both PPS5 and the Planning Practice Guide. It would also be worth including the Government's Statement on the Historic Environment in England (2010).	<p>Agree, reference document to be added to Evidence Base.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Add 'Government's Statement on the Historic Environment in England (2010) to Appendix 1 Evidence Base.</p>
116	26	English Heritage (late submission)	Appendix 4 Glossary Appendix 4 Glossary	Object	For clarity, we suggest that the terms Heritage Asset and Conservation are defined within the glossary. The first two should draw on definitions set out in PPS5.	<p>Agree. Definitions for 'Heritage Asset' and 'Conservation' to be added to glossary based on the definitions in PPS 5.</p> <p style="text-align: center;"><u>Council's Proposed Action</u></p> <p>Add new entry under Glossary for 'Heritage Asset' to read:</p> <p>'A building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. Heritage assets are the valued components of the historic environment. They include designated heritage assets (as defined in PPS 5) and assets identified by the local planning authority during the process of decision-making or through the plan-making process (including local listing)'.</p> <p>Add new entry under Glossary for 'Conservation' to read:</p> <p>'The process of maintaining and managing change to a heritage asset in a way that sustains and where appropriate enhances its significance'.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
116	27	English Heritage (late submission)	Sustainability Appraisal Sustainability Appraisal	Object	<p>Sustainability Appraisal General comments English Heritage welcomes the Sustainability Appraisal process which can ensure that the potential impacts of local plans on the historic environment can be identified at an early stage, along with possible mitigation measures. English Heritage has recently published Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment (2010) to assist in this regard. This document has informed the comments set out below.</p> <p>In general, there is further scope for the potential impacts of the Core Strategy policies on the historic environment to be picked up within the detailed Core Strategy Policies Appraisal (pages 62-100). For example, traffic generated by employment growth (policy E1) could have negative impacts on the historic environment by accelerating weathering processes and detracting from the environmental quality of the settings of heritage assets. The appraisal should also identify positive impacts on the historic environment from Core Strategy policies. For example, retention and re-use of historic structures can support climate change objectives by preserving embodied energy which would otherwise be lost through demolition.</p> <p>We recommend that more detail could be provided regarding the impacts of Core Strategy policies on the historic environment, and that key issues, for example, the cumulative impacts of growth on historic character, should be brought forward into the summary tables at the start of the SA.</p>	Noted.
						<p><u>Council's Proposed Action</u> To be included within review of Sustainability Appraisal.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
116	28	English Heritage (late submission)	Sustainability Appraisal Sustainability Appraisal	Object	<p>Detailed comments Summary of appraisal The summary should identify the risk that growth within the borough could detract from the Borough's historic character if it does not deliver high quality design which is sensitive to historic context. This point would most appropriately be made in relation to policy E5: Town and Local Centres (page 11), which deals with growth in general, and because town centres often accommodate the highest concentration of heritage assets.</p> <p>We welcome the intention in the appraisal summary of Policy HE1: Heritage to highlight potential conflicts between climate change and historic environment objectives. However, we suggest that the current wording of the final paragraph unnecessarily casts heritage protection as an impediment to sustainable design and construction. High standards of environmental sustainability in construction do not necessarily imply harm to historic character, though there is the potential for this. PPS5 requires emphasises the need to design schemes which meet high standards of environmental sustainability whilst being sensitive to historic context. The provision of a quotation from PPS1 is misleading in that it could be interpreted to suggest that PPS1 justifies designs which do not respond to historic context. This is not the case for two reasons:</p> <ul style="list-style-type: none"> · Firstly, because designs should have regard for PPS5 which requires that buildings are sensitive to historic context, even if they are different from their neighbours; and · Secondly, because the definition of sustainable development set out in PPS1 includes enhancement of local character (paragraphs 17 and 18), irrespective of a building's level of similarity to its surrounds. <p>In view of this, we advise that the final three paragraphs of the appraisal summary for policy HE.1 Heritage are removed, to be replaced with the following sentence:</p> <p>"It is important that development is built to the highest standards of environmental sustainability, whilst being sensitive to historic context." PPS5, policy HE1 provides clear guidance regarding this issue as a whole, and in particular, regarding instances where climate change and historic environment objectives conflict. In addition, English Heritage has provided further guidance in Climate Change and the Historic Environment, available at: http://www.helm.org.uk/server/show/nav.00h016008001</p>	Noted.
						<p><u>Council's Proposed Action</u></p> <p>To be included within review of Sustainability Appraisal.</p>

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
116	29	English Heritage (late submission)	Sustainability Appraisal Sustainability Appraisal	Object	Existing Sustainability Problems: Historic and Built Environment (page 44) The title to this table should be corrected to read "Historic and Built Environment" rather than "Housing and Built Environment". For clarity, and for greater consistency with PPS 5, we suggest that the first issue be separated out into two separate points, as follows: · Firstly "The need to maintain the historic character, identity, suburban qualities of the Borough's spaces and buildings". This encapsulates the need to protect the borough's historic character through contextually responsive new design and managed change in general; and · Secondly "The need to conserve the historic significance of the Borough's heritage assets and their settings". This addresses the need to protect designated assets such as listed buildings and conservation areas, for example, through their physical maintenance, or through appropriate management of their settings.	Noted. <u>Council's Proposed Action</u> To be included within review of Sustainability Appraisal.
116	30	English Heritage (late submission)	Sustainability Appraisal Sustainability Appraisal	Object	The Vision for Hillingdon (pages 52 and 54) The wording of the Vision for Hillingdon and the Strategic objectives which follow should be updated to be consistent with any alterations made to these sections of the Core Strategy itself.	Noted. <u>Council's Proposed Action</u> To be included within review of Sustainability Appraisal
116	31	English Heritage (late submission)	Sustainability Appraisal Sustainability Appraisal	Object	10. The Core Strategy Policies Appraisal (pages 62 – 100) This section as a whole could draw give further consideration to impacts that each of the Core Strategy policies could have on the historic environment, including positive as well as negative impacts (please see earlier comments within the SA section of this letter).	Agree. <u>Council's Proposed Action</u> To be included within review of Sustainability Appraisal.

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
116	32	English Heritage (late submission)	Sustainability Appraisal Sustainability Appraisal	Object	11. Assessment of cumulative impacts: Landscape and heritage (page104) As stated earlier, we welcome the awareness of climate change / conservation conflicts shown here. However, we advise that the second paragraph of this section should be rephrased to emphasise a more positive approach towards design solutions which can incorporate renewable energy technologies whilst avoiding harm to the historic environment. This section should also identify the potential for cumulative impacts of minor alterations on the historic environment, for example, through renovations and extensions. This could be a force for positive maintenance and enhancement of the historic environment, but it could equally lead to loss of character if individual designs are not monitored.	Agree <u>Council's Proposed Action</u> To be included within the review of the Sustainability Appraisal
116	33	English Heritage (late submission)	Sustainability Appraisal Sustainability Appraisal, Appendix 2: Page 117	Object	14. Appendix 2: Sustainability Appraisal Framework (page 117) The indicators set out in regard of the historic environment should be reworded to read "Percentage of heritage assets at risk on English Heritage's Heritage at Risk register." The target for this should be zero. English Heritage's annual update of the Heritage at Risk Register was recently published on 7 July 2010, and identifies 24 listed buildings, 2 scheduled monuments and 9 conservation areas as being at risk in Hillingdon.	Agree. <u>Council's Proposed Action</u> Text to be changed to read 'Percentage of heritage assets at risk on English Heritage's Heritage at Risk register.'

Core Strategy Consultation Draft

ID	Rep No.	Organisation / Individual	Chapter/Policy /Para /section	Support/ Object/ Observation	Summary of Representation	Council's Response
117	1	Hillingdon Inter Faith Network (late submission)	9 Core Policies - Transport and Infrastructure Community Infrastructure	Object	<p>Key points are as follows:</p> <p>A significant number of faith groups from the ethnic minority communities in Hillingdon do not have their own premises and there is a growing groundswell of feeling amongst them that they are facing discrimination in trying to carry out the fundamental right to worship.</p> <p>It is fortunate for a small number of groups that they do have their own premises but it seems almost an accident of history that some do and some do not. This adds to the feeling of alienation and discrimination that is becoming ever more evident.</p> <p>No overall plan to provide land or premises for faith groups, it seems that the Council does not see it as its job to provide space for individual faith groups or to assist in identifying possible sites for this purpose.</p> <p>Each group is left to its own devices and looks out for premises that might be suitable for its needs but often with no true understanding or acceptance of the planning issues that might be involved.</p> <p>Whilst the impression may be that a faith building is used strictly as a place of worship, this is far from the reality. Our recent audit shows that the actual use is around 52% for worship and 48% for what would be better described as 'serving the community' The reality being that over 900 activities are taking place – making faith buildings a vital part of the a healthy community.</p>	<p>The need for additional places of worship will be addressed as part of the production of the Strategic Infrastructure Plan.</p> <p style="text-align: right;"><u>Council's Proposed Action</u></p> <p style="text-align: right;">To be included in the Strategic Infrastructure Plan.</p>