

## Appendix 1: Responses received to the Pre-Submission Draft Core Strategy

ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
77	General Comment	Hillingdon Primary Care Trust		The LDF refers to green initiatives such as cycling and car sharing. How are public sector organisations going to be brought together to support and develop these plans. i.e Hillingdon PCT, Brunel University and Hillingdon Hospital generate substantial vehicle and personnel movements daily.	The Council will liaise with its major public sector partner bodies on sustainable transport initiatives - and develop these through other Council strategies such as the Local Implementation Plan. No proposed change.
78	General Comment	Hillingdon Primary Care Trust		Should the LDF make a statement about how it is going to draw together public and private sector organisations to support sustainability initiatives.	Disagree - the Council will continue to work with its partner organisations to achieve the objectives of the Sustainable Community Strategy. These arrangements do not need to be detailed in the Core Strategy. No proposed change.
80	General Comment	Coal Authority		We have no specific comments to make on this document at this stage.	Noted. No proposed change.
79	General Comment	Planning Inspectorate		Unable to find any superseded policies in your DPD (a list of these will be needed when you submit), or a HRA/letter from Natural England saying it is not required.	<p>Agree, a list of superseded UDP Saved Policies will be provided in the Submission Draft of the Core Strategy.</p> <p>A Habitats Regulation Assessment Verdict letter from Natural England confirming that stage two and three of the Habitats Regulation Assessment, requiring a full Appropriate Assessment, would not be required. This letter was placed on the Council's website in February 2011 under the section 'Evidence Base' documents.</p>
81	General Comment	Fulmer Parish Council - South Bucks		Impressive response to the consultation. Fulmer Parish has nothing to add.	Support welcomed.
91	General Comment	Northwood Residents Association		As a general comment, it would appear that not enough emphasis has been put on the needs of the elderly.	No proposed change. Hillingdon's aging population is acknowledged in the population section of A Portrait for Hillingdon and in relation to housing in paragraph 6.29. Paragraph 9.43 notes that in relation to social infrastructure, DPDs will need to make provision for the facilities required by the aging population.

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92	General Comment	Northwood Residents Association		The report also makes far too many assumptions where there is a lack of concrete fact.	The Council has prepared the Core Strategy in accordance with national planning guidance and its policies are supported by a substantial evidence base. No proposed change.
228	General Comment	Hillingdon Alliance of Residents Associations		Regeneration is needed in the south of the borough - but with this should be with the agreement of the local community and respecting Green Belt land. The closure of the swimming pool at Yiewsley and its planned replacement by a health centre is inappropriate. There is an alternative location for the health centre and the site should continue to provide local sports and leisure facilities for the large young population in the area.	<p>The Council will continue to consult the local community in accordance with the approved Statement of Community Involvement as further detailed work progresses on regeneration proposals for the south of the borough. These can be expected to come forward as part of work on the Site Allocations, Proposals Map and Heathrow Area Development Plan Documents.</p> <p>The detailed issue of the closure of the swimming pool at Yiewsley is not a matter for the Core Strategy.</p> <p>No proposed change.</p>
93	General Comment	Northwood Residents Association		The report ignores the existence of the development of the old Southall Gas Works development and the impact it will have on Hillingdon.	The Council has not ignored the Southall Gas Works scheme. It sees the potential development there as supporting its own regeneration proposals within the Hayes - West Drayton corridor. No proposed change.
94	General Comment	Northwood Residents Association		No mention is made of golf courses, their effect on the green belt and the water table.	The Council is aware of the issues of water use which can arise with proposals for golf courses and other commercial uses. This is a detailed development consideration which can be addressed by the Council in a Development Management Development Plan Document to be produced as a later part of the Local Development Framework. No proposed change.
111	General Comment	Individual		<p>1) There has been a lack of consultation with people in the borough.</p> <p>2) Most sections of the Strategy have loose wording and loopholes. Various policies need strengthening from stating the Council "will seek" to it "will" - e.g. maintain the current extent of the</p>	<p>1) Disagree, involvement of the public and key stakeholders in preparing the Core Strategy Pre-Submission 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</p>

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				<p>Green Belt / identify and protect quiet areas / safeguard and improve water quality / encourage or require sustainable techniques to land redemption or require the installation of renewable energy.</p> <p>3) The Strategy does not adequately address the problems of new development having been allowed in the wrong locations, traffic congestion on local roads (e.g. at Hillingdon Hospital) with its impact on public transport, pollution and loss of Green Belt land.</p> <p>4) There should be no further expansion at either Heathrow or Northolt Airports.</p> <p>5) There is nothing explicit on the protection of green space.</p> <p>6) Employment areas should be spread more across the borough.</p> <p>7) Retail shops should not be lost to fast food outlets.</p>	<p>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, 6 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 3,123 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 173 randomly selected businesses from the 2008 Hillingdon Business Directory. No proposed change.</p> <p>2) Disagree, the Council considers that the wording is appropriate for a Core Strategy as implementation of some policies depend on the contribution from other agencies. No proposed change.</p> <p>3) Disagree, Table 3.1 sets out the main challenges facing the borough and acknowledges pressure for inappropriate developments. The Core Strategy seeks to direct development to the most sustainable locations whilst minimising their impact on the environment. No proposed change.</p> <p>4) Paras 3.5 and 3.6 set out the Council's position on the expansion of Heathrow Airport. There are no known expansion plans for Northolt Airport. No proposed change.</p> <p>5) Disagree, Policy EM2 seeks to protect green belt, metropolitan open land and green chains, Policy EM4 seeks to protect open space and</p>

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					<p>informal recreation areas and Policy BE1 seeks to protect the development of gardens from inappropriate development and improve the quality of the public realm. No proposed change.</p> <p>6) The location of the main employment areas across the borough is set out at Map 5.1 in the Core Strategy. There are many other individual employment locations in Hillingdon and together with the local network of town centres the Council considers that there is already a wide range of employment opportunities available across its area. No proposed change.</p> <p>7) Changes of use will be dealt with in the Development Management DPD. No proposed change.</p>
137	General Comment	Hillingdon Inter Faith Network		<p>The main submission is that-</p> <ol style="list-style-type: none"> <li>1.the current proposals do not (always) address needs in a holistic way for the benefit of residents</li> <li>2.there is a lack of appreciation of the community cohesion and strength brought about by the faith communities</li> <li>3.there is a lack of engagement with the need for community regeneration of the Heathrow villages and of the need to acknowledge the demographic changes with the intrinsic need for community space.</li> <li>4.the proposals are not flexible enough to meet all of the changing communities within the given timescale.</li> </ol> <p>In our submission, we have recognised the importance of basing our comments on</p>	<p>The Vision statement looks towards Hillingdon taking full advantage of its distinctive strengths with regard to its various communities and seeks to improve the quality of life by improving accessibility to local facilities. Strategic Objective SO6 in the Core Strategy also highlights the importance the Council attaches to the issue of social inclusion. The main policy in the Strategy on Community Infrastructure provision derives from the Vision and this objective and partly looks towards the retention of existing community facilities and the provision of new ones to meet the needs of new communities within the local population. In this way the Core Strategy sets out the broad strategic approach it will take to such issues as the provision on places of worship or new community meeting places.</p> <p>Detailed proposals for further local provision of community space or other facilities can be expected to come forward as part of other Local Development Framework documents - such as</p>

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				<p>perceived sound evidence, providing some examples.</p> <p>We also noted that the council does need to be consistent with national policy. This now focuses on being localised, both by and for the locality. The strategic objectives mentioned are those which relate specifically to the points raised.</p>	<p>the Site Allocations or Heathrow Area Development Plan Documents.</p> <p>No proposed change.</p>
202	General Comment	The Ballymore Group		<p>Reference should be made to how S106, CIL and the Mayoral CIL will be implemented. The cumulative burden of this charge on developers should be taken into account and should not be set at a level where developments become unviable.</p>	<p>The following text will be inserted as supporting text to policy C11 following paragraph 9.38:</p> <p>The Council currently secures developer contributions towards infrastructure by way of planning obligations, with the support of Hillingdon's adopted Planning Obligations Supplementary Planning Document. In November 2010, the government confirmed that this mechanism of funding infrastructure will be replaced with the Community Infrastructure Levy (CIL). Unlike S106, CIL payments would apply to the majority of new development in the borough. The Council has undertaken to prepare a CIL Charging Schedule and will be consulting on this in accordance with Government Guidance.</p> <p>The Mayoral CIL is a GLA proposal that is currently out for consultation. First and foremost, it should be progressed by the Mayor as part of the Replacement London Plan. The matter will be progressed by Hillingdon following the completion of the consultation process and the independent examination of the proposals.</p>
231	General Comment	Individual		<p>Less housing growth should be proposed and more off-road parking provided for residents - to free up the current congested local roads for public transport. Heathrow Airport should not be allowed to expand further.</p>	<p>The council has to meet the level of housing provision required of it in the London Plan - to help meet London's overall housing needs.</p> <p>Detailed car parking standards will be proposed in a later part of the Local Development Framework - the Development Management Development</p>

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					<p>Plan Document.</p> <p>An overall aim of the Council is to encourage more use of sustainable forms of transport - e.g. a part of that approach entails encouraging the location of major developments at locations with good public transport access.</p> <p>The Council's policy approach to Heathrow Airport is to protect the current airport boundary and allow only airport-related development within that boundary. The Council does not wish to see further expansion of the airport beyond that boundary.</p> <p>No proposed change.</p>
234	General Comment	Individual		<p>There is no guarantee that the policies in the Strategy will be put into practice. The Council must prevent the loss of the Green Belt and save it for future generations.</p>	<p>The Core Strategy represents an important vehicle through which the Council will seek to achieve its corporate objectives in the Hillingdon Sustainable Community Strategy. As such, the Council will be firmly committed to putting the policies in the Strategy into effect.</p> <p>The Council agrees that loss of Green Belt is to be resisted - and its policy EM2 is a robust expression of its approach.</p> <p>No proposed change.</p>
272	General Comment	Individual		<p>The Heathrow villages are blighted by the Runway Three decision. BAA is retaining properties for several years there pending the Government's aviation policy review. The further environmental and health impacts that would follow from increased passenger numbers at Heathrow. Threat to the Villages from High Speed 2 and the possibility of a Heathrow Station. The unacceptable impact on the area caused by the uncontrolled increase in the numbers of hotels. The unacceptable impact of</p>	<p>The Core Strategy cannot consider land ownership matters.</p> <p>The Council is aware of concerns over environmental and health issues regarding the expansion of Heathrow Airport. Its broad policy approach regarding environmental issues is set out at section 8 of the Core Strategy (e.g. at policy EM8).</p> <p>The details of the High Speed 2 project are yet to</p>

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				<p>the preferred Mineral Safeguarding Area, i.e. land west of Harmondsworth quarry and north of the village of Harmondsworth. The lack of consideration given to the resulting increased traffic flow, noise and air pollution and damage to roads and pavements. The lack of recycling facilities in the south of the borough and inadequate provision for the Heathrow Villages.</p>	<p>be determined by the Government and cannot be addressed at this stage in the Core Strategy.</p> <p>The Council is required to meet the mineral apportionment requirements of the London Plan. As Hillingdon is one of the few London Boroughs with commercial aggregate resources it has to provide some measure of safeguarding for those reserves located in the south of the borough.</p> <p>The lack of local recycling facilities for residents in the south of the borough is recognised by the Council and it is committed to identifying and allocating suitable new sites for waste management at policy EM11.</p> <p>No proposed change.</p>
283	General Comment	Legal and General Property Partners (Life Fund) Ltd	Drivers Jonas Deloitte on behalf of Legal & General Property Partners (Life Fund) Ltd	<p>The Core Strategy should make clear that all diagrams are illustrative. Detailed designations will be subject to future consultations.</p>	<p>Paragraph 1.1 makes clear that the Core Strategy: "...does not set out guidelines for decisions about planning applications (this will be done through the Development Management document) and nor does it allocate specific sites (this will be done through the Site Allocations document and Proposals Map)". This paragraph also makes clear the broad, strategic nature of the Core Strategy.</p> <p>All Development Plan Documents are also to be subject to consultations - as specified in the Council's approved Statement of Community Involvement.</p> <p>No proposed change.</p>
323	General Comment	Surrey County Council		<p>As the Core Strategy includes development management policies covering the London Borough which will be used to determine planning applications for major development, the lack of any policy reference requiring developers to prepare SWMPs renders the Core Strategy to</p>	<p>The policy on sustainable waste management (EM 11) is a broad strategic policy. The Council is preparing a joint West London Waste Plan Development Plan Document in conjunction with five other west London partner boroughs. It will investigate whether this proposed policy</p>

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				be unsound and not effective as it is not consistent with either the London Plan or national policy. In order to address this issue, the London Borough should propose a minor amendment to the Core Strategy to include an appropriate policy reference requiring developers to prepare and submit a SWMP in support of their application.	reference should be included in the Waste Plan or in a Development Management Development Plan Document. No proposed change.
373	General Comment	Bell Farm Christian Centre		<p>Consultation Statement:</p> <p>In failing to invite consultation from any of the 50 or more active churches in the borough the consultation process is flawed and discriminates against those of the Christian Faith who have not been properly consulted on the Core Strategy. The consultation period should be extended to include consultative feedback from Churches which are significant and active stakeholders in the local community. Several organisations which have been disbanded for some years have still been consulted - they should be removed from the consultation statement - and how many other non-existent organisations have been included in the consultation?</p>	The Core Strategy was consulted on in accordance with government guidance and the Council's Statement of Community Involvement. Hillingdon's Inter-Faith Network was specifically consulted as an organisation that represents faith groups in the borough. No proposed change.
490	General Comment	Mr John McDonnell MP		The Core Strategy is extremely weak and needs to be strengthened to ensure it produces concrete policies and actions to reflect the priorities of the community.	The Core Strategy has been prepared in accordance with the adopted Statement of Community Involvement. This has ensured extensive public involvement in the Strategy's preparation and the resultant policies do reflect the priorities of the borough's population - as regards meeting local housing needs, protecting and enhancing the built and natural environment, etc. No proposed change.
541	General Comment	Arla Foods UK Plc	BNP Paribas Real Estate	Policy wording in the Strategy needs to be more flexible - particularly where this could impact on development viability when bringing forward brownfield land (with its additional costs) for	The Council is aware of the requirements of national planning policy guidance regarding the need to word and apply policies with a degree of flexibility. The policies in the draft Core Strategy



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				development.	are sufficiently flexible in their approach for the purposes of a broad strategic policy document. No proposed change.
426	General Comment	National Grid	Entec on behalf of National Grid	National Grid owns and operates North Hyde substation which is located within an area identified as a Strategic Employment Site in the Pre-submission Core Strategy Document. While National Grid does not object to future redevelopment in this area, we would like to take this opportunity to highlight that substations are vital to the efficient operation of our electricity transmission network for switching circuits or transforming voltage. North Hyde substation is an essential part of the transmission network and has an important role to play in maintaining the supply of electricity to the local distribution network operator and therefore ultimately to homes and businesses throughout Hillingdon and the wider area. The site is therefore "Operational Land" and, for the reasons outlined above, there may need to be further essential utility development at the site in the future.	Noted - no proposed change.
427	General Comment	Individual		The further growth envisaged in the Strategy should be considered against the need to preserve the environment and wildlife; to consider whether empty office blocks and vacant MoD buildings in West Drayton & Uxbridge could be used for some of the new housing growth; and the risk of not having sufficient school places available.	The Core Strategy already contains robust policies aimed at protecting the borough's natural environment and biodiversity. Detailed allocations for housing and other development will be made through the Site Allocations and Proposals Map Development Plan Documents. The Core Strategy includes an infrastructure schedule which will be kept under review with respect to school provision as development proceeds during the plan period. No proposed change.
452	General Comment	Hayes and Harlington Community Development Forum		C.S is not concise, focused, nor has engaged the community.  It has avoided dealing with critical issues, e.g. Heathrow Opportunity Planning Framework & London Plan targets; reconciling growth and air	The Council would submit that there has been extensive public involvement in the drafting of the Core Strategy and that the result has been a concise and focussed document.  The Heathrow Opportunity Area is a London Plan

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				<p>quality/ climate change/ environmental impacts.</p> <p>It has not acknowledged the implications of HS2 and links to Heathrow.</p> <p>The Infrastructure Schedule is simply a list and does not set out a delivery plan.</p> <p>Integration with plans of adjoining authorities is not clear and their proposals are not apparently addressed.</p> <p>As for evidence, many LBH documents are apparently not in the public domain presently.</p> <p>Sustainability Appraisal (Feb 2011) recommendations have not apparently resulted in amended policies being put forward.</p> <p>Emerging national policy and the Neighbourhood Plans approach has not been signposted in the Core Strategy.</p> <p>Emerging regional policy – the draft Replacement London Plan which has been subjected to EiP and a Panel report (yet to be published by the Mayor) – has progressed to such an advanced stage, with a considerable evidential base, that it should be reflected in the C.S.</p> <p>There is a need for a fundamental and systematic rewriting of the Pre Submission Core Strategy to take on board the above comments.</p>	<p>proposal and it remains for the Mayor of London to designate the precise area to be included.</p> <p>The Core Strategy does contain both policies aimed at meeting London Plan growth expectations and at addressing environmental concerns which that growth may give rise to.</p> <p>The Government has yet to determine the route of High Speed 2 and whether there will be a link to Heathrow Airport - it would be premature to refer to these proposals in the Core Strategy.</p> <p>Indicative phasing details - where known - have been included in the Infrastructure Schedule of the Strategy.</p> <p>Evidence for the Core Strategy will continue to be compiled up to Submission and the Sustainability Appraisal recommendations will be included as proposed changes to the Strategy.</p> <p>The Localism Bill proposals have yet to be enacted and are still subject to change. It would again be premature to refer to these in the Core Strategy.</p> <p>Relevant policy recommendations from the Panel Report will be taken into account in Proposed Changes to the Core Strategy.</p> <p>No proposed change.</p>
502	General Comment	Councillor R Sansarpuri		Not specified (Blank).	Representor will be advised on the date for the EiP. No proposed change.
507	General Comment	Cllr R Ghei		The employment strategy in the Plan should aim to create the maximum number of jobs for Hillingdon residents.	The Core Strategy policies (at section 5) do look towards providing significant job growth in the borough over the plan period. They provide a

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					<p>detailed policy framework to maintain a range of jobs across the borough by encouraging further office-based employment, protecting industrial sites and employment locations (policy E1), providing a strategy for future growth at Uxbridge and in the Heathrow Opportunity Area (policies E2-E4), undertaking to accommodate additional retail growth in the borough's town and local centres (policy E5), and looking to raise skill levels in the local workforce (policy E7).</p> <p>No proposed change.</p>
18	1.4	Individual		<p>It is important the Council keeps all the green belt within its boundary as a legacy for the future population of the borough. Changes to the green belt laws will also place excess pressure on local community services that are currently stretched to meet the requirements of the borough.</p>	<p>Policy EM2 in the Core Strategy states the Council's clear intention to maintain the current extent, hierarchy and strategic functions of the Green Belt. No proposed change.</p>
236	1.7	Individual		<p>No genuine effort was made to involve the citizens of Hayes in the consultation. Concerned at the lack of printed copies available to local residents. Copies should have been available to loan from local libraries, printed copies should have been made to post to interested residents and an audio cassette more readily available. The Council has a poor consultation record on this and several other documents.</p>	<p>The detailed arrangements made to involve the public and key stakeholders in consultations on the Core Strategy have followed the approach set out in the Council's Statement of Community Involvement (SCI) adopted in November 2006. The SCI sets out a minimum of six weeks for public consultations for each of the stages in the plan making process. Consultations on the Pre-Submission Core Strategy were carried out over a six-week period between 9th February and 25th March.</p> <p>During this six-week period:</p> <p>a. Press notices were published in the Hillingdon Leader, Gazette series (all Hillingdon editions) and in the London Gazette on the 9th February.</p> <p>b. Consultation documents were available for viewing and comment at all borough public libraries, the Hayes One Stop Shop, and the</p>

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					<p>Planning Information Services section at the Uxbridge Civic Centre.</p> <p>c. Public information displays were exhibited at Uxbridge Library and at Planning Information Services, Civic Centre, Uxbridge.</p> <p>d. Six information drop in sessions were held at Ruislip Manor, Uxbridge and Botwell libraries.</p> <p>A number of local events and meetings were also attended by officers to raise awareness and encourage discussion about the Pre-Submission Core Strategy. These included the:</p> <ul style="list-style-type: none"> <li>• Youth Council (5pm, 10 January)</li> <li>• West Drayton Town Partnership (7pm, 12 January)</li> <li>• Hillingdon Motorists Forum (7pm, 12 January)</li> <li>• Older Peoples Steering Group exhibition (12 January)</li> <li>• Cleaner Greener Group (25 January)</li> <li>• Hayes Town Partnership (7 February)</li> <li>• Local Strategic Partnership - Executive Meeting (8 February)</li> <li>• Hillingdon Force - Older People's Steering Group (18 February)</li> <li>• Yiewsley Community Fair (26 February)</li> <li>• Yiewsley &amp; West Drayton Town Centre Partnership (2 March)</li> </ul>

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					<ul style="list-style-type: none"> <li>• Hillingdon Interfaith Network (2 March)</li> <li>• Access and Mobility Forum (7 March)</li> </ul> <p>17. Approximately 3,000 letters and emails were sent to various groups and individuals, inviting comments on the consultation documents. The letters included a brief summary about the Core Strategy, where to view it and how to provide comments. Relevant groups were also provided with a CD Rom. Responses were invited on-line, by email, by completing a Consultation Response Form, by letter or fax.</p> <p>The recent consultations were held in accordance with the approved Statement of Community Involvement and electronic responses were requested as the most cost-effective means of dealing with responses. Responses made by letter were also accepted as the Council would agree that not all consultees are able to use computers to respond to consultations. Drop-in information sessions were staged at libraries in the north, centre and south of the borough to give local residents and businesses the opportunity to discuss the Core Strategy with planning officers.</p> <p>No proposed change.</p>
392	2	Hillingdon Motorist Forum		<p>A modern Borough such as Hillingdon should be planning a road network that will be able to support the current as well as the predicted level of road traffic. It is clear from the comments throughout the document referring to traffic congestion that the current road network cannot support the current level of traffic let alone the predicted traffic levels. There are no plans to upgrade the road network to a sufficient standard.</p>	<p>Improvements to the road network are primarily dealt with in the borough's Local Implementation Plan and are only one facet of reducing traffic congestion. The transport policies in the Strategy aim to steer development to the most accessible locations (to facilitate access by all modes of transport), to improve public transport interchanges in local centres (to make use of public transport a more attractive option) and to improve north-south public transport links across the borough (to reduce pressure for private car</p>

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					<p>use). Taken together these measures should help reduce road congestion within the existing road network.</p> <p>No proposed change.</p>
491	2	Mr John McDonnell MP		Greater emphasis should be given to the issue of environmental inequality.	The Vision statement has to cover a number of major themes which the Core Strategy addresses in its objectives and policies. The environment theme is noted in the Vision with respect to both Hillingdon taking full advantage of its distinctive strengths and to seeking an improved environment and infrastructure. Whilst environmental issues then are dealt with throughout the Strategy they are given prominence in section 7 dealing with the historic and built environment and in section 8 dealing with environmental improvement. No proposed change.
56	2.2	Mr John McDonnell MP		The vision for Hillingdon does not recognise adequately the social, economic and environmental pressures that areas of the borough are facing and sidesteps the issue of the inequality within the borough, failing to address the particular issue of the inequality between the south and north of the borough and the need to tackle inequality within our area. There needs to be particular reference in the vision for the future of the borough which recognises the pressures that certain areas face and a commitment to address inequality between the south and north of the borough in order to achieve greater equality.	<p>The summary of the Vision statement in the Core Strategy at paragraph 2.2 notes the intention that economic growth is to be concentrated in those parts of the borough with the greatest socio-economic need, notably the Hayes / West Drayton corridor. The inequality between the north and south of the borough is also clearly highlighted in section 3 - e.g. see paragraph 3.2 which notes the areas of deprivation to the south of the A 40. Section 4 then sets out the Vision for the borough and includes a range of strategic objectives to deliver the Vision. These again aim to address the deprivation in the south parts of the borough - e.g. by accommodating new job growth at Uxbridge and in the general area around Heathrow.</p> <p>No proposed change.</p>
58	2.2	Mr John McDonnell MP		The vision fails to address the issue of the lack of community identity of in the borough, the	The Vision in the Core Strategy looks to take full advantage of the distinctive strengths of the

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				isolation of many communities and individuals, and the ever changing transient population of the area. The Vision should include recognition of the issue of lack of identity and population change by setting a goal of increasing community engagement and overcoming isolation, promoting community cohesion and celebrating the multi cultural nature of our community.	borough - its range of places, communities and heritage - e.g. see first bullet point in the Vision statement at paragraph 4.1. As with other outer London Boroughs Hillingdon has always had a partly transient population - acting as a place to which people move to from inner parts of London, perhaps to take advantage of the wider range of housing and green spaces here, and also as a first place to live in the capital for people from outside, attracted by lower housing prices compared to more central parts of the city. What the Core Strategy is attempting to do is to set out how the Council will seek to make the borough an attractive location to live, building on the existing strengths highlighted in the Vision statement.  No proposed change.
304	2.2	PRUPIM	CB Richard Ellis on behalf of PRUPIM	The vision should be strengthened such that it recognises the strategic role of Heathrow airport, for example, the last bullet point could be reworded as follows: "Heathrow airport will continue to play a strategic role in the growth of the national and local economy".	The Core Strategy already highlights the economic importance of Heathrow Airport to the borough in several places - e.g. in the Vision Statement at paragraph 4.1, at Strategic Objectives SO23 - SO25 and in the section of Table 5.3 on Heathrow Airport. It is not considered necessary to further emphasise the role of the Airport in the Vision statement as suggested.  No proposed change.
320	3	Surrey County Council		In relation to the Spatial Portrait, the County Council therefore welcomes the acknowledgement on page 10 of the Core Strategy that Hillingdon is a major producer of minerals compared to other London Boroughs. The reference on page 15 to the need to meet the London Plan mineral apportionment figures as being one of the main planning challenges facing the Borough is also supported, together with the Vision on page 18 which recognises that Hillingdon continues to retain viable mineral	Noted. No proposed change.

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				resources within the Opportunity Area.	
193		British Airways plc	Lichfield Planning	<p>Comments on accuracy:</p> <p>In section 3. Portrait of Hillingdon under 'Transport':</p> <p>It should note that only Crossrail is actually committed;</p> <p>T5 should be listed as a major rail/underground station in its own right.</p> <p>Under 'Economy' (page 9): the document states "Each year Heathrow accommodates 480,000 flights and approximately 67m passengers". But paragraph 4.14 states that "...the airport receives 63 mppa". For consistency the same figure should appear in both sections, and BA regard 67mppa as a closer approximation of the current number.</p>	<p>Accepted - sub-section on transport following paragraph 3.3 to be amended to note that Crossrail scheme is under construction; and reference to be added regarding the status of the T5 station.</p> <p>Paragraph 4.14 to be amended to refer to 67 mppa.</p>
203		Heathrow Airport Ltd		<p>The third bullet of the Key Facts: Economy box refers to current and predicted passenger numbers at Heathrow. These need to be brought up to date. Passenger throughput for 2010 stands at 67 million passengers. The Draft Core Strategy refers to passenger numbers reaching 85 mppa by 2015. The decline in air traffic as a result of the economic recession means passenger numbers have not increased in line with previous forecasts. Our 2010 Capital Investment Plan illustrates that passenger numbers for 2015 are more likely to be in the range of 75-77mppa.</p>	<p>Accepted - change third bullet point in sub-section on Economy to refer to 75-77 mppa passenger numbers by 2015 - and similarly change figure quoted at paragraph 4.14.</p>
204		Heathrow Airport Ltd		<p>The Core Strategy, describes Heathrow as a key gateway for the UK. HAL suggest that the document makes clear the role of Heathrow as the UK's only hub airport. This should be explicitly recognised.</p>	<p>Accepted - amend wording of first sentence at first bullet point in sub-section on Transport following paragraph 3.3 to note that: "The borough is home to Heathrow Airport, a key gateway for the UK, the UK's only hub airport and</p>



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					one of the busiest airports in the world."
72	3.3	Hillingdon Primary Care Trust		Page 11 - correct text to say PCT manages 20 health care facilities.	Agreed - amend fourth bullet point at sub-section on Community Facilities to read: "Hillingdon Primary Care Trust owns and manages 20 health care facilities."
284	3.3	HFCA		The input & facilities of the borough's many community associations is not acknowledged in the Core Strategy. More emphasis is needed on improving their role.	Whilst the role of community associations is beyond the remit of the Core Strategy, the Vision statement does look to focus community activities in town and neighbourhood centres by encouraging a diversity of uses there and the policies in the Strategy aim to achieve this, e.g. via Strategic Objective 18 and policy CI 1. No proposed change.
305	Table 3.1	PRUPIM	CB Richard Ellis on behalf of PRUPIM	The issues section, as drafted, fails to recognise the wider definition of economic development in PPS4 which also includes main town centre uses such as hotels and retail uses. It therefore fails to recognise such uses as critical contributors to the supply of local employment opportunities. This section should include a key challenge as "delivering employment opportunities for the local population".	Table 3.1 is simply a summary of the main planning issues facing the borough - which includes local pressure on designated employment land from other uses - e.g. housing or retailing. The summary given does not mean that the Council fails to recognise the national guidance set out in PPS4.  No proposed change.
442	Table 3.1	Henry Streeter Automotive Ltd	CGMS Ltd on behalf of Henry Streeter Automotive Ltd	Support for delivering hotel growth as required by London Plan	Noted.  No proposed change.
464	Table 3.1	Mayor of London	Greater London Authority	On the economy section of the main challenges for Hillingdon it states that the London Plan requirement is to accommodate a proportion of 9-11,000 new jobs in Heathrow Opportunity Area. The Draft Replacement London Plan (2009) states that the employment capacity for Heathrow is 12,000 with 9,000 new homes...the table should reflect the new figures.  It is recognised that detailed policies for Heathrow will be set out in the Heathrow Area DPD and the GLA looks forward to collaborative	Accepted - amend Table 3.1 to include the revised figures of 12,000 new jobs with 9,000 new homes as stated in the draft Replacement London Plan.

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				working with Hillingdon and Hounslow Councils on an Opportunity Area Planning Framework/DPD for the area.	
130	3.5		Gleeson Developments Ltd	Supports policy.	Noted.  No proposed change.
185	3.5	British Airways plc	Lichfield Planning	Change paragraphs 3.5, 3.6 and 3.8 to recognise that land should be reserved for later consideration of Runway Three; there should be more intensive use of the runways; and remove the Council's opposition to supporting greater flight numbers.	The Core Strategy is intended to cover a fifteen year period and the inclusion of the detailed information suggested would risk becoming quickly out of date. The existing wording is considered to state clearly the current position on a third runway, and the Council's position regarding the Airport's future operation.  No proposed change.
205	3.5	Heathrow Airport Ltd		<p>HAL object to the inclusion of paragraphs 3.5 to 3.6 of the Draft Core Strategy regarding "Heathrow Expansion". The Government's policy position on airports needs to be updated. As such, we suggest deletion of paragraphs 3.5 to 3.6 as drafted and replacement with appropriate wording acknowledging the position of the Government not to support a third runway but also the importance of improving existing airports to enhance reliability and passenger experience in line with the Government's objectives of "better not bigger". Given the relevance of this policy to the Government's decision to end the Cranford Agreement, this should also be drawn out in the document. We suggest the replacement of these paragraphs with wording which reflects the following:</p> <p>"Heathrow Airport</p> <p>The scale of the Heathrow Airport operation and the mitigation of its associated environmental impacts are defined by the conditions set out by</p>	The Core Strategy is intended to cover a fifteen year period and the inclusion of the detailed information suggested would risk becoming quickly out of date. The existing wording is considered to state clearly the current position on a third runway, and the Council's position regarding the Airport's future operation.  No proposed change.

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				<p>the Secretaries of State in the decision to permit Terminal 5. In particular, the airport continues to be limited to a maximum of 480,000 Air Traffic Movements (ATMs), 42,000 car parking spaces and the area affected by aircraft noise must not exceed 145 sq km based on the 57 dB(A) Leq 16 hr contour. The growth of the airport within the permitted limits of 480,000ATMs with a potential passenger capacity of some 90 – 95 mppa, and with the runways operating in segregated mode, has therefore already been thoroughly considered, reviewed and appropriate mitigation secured.</p> <p>In January 2009 the Government confirmed its policy support for a third runway at Heathrow. In April 2009 a legal challenge to this decision was submitted by Hillingdon and nine other claimants. In March 2010 the judge ruled that the Secretary of State must reconsider the case for a third runway and the associated evidence base through the process of formulating its future Airport Policy. At the time it was envisaged this would be through an Airports National Policy Statement (NPS). Following the election in May 2010 the new Government announced cancellation of the third runway in their coalition agreement. In that context, BAA have announced that they are not progressing a planning application for a third runway.</p> <p>In the context of constrained airport capacity in the South East and the Government's decision to</p> <p>oppose expansion at Heathrow, Gatwick and Stansted, Transport Secretary Philip Hammond has set up a South East Airports Taskforce. The objectives of the Taskforce are to investigate the options "to make best use of the existing airport</p>	

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				<p>infrastructure” to ensure “improving efficiency and reliability and reducing delay” (source: South East Airports Taskforce, Draft Terms of Reference and Membership, 15 June 2010). Working together with key partners within the aviation community, this group will look at how to secure the successful future of aviation in the South East and Heathrow's hub status within the constraints of the existing runways The first meeting of the Taskforce was held in July 2010 and the findings are due to be reported in July 2011.</p> <p>The Government have also announced that the planned Airports NPS is to instead be progressed in the form of a “sustainable framework for UK aviation”. The Department for Transport (DfT) anticipate scoping this document during 2011, consulting on it in 2012 and adoption in 2013.”</p> <p>It is also relevant to report that, a ministerial statement was issued on 7th September 2010, by The Minister of State for Transport (Theresa Villiers), as follows:</p> <p>‘The previous Government's decisions in 2009 also included a commitment to end the Cranford agreement. This decision was based on the desire to distribute noise more fairly around the airport and extend the benefits of runway alternation to communities under the flight paths during periods of easterly winds. We support that objective and do not intend to re-open the decision. A number of infrastructure and operational changes by BAA and NATS are needed to implement this decision. The airport operator, BAA, is currently developing proposals for ending the Cranford agreement with a view to confirming the necessary works by the end of</p>	

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				<p>this year. I will look to BAA to ensure that proper consideration is given to appropriate mitigation and compensation measures for those likely to be affected by the proposals.”</p> <p>In the context of this, HAL would encourage policy support for the programme of renewal at Heathrow to deliver the objectives of improving passenger experience and improving reliability in line with the stated objectives of the new Government.</p>	
432	3.6	Imperial College NHS Trust		It is not clear in the Strategy how the Council will secure improvements for the local communities.	Through the use of its development control powers the Council will look to achieve the policy objectives in the Core Strategy - e.g. where significant commercial developments are proposed the Council will seek to encourage the provision of necessary community infrastructure provision in accessible local centres (as proposed at policy CI 1). This approach would benefit centres such as the Heathrow Villages. No proposed change.
433	3.7	Imperial College NHS Trust		There is no information given on where the High Speed 2 link to Heathrow will run or where a station will be located.	The precise details of the HS2 scheme have yet to be finalised and it is not possible to include any details on the scheme in the Core Strategy. No proposed change.
227	4	Hillingdon Alliance of Residents Associations		The Vision Statement does not fit with what is happening in the borough. Policies on the Green Belt need to be rigorously adhered to across the borough.	<p>The Vision Statement is not intended to summarise current trends but sets out the overall direction of travel which the Core Strategy is to take for the borough over the Plan period.</p> <p>Policy EM2 explains the Council's commitment to maintain the current extent, hierarchy and strategic functions of the Green Belt in the borough.</p> <p>No proposed change.</p>
255	4	Warren Park Residents		Need to include reference to environmental inequality gaps in the Vision statement.	Primarily through the operation of its environmental policies - e.g. BE 1 and EM 4 - the

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		Association			<p>Council aims to address improving the quality of the built and open environment across the borough as a whole. The first bullet point of the Vision statement also sets out the intention of protecting and enhancing the borough's natural and built environment generally - thereby addressing issues of environmental inequality.</p> <p>No proposed change.</p>
552	4	English Heritage		<p>4 The Vision – where we want to be (pg 18-19)-It is noted that our comments with regards to the Vision identifying the potential of heritage assets to be at the heart of regeneration have not been incorporated into the Pre-submission version of the Core Strategy. This omission is contrary to advice set out in PPS5 (paragraph 7) and the emerging Mayor's Replacement London Plan (policy 7.9 part c – Consolidated Draft Replacement London Plan December 2010)</p>	<p>The Vision statement does give prominence to the importance of heritage assets (at the first bullet point) and taking full advantage of these as part of the borough's distinctive strengths. The fourth bullet point in the Vision statement covers future economic growth and notes the ambition with respect to heritage assets that by 2026 "Hillingdon has maximised the potential of its heritage assets...". In particular this section notes the intention to make best use of the Grand Union Canal for regeneration in the Hayes - West Drayton corridor. No proposed change.</p>
385	4	Royal Brompton & Harefield NHS Trust	CGMS Consulting	<p>The Trust would like to see the inclusion of a new strategic vision to support existing social infrastructure providers (including acute trusts that provide hospital care and medical research and development) within the borough that meet both a local, national and international health</p>	<p>The Council considers that the fifth bullet point of the Vision statement in the Core Strategy already effectively meets this proposal by seeking to ensure improved accessibility to local facilities (which would include social infrastructure) in order to improve the quality of life for local residents.</p> <p>No proposed change.</p>
531	4	Arla Foods UK Plc	BNP Paribas Real Estate	<p>Support the Vision Statement.</p>	<p>Noted.</p> <p>No proposed change.</p>
428	4	Individual		<p>Overall the DPD is a document that gains general support and has a vision but I feel that the vision lacks description and therefore cannot be as effective as it should be. Use of the words "the Council will" is too frequent - it has not always been able to achieve its aims.</p>	<p>Noted - the Core Strategy is intended to cover a period of 15 years and it would be difficult to predict exactly how the Vision will take shape over that length of time. The Strategy does make commitments where it can to particular objectives, e.g. the amount of housing to be delivered, and</p>

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					does commit the Council to monitoring and keeping under review progress towards meeting those objectives. No proposed change.
462	4	Mayor of London	Greater London Authority	Hillingdon Council be advised that the Submission Document is not in general conformity with the London Plan with regard to the strategic issues relating to waste sites and apportionment figure and Crossrail contributions.	The Council addresses this comment by the Mayor at its responses to his representations at 465 and 466.
463	4	Mayor of London	Greater London Authority	The core strategy sets a framework for concentrating economic growth in Uxbridge, Heathrow and the Hayes/ West Drayton Corridor, without ignoring local centres. This vision is pragmatic and is supported.	Noted.  No proposed change.
26	4.1	British Waterways		<p>The borough's waterways are a distinct asset to its character, and should be mentioned in the vision - we suggest that the first point be slightly amended to read:</p> <ul style="list-style-type: none"> <li>•Hillingdon is taking full advantage of its distinctive strengths with regard to its places, communities and heritage: The special character of the borough's natural and built assets have been protected and enhanced, fewer heritage assets and wildlife habitats are at risk, there are more locally-distinct buildings, and new higher standards of development, integrating renewable energy technology. More residents are enjoying the borough's waterways and quality public open spaces, particularly in Harefield and south of the A40.</li> </ul>	<p>Accepted - the borough's waterways are a significant local resource, adding to its character.</p> <p>Final sentence of first bullet point of the Vision statement to be amended as proposed to read: "More residents are enjoying the borough's waterways and quality public open spaces, particularly in Harefield and south of the A40."</p>
27	4.1	British Waterways		<p>As above, this point could include reference to the valuable network of waterways in the borough, which are being more widely recognised for their value in improving health and well-being. We would suggest the following amendment:</p> <ul style="list-style-type: none"> <li>•Improved environment and infrastructure is</li> </ul>	<p>The more general nature of this part of the Vision statement does not need additional emphasis to waterways - which are covered under the general description of physical infrastructure.</p> <p>No proposed change.</p>

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				<p>supporting healthier living and helping the borough to mitigate and adapt to climate change: Areas lacking the social, physical and green infrastructure required to support healthy lifestyles have been identified and measures are well under way to address these, including improving and better utilising the borough's network of waterways. Improved building design and less reliance on cars has helped the borough to reduce its carbon footprint.</p> <p>Generation of energy from renewable sources is common practice and older housing stock is also benefiting from climate change initiatives. Town and neighbourhood centres are the focus for community activities and have a diverse range of uses including health clinics, cultural activities, local and business services, as well as retail and office uses.</p>	
178	4.1	Universities Superannuation Scheme Ltd	Drivers Jonas Deloitte	General Approach to Employment- USS continues to support the Council's vision to concentrate economic growth in Uxbridge, Heathrow and the Hayes/West Drayton Corridor, without ignoring local centres.	Noted.  No proposed change.
306	4.1	PRUPIM	CB Richard Ellis on behalf of PRUPIM	The bullet point on economic growth should give greater recognition to Heathrow's significant role and contribution to the local and national economy.	The Core Strategy already contains references elsewhere to the importance of Heathrow Airport to the local economy as a key employment area - e.g. see paragraph 4.10 or Table 5.3 - and the final bullet point of the Vision statement adequately refers to the economic benefits of the Airport to the borough.  No proposed change.
434	4.1	Imperial College NHS Trust		Para. 4.1, will the economical benefit from Heathrow Airport be harmonised and prosper Heathrow Villages and the surrounding areas?	When development proposals come forward at the Airport the general policies in the Core Strategy aimed at encouraging the provision of community infrastructure (e.g. CI 1 at sub-section 6) should assist communities such as the Heathrow Villages to benefit.



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					No proposed change.
96	Strategic Objectives to deliver The Vision	Northwood Residents Association		Strategic Objective SO14 (page32) states that all new jobs are to be developed in the south of the Borough. Again the north is totally neglected. Thus, even more residents from the north will have to commute to the south to work therefore creating more congestion. This is one reason why SMSs should be encouraged to set up in the north.	Strategic Objective 14 addresses the need for economic growth to be steered towards the more deprived, southern parts of the borough - but it does not preclude growth also taking place in the northern half, e.g. on the Locally Significant Industrial Sites identified in Map 5.1 or in local town centres - the strategy for these is summarised at Map 5.3. No proposed change.
116	Strategic Objectives to deliver The Vision	Environment Agency		We support SO3, SO8 and SO10 because they will help deliver the environmental objectives that we want to see in the London Borough of Hillingdon.	Noted.  No proposed change.
139	Strategic Objectives to deliver The Vision	Hillingdon Inter Faith Network		<p>The strategic objective includes the release of land for 'other uses' and this is specifically mentioned in section 5.10 where it is acknowledged that there is currently more employment land than is needed.</p> <p>In the last year alone, HIFN has been supporting a number of faith communities who have been searching for land and premises for community use. In dealing with policies on surplus land, there would appear to be an opportunity to meet other community needs.</p>	<p>Strategic Objective 6 already commits the Council to promoting social inclusion through the provision of equality of access to social, cultural and other facilities. It is not necessary to amend SO15 as suggested. This would put an undue emphasis on community uses alone where land is considered surplus to employment needs, rather than seeking to address a range of other land use needs in the borough such as housing, education or leisure uses.</p> <p>No proposed change.</p>
142	Strategic Objectives to deliver The Vision	Hillingdon Inter Faith Network		New development must try to overlook green space wherever possible. SO7 & SO19 should cross refer to EM4.	<p>The implementation section of policy H1 following paragraph 6.24 already covers this point. It promotes high quality design - outlook from residential properties being one aspect which the Council would consider - e.g. encouraging views towards local green space where possible.</p> <p>No proposed change.</p>
147	Strategic Objectives to deliver The Vision	Hillingdon Inter Faith Network		S06 should additionally specify that surplus employment land should be used for community infrastructure provision.	No further change is considered necessary here as the social and community facilities referred to already includes community infrastructure

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					<p>provision - and justifies its provision later in the Core Strategy in the preamble to Policy CI 1.</p> <p>No proposed change.</p>
155	Strategic Objectives to deliver The Vision	Individual		Suggested Text for Strategic Objectives SO1 "Related Policy: HE1."	<p>Strategic Objective SO1 is equally relevant to both policies. It is not simply aimed at conserving and enhancing the existing built heritage in the borough but also, in combination with other Strategic Objectives in the Core Strategy, encourages high quality design appropriate to the wider area.</p> <p>No proposed change.</p>
160	Strategic Objectives to deliver The Vision	Individual		Suggested Text for Strategic Objectives SO1 "Related Policy: HE1."	<p>Strategic Objective SO1 is equally relevant to both policies. It is not simply aimed at conserving and enhancing the existing built heritage in the borough but also, in combination with other Strategic Objectives in the Core Strategy, encourages high quality design appropriate to the wider area.</p> <p>No proposed change.</p>
192	Strategic Objectives to deliver The Vision	British Airways plc	Lichfield Planning	<p>SO23, SO24, SO25</p> <p>1. Inconsistency between the Council's appreciation of the important contribution that Heathrow Airport makes to the local economy, and the Council's intentions of curtailing the growth of Heathrow's capacity: without growth the airport's economic activity is bound to decline with dire impacts on the welfare of the local population.</p> <p>2. To ensure feasibility of the Heathrow Opportunity Area, British Airways should be party to its planning.</p> <p>The continued economic and employment</p>	<p>The Council's overall approach to the future development of the Airport is set out at Table 5.3 and the importance of the Airport to the borough's economy is recognised in the Core Strategy.</p> <p>The Council is also committed to preparing a future Heathrow Opportunity Area Development Plan Document - at policy E3. As a major commercial operator at the Airport, British Airways would be consulted and involved in the preparation of that Document.</p> <p>The Council does not consider it reasonable to expect that during the Plan period it would have to reserve land originally identified as required for the Runway 3 proposal - including its apron and</p>

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				<p>growth of the entire Heathrow Opportunity Area, together with wider economic and social benefits, are dependent on the competitiveness and economic viability of Heathrow Airport. This dependency ought to be recognised in the Strategic Objectives.</p> <p>In this context, British Airways attach cardinal importance to keeping open the options for increased capacity of Heathrow airport, to enable economic and social objectives of the Core Strategy to be realised.</p> <p>Although the R3 scheme has been rejected by the current Government, governments and policies change from time to time and the importance of Heathrow's growth is likely to be recognised in future.</p> <p>To keep the options open, the land which would have served that airport expansion should not be put to uses that would conflict with its future aviation uses. This principle should relate to the entire R3, its apron and services north of the Bath road, as well as to land that would be within the flight safety zone and noise contours.</p> <p>In terms of SO 24, 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. This should be reflected in the Strategic Objectives.</p>	<p>services north of the Bath Road, and land that would be within the flight safety zone and noise contours - to uses which would not conflict with its future use for aviation.</p> <p>No proposed change.</p>
267	Strategic Objectives to deliver The Vision	Cathedral Group	Nathaniel Lichfield & Partners	Reference to a specific Housing Need Study can be removed - as it is likely to be superseded during the Plan period.	Accepted - reference to the Housing Needs Study to be removed as this may become out of date during the Plan period. The primary policy framework for affordable housing provision is likely to remain being set by national (PPS3) and regional (London Plan) policy.

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312	Strategic Objectives to deliver The Vision	PRUPIM	CB Richard Ellis on behalf of PRUPIM	We support the strategic objective to provide new jobs and economic growth in the Heathrow Opportunity Area.	Noted.  No proposed change.
291	Strategic Objectives to deliver The Vision	Garden City Estate Residents' Association		SO23:  The policy needs to clarify it aims to improve air quality - and should read: "...reductions in noise and poor air quality."	The Core Strategy already includes Strategic Objectives 10 and 11 together with policy EM8 which aim to address the issue of the need for improved air quality in the borough.  No proposed change.
297	Strategic Objectives to deliver The Vision	Garden City Estate Residents' Association		SO6 and SO9  Both strategic objectives need strengthening as they have been unable to prevent the loss of the Yiewsley Swimming Pool from an area identified as suffering from social deprivation.	The individual case here is not a Core Strategy matter but the Council would note that the Strategy does contain at policy EM4 a commitment to safeguard, enhance and extend the network of open spaces, informal recreational and environmental opportunities that meet local community needs and facilitate active lifestyles and at policy EM5 a commitment to provide and promote sport and leisure facilities to meet the needs of the local population.  No proposed change.
300	Strategic Objectives to deliver The Vision	Garden City Estate Residents' Association		SO23, SO24 and SO25  The Heathrow Opportunity Area boundaries should be included in the Core Strategy with explanations of what this means for the area - this is a material omission for residents and others seeking explanations of what is proposed.	The Heathrow Opportunity Area designation will be a matter for the Mayor of London as this is a London Plan proposal which has yet to come forward.  No proposed change.
380	Strategic Objectives to deliver The Vision	Planning Perspectives LLP		Strategic policy SO18 seeks to improve access to "local services and facilities, including health, education, employment and training, local shopping, community, cultural, sport and leisure facilities especially for those without a car and for those in remote parts of the Borough". This policy is welcomed but should be integrated with wider strategic policies relating to Housing, Green Belt and access to Green Belt and Green Chains.	Taken together the Strategic Objectives set out in the Core Strategy do cover the issues of access to housing (SO7, SO19) Green Belt and Green Chain access (SO3, SO9) - and these in turn support the relevant policies regarding housing provision (H1, H2) or Green Belt and Green Chains (EM2).  No proposed change.

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384	Strategic Objectives to deliver The Vision	Planning Perspectives LLP		This policy is welcomed as it is considered that there are isolated residential communities in the Borough such as Charville, who have clearly obvious deficiencies in terms of access to local services and facilities. It is important that there are coherent strategies promoted to ensure that the accessibility of such communities is enhanced.	Noted - Strategic Objective 6 and policy CI 1 in the Core Strategy address the need to promote social inclusion through equality of access to social, cultural recreational and other facilities.  No proposed change.
431	Strategic Objectives to deliver The Vision	Imperial College NHS Trust		The Strategy refers to the prosperity which Heathrow Airport brings but does not address the blight caused by BAA ownership of properties in the Heathrow villages. Further growth at the Airport will adversely affect the villages - e.g. with road congestion.	The Core Strategy encourages sustainable operation and growth at Heathrow Airport (policy T4) and makes clear that in implementing this policy it will look to encourage sustainable transport solutions there - e.g. to prevent road congestion stemming from additional development. It is beyond the remit of the Core Strategy to prevent housing acquisitions by individual organisations.  No proposed change.
473	Strategic Objectives to deliver The Vision	Mayor of London	Greater London Authority	The GLA particularly supports the following objectives SO1, SO2, SO3, SO4, SO6, SO8 and SO11.	Noted.  No proposed change.
477	Strategic Objectives to deliver The Vision	Mayor of London	Greater London Authority	SO12-TfL supports the Borough's objective to promote sustainable modes of transport (i.e. walking and cycling) and reduce car dependence. However it is considered that this would only achieve limited success without implementing demand management measures such as parking restrictions; e.g. limited car parking provision for new residential and business developments where public transport accessibility is good in order to restrain car ownership growth and car based trips.	Noted - comment to be used to inform drafting of the later Development Management Development Plan Document which will consider local parking standards.  No proposed change.
478	Strategic Objectives to deliver The Vision	Mayor of London	Greater London Authority	SO21-TfL acknowledges 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	The need for improved north-south links is supported by residents' surveys. The Council believes that north-south public transport links are currently slow and need to be improved to support planned growth in the south of the borough.

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				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."	Improving these links is a key objective for the Council.  No proposed change.
513	Strategic Objectives to deliver The Vision	L B Hillingdon (Labour Group)		SO6 & SO9:  Yiewsley and West Drayton are identified as areas of need yet the Yiewsley Swimming Pool has been closed and is to be disposed of contrary to these objectives - if they are not strong enough to prevent the loss of this local facility in an area of deprivation then they need strengthening.	The individual case here is not a Core Strategy matter but the Council would note that the Strategy does contain at policy EM4 a commitment to safeguard, enhance and extend the network of open spaces, informal recreational and environmental opportunities that meet local community needs and facilitate active lifestyles and at policy EM5 a commitment to provide and promote sport and leisure facilities to meet the needs of the local population.  No proposed change.
518	Strategic Objectives to deliver The Vision	L B Hillingdon (Labour Group)		SO23  The wording needs changing here from "...reductions in noise & air quality." to "...reductions in noise & poor air quality..." to make clear the objective is to improve poor air quality.	Accepted - existing wording is unclear - add qualifying word "poor" in SO23 to read: "...reductions in noise & poor air quality..."
520	Strategic Objectives to deliver The Vision	L B Hillingdon (Labour Group)		SO23, SO24 and SO25 - The Heathrow Opportunity Area should not include:-  (i) The Heathrow Villages area between the M4 and A4.  (ii) The whole of West Drayton, the majority of Yiewsley and large parts of southern Hayes.  It is worthwhile noting that one reason the Tavistock Road Coal Yard site in West Drayton was included in the West London Waste Plan proposals is that it was in the Heathrow Opportunity Area.	Designation of the Heathrow Opportunity Area will be a matter for the Mayor of London as this policy proposal relates to the London Plan. The Council will be able to make representations to the Mayor as to the nature and extent of the designation in Hillingdon when the proposed designation comes forward - which is expected to happen during the plan period covered by the Core Strategy. Strategic Objectives 23-25 state the Council's objectives of securing economic, environmental, social and other benefits for the local area stemming from presence of Heathrow Airport as development comes forward there and in the immediate area during the plan period.

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					<p>The Tavistock Road site was not included in the West London Waste Plan proposals because it was in the Heathrow Opportunity Area.</p> <p>No proposed change.</p>
522	Strategic Objectives to deliver The Vision	L B Hillingdon (Labour Group)		Should include reference to those unable to walk or cycle any distance - add words to SO12: "...whilst making adequate provision for elderly or disabled people who are unable to walk or cycle any distance."	Accessibility to homes, social & community facilities, leisure & recreation opportunities and other land uses is a general theme already running through the Core Strategy and it is not considered necessary to amend the Strategy further as suggested as other Strategic Objectives (e.g. SO2, SO3 or SO9) all stress the need for accessibility to be a key consideration in creating better neighbourhoods, accessing open space or the range of local recreation, health and leisure facilities. No proposed change.
526	Strategic Objectives to deliver The Vision	L B Hillingdon (Labour Group)		<p>SO23, SO24, SO25 and Table 5.3:</p> <p>The Plan should show the boundaries of the Heathrow Opportunity Area with an explanation of what it means to help residents and others understand the implications for the area.</p>	<p>Designation of the Heathrow Opportunity Area will be a matter for the Mayor of London as this policy proposal relates to the London Plan. The Council will be able to make representations to the Mayor as to the nature and extent of the designation in Hillingdon when the proposed designation comes forward - which is expected to happen during the plan period covered by the Core Strategy. Strategic Objectives 23-25 state the Council's objectives of securing economic, environmental, social and other benefits for the local area stemming from presence of Heathrow Airport as development comes forward there and in the immediate area during the plan period.</p> <p>No proposed change.</p>
179	4.2	Universities Superannuation Scheme Ltd	Drivers Jonas Deloitte	USS continues to support strategic objectives 14 and 15 which seek to provide 9,000 new jobs and accommodate most economic growth in Uxbridge / the Heathrow Opportunity Area and protect land for employment uses to meet the	<p>Noted.</p> <p>No proposed change.</p>

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				needs of different sectors of the economy.	
307	4.2	PRUPIM	CB Richard Ellis on behalf of PRUPIM	This policy should be redrafted as follows "SO15: Manage the supply of land for employment uses, as appropriate, to meet the needs of different sectors of the economy in accordance with PPS4".	The Strategic Objectives and policies in the Core Strategy covering employment land have to be read in the context of the wider national planning framework set by PPS 4 and regional framework set out in the London Plan. Consequently there is no need to specifically refer to PPS 4 as proposed here.  No proposed change.
308	4.2	PRUPIM	CB Richard Ellis on behalf of PRUPIM	We acknowledge and support the broad principle of these strategic objectives. We agree that opportunities to optimise local employment opportunities in the Heathrow area should be pursued by the Borough. For example, we consider that opportunities to improve access to employment in town centre, service and leisure uses, alongside traditional B class uses should be pursued by the Council.	Noted.  No proposed change.
288	4.2	Garden City Estate Residents' Association		Add another Strategic Objective "Develop a plan for movement of heavy goods vehicles and uses generating heavy goods vehicles and uses generating heavy goods vehicles traffic for the borough so that town and local centres as well as residential areas are protected and can grow in a sustainable way."	This Core Strategy will not be able to set out a strategy for heavy goods vehicle movements in the way suggested. That would properly fall within the remit of a transport strategy for the borough in conjunction with the Local Implementation Plan.  No proposed change.
292	4.2	Garden City Estate Residents' Association		Does not refer to neighbourhood plans - another Strategic Objective should be added to state: "Develop neighbourhood plans in conjunction with residents where these are requested."	Until the Localism Bill is enacted it is not certain that a system of neighbourhood plans will be introduced. It would be premature for the Core Strategy to include an undertaking to develop these plans in conjunction with local residents.  No proposed change.
354	4.2	Hayes Town Partnership		There is insufficient recognition of Hillingdon's diverse communities. Hayes Town is already richly diverse and this brings many benefits and also some challenges. Similar factors affect	There is a general theme running through the Core Strategy recognising the diversity of the borough's population and the need to capitalise on this. This comes through in the first part of the



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				<p>other parts of the south of the Borough and in the period up to 2026 this diversity is likely to become even more widely spread. A comprehensive vision therefore needs to recognise the importance of diversity and the need for appropriate action to maximise its benefits. There is also a need to acknowledge that the Borough still has a fairly clear north-south divide that has to be addressed.</p>	<p>Vision statement which sets the aim for the borough to take full advantage of its distinctive strengths - including those of its various communities. The importance of helping those communities then follows through in the Strategy's policies, e.g. by seeking to ensure the vitality and viability of local town centres at policy E5, which act as a focus for various communities, or by aiming to encourage community infrastructure provision at policy CI 1, to meet the needs of the diverse range of communities now present in the borough population.</p> <p>No proposed change.</p>
516	4.2	L B Hillingdon (Labour Group)		<p>Add another Strategic Objective to "Develop a plan for movement of Heavy Goods Vehicles and uses generating Heavy Goods Vehicle traffic for the borough so that town &amp; local centres as well as residential areas are protected and can grow in a sustainable way."</p>	<p>Developing a plan for Heavy Goods Vehicle movements across the borough falls outside the scope of the Core Strategy - this comment will be passed to the relevant department of the Council dealing with road use.</p> <p>The Core Strategy does have a Strategic Objective 11 which looks to minimise air pollution and carbon emissions from new development and transport. Policy EM8 sets out how the Council will seek to safeguard and improve air quality and noise levels across the borough. Part of the implementation of this policy will involve implementing the borough Transport Strategy to ensure reductions in emissions from transport in the borough.</p> <p>No proposed change.</p>
523	4.2	L B Hillingdon (Labour Group)		<p>Does not include neighbourhood plan provision - add another strategic objective: "Develop neighbourhood plans in conjunction with residents where these are requested."</p>	<p>The proposals for Neighbourhood Plans in the Localism Bill have yet to be enacted. It would be premature for the Core Strategy to make a commitment of this kind in advance of the legislation. The Strategy already contains two "place shaping" strategic objectives: SO1 &amp; SO2, which together would support the making of</p>

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					neighbourhood plans.  No proposed change.
546		English Heritage		<p>LATE SUBMISSION</p> <p>We would advise that providing a sound evidence base, including a thorough understanding of the historic environment and local character will help ensure that Core Strategy policies are locally specific and reflect more fully the issues and aspirations of the Borough. This includes how locations identified for growth (as set out in The Spatial Strategy) will be delivered without causing irreversible damage to the environmental characteristics of the area (PPS1 para 19). At present there appears to be a lack of clarity on how and why these locations were identified, and their capacity to accommodate change. If the Borough has already produced such work, this should be made public and listed within the Core Strategy itself and /or linked to the evidence base so that it can be scrutinised.</p>	<p>The Core Strategy sets out the broad spatial approach which the Council intends taking over the next 15 years. It will be for other more detailed parts of the Local Development Framework - e.g. the Site Allocations, Development Management and Heathrow Area Development Plan Documents to bring forward detailed development proposals which will help meet the borough's overall development objectives. No proposed change.</p>
286		Garden City Estate Residents' Association		<p>Add reference at SO12 to those unable to walk or cycle any distance with this wording: "...whilst making adequate provision for the elderly or disabled people who are unable to walk or cycle any distance."</p>	<p>Improved accessibility for the elderly, disabled and others is a key theme running through the Core Strategy - e.g. the fifth bullet point of the Vision statement carries a general commitment to improved accessibility, the aim to create safe, functional and accessible neighbourhoods is set out at Strategic Objective 2 and policy BE1 aims to provide more homes and places which will be accessible for the elderly and disabled. Consequently it is not considered necessary to amend SO12 specifically for this purpose.</p> <p>The Council would note that it intends producing a Development Management Development Plan Document which will cover detailed planning standards for accessible buildings.</p>

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					No proposed change.
293		Garden City Estate Residents' Association		The Heathrow Opportunity Area designation should not cover: the Heathrow Villages area which is predominantly Green Belt; the large residential areas in West Drayton, Yiewsley and Hayes - it should only cover existing industrial or commercial areas.	The Heathrow Opportunity Area designation will be a matter for the Mayor of London as this is a London Plan proposal which has yet to come forward.  No proposed change.
115	Table 4.1	Buccluech Property	Drivers Jonas Deloitte	The Replacement London Plan 2009, identifies that through the LDF process, the Council should look to provide a target of 620 new units per annum. The current target provides a maximum of 425 units per annum.	The borough's housing target in the draft Replacement London Plan has been amended following discussions at the Examination in Public to 425 units per annum and this is the figure now included in the Core Strategy.  No proposed change.
29	4.8	British Waterways		Uxbridge benefits from the presence of the Grand Union Canal that runs through it and connects it to other centres, offering a sustainable transport link for pedestrians and cyclists and an amenity resource for employees working in the area. We would therefore suggest that the canal and its towpath be mentioned here.	Paragraph 9.25 already includes a general intention on the part of the Council to seek to encourage the use of the Grand Union Canal for better pedestrian and cycle links across the borough. It is not considered necessary to also amend paragraph 4.8 to highlight doing this specifically in Uxbridge.  No proposed change.
186	4.10	British Airways plc	Lichfield Planning	There is inconsistency between the Council's appreciation of the important contribution that Heathrow Airport makes to the local economy, and the Council's intentions of curtailing the growth of Heathrow's capacity: without growth the airport's economic activity is bound to decline with dire impacts on the welfare of the local population.	There is no inconsistency in the Core Strategy's approach to Heathrow Airport - e.g. its importance is highlighted at Table 5.3 and the Council again re-iterates its broad support for delivering a renewal programme at the Airport. Equally, the Council has a responsibility to consider the environmental and amenity implications of any major future development in its area and it has to set out its intention to do this with respect to Heathrow Airport - the major commercial development in its area.  No proposed change.

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206	4.10	Heathrow Airport Ltd		<p>HAL object to the Council's proposed policies on airport related development. Whilst acknowledging that the majority of development on airport shall be directly airport related, HAL consider there is a strong case for hotels on airport, particularly where they are well served by public transport. On that basis, there may be plans in the longer term for hotels in sustainable locations such as the Central Terminal Area and at Hatton Cross. Allowing hotels on the airport (in appropriate locations) allows for an improved passenger experience, provides equivalent levels of service at all terminals and reduces the need for additional journeys by road from hotels to terminals due to the proximity of railway stations, or within walking distance to terminals HAL find that the Council's policy on hotel provision confusing and this creates uncertainty.</p> <p>These comments are consistent across para 4.10, policy E2, the section on "future growth" on page 38 and Policy E3. It is also noted that the wording of paragraph 4.10 states that "the continuing demand for freight handling and commercial floor space within the airport boundary will only be met as long as environmental conditions are improved and maintained." The findings of the Inspector and Secretaries of State in respect of Terminal 5 require HAL to safeguard land for airport uses. This is to be reported on a 5 yearly basis (Condition A77 of the T5 permission), to demonstrate how airport related uses can be accommodated as passenger throughput increases. Environmental issues, such as local air quality, are not specific to airport related development. These apply to all developments in the Borough and therefore it is not considered appropriate that this additional "test" is applied in respect of airport related development. It is</p>	<p>As it stands paragraph 4.10 permits the development of associated freight handling and commercial development within the airport boundary. This would appear to meet with Heathrow Airport Ltd.'s requirements and it is reasonable for the Council to specify that existing environmental conditions should not be adversely affected by that development.</p> <p>No proposed change.</p>

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				<p>considered the Council's policy in respect of Air Quality is set out adequately in Policy EM8. HAL propose relevant wording in our comments on Policy E2 and text at para 4.10 should be amended accordingly to acknowledge the potential for hotel uses on airport, which although not defined as "airport related development" often form an important part of many passengers' overall journey from origin to destination. In respect of other airport related development, Condition A77 of the Terminal 5 permission requires HAL to review on a 5 year basis the potential to accommodate airport related uses on airport. The 2008 ARD report (submitted April 2009) demonstrates that there is more than adequate land (a surplus of 12.6 hectares) to accommodate airport related development at Heathrow up to a 90 mppa scenario. Therefore, it is important for HAL to continue to make provision for airport related uses on airport and to safeguard land in the longer term for this purpose, to satisfy the requirements of the Secretaries of State set out in the decision on Terminal 5 and as supported by other local planning authorities adjoining Heathrow.</p> <p>It is acknowledged that there is a need to take into account the environmental impacts of new development (e.g. air quality) but this is not an airport specific issue. As demonstrated elsewhere, contributors to air quality are not only located on airport and there are significant contributors in perimeter areas and beyond the immediate environs of the airport. As such, the general policies on this issue are relevant.</p> <p>We would suggest changing the wording of paragraph 4.10 as follows: "the continuing demand for freight handling, commercial floor</p>	

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				space and other airport related development within the airport boundary will be provided for.”	
207	4.12	Heathrow Airport Ltd		<p>HAL feel that clarification should be provided within the Core Strategy regarding the area defined as the Heathrow Opportunity Area. Given Heathrow’s important contribution we would envisage the entire airport boundary is included. In which case the proposed 700 ha boundary would be significantly larger with Heathrow Airport covering an area of circa 1,200 hectares. The text on page 40 refers to the Heathrow Opportunity Area being illustrated on Map 5.1. It is not considered that Map 5.1 is effective in defining the coverage of the Heathrow Opportunity Area.</p> <p>HAL feel that clarification should be provided within Core Strategy regarding the area defined as the Heathrow Opportunity Area. Given Heathrow’s important contribution we would envisage the entire airport boundary is included. In which case the proposed 700 ha boundary would be significantly larger with Heathrow covering an area of circa 1,200 hectares.</p>	<p>The Heathrow Opportunity Area will be defined by the Mayor of London as it is a proposal in the London Plan. It cannot be defined in the Core Strategy as the Mayor has yet to come forward with initial proposals for the Opportunity Area, including details of its extent.</p> <p>No proposed change.</p>
208	4.14	Heathrow Airport Ltd		<p>The figures quoted at para 4.14 should be updated. Furthermore, it is unclear why the Council have assumed that in 2012 there will be a rise in the number of larger aircraft. Passenger throughput for 2010 stands at 67 million passengers. The Draft Core Strategy refers to passenger numbers reaching 85 mppa by 2015. The decline in air traffic as a result of the economic recession means passenger numbers have not increased in line with previous forecasts. Our 2010 Capital Investment Plan illustrates that passenger numbers for 2015 are more likely to be in the range of 75-77mppa. Furthermore, it is unclear why the Council have assumed that in 2012 there will be a rise in the</p>	<p>Accepted - Paragraph 4.14 to be amended to refer to 75-77 mppa by 2015.</p> <p>Noted that there is some likely increase in the number of larger aircraft using the airport by 2012.</p>

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				number of larger aircraft. BAA would be happy to share the proposed fleet mix if desirable and are doing so through work on the ending of the Cranford Agreement. There is not indication that there will be a substantive increase in the use of larger aircraft in 2012. In line with our comments on paragraphs 3.5-3.6, this paragraph should articulate the parameters defined by the Terminal 5 planning permission and the recognised capacity of Heathrow. These are not repeated in the interests of brevity, either at paragraph 3.5-3.6 or in paragraph 4.14.	
209	4.15	Heathrow Airport Ltd		HAL feel that at least an indication of the boundary of the HOA should be given in the Core Strategy. The document identifies numerous site specific issues (e.g. designations) which are difficult to identify at the scale proposed and would be better left to the Proposals Map. It does however omit the boundary of the Heathrow Opportunity Area which would provide a good guide to the area covered by the future DPD and would be sufficiently "strategic" to minimise site specific issues. The text on page 40 refers to the Heathrow Opportunity Area being illustrated on Map 5.1. It is not considered that Map 5.1 is effective in defining the coverage of the Heathrow Opportunity Area. HAL consider that the boundary for the Heathrow Opportunity Area should be defined on the either Map 4.1 (Key Diagram) or Map 5.1 (Locations for Employment Growth).	The Heathrow Opportunity Area will be defined by the Mayor of London as it is a proposal in the London Plan. It cannot be defined in the Core Strategy as the Mayor has yet to come forward with initial proposals for the Opportunity Area, including details of its extent.  No proposed change.
196	4.19	The Ballymore Group		Support statement that land at Blyth Road Hayes will be partially released for mixed-use development.	Noted.  No proposed change.
28	4.21	British Waterways		We support the introduction of this statement, and would only suggest a small amendment to highlight the full potential of the GUC:	Policy EM3 and paragraph 8.33 already emphasise the potential of the borough's canals and rivers for leisure and other uses. It is not

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				<p>"The Grand Union Canal will be a key open space, blue/ green corridor and sustainable transport link, with improved public access, strong biodiversity habitats, and increased opportunities for recreation and leisure activities, on and along the water."</p>	<p>considered necessary to amend paragraph 4.21 in addition.</p> <p>No proposed change.</p>
95	4.31	Northwood Residents Association		<p>Para 4.3.1 (page 25) states that strategies will be developed to ensure that local centres etc will respond to changes in shopping patterns. Table 5.5 (page 49) gives details of estimated extra square meterage required. The Council assumes that its policies will be successful and it does not state where the land/premises will come from to provide the extra retail space. The current Council policy of introducing higher parking charges for non-residents is driving people away from centres such as Northwood which is contrary to the declared strategy. Furthermore there is no strategy to encourage SME's to set up north of the A40 as policy E6 (page 51) indicates that all the land is found south of the A40. A strategy needs to be developed for the northern centres if they are to be vitalised.</p>	<p>The Core Strategy does not set out detailed strategies for individual centres but rather a broad strategy approach across the borough. As other parts of the Local Development Framework come forward, these can be expected to identify land potentially available locally for retail (and other) land uses - e.g. in a Site Allocations Development Plan Document.</p> <p>Policy E6 does make clear that the Council will look to encourage the development of accommodation for small and medium-sized businesses across the borough - not simply on sites south of the A 40.</p> <p>The Council does carry out annual land use surveys in its town centres and will keep their retail status under review. It may bring forward specific local area strategies as appropriate in future if survey information indicates these may be required.</p>
30	Map 4.1	British Waterways		<p>We are pleased to note the reference to the Grand Union Canal on the Key Diagram.</p>	<p>Noted.</p> <p>No proposed change.</p>
194	Map 4.1	British Airways plc	Lichfield Planning	<p>Map 4.1 Key Diagram is inaccurate. The site of the existing T5 and its satellites is shown as "retained greenbelt".</p> <p>BA suggest that the diagram should also show the boundary of land that was reserved for the R3 and its apron, as well as the areas that would</p>	<p>The Council intends reviewing all Green Belt designations in a Site Allocations Development Plan Document to be produced following preparation of the Core Strategy. Individual alterations to the Green Belt will not require alterations to the Key Diagram - which is purely illustrative and intended to summarise the broad</p>



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				<p>be affected its safety and noise shadow, which should be reserved in case government policy regarding airport expansion changes in future years.</p>	<p>spatial planning approach being taken in the Core Strategy.</p> <p>The request to show the original Runway 3 proposals on the Key Diagram would not serve any useful purpose in terms of explaining the Core Strategy. Future proposals for the Airport's development could be dealt with in a future Heathrow Opportunity Area Development Plan Document.</p> <p>No proposed change.</p>
210	Map 4.1	Heathrow Airport Ltd		<p>The Green Belt designation affecting T5 should be removed or adjusted to reflect the current development. There are two options to resolve this, as follows:</p> <ul style="list-style-type: none"> <li>• Amend the Key Diagram so it is more strategic in nature (rather than making site specific designations). This would include removal of Green Belt from the plan for definition in the Proposals Map at a later date and avoid this providing conflicting information.</li> <li>• Amending the boundary of the Green Belt so that land at Terminal 5 and Longford Meadows is removed;</li> </ul>	<p>The Key Diagram is purely illustrative, summarising the broad policy approach being taken by the Core Strategy. It is not a detailed development control document. The Council will prepare a subsequent Site Allocations Development Plan Document which will examine all local Green Belt designations and come forward with proposals for changes where these are considered necessary. It is not proposing to consider Green Belt alterations in the Core Strategy for that reason.</p> <p>No proposed change.</p>
386	Map 4.1	Royal Brompton & Harefield NHS Trust	CGMS Consulting	<p>The Trust requests the identification of Harefield Hospital on the Key Diagram as a major developed site in the Green Belt.</p>	<p>The Key Diagram is intended to show the broad policy themes included in the Core Strategy. It is purely illustrative and not a detailed land use plan. That purpose will be served by the Proposals Map Development Plan Document which is to be brought forward at a later stage. It will set out detailed land use proposals in the Local Development Framework and reflect the outcome of work on other Development Plan Documents - notably the Site Allocations and Development Management Development Plan Documents.</p>

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					No proposed change.
418	Map 4.1	PRUPIM	Maddox & Associates on behalf of PRUPIM	It is proposed that the Bath Road Employment Area highlighted on Map 4.1: Key Diagram is removed. If necessary, the designated areas of Locally Significant Employment Areas should be highlighted on this plan ensuring that the Core Strategy is consistent.	<p>The Bath Road Employment Area does cover a broad area on the northern perimeter of Heathrow Airport and as such is shown as a significant proposal affecting that part of the borough. The Key Diagram is purely illustrative and only covers broad policy themes. The designated Locally Significant Employment Areas are already shown elsewhere in the Strategy - at Map 5.1 (Locations for Employment Growth) and do not need to be repeated on the Key Diagram. Their detailed designations will be shown on the later Proposals Map and in the Site Allocations Development Plan Documents.</p> <p>No proposed change.</p>
177	5	Universities Superannuation Scheme Ltd	Drivers Jonas Deloitte	The London Plan identifies two Opportunity Areas within the Borough. One of these areas is North Heathrow, which includes Stockley Park. The Sub-Regional Development Framework expects the North Heathrow area to accommodate the capacity for 5,500 new jobs. Stockley Park is identified as a Locally Significant Employment Location in the London Plan. Both Riverside Way Industrial Estate and Eskdale Industrial Estate are identified as Industrial Business Parks in the London Plan. The Hillingdon Core Strategy aims to protect these London Plan allocations and also supports their growth. USS supports the recognition of the allocations.	<p>Noted.</p> <p>No proposed change.</p>
310	5.1	PRUPIM	CB Richard Ellis on behalf of PRUPIM	We support the recognition in the Core Strategy that there is currently an oversupply of employment land in the Borough and consequently, that there is scope for release to other uses.	<p>Noted.</p> <p>No proposed change.</p>
20		Tarmac Limited	Quarryplan (GB) Limited	The strategic objective of protecting employment land is supported by Tarmac. It is particularly	Noted.

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				<p>important to protect employment land where such land is well located on appropriate transport routes. The Tarmac operations at Pump Lane Hayes are a particularly good example of multiple industrial uses which are heavily dependent on the importation of raw materials by rail and export of materials by road. The Tarmac site imports crushed stone and sand by rail for use in manufacturing asphalt for roads, for the production of ready mixed concrete and for distribution as construction aggregates. Due to excellent road connections the site also imports asphalt planings from road works for recycling and reuse in asphalt manufacture. The site is located on the Bristol to Paddington main rail line and adjacent to the Hayes by-pass. The policy regarding the release of surplus employment land for other uses needs to be carefully considered. The potential impact of new non-employment uses being established close to existing employment uses is not always appropriate. This is especially the case where remaining employment uses include major industrial operations such as the Tarmac Hayes site which operates 24 hours per day and seven days per week. The release of surplus employment land needs to be undertaken only after the most rigorous of assessments into the long term need for the land and also the potential impacts on other employment and industrial occupiers in the area.</p>	<p>No proposed change.</p>
31	5.3	British Waterways		<p>We would request the following amendment to this paragraph:</p> <p>"...much of this area was industrial and reliant on the Grand Union Canal for transport; employment has become increasingly office based with many office parks located on former industrial sites, becoming a poor neighbour to</p>	<p>The proposed change does not add to the context set out in this section. The Council would note that London Plan policies require canalside development to enhance the character of canals (see policy 4C.20 in the 2008 London Plan or policy 7.30A in the 2009 draft Replacement London Plan).</p>

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				the canal environment."	No proposed change.
393	5.3	Hillingdon Motorist Forum		The Grand Union canal should be developed to carry some of the freight through the Borough.	<p>The 2008 London Plan encourages boroughs to support new facilities which increase the use of the network for passenger &amp; tourist traffic and bulk freight movement (policies 4C.7, 4C.8 and specifically policy 4C.20 re canals).</p> <p>The 2009 Draft Replacement London Plan is expected to be adopted by the Mayor as the latest version of the London Plan during 2011. Its policies largely re-iterate those of the current 2008 London Plan and again encourage greater use of the network for transport - especially for freight (policies 7.26 &amp; 7.30).</p> <p>In the Core Strategy Section 8 on Environmental Management carries the main section on the borough's "Blue Ribbon Network". It notes that the borough has 20 km of the Grand Union Canal (GUC) - including the Main Line, Paddington and Slough Arms. Their value to the borough's open space network is stressed - e.g. the GUC is of regional importance as it crosses several local authority boundaries.</p> <p>The multi-functional role played by the GUC (and the rest of the Blue Ribbon network) is also highlighted. The policies in the Core Strategy recognise this and a number of policies support its implementation - e.g. policies covering landscape, flood risk, open space, sport &amp; leisure and its use for sustainable transport (at policy EM3).</p> <p>No proposed change.</p>
508	5.3	Councillor P Harmsworth		<p>Economy (S3):</p> <p>Existing residential and green space areas should be deleted from the Heathrow</p>	The designation of detailed boundaries for the Heathrow Opportunity Area is still to be undertaken by the Mayor of London as this is a proposal within the London Plan. The Core

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				Opportunity Area designation - which should be limited to existing industrial and commercial areas.	Strategy already contains policies to maintain and enhance local green space and residential areas and these will continue to operate should the Mayor declare an Opportunity Planning Area Framework covering part of the borough.  No proposed change.
60	5.4	Mr John McDonnell MP		There is insufficient concern expressed about the loss of employment sites to other uses. There should be a more positive commitment to protecting land for employment, particularly manufacturing.	The Council is committed to protecting Strategic Industrial Locations and Locally Significant Industrial Sites and Employment Locations - as well as maintaining its network of town centres, which are themselves significant employment locations. The Council is looking to maintain manufacturing industry through its policy approach on employment land (see policy E1) and is committed to monitoring the amount of employment land available and maintaining an appropriate supply of sites through the plan period.  No proposed change.
394	5.4	Hillingdon Motorist Forum		Traffic congestion causes delays which in turn increases business costs. An adequate road network will encourage businesses to move into Hillingdon. Upgrade the road network to reduce traffic congestion.	Improvements to the road network are primarily dealt with in the borough's Local Implementation Plan and are only one facet of reducing traffic congestion. The transport policies in the Strategy aim to steer development to the most accessible locations (to facilitate access by all modes of transport), to improve public transport interchanges in local centres (to make use of public transport a more attractive option) and to improve north-south public transport links across the borough (to reduce pressure for private car use). Taken together these measures should help reduce road congestion within the existing road network.  No proposed change.
309	5.5	PRUPIM	CB Richard Ellis on	This paragraph should be amended to reflect	The Core Strategy primarily sets out the spatial

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			behalf of PRUPIM	recognition of the other issues affecting the location choices of businesses.	land use planning priorities and policies for the borough. It is not an economic development document which might more appropriately cover the points raised in this objection. The Council take the view that no further clarification is required as such in paragraph 5.5 and would note that some location advantages for businesses are detailed in the section on Hillingdon's Key Facts following paragraph 3.3.  No proposed change.
32	5.10	British Waterways		Add words: "...responding particularly to sensitive environments such as along the Grand Union Canal,..." to paragraph 5.10 to read:  "...and any release of surplus industrial land will be carefully managed to support Hillingdon's employment generation, responding particularly to sensitive environments such as along the Grand Union Canal, whilst creating opportunities for regeneration and release to other uses including much needed housing."	The Council would note that London Plan policies already require canalside development to enhance the character of canals (see policy 4C.20 in the 2008 London Plan or policy 7.30A in the 2009 draft Replacement London Plan). In view of that policy requirement the proposed additional text here is considered unnecessary.  No proposed change.
241	Map 5.1	Yiewsley and West Drayton Town Centre Action Group		It has been noted that the designated areas for hotels and offices has been reduced. However, it is still difficult to determine the exact scale as the map does not include detail of the area concerned.	Map 5.1 is purely illustrative - proposals for future hotel or office locations in the growth areas shown can be expected to come forward as part of later work on the Local Development Framework - either in the Site Allocations or Heathrow Area Development Plan Documents. No proposed change.
114	Map 5.1	Buckleuch Property	Drivers Jonas Deloitte	Map 5.1, 'Locations for Employment Growth' identifies an indicative area for the managed release of employment land through a purple circle. It is noted within the Council's response to comments to the previous draft of the Core Strategy, that this circle relates specifically to the Pump Lane and Blyth Road areas.  In our previous representations, we commented	The information regarding potential employment land release given at Map 5.1 and in paragraph 5.11 is illustrative. The text does make clear the Council's intention to further explore the potential for any release in detail when it prepares the Site Allocations Development Plan Document. The wording of the Core Strategy is careful to point out that any sites to be examined for potential release from employment use may include those

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				<p>that full consideration had not been given to all available land around Hayes, in particular land adjoining Hayes Town Centre, Station Road and Nestles Avenue. Therefore, we are concerned that the identification of specific sites within this draft is premature ahead of a detailed site allocations review and Policy SO15 / Map 5.1 have not been fully justified by a robust evidence base.</p> <p>Further, the above policies are contrary to the 'Implementation of Policy E1' which states that the release of surplus land of the plan period 'will be delivered through the Site Allocations and Development Management Development Plan Documents.'</p> <p>In order to ensure that these policies are compliant and 'sound' we recommend that Map 5.1 is amended to extend the potential area for the release of employment land allowing for further analysis at the Site Allocations consultation stage.</p>	<p>sites named. It does not state that only these sites will be looked at - and allows for the examination of other employment sites in the Hayes area as the objector requests.</p> <p>No proposed change.</p>
195	Map 5.1	British Airways plc	Lichfield Planning	Map 5.1 – the bottom box headed 'Heathrow Opportunity Area' is misleading the reader to think that this applies to the entire area in that diagram.	<p>Map 5.1 is a diagram and purely for illustrative purposes.</p> <p>No proposed change.</p>
211	Map 5.1	Heathrow Airport Ltd		The diagram should be removed as it does not help clarify specific designations - a more general statement should be included in the Core Strategy and detailed designations dealt with in the Proposals Map. The document does not seem to be the appropriate forum for determining precise locations for development or specific designations. Instead, HAL would suggest that these are deleted from the document to aid clarity but that the policy intent can be set out in the Core Strategy. The precise boundaries can then be defined in the Proposals	<p>Map 5.1 is purely illustrative and not intended to set out precise locations for future development. The Council agrees that that would be the role of later documents brought forward as part of the Local Development Framework - including the Site Allocations and Proposals Map Development Plan Documents.</p> <p>No proposed change.</p>

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				Map.	
265	Map 5.1	Cathedral Group	Nathaniel Lichfield & Partners	Supports the managed release of employment land in the Blyth Road area of Hayes.	Noted.  No proposed change.
409	Map 5.1	SEGRO Plc	Nathaniel Lichfield & Partners	Identifying Riverside Industrial Estate as being outside the North Uxbridge IBP is inconsistent with national policy, Designating Riverside Industrial Estate as an LSIS will undermine its role as a quality industrial business park - LSIS designation should be removed and IBP designation should apply.	The Core Strategy has to be in general conformity with the London Plan. This designation has not been raised by the Mayor of London as a conformity issue.  The Council does not consider the designation as a Locally Significant Industrial Site as any lesser than the London Plan designation of Industrial Business Park. It will seek to protect employment generating uses on these sites. It will not simply restrict uses to B2 or B8 alone there, where other business uses may be acceptable.  No proposed change.
419	Map 5.1	PRUPIM	Maddox & Associates on behalf of PRUPIM	It is proposed that Bath Road is highlighted on Map 5.1 as area for growth of offices and hotels, except those areas already identified as Locally Important Employment Areas.	Accepted in part - for consistency with the section in table 5.3 on Heathrow Airport and Perimeter, the Council will amend paragraph 5.20 to note the Bath Road area is also potentially suitable for hotel and office development.
425	Map 5.1	Tesco Stores Ltd	GL Hearn on behalf of Tesco Stores Ltd	Map 5.1 should be amended to acknowledge local conditions and other Council policy documents which anticipate growth in North Hillingdon Local Centre. Accordingly, North Hillingdon Local Centre should be identified as 'proposed areas of growth for hotels and office - reference 2'	The Council is to produce a revised Site Allocations Development Plan Document and new Development Management Development Plan Document as further parts of the Local Development Framework. These can be expected to detail the current position on any development sites / proposals in North Hillingdon and review the town centre boundary and shopping frontage designations. Until that work is completed the Council takes the view that it would be premature to make the proposed change to Map 5.1.



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					No proposed change.
413	Map 5.1	Greater Manchester Pension Fund	Capita Symonds on behalf of Greater Manchester Pension Fund	Object to the designation of the Argent Centre as a "Locally Significant Industrial Area". Map 5.1 should be amended to identify it as a potential area for the managed release of employment land.	<p>The Council propose bringing forward detailed proposals for the managed release of employment land in the borough as part of work for the Site Allocations Development Plan Document. It will consider these representations as part of that work, together with other areas in Hayes.</p> <p>No proposed change.</p>
445	Map 5.1	Henry Streeter Automotive Ltd	CGMS Ltd on behalf of Henry Streeter Automotive Ltd	The annotation to the map advises that opportunities for growth in the Heathrow Opportunity Area (HOA) will be defined through a separate document. However the boundary of this area is not shown on the Map. Responses to our representations on the previous version of the Core Strategy suggested that hotel growth would include 'sites' outside of designated employment land on the Heathrow perimeter but these areas are not shown on the plan. It is unclear where this designation is to be from this Map.	<p>The Heathrow Opportunity Area is a London Plan proposal and the designation of its boundaries will be a matter for the Mayor of London who has yet to come forward with detailed proposals for the extent of the designation.</p> <p>The Core Strategy sets out the broad approach which the Council intends to take for the future spatial development of the borough. With respect to hotel development its approach will be primarily to seek to steer this towards those centres with high levels of public transport accessibility. Once further work is completed on other parts of the Local Development Framework, notably the Site Allocations and Heathrow Area Development Plan Documents, a more detailed strategy will effectively be in place for the development of hotels across the borough.</p> <p>No proposed change.</p>
21	5.11	Tarmac Limited	Quarryplan (GB) Limited	Part of Pump Lane, Hayes is listed within the areas that have been identified for potential release from industrial and warehouse use to other uses. The Employment Land Study (London Borough of Hillingdon, July 2009) considers existing employment and industrial uses including those at Pump Lane Hayes.	The Core Strategy is required to be in general conformity with the London Plan. The draft Replacement London Plan issued in October 2009 (at policy 4.4 and Map 4.1) identifies the borough as one where limited release of industrial land should be considered in future. In order to address this part of the London Plan, paragraph

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				<p>Approximately 1.74 hectares at the western end of the Pump Lane industrial area has been removed from the designation of Proposed Locally Significant Industrial Sites. This 1.74 hectare area is considered to have potential for retail/town centre mixed use redevelopment in part due to its proximity to the town centre and vacancy level. Tarmac wish to object to the potential removal of part of the Pump Lane area at Hayes from the industrial designation. Although Tarmac's land is not directly affected by the proposal, being at the eastern end of the Pump Lane industrial area, the 1.74 hectare area is only 150 metres from the Tarmac site. The Tarmac site operates 24 hours per day and seven days per week, it includes a number of industrial and manufacturing processes and has considerable train and lorry movements outside normal working hours. The presence of potentially sensitive receptors in close proximity to the Tarmac Hayes site may create unnecessary constraints and is therefore unacceptable. The entirety of the existing Pump Lane, Hayes industrial area should be retained. All of the Pump Lane Hayes industrial area should be retained for industrial use and there should be no release for alternative use due to the potential constraints this release would create on existing industrial occupiers on the remainder of the Pump Lane industrial area.</p>	<p>5.11 of the Core Strategy has identified those areas where it might consider release of some existing industrial land in future. Later parts of the Local Development Framework will address this issue in detail e.g. the Site Allocations Development Plan Document. As noted in the Core Strategy, the Council is proposing to look especially at existing industrial land designations alongside the Grand Union Canal in Hayes to assess whether opportunities for mixed use redevelopment might be brought forward.</p> <p>No proposed change.</p>
33	5.11	British Waterways		<p>We are pleased that the value of the GUC as a catalyst for regeneration has been recognised here, and that its potential for delivering benefits to Hayes has been identified.</p>	<p>Noted.</p>
112	5.11	Buckleuch Property	Drivers Jonas Deloitte	<p>The rewording of para 5.11: '...in accordance with Strategic Objective 15, the Council proposes a review of employment sites in Hayes, specifically those in highly accessible locations.' (Delete Where appropriate, sites in</p>	<p>It would be premature at this stage to commit the future strategy approach in Hayes Town Centre without further detailed investigation. Work on the Site Allocations and Development Management Development Plan Documents can be expected</p>

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				Hayes along the canal frontage will be identified through a review of the Council's Employment Land Study and brought forward for residential led mixed use development as part of the production of the Site Allocations DPD.)	to come forward with appropriate site proposals which might support regeneration in the Town Centre. Canal frontage locations may be further removed from the centre but offer better opportunities for residential development for example, whilst sites closer to the station and High Street may offer better locations for commercial and other social or community facilities. This will require more detailed investigation appropriate to those parts of the Local Development Framework rather than the Core Strategy.  No proposed change.
171	5.11	BS Pension Fund Trustee Ltd	CGMS Consulting	Amendment of paragraph 5.11 to extend the list of employment land to be released to include part of Millington Road, Hayes.	The list of areas noted at paragraph 5.11 is purely illustrative. The Council will be looking at employment land release proposals as part of detailed work for the subsequent Site Allocations Development Plan Document. It will consider this proposal as part of that assessment.  No proposed change.
262	5.11	Cathedral Group	Nathaniel Lichfield & Partners	Supports the managed release of employment land in the Blyth Road area of Hayes.	Noted.  No proposed change.
414	5.11	Greater Manchester Pension Fund	Capita Symonds on behalf of Greater Manchester Pension Fund	Para 5.11 should be amended as follows: "5.11 Locations proposed for the managed release of employment land are shown in Map 5.1 above and may include:  <ul style="list-style-type: none"> <li>• Part of Summerhouse Lane/ Royal Quay/ Salamander Quay, Harefield</li> <li>• Part of Uxbridge Industrial Estate</li> <li>• Part of Braintree Road area, South Ruislip</li> <li>• Part of Trout Road area, Yiewsley</li> </ul>	The list at paragraph 5.11 is purely illustrative. The Council propose bringing forward detailed proposals for the managed release of employment land in the borough as part of work for the Site Allocations Development Plan Document. It will consider these representations as part of that work - together with other areas in Hayes.  No proposed change.

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				<ul style="list-style-type: none"> <li>• Chailey Industrial Estate and Argent Centre, Pump Lane, Hayes</li> <li>• Warwick Road/ Kingston Lane area, West Drayton</li> <li>• Part of Blyth Road area, Hayes</li> <li>• Hayes Bridge area"</li> </ul>	
22	Policy E1: Managing the Supply of Employment Land	Tarmac Limited	Quarryplan (GB) Limited	<p>Tarmac is fully supportive of the policy to protect industrial and employment sites. The Tarmac site at Pump Lane is included within the Proposed Locally Significant Industrial Sites designation. The Tarmac Hayes site at Pump Lane is a strategic site for the supply of asphalt and ready mixed concrete, recycled asphalt plantings, crushed rock and sand for use as construction aggregates. The majority of raw materials are brought to the site by rail and therefore its location on the Bristol to Paddington rail line is crucial. Many thousands of lorry movements are saved every year because raw materials are brought into the site by rail. The site is one of the largest producers of asphalt materials in the United Kingdom and supplies large parts of London and the south-east. The site should be regarded as "Strategic" rather than "Locally Significant".</p>	<p>As noted at paragraph 5.6 of the Core Strategy, the Strategic Industrial Location is a designation stemming from the London Plan. Their designation is a matter for the Mayor of London.</p> <p>The individual operation at this site may well be significant within its industrial sector. The Council considers the current mix of activities in the wider Pump Lane area to continue to merit the "Locally Significant Employment Location" designation - i.e. as noted at paragraph 5.7 of the Core Strategy, these are important local industrial areas where industrial and warehousing uses can operate together.</p> <p>No proposed change.</p>
84	Policy E1: Managing the Supply of Employment Land	Orbit Developments (Southern) Ltd	The Emerson Group	<p>Only B1c, B2 &amp; B8 are listed as employment. PPS4 recognises economic development as the B use classes, public and community uses and main town centre uses and other development that provides employment, generates wealth or produces an economic output or product. This should be reflected in the policy.</p>	<p>The section referred to covers how employment floorspace is currently monitored in the Annual Monitoring Report. The policy itself does not seek to limit employment growth purely to the B1c, B2 &amp; B8 use classes and does not need further amendment.</p> <p>No proposed change.</p>

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128	Policy E1: Managing the Supply of Employment Land		Gleeson Developments Ltd	We would suggest that the references within the policy to the release of surplus industrial land are removed from policy E1.	<p>Paragraph 5.8 in the Core Strategy explains how the two new employment sites at Stockley and South Ruislip together provide a total of 13.63 ha of new designated employment land in the borough.</p> <p>Policy 4.4 and Map 4.1 in the 2009 draft London Replacement Plan set the strategic policy context for the proposed limited release of employment land in the Core Strategy. Reference to assessing the potential for a limited release of employment land is to be retained in the Core Strategy to ensure conformity with the London Plan.</p> <p>The borough's 2010 Position Statement on Employment Land and Retail Capacity identified 17.58 ha of industrial and warehousing land which might be released from their current use in future. The Core Strategy makes clear that any release will have to be explored further in work on subsequent parts of the Local Development Framework - specifically the Site Allocations Development Plan Document - which might come forward with proposals for releases both in existing designated employment land areas as well as on sites elsewhere in the borough.</p> <p>No proposed change.</p>
138	Policy E1: Managing the Supply of Employment Land	Hillingdon Inter Faith Network		In dealing with policies on surplus land, there would appear to be an opportunity to meet other community needs.	The Council fully supports the provision of better social and community facilities in the borough. The Core Strategy Vision statement recognises the need to do this through its commitments to close inequality gaps over the plan period and to improve access to local facilities generally to improve the quality of life for residents. Policy CI 1 in the Strategy looks to deliver adequate social infrastructure to support new development and to locate new community centres in town centres or at other accessible locations - to maximise

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					<p>community access to facilities.</p> <p>The Council will review possible new uses for surplus employment land during work on a later part of the Local Development Framework, for the Site Allocations Development Plan Document, and proposals for new community uses may come forward as part of that work. No proposed change.</p>
162	Policy E1: Managing the Supply of Employment Land	Workspace Group	Ransome and Company Ltd	Workspace supports the identification of Blyth Road as a potential area for managed release of employment land and proposed area for growth for office and hotel uses. Workspace would want to be actively involved in any future planning of this area.	<p>Noted. The Council will undertake detailed work for another part of the Local Development Framework - the Site Allocations Development Plan Document - which will consider the detailed case for the release of individual sites currently used for employment land.</p> <p>No proposed change.</p>
180	Policy E1: Managing the Supply of Employment Land	Universities Superannuation Scheme Ltd	Drivers Jonas Deloitte	<p>USS supports the main principles of Policy E1: Managing the Supply of Employment Land through the designation of Locally Significant Industrial Sites (LSIS) and Locally Significant Employment Locations (LSEL).</p> <p>However, USS continues to urge the Council to place a greater emphasis 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 the B classes that have the potential for employment generation.</p>	<p>Paragraph 5.11 explains how the Council intend considering where sites might be released from their current employment land use as part of work on the Site Allocations Development Plan Document. The list of locations proposed for the managed release of employment land in this paragraph is purely illustrative and does not preclude consideration of sites elsewhere in the borough.</p> <p>No proposed change.</p>
250	Policy E1: Managing the Supply of Employment Land	Co-operative Insurance Society (managed by AXA REIM)	Gerald Eve on behalf of Co-operative Insurance Society	Support the release of land at Pump Lane, specifically the Chailey Industrial Estate, for residential-led mixed-use redevelopment.	<p>Detailed site-specific allocations will be brought forward during preparation of the Site Allocations Development Plan Document.</p> <p>No proposed change.</p>
251	Policy E1: Managing the Supply of	Threadneedle Property	Indigo Planning on behalf of	Policy E1 or paragraph 5.4 should acknowledge that the redevelopment of existing sites in	The emphasis of the policy is that the Council is placing a priority on protecting Strategic Industrial

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	Employment Land	Investments	Threadneedle Property Investments	employment use outside designated areas may be appropriate where the existing employment use is no longer viable.	<p>Locations and its designations of Locally Significant Industrial Sites / Employment Locations. In the Core Strategy the Council does not seek to permanently maintain employment sites outside the designated areas. It will consider alternative use proposals on sites elsewhere - and the Strategy makes clear at paragraph 5.11 that it will pursue an approach of "managed release" of employment land (to conform with the requirements of the London Plan).</p> <p>No proposed change.</p>
263	Policy E1: Managing the Supply of Employment Land	Cathedral Group	Nathaniel Lichfield & Partners	Object to the exclusion of an exemptions test from Policy E1 and want the policy amended to recognise the scope for appropriate ancillary uses. Add sentence at end of Policy E1 to read: Such protection will recognise the scope for appropriate ancillary uses.	<p>This policy sets out the broad approach the Council will take to protecting Strategic Industrial Locations and Locally Significant Industrial Sites / Employment Locations. The Council is aware of national planning guidance that policies must be applied flexibly and the Core Strategy policies do not preclude ancillary / other uses coming forward on Locally Significant Industrial Sites.</p> <p>The Council would note that the range of criteria quoted in this objection are more appropriately considered for the detailed policies to be brought forward later in a Development Management Development Plan Document for the borough. No proposed change.</p>
264	Policy E1: Managing the Supply of Employment Land	Cathedral Group	Nathaniel Lichfield & Partners	Supports the managed release of employment land.	<p>Noted.</p> <p>No proposed change.</p>
422	Policy E1: Managing the Supply of Employment Land	Individual		Increasing the supply of employment land should not be at the expense of residential areas. These should be protected and not placed under threat of take over by commercial enterprise. The policy should protect residential areas from mixed use.	The Core Strategy does not propose increasing the amount of employment land at the expense of existing residential areas. Preventing the loss of housing throughout London is already a requirement of the London Plan (e.g. see policy 3.15 B in the 2009 draft Replacement London Plan).

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					<p>The Council cannot preclude mixed use redevelopment in existing residential areas as this might allow the introduction of a much-needed community use - e.g. a doctor's practice or community use - with the retention of a part of a scheme for residential accommodation.</p> <p>No proposed change.</p>
311	Policy E1: Managing the Supply of Employment Land	PRUPIM	CB Richard Ellis on behalf of PRUPIM	This policy should be redrafted as follows "The Council will accommodate growth through the appropriate management of SIL and LSIL/LSEL allocations...in accordance with PPS4". This affords greater flexibility to manage economic benefits and growth of employment locations e.g. in terms of profile of the area and employment generation (compared with land supply).	<p>The Council is aware of the need to operate all its policies with a degree of flexibility - in accordance with national planning policy guidance. It does not consider that a specific reference should be included in the policy to Planning Policy Statement 4.</p> <p>No proposed change.</p>
299	Policy E1: Managing the Supply of Employment Land	Garden City Estate Residents' Association		Employment land that is designated for release to other uses should be considered for new school sites before greenfield sites are identified. Growth should be directed to existing business or industrial areas or town centres. The policy should include the wording: "...any released land to be considered for educational use first if suitable."	<p>The Core Strategy will cover a 15-year period and to make a commitment in this way, firstly to consider educational needs above any other use would not be in the best planning interests of the borough. Its spatial planning priorities may change over the plan period and it has to take into account several land use needs at any particular moment as sites come forward for development.</p> <p>No proposed change.</p>
333	Policy E1: Managing the Supply of Employment Land	Southstream Holdings Ltd	Montagu Evans on behalf of Southstream Holdings Ltd	Policy vacuum until Site Allocations is adopted. The following wording to policy E1 will address this issue: "The Council will manage the release of 17.58ha of surplus industrial land for other uses over the plan period (see Map 5.1). Sites that come forward ahead of the adoption of the Site Allocations DPD will be subject to a sequential test of other appropriate sites and a marketing process."	Detailed consideration of proposals for development will continue to be based on the London Plan and 2007 Saved Unitary Development Plan policies as well as the broad policies contained in the Core Strategy. The approach taken in policy LE2 in the 2007 Saved UDP policies effectively covers the points raised in this objection - until work on later parts of the Local Development Framework can supersede the policy.



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					No proposed change.
408	Policy E1: Managing the Supply of Employment Land	CES Properties (Ickenham) Ltd	DP9 on behalf of CES Properties (Ickenham) Ltd	<p>This comment refers to Policy SO15 but relates to Policy E1 and Strategic Objective SO15.</p> <p>The policy and supporting text should make clear provision that existing offices outside of designated employment land will not be protected. If it is intended to protect this land then justification should be provided and clear criteria identified for when it would be released, particularly when there is a history of vacancy.</p>	<p>There is no proposal in the Core Strategy to protect existing office floorspace outside designated Locally Significant Employment Sites. With such proposals the Council would take each case on its merits and assess the relevant employment value of the existing use against any proposal, taking into account the land use priorities at the time and any relevant local information.</p> <p>No proposed change.</p>
364	Policy E1: Managing the Supply of Employment Land	Bell Farm Christian Centre		<p>Increasing the supply of employment land should not be at the expense of residential areas. These should be protected and not placed under threat of take over by commercial enterprise. The policy should protect residential areas from mixed use.</p>	<p>The Core Strategy does not propose increasing the amount of employment land at the expense of existing residential areas. Loss of housing throughout London is already a requirement of the London Plan (e.g. see policy 3.15 B in the 2009 draft Replacement London Plan).</p> <p>It cannot preclude mixed use redevelopment in existing residential areas as this might allow the introduction of a much-needed community use - e.g. a doctor's practice or community use - with the retention of a part of a scheme for residential accommodation.</p> <p>No proposed change.</p>
410	Policy E1: Managing the Supply of Employment Land	SEGRO Plc	Nathaniel Lichfield & Partners	<p>Object to the proposal to add an additional tier of policy to SIL designations. The priority should be to deliver economic and physical regeneration in the borough and local jobs. The policy as currently worded restricts the scope of employment uses on industrial sites. Creating an artificial distinction between LSIS and LSEL designations limits development options and detracts from the employment land resource.</p>	<p>The objection focuses on the distinction between the two designations; Locally Significant Industrial Sites and Employment Locations. Neither is considered by the Council to exclude other commercial uses coming forward. They are primarily delineating employment areas where either industrial / warehousing uses predominate at present or lighter, office-based businesses. In both cases employment growth will be the objective of the Council. It has to apply its policies flexibly to comply with national planning guidance</p>

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					requirements and it will not artificially divide future land uses in either of the designated areas. No proposed change.
532	Policy E1: Managing the Supply of Employment Land	Arla Foods UK Plc	BNP Paribas Real Estate	Intend submitting a planning application over the coming year for a mixed use development on the former dairy site - which is in an area designated for employment land release during the plan period. The proposal will accord with policy E2 in promoting a mixed use development in a highly accessible location.	Noted.  No proposed change.
525	Policy E1: Managing the Supply of Employment Land	L B Hillingdon (Labour Group)		Priority should be given to sites for new schools where the release of employment land is under consideration. Policy E1 should include words: "Any released land to be considered for educational use first if suitable."	The Core Strategy will cover a 15-year period and to make a commitment in this way, firstly to consider educational needs above any other use would not be in the best planning interests of the borough. Its spatial planning priorities may change over the plan period and it has to take into account several land use needs at any particular moment as sites come forward for development.  No proposed change.
242		Yiewsley and West Drayton Town Centre Action Group		Given the statistics on page 9 (in the sub-section on Economy following paragraph 3.3) 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 attains the skills that may / will be needed?	It is not possible for the Council to predict what proportion of future jobs will be taken by up the local workforce and to specify this in the Core Strategy with respect to employment at Heathrow. It can only state the current importance of the Airport as a provider of jobs for local people.  The Council does undertake at policy E7 to:  "...ensure training opportunities are linked with the development of major sites for both construction phases and end use occupiers, and through liaising with local colleges and businesses to ensure workforce development initiatives and training programmes reflect skill requirements in the workplace. The Council will engage with local businesses and universities to link high end jobs in the borough with higher education courses. The

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
					<p>Council will promote Hillingdon as a destination for visitors and tourists and ensure that local residents have access to jobs within related industries."</p> <p>To implement this approach it states in the Core Strategy that it will deliver policy E7:</p> <p>"...through preparing and implementing the Local Economic Assessment, and by means of partnership working with businesses, Adult Education services, universities and FE colleges, Jobcentre Plus, Chamber of Commerce, West London Working, Visit London and private developers."</p> <p>No proposed change.</p>
188	5.15	British Airways plc	Lichfield Planning	Addition to paragraph 5.15: Heathrow Airport is a major economic enabler for the Heathrow Opportunity Area, and the number of future jobs created would depend greatly on the viability and competitiveness of the airport.	<p>The Core Strategy already highlights the importance of the airport to the local economy - in the section on "Key Facts" following paragraph 3.3 and again at Table 5.3. The Council consider it unnecessary to add the proposed wording at paragraph 5.15.</p> <p>No proposed change.</p>
61	5.18	Mr John McDonnell MP		Concern has to be taken about the dominance of a particular area by hotel development. Hotel development should not be on a scale that it will be allowed to dominate a particular area or community.	<p>The Council does see Heathrow, Hayes and Uxbridge as the main areas for possible hotel development in future. It does undertake to monitor future hotel development through its Annual Monitoring Report and keep the position with future development under review.</p> <p>All hotel development will be expected to conform to the other Core Strategy policies e.g. regarding the general design criteria set out at policy BE1. Later work on the Local Development Framework on the Site Allocations Development Plan Document can be expected to identify appropriate locations for commercial development, including</p>

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					hotels. No proposed change.
313	5.19	PRUPIM	CB Richard Ellis on behalf of PRUPIM	We welcome the Council's recognition that hotel development in Hillingdon will help to meet employment targets for the Heathrow Opportunity Area, but comment that this is no longer consistent with national policy in PPS4 for other employment/commercial areas. As per our comments on policy E1, we consider that this paragraph should be amended to take into account the wider definition of economic development as set out in PPS4.	The Council is aware that it must operate its policies flexibly and will do so with respect to future hotel proposals. It does not consider that a specific reference at this paragraph to Planning Policy Statement 4 needs to be added at this paragraph. National planning guidance will automatically be a matter for consideration in future planning applications. No proposed change.
444	5.19	Henry Streeter Automotive Ltd	CGMS Ltd on behalf of Henry Streeter Automotive Ltd	Support the higher figures for hotel growth specific to Hillingdon. Need to identify strategically where these are to be delivered given the number of rooms proposed. Relying upon the planning application process, the response to our previous representations is insufficient.	<p>The Core Strategy sets out the broad approach which the Council intends to take for the future spatial development of the borough. With respect to hotel development its approach will be primarily to seek to steer this towards those centres with high levels of public transport accessibility. Once further work is completed on other parts of the Local Development Framework - notably the Site Allocations and Heathrow Area Development Plan Documents - a more detailed strategy will effectively be in place for the development of hotels across the borough.</p> <p>No proposed change.</p>
443	Table 5.2	Henry Streeter Automotive Ltd	CGMS Ltd on behalf of Henry Streeter Automotive Ltd	Support the higher figures for hotel growth specific to Hillingdon. Need to identify strategically where these are to be delivered given the number of rooms proposed.	<p>The Core Strategy sets out the broad approach which the Council intends to take for the future spatial development of the borough. With respect to hotel development its approach will be primarily to seek to steer this towards those centres with high levels of public transport accessibility. Once further work is completed on other parts of the Local Development Framework - notably the Site Allocations and Heathrow Area Development Plan Documents - a more detailed strategy will effectively be in place for the development of hotels across the borough.</p>

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					No proposed change.
212	5.20	Heathrow Airport Ltd		Map 5.1 fails to recognise the importance of Heathrow Airport and its perimeter for commercial and hotel development - and would preclude new hotels within the Airport.	<p>The Council has taken the position that land within the Airport boundary should be used for Airport-related development. This is partly to ease pressure for further Airport-related development beyond that boundary in future.</p> <p>With hotel development the Council has clearly stated its position as to where it would prefer future developments to take place - in local town centres with good public transport access and links with the Airport. The Council has to balance its future land use needs in the Heathrow area and one key objective (as elsewhere in the borough) has to be to retain sufficient employment land in the immediate area so as to provide employment opportunities for local residents.</p> <p>No proposed change.</p>
446	5.20	Henry Streeter Automotive Ltd	CGMS Ltd on behalf of Henry Streeter Automotive Ltd	The map fails to include the areas referred to in the text. This states: "Three key locations for hotel growth are identified by Hillingdon's Tourism Study; Heathrow, Hayes and Uxbridge. These areas for growth are shown on Map 5.1". The hotel growth location at Heathrow is not shown on Map 1.	<p>The Core Strategy sets out the broad approach which the Council intends to take for the future spatial development of the borough. With respect to hotel development its approach will be primarily to seek to steer this towards those centres with high levels of public transport accessibility. Once further work is completed on other parts of the Local Development Framework - notably the Site Allocations and Heathrow Area Development Plan Documents - a more detailed strategy will effectively be in place for the development of hotels across the borough.</p> <p>No proposed change.</p>
213	5.21	Heathrow Airport Ltd		HAL consider that paragraph 5.21 portrays an unbalanced view of Air Quality issues affecting the Borough. Paragraph 8.116 of this draft document sets a more balanced picture taking	The Council does not accept that the two paragraphs need to be more closely related - the emphasis of paragraph 5.21 is that development which focuses around the Airport needs to be

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				into account impacts on air quality from road traffic, rail and other sources. HAL believe this paragraph should be consistent with paragraph 8.116.	aware that - as elsewhere in parts of the borough with poor air quality, the Council will be looking to ensure that there is no worsening of air quality in the area as a result (i.e. the approach specified later in the Core Strategy at policy EM8).  No proposed change.
447	5.21	Henry Streeter Automotive Ltd	CGMS Ltd on behalf of Henry Streeter Automotive Ltd	Further hotel development should be actively supported in the Heathrow area providing issues such as air quality can be addressed.	The Council accepts that demand for hotel development in the Heathrow Airport area is likely to continue. It has a responsibility for the proper planning of its area and must attempt to provide a range of uses in the area - e.g. to meet housing and other community needs for local residents and workers - and will not give undue emphasis in this part of the Strategy to the provision of hotel development.  The Core Strategy sets out the broad approach which the Council intends to take for the future spatial development of the borough. With respect to hotel development its approach will be primarily to seek to steer this towards those centres with high levels of public transport accessibility. Once further work is completed on other parts of the Local Development Framework - notably the Site Allocations and Heathrow Area Development Plan Documents - a more detailed strategy will effectively be in place for the development of hotels across the borough.  No proposed change.
85	Policy E2: Location of Employment Growth	Orbit Developments (Southern) Ltd	The Emerson Group	Only B1C, B2 and B8 developments are listed as employment. Policy should reflect that B classes, public, community and town centre uses that provide employment.	The section referred to covers how employment floorspace is currently monitored in the Annual Monitoring Report. The policy itself does not seek to limit employment growth purely to the B1c, B2 & B8 use classes and does not need further amendment. Monitoring will analyse the development of different employment uses by type - and will cover the whole B Use Class.

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					No proposed change.
113	Policy E2: Location of Employment Growth	Bucleuch Property	Drivers Jonas Deloitte	The policy accords with national policy in seeking to focus growth within existing centres and around sustainable transport nodes.	Noted.  No proposed change.
152	Policy E2: Location of Employment Growth	Individual		<p>Stop the increase in Hotel bedrooms in the Heathrow OA. This will limit the growth in NO2 due to vehicles travelling to Heathrow. This will also prevent any increase in Parking problems for the local residents. Suggested Text for Policy E2 "The Council will accommodate a minimum of XXX additional Hotel bedrooms and new hotels and visitor facilities will be encouraged in Uxbridge, Hayes and on sites outside of the Heathrow OA and in other sustainable locations.</p> <p>Suggested Text for Monitoring of Policy E2 "LO3 (Local) Indicator: Number of hotel and visitor bedrooms in the Borough outside of protected Heathrow OA. Target XXXX new rooms between 2007-2026 Business registrations and failures will be regularly monitored using a combination of ONS business demography: Enterprise Births and Deaths statistics together with successful planning applications.</p>	<p>The Council cannot control how people will travel to hotel accommodation. It will look to locate new hotel development at the most accessible locations (e.g. through policy T1) so as to make travel by public transport as convenient as possible for hotel users. As paragraph 5.20 notes, Heathrow, Hayes and Uxbridge are expected to be the main locations for new hotel development in the borough and these locations do have a high level of public transport accessibility.</p> <p>The additional monitoring information is designed to assess hotel development across the borough rather than specifically in the Heathrow area. The Council already assembles information on an area basis for its Annual Monitoring Report and is able to monitor future hotel development specifically within and outside the Heathrow area in support of a future Heathrow Area Development Plan Document.</p> <p>No proposed change.</p>
157	Policy E2: Location of Employment Growth	Individual		<p>Stop the increase in Hotel bedrooms in the Heathrow OA. This will limit the growth in NO2 due to vehicles travelling to Heathrow. This will also prevent any increase in Parking problems for the local residents. Suggested Text for Policy E2 "The Council will accommodate a minimum of XXX additional Hotel bedrooms and new hotels and visitor</p> <p>facilities will be encouraged in Uxbridge, Hayes and on sites outside of the Heathrow OA and in</p>	<p>The Council cannot control how people will travel to hotel accommodation here. It will look to locate new hotel development at the most accessible locations (e.g. through policy T1) so as to make travel by public transport as convenient as possible for hotel users. As paragraph 5.20 notes, Heathrow, Hayes and Uxbridge are expected to be the main locations for new hotel development in the borough and these locations do have a high level of public transport accessibility.</p>

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				<p>other sustainable locations."</p> <p>Suggested Text for Monitoring of Policy E2 "LO3 (Local) Indicator: Number of hotel and visitor bedrooms in the Borough outside of protected Heathrow OA. Target XXXX new rooms between 2007-2026 Business registrations and failures will be regularly monitored using a combination of ONS business demography: Enterprise Births and Deaths statistics together with successful planning applications."</p>	<p>The additional monitoring information is designed to assess hotel development across the borough rather than specifically in the Heathrow area. The Council already assembles information on an area basis for its Annual Monitoring Report and is able to monitor future hotel development specifically within and outside the Heathrow area in support of a future Heathrow Area Development Plan Document.</p> <p>No proposed change.</p>
163	Policy E2: Location of Employment Growth	Workspace Group	Ransome and Company Ltd	<p>Workspace supports the promotion of Heathrow Opportunity Area, Strategic Industrial Locations, Locally Significant Employment Locations (LSEL), Locally Significant Industrial Sites (LSIS), Uxbridge town centre and Hayes Town Centre for employment growth.</p> <p>Workspace supports the promotion of a minimum of 3,800 additional hotel bedrooms and new hotels and visitor facilities at Uxbridge and Hayes.</p>	<p>Noted.</p> <p>No proposed change.</p>
181	Policy E2: Location of Employment Growth	Universities Superannuation Scheme Ltd	Drivers Jonas Deloitte	<p>USS also continues to support 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>	<p>Noted.</p> <p>No proposed change.</p>
189	Policy E2: Location of Employment Growth	British Airways plc	Lichfield Planning	<p>British Airways propose adding a sentence at the end of Policy E2 to read:</p> <p>Taking a long-term view, land that had been identified for the Heathrow third runway development should be safeguarded and not be released for any other uses. If Government policy on Heathrow expansion changes in the</p>	<p>The Council does not consider it reasonable to expect that during the Plan period it would have to reserve land originally identified as required for the Runway 3 proposal - including its apron and services north of the Bath Road, and land that would be within the flight safety zone and noise contours - to uses which would not conflict with its future use for aviation.</p>



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				<p>future, wishing to reintroduce the third runway, then the option to do so should be available. This would support Heathrow's position as the main economic enabler of the area.</p> <p>The Implementation section at Policy E2 should be modified to include references to the British Airports Authority and British Airways in connection with future partnership working and include a section regarding future hotel development so that it will read:</p> <p>Policy E2 will be delivered through partnership working with key stakeholders like TfL, BAA, BA, private land owners and developers. Inward investment opportunities will be identified in partnership with Think London. The Council will apply national, regional and local policies when considering development growth and set out area-specific policies through the Site Allocations and Heathrow Area Development Plan Documents.</p> <p>The Council will accommodate additional hotel bedrooms in line with anticipated demand taking account of demand generated by Heathrow Airport and other sources. The same is true for employment land.</p>	<p>The proposed wording modifications to the implementation section are considered unnecessary by the Council.</p> <p>The existing Statement of Community Involvement would ensure the involvement of the British Airports Authority and British Airways as two major stakeholders in the borough's Local Development Framework.</p> <p>The Council will take into account the future need for additional hotel accommodation generated by the demand from passengers using Heathrow Airport. But it will balance this against other land use needs coming forward when work proceeds on the Site Allocations and Development Management Development Plan Documents.</p> <p>No proposed change.</p>
197	Policy E2: Location of Employment Growth	The Ballymore Group		Where hotels are approved but not have not be able to attract viable operators the Council will take a pragmatic to a change of use, when presented with evidence of an unsuccessful marketing campaign.	The Council would consider any subsequent application on its merits in the context of London Plan and Hillingdon's Local Development Framework policies.
214	Policy E2: Location of Employment Growth	Heathrow Airport Ltd		With regards to the location of new hotels on airport, we reiterate our suggested amendments from the previous draft of the document and our comments on paragraph 4.10, 5.20 and in respect of Policy E2, as follows: "Hotels will be directed to locations outside of designated	The Council has taken the position that land within the Airport boundary should be used for Airport-related development. This is partly to ease pressure for further Airport-related development beyond that boundary in future.

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				<p>employment areas. Hotel uses are also likely to be acceptable on airport where they are located in sustainable locations close to public transport interchanges." Such wording would allow flexibility in the application of Policy E2 to allow new hotels in the Central Terminal Area and at Hatton Cross but would read as a general presumption against other less sustainable perimeter locations.</p>	<p>With hotel development the Council has clearly stated its position as to where it would prefer future developments to take place - in local town centres with good public transport access and links with the Airport. The Council has to balance its future land use needs in the Heathrow area and one key objective (as elsewhere in the borough) has to be to retain sufficient employment land in the immediate area so as to provide employment opportunities for local residents.</p> <p>No proposed change.</p>
315	Policy E2: Location of Employment Growth	PRUPIM	CB Richard Ellis on behalf of PRUPIM	<p>The policy as drafted is not sufficiently flexible nor in accordance with PPS4. We would suggest that the following phrase should be deleted "outside of designated employment land".</p>	<p>The Council is aware of the need to apply its policies flexibly. The policy as drafted does not preclude consideration of other uses on designated industrial or employment land. Elsewhere at paragraph 5.11 the Strategy does note how some areas of existing employment land will be considered for "managed release" from their existing use in later work on the Local Development Framework - e.g. as part of work on a Site Allocations Development Plan Document. Accordingly it does not consider the proposed wording change adds any further clarity to the Core Strategy. No proposed change.</p>
290	Policy E2: Location of Employment Growth	Garden City Estate Residents' Association		<p>The policy does not say how local people will benefit from jobs - it should clearly state that this will be linked to detailed planning policies and initiatives to ensure training and employment opportunities for local people.</p>	<p>Policy E7 in the Core Strategy sets out the Council's broad approach to raising skill levels in the local community to take advantage of new job opportunities. The policy notes: "The Council will ensure training opportunities are linked with the development of major sites for both construction phases and end use occupiers, and through liaising with local colleges and businesses to ensure workforce development initiatives and training programmes reflect skill requirements in the workplace. The Council will engage with local businesses and universities to link high end jobs in the borough with higher education courses....".</p>

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					<p>The section on implementation for the policy also notes that: "Policy E7 will be delivered through preparing and implementing the Local Economic Assessment, and by means of partnership working with businesses, Adult Education services, universities and FE colleges, Jobcentre Plus, Chamber of Commerce, West London Working, Visit London and private developers. Delivery will also be through implementing the Planning Obligations DPD, the economic development strategy, strategy for tourism and visitor attractions, and the Sub regional Employment and Skills Plan..."</p> <p>No proposed change.</p>
335	Policy E2: Location of Employment Growth	Kerville Associates	Montagu Evans on behalf of Kerville Associates	<p>As currently worded, the Stockley Park area falls under the wider heading of the "Heathrow Opportunity Area". Map 5.1 identifies the locations for employment growth, but does not identify either Stockley Park or the wider area on this map. The map does include an informative box stating that the Heathrow Opportunity Area will be defined through the Heathrow Opportunity Area Planning Framework, but does not identify the envisaged boundary of this area. It is therefore considered that this map and corresponding Policy E2 (Location of Employment Growth) and Policy E3 (Strategy for Heathrow Opportunity Area) is ineffective as it does not clearly set out the areas where these policies can be applied.</p>	<p>As the objector notes, the Core Strategy is a broad policy document. The issue of the final designation of the Heathrow Opportunity Area is a matter for the Mayor of London as this is a proposal in the London Plan. At present the Core Strategy can only give a general policy statement on its intentions, pending the detailed Opportunity Area designation and work on an Opportunity Area Planning Framework. No proposed change.</p>
365	Policy E2: Location of Employment Growth	Bell Farm Christian Centre		<p>Hotel and office growth is at odds with protecting character - residential areas should be protected and not placed under threat of take over by commercial enterprise.</p> <p>The Heathrow Opportunity Area should exclude expansion into current residential areas. Suitable</p>	<p>The Core Strategy does not propose increasing the amount of commercial development at the expense of existing residential areas. Loss of housing throughout London is already a requirement of the London Plan (e.g. see policy 3.15 B in the 2009 draft Replacement London Plan).</p>

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				<p>sites have not been identified and the Strategy does not protect existing residential areas. The policy should protect residential areas from mixed use.</p>	<p>Hotel development would normally be steered towards the main centres identified at paragraph 5.20 - i.e. commercial centres / areas with good public transport accessibility.</p> <p>The Heathrow Opportunity Area is a London Plan proposal and has yet to be designated by the Mayor of London.</p> <p>Suitable sites for future commercial development are expected to be identified in later parts of the Local Development Framework - e.g. the Site Allocations and Heathrow Area Development Plan Documents.</p> <p>No proposed change.</p>
530	Policy E2: Location of Employment Growth	L B Hillingdon (Labour Group)		<p>E2 and E3:</p> <p>The Strategy does not state here how local people will benefit from jobs. It should state that this will be linked to specific detailed planning policies and initiatives to ensure training &amp; employment opportunities for local people.</p>	<p>Policy E7 in the Core Strategy sets out the Council's broad approach to raising skill levels in the local community to take advantage of new job opportunities. The policy notes: "The Council will ensure training opportunities are linked with the development of major sites for both construction phases and end use occupiers, and through liaising with local colleges and businesses to ensure workforce development initiatives and training programmes reflect skill requirements in the workplace. The Council will engage with local businesses and universities to link high end jobs in the borough with higher education courses....".</p> <p>The section on implementation for the policy also notes that: "Policy E7 will be delivered through preparing and implementing the Local Economic Assessment, and by means of partnership working with businesses, Adult Education services, universities and FE colleges, Jobcentre Plus, Chamber of Commerce, West London Working, Visit London and private developers.</p>

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					<p>Delivery will also be through implementing the Planning Obligations DPD, the economic development strategy, strategy for tourism and visitor attractions, and the Sub regional Employment and Skills Plan..."</p> <p>No proposed change.</p>
355	5.24	Hayes Town Partnership		<p>The Plan should be more specific about how it is intended to achieve the redevelopment envisaged for Hayes Town Centre as a result of Crossrail and taking advantage of the Grand Union Canal.</p>	<p>The purpose of the Core Strategy is to set the broad spatial approach for the planning of the whole borough over the next 15 years. Detailed planning for particular parts of the borough can be expected to come through other parts of the Local Development Framework - the Site Allocations, Development Management and Heathrow Area Development Plan Documents. During this work it may be that the Council decides at some future point that there is a need for a detailed local strategy document of the type referred to. The Council will keep this proposal under review as work on the LDF continues and consider bringing forward such a strategy if the need arises.</p> <p>No proposed change.</p>
34	Table 5.3	British Waterways		<p>We are pleased that the potential value of the GUC is recognised as part of the regeneration of the Hayes West Drayton Corridor. However, we are concerned that it should be seen as more than just a setting for development. The Town and Country Planning Association's Policy Advice Note: Inland Waterways (<a href="http://www.tcpa.org.uk/pages/inland-waterways.html">http://www.tcpa.org.uk/pages/inland-waterways.html</a>) suggests the following:</p> <p>"Applicants should be encouraged to include any waterway, towing path and environs lying within the application site edged in red on the location plan in order to ensure that:</p> <p>- the waterway is not just treated as a setting or</p>	<p>The Council would note that London Plan policies require canalside development to enhance the character of canals (see policy 4C.20 in the 2008 London Plan or policy 7.30A in the 2009 draft Replacement London Plan). The 2008 London Plan also encourages boroughs to support new facilities which increase the use of the network for passenger &amp; tourist traffic and bulk freight movement (policies 4C.7, 4C.8 and specifically policy 4C.20 re canals) and for sport / leisure use (policy 4C.10).</p> <p>The 2009 Draft Replacement London Plan again gives emphasis to supporting development which respects the character of canals and encourages greater use of the network for transport -</p>

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				<p>backdrop for development, and that instead the land and water are integrated and the waterway is treated as a useable space;</p> <p>- the waterway, towing path and environs form an integral part of the public realm in terms of both design and management" (Page 23)</p> <p>We would also suggest the removal of 'natural environment', as the canal is man-made, and primarily a navigation channel, with the associated benefits of being a wildlife habitat and amenity resource.</p> <p>We would therefore suggest that the paragraph on the Hayes-West Drayton Corridor be amended to the following:</p> <p>"The Grand Union Canal runs through the corridor and will have a role to play in the regeneration of the area. The canal has the potential to provide an attractive waterfront setting, but regeneration projects will benefit from its presence and should therefore fully integrate with and address the waterspace, delivering enhancements to this important environment. These opportunities will be delivered through Policy EM3 as well as specific requirements in the Development Management and Heathrow Area Development Plan Documents."</p>	<p>especially for freight (policies 7.26 &amp; 7.30), leisure and recreation.</p> <p>Taken together with policy EM3 in the Core Strategy, e.g. part of which aims to improve access to Hillingdon's canals, the Council considers there is already an adequate policy framework to meet the requirements of the wording change proposed.</p> <p>No proposed change.</p>
35	Table 5.3	British Waterways		<p>With regard to Hayes Town Centre, we support the reference to making the best use of the Grand Union Canal, but would like to enhance this to maximise the potential opportunities for this resource in delivering benefit to this area:</p> <p>We would therefore recommend that "The Council will also seek to make the best use of</p>	<p>The Council considers that the objectives of the further wording changes proposed here are already met by the existing policy framework set out in the London Plan and the draft Core Strategy on canals. All new development is expected to enhance the character of canals and policies in both look to increase its use - e.g. for passenger and freight traffic as well as for cycling</p>

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				<p>the Grand Union Canal in the regeneration process." be amended to:</p> <p>"The Council will require development proposals to address and integrate with the Grand Union Canal in the regeneration process."</p> <p>We would also recommend the following amendment to the final sentence of the first paragraph under Future Growth:</p> <p>"The Grand Union Canal offers an attractive and sustainable alternative for pedestrian and cycle routes through the area, as well as a leisure, education and recreational resource".</p> <p>With regard to Yiewsley and West Drayton Town Centre, we would add the following to the end of the first paragraph:</p> <p>"The town grew up as an industrial/manufacturing centre located on the Bristol-Paddington Railway line (West Drayton Station) and Grand Union Canal, although many of the area's manufacturing and industrial jobs have now gone, leaving sites and structures that present a poor neighbour to the waterfront." Under Future Growth of Yiewsley and West Drayton Town Centre we would add "The Grand Union Canal will also have a role to play in the regeneration of the area in supporting sustainable transport, education, biodiversity, health, well-being and recreation."</p>	<p>and walking routes or leisure / recreation use.</p> <p>The Council would note that London Plan policies require canalside development to enhance the character of canals (see policy 4C.20 in the 2008 London Plan or policy 7.30A in the 2009 draft Replacement London Plan). The 2008 London Plan also encourages boroughs to support new facilities which increase the use of the network for passenger &amp; tourist traffic and bulk freight movement (policies 4C.7, 4C.8 and specifically policy 4C.20 re canals) and for sport / leisure use (policy 4C.10).</p> <p>The 2009 Draft Replacement London Plan again gives emphasis to supporting development which respects the character of canals and encourages greater use of the network for transport - especially for freight (policies 7.26 &amp; 7.30), leisure and recreation.</p> <p>Taken together with policy EM3 in the Core Strategy - e.g. part of which aims to improve access to Hillingdon's canals - the Council considers there is already an adequate policy framework to meet the requirements of the wording change proposed.</p> <p>No proposed change.</p>
106	Table 5.3	Lafarge Aggregates Ltd		Lafarge supports the economic regeneration of the West Drayton area and notes that the document has identified Yiewsley and West Drayton as a suitable location for mixed use development. Lafarge have no objection in principle to mixed use development as long as	Noted.  No proposed change.

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				the requirements and guidance as set out in MPS 1 are reflected in the subsequent Heathrow Area and Site Allocations DPD, as currently there appears to be no regard to this national policy guidance document.	
172	Table 5.3	BS Pension Fund Trustee Ltd	CGMS Consulting	Under table 5.3 Heathrow Opportunity Area - Future 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 new main foodstore to limit convenience expenditure currently leaving the town to out-of-centre stores'.	<p>The Council has a Town Centres and Retail Study which has identified limited capacity for further convenience retailing floorspace in the borough in the immediate future.</p> <p>The Council will bring forward a further study as part of later work on the Local Development Framework - particularly in support of the Site Allocations and Development Management Development Plan Documents - on retail need to help identify where further capacity might be required. These Development Plan Documents will look at potential employment land release across the borough and at existing town centre boundaries and shopping frontage designations and can be expected to come forward with detailed recommendations as to where further retail capacity might be accommodated in the borough. It would be premature for the Core Strategy to include a recommendation of this type in advance of work on the whole borough.</p> <p>No proposed change.</p>
215	Table 5.3	Heathrow Airport Ltd		Cross refer to proposal to amend Policy E2 to clarify that hotel development should be permissible on sites outside the protected employment sites on the Airport perimeter and at appropriate locations within the Airport.	<p>The Council has taken the position that land within the Airport boundary should be used for Airport-related development. This is partly to ease pressure for further Airport-related development beyond that boundary in future.</p> <p>With hotel development the Council has clearly stated its position as to where it would prefer future developments to take place - in local town centres with good public transport access and links with the Airport. The Council has to balance</p>



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					<p>its future land use needs in the Heathrow area and one key objective (as elsewhere in the borough) has to be to retain sufficient employment land in the immediate area so as to provide employment opportunities for local residents.</p> <p>No proposed change.</p>
266	Table 5.3	Cathedral Group	Nathaniel Lichfield & Partners	<p>Add following text to Table 5.3 at end of section on Future Growth in sub-section on Hayes - West Drayton Corridor to denote importance of managed release of employment land at the Blyth Road area in Hayes for regeneration opportunities in the Heathrow area:</p> <p>The Hayes West Drayton corridor also provides regeneration opportunities through the managed release of employment land at Blyth Road, Warwick Road / Kingston Lane, Pump Lane and the Hayes Bridge area. These opportunities will be delivered through Policy E1 as well as specific requirements in the Development Management and Heathrow Area Development Plan Documents.</p>	<p>The Council does not consider it necessary to add this further emphasis to the Plan. Table 5.3 already makes clear the opportunity for regeneration in the Hayes-West Drayton corridor. The note on the Grand Union Canal here is recognising its strategic role in the area as a focus for regeneration - rather than that of any individual sites.</p> <p>Given the inclusion of the list of areas at paragraph 5.11 where the Council already notes the potential for the managed release of employment land (including part of Blyth Road), the Council does not consider any further clarity will be added to the Core Strategy by this proposed additional wording. No proposed change.</p>
448	Table 5.3	Henry Streeter Automotive Ltd	CGMS Ltd on behalf of Henry Streeter Automotive Ltd	<p>In dealing with Heathrow Airport and perimeter sub area the table under "future growth" fails to consider opportunities in the Bath Road for hotel growth. It seeks to defer the matter to a later document when in considering boundaries this is of strategic importance.</p>	<p>The Core Strategy sets out the broad approach which the Council intends to take for the future spatial development of the borough. With respect to hotel development its approach will be primarily to seek to steer this towards those centres with high levels of public transport accessibility. Once further work is completed on other parts of the Local Development Framework - notably the Site Allocations and Heathrow Area Development Plan Documents - a more detailed strategy will effectively be in place for the development of hotels across the borough. No proposed change.</p>

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
577	Table 5.3	Arora Management Services Ltd		<p>Core Strategy policies concerning development proposals at Heathrow Airport should be applied flexibly.</p> <p>Hotels sited directly adjacent to airport passenger terminals are highly sustainable and effectively comprise airport operational development as nearly 100% of guests are likely to be airline passengers or crew. Such hotels are far more sustainable than alternative sites off-airport - for example along the Bath Road – where transfer of guests to and from the airport terminals has to be made by road.</p> <p>The Core Strategy proposes a change of approach to that of the existing UDP policy and this is considered unjustified by any evidence. All major airports in Britain accommodate hotels on-airport where their sustainability benefits can far exceed those of airport developments such as some types of airport warehousing.</p> <p>Wording should be added to Table 5.3 and / or Policy E3 to the effect that: <i>“Exceptions for non-operational development will only be considered on a site specific basis having regard to the proposal’s:</i>  <i>i) links to the operation of the airport;</i>  <i>ii) sustainability benefits;</i>  <i>iii) improved efficiency in the use of airport operational land.”</i></p>	<p>The Council is aware of the need to apply its policies flexibly. It has taken the position that land within the Airport boundary should be used for Airport-related development. This is partly to ease pressure for further Airport-related development beyond that boundary in future.</p> <p>With hotel development the Council has clearly stated its position as to where it would prefer future developments to take place - in local town centres with good public transport access and links with the Airport. The Council has to balance its future land use needs in the Heathrow area and one key objective (as elsewhere in the borough) has to be to retain sufficient employment land in the immediate area so as to provide employment opportunities for local residents.</p> <p>No proposed change.</p>
62	Policy E3: Strategy for Heathrow Opportunity Area	Mr John McDonnell MP		<p>No reference to:</p> <p>the need for community involvement</p> <p>the need to secure employment for local people not commuters and to improve skills and education to achieve this</p>	<p>The Statement of Community Involvement adopted by the Council in November 2006 sets out the community consultation arrangements for the preparation of Development Plan Documents. This would guide consultation arrangements for a Heathrow Area Development Plan Document and would ensure community involvement in its</p>

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				<p>the development of local targets for employment for local residents</p> <p>targets for air quality, and</p> <p>the need to restrict airport activities within the airport to prevent airport sprawl.</p> <p>The document needs to emphasise the need for local jobs for local people and describe how this could be achieved. There needs to be a commitment to the development of local community plans, setting out targets for promoting local employment within the constraints of improving air quality and tackling climate change.</p> <p>There should be a statement that airport activity will be retained within the airport to prevent airport sprawl.</p>	<p>preparation.</p> <p>The provision of job training (and aim to secure a percentage of additional growth from jobs created in the Heathrow area for local residents) is an objective of policy E7 on "Raising Skills" when major developments come forward.</p> <p>Policy EM8 in the Core Strategy already sets out the Council's approach on air quality - i.e. there should be no worsening of air quality resulting from new development in the Air Quality Management Area.</p> <p>At Table 5.3 the section on Heathrow Airport already undertakes to ensure that development within the airport boundary is protected for activity directly related to the Airport - i.e. to prevent sprawl occurring.</p> <p>No proposed change.</p>
125	Policy E3: Strategy for Heathrow Opportunity Area		Gleeson Developments Ltd	<p>We would suggest that flexibility as suggested within paragraph 4.14 and 4.46 of PPS 12 is identified within the document to allow additional growth to be provided within the Heathrow Opportunity Area should capacity testing identify it. This would allow the subsequent Opportunity Area DPD to be in conformity with the CS.</p>	<p>Work on subsequent parts of the Local Development Framework will require further capacity testing as the objector suggests. This is noted already in the Core Strategy at paragraph 4.12. Both the Site Allocations and Heathrow Area Development Plan Documents can be expected to come forward with detailed land use proposals for the area which will identify potential capacity which can then be tested at that stage. This will not prevent further development coming forward beyond that specified in the Core Strategy - which is intended to broadly indicate assumptions on future growth in the borough, rather than set levels of growth which cannot then be exceeded within the plan period.</p> <p>No proposed change.</p>

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
153	Policy E3: Strategy for Heathrow Opportunity Area	Individual		<p>The wording for Policy E3 should be as follows: "Policy E3: Strategy for Heathrow Opportunity Area The Council will prepare a DPD for the Heathrow OA to achieve the future growth set out in table 5.3, in consultation with Local Residents Groups, and GLA. This DPD will help manage development and protect land within the boundaries of Heathrow Airport for airport related activities. It will balance demand for hotel and employment uses and ensure that local people benefit from sustainable economic growth.</p> <p>The DPD will also set out requirements for climate change and measures to improve local air quality especially with relation to the EU requirements. The wording for Monitoring Policy E3: "Policy E3 will be monitored through the Council's Local Development Scheme and subsequent targets will be set out in the AMR which will reflect EU regulations."</p>	<p>The two proposed changes involve including wording (a) in policy E3 to ensure the Council is committed to undertaking consultation with residents groups for the Heathrow Area Development Plan Document and (b) including wording in policy E3 and in its monitoring section on improving air quality in relation to EU regulations.</p> <p>Undertaking consultations with local residents' organisations is already a requirement of the Council's adopted Statement of Community Involvement for the preparation of Development Plan Documents. Consequently the Council does not consider it necessary to include a specific reference in this policy to consulting local residents' organisations.</p> <p>Specific reference to the EU air quality regulations is unnecessary - the Core Strategy is not required to carry references to other EU or national legislation within its policies.</p> <p>No proposed change.</p>
158	Policy E3: Strategy for Heathrow Opportunity Area	Individual		<p>The wording for Policy E3 should be as follows: "Policy E3: Strategy for Heathrow Opportunity Area</p> <p>The Council will prepare a DPD for the Heathrow OA to achieve the future growth set out in table 5.3, in consultation with Local Residents Groups, and GLA. This DPD will help manage development and protect land within the boundaries of Heathrow Airport for airport related activities. It will balance demand for hotel and employment uses and ensure that local people benefit from sustainable economic growth.</p>	<p>The two proposed changes involve including wording (a) in policy E3 to ensure the Council is committed to undertaking consultation with residents groups for the Heathrow Area Development Plan Document and (b) including wording in policy E3 and in its monitoring section on improving air quality in relation to EU regulations.</p> <p>Undertaking consultations with local residents' organisations is already a requirement of the Council's adopted Statement of Community Involvement for the preparation of Development Plan Documents. Consequently the Council does not consider it necessary to include a specific</p>

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				<p>The DPD will also set out requirements for climate change and measures to improve local air quality especially with relation to the EU requirements."</p> <p>The wording for Monitoring Policy E3: "Policy E3 will be monitored through the Council's Local Development Scheme and subsequent targets will be set out in the AMR which will reflect EU regulations."</p>	<p>reference in this policy to consulting local residents' organisations.</p> <p>Specific reference to the EU air quality regulations is unnecessary - the Core Strategy is not required to carry references to other EU or national legislation within its policies.</p> <p>No proposed change.</p>
182	Policy E3: Strategy for Heathrow Opportunity Area	Universities Superannuation Scheme Ltd	Drivers Jonas Deloitte	<p>USS remains in support of the strategy for Heathrow Opportunity Area (Policy E3). This seeks to help manage development and protect land within Heathrow, balance demand for hotel and employment uses and ensure that local people benefit from sustainable economic growth.</p> <p>USS continues to welcome 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.</p> <p>However, in order to capitalise on job creation, the emerging policy should acknowledge the contribution of other forms of employment, other than those within the B classes, can have on the economic prosperity and wider regenerative effect of Hillingdon.</p> <p>Therefore, USS considers that applications for other employment uses should be judged on a case by case basis allowing economic, environmental and transport impacts to be assessed in relation to specific sites. Flexibility to allow this should be built into the policy in</p>	<p>The policies on employment land in the Core Strategy do not preclude consideration of other land uses being located there. In particular the Council would note that further work to be carried out on the Site Allocations Development Plan Document will consider whether sites can be proposed for managed release from previous employment use to accommodate other land uses.</p> <p>No proposed change.</p>

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				advance of adoption.	
190	Policy E3: Strategy for Heathrow Opportunity Area	British Airways plc	Lichfield Planning	<p>Revise text at Policy E3 to read: Strategy for Heathrow Opportunity Area</p> <p>The Council will prepare a Development Plan Document (DPD) for the Heathrow area to achieve the future growth set out in Table 5.3, in consultation with BA and BAA, the GLA and London Borough of Hounslow. This DPD will help manage development and protect land within and around Heathrow for airport-related activities, including for a potential future consideration of R3. It will balance demand for hotel and employment uses, and ensure that local people benefit from sustainable economic growth. The DPD will also set requirements consistent with national policy targets for climate change mitigation and adaptation through a low carbon emission strategy and measures to improve local air quality, having regard to emissions from buildings of various uses and road transportation to various destinations as well as the agreed environmental standards for Heathrow.</p>	<p>The proposed wording modifications are considered unnecessary by the Council.</p> <p>The existing Statement of Community Involvement would ensure the involvement of the British Airports Authority and British Airways as two major stakeholders in the borough's Local Development Framework - they do not need to be named in the policy - where the GLA and LB Hounslow are shown as the major plan-making authorities for the Airport and immediate area in conjunction with Hillingdon Council.</p> <p>The Council does not consider it reasonable to expect that during the Plan period it would have to reserve land originally identified as required for the Runway 3 proposal.</p> <p>The additional wording on air quality adds little to the existing policy. It also seeks to set out the nature of the approach to be taken in the Development Plan Document on the precise nature of the low carbon emission strategy and measures to improve local air quality. These are still some way ahead and need further investigation by the Council.</p> <p>No proposed change.</p>
216	Policy E3: Strategy for Heathrow Opportunity Area	Heathrow Airport Ltd		The boundary of the Heathrow Opportunity Area should be broadly defined. In line with HAL's comments on para 4.15, we believe that the Core Strategy should define the boundary (in broad terms) that will be covered by the DPD.	<p>The designation of the Heathrow Opportunity Area is a matter for the Mayor of London as this is a proposal in the London Plan. The proposal has yet to be taken forward by the Mayor and the extent of the proposed designation in LB Hillingdon is not known.</p> <p>No proposed change.</p>

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
347	Policy E3: Strategy for Heathrow Opportunity Area	Individual		The policy is weak and should allow growth where it is not at the expense of the environment, heritage or existing communities. Current residential areas should be protected and firm boundaries placed around Heathrow Airport so that it does not encroach on the surrounding areas - where work needs to be done to improve the community life of the surrounding villages.	<p>Various sections of the Core Strategy aim to protect and enhance the environment, heritage and existing communities - as well as allow for further growth. A number of Strategic Objectives cover this theme, e.g. SO1-SO3, SO8, SO10 and SO11 and in turn various policies in the Core Strategy look to protect and enhance Hillingdon's heritage (HE 1), built environment (BE1), combat climate change (EM2), protect the borough's Green Belt, Metropolitan Open Land and Green Chains (EM2) and ecology (EM7).</p> <p>No proposed change.</p>
316	Policy E3: Strategy for Heathrow Opportunity Area	Individual		<p>I don't believe there has been full consultation.</p> <p>Not enough detail on how goals can be achieved. South of the borough does not have room to expand, roads, schools etc.</p>	<p>Consultations on the Core Strategy to date have been carried out in accordance with the Council's approved Statement of Community Consultation and these do constitute a full consultation exercise as required by the relevant regulations.</p> <p>The Council will be bringing forward further Development Plan Documents - on Site Allocations and specifically for the Heathrow Area - which can be expected to detail proposals explaining how the proposed growth in the south of the borough will be accommodated.</p> <p>No proposed change.</p>
336	Policy E3: Strategy for Heathrow Opportunity Area	Kerville Associates	Montagu Evans on behalf of Kerville Associates	We believe that the wording of Policy E3 is ineffective in its delivery for future growth. Despite the future of Stockley Park being discussed within Table 5.3, the policy wording focuses on the delivery of airport and hotel uses, with employment only receiving a passing reference. We believe that the policy and supportive text must recognise new and evolving industries, the benefits they bring for both Hillingdon and the wider London economy through utilising the location benefits of the borough. To overcome these problems, we	<p>Designation of the Heathrow Opportunity Area is a matter for the Mayor of London as this is a proposal from the London Plan.</p> <p>The Core Strategy has to be read as a whole and the Council takes the view that there is already sufficient detail in its broad policies and proposals to highlight the importance of employment generally and they do not preclude newer industries locating in the borough on existing employment / industrial sites.</p>

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				believe that Map 5.1 should be updated to identify the Heathrow Opportunity Area and include the wider Stockley Park area as an employment cluster. This will make the map sound and will help to overcome the related lack of effectiveness for Policies E2 and E3. With regard to Policy E3, we acknowledge and welcome further guidance through a specific Development Plan Document for the Heathrow area, and reference to this within the policy is appropriate. Notwithstanding this, Policy E3 requires further elaboration to make reference to the areas of growth in Table 5.3 to be sound.	No proposed change.
366	Policy E3: Strategy for Heathrow Opportunity Area	Bell Farm Christian Centre		The policy is not defined and appears to exclude residents from participating in the DPD - and does not protect residents from the erosion of residential areas. Consultation on the Strategy should be wider than just the GLA and London Borough of Hounslow and should include the residents who will be impacted by the expansion.	Consultations on the various parts of the Local Development Framework are undertaken in accordance with the Council's approved 2006 Statement of Community Involvement. This would equally be the case with a Heathrow Area Development Plan Document and local residents would be fully informed and involved in consultations during its preparation. No proposed change.
487	Policy E3: Strategy for Heathrow Opportunity Area	Mr John McDonnell MP		Policy E3: Strategy for Heathrow Opportunity Area - There is no reference to the need for community involvement, the need to secure local people employment not commuters, improve skills and education to achieve this, the development of local targets for employment for local residents, targets for air quality, and the need to restrict airport activities within the airport to prevent airport sprawl. The document needs to emphasise the need for local jobs for local people and describe how this could be achieved. There needs to be a commitment to the development of local community plans, setting out targets for promoting local employment within the constraints of improving air quality and tackling climate change. There should be a statement that airport activity will be retained	The Core Strategy is being drawn up following consultations with the local community - in accordance with the Council's approved 2006 Statement of Community Involvement. As further work proceeds on the Local Development Framework - e.g. for the Site Allocations Development Plan Document - the Council will consult the local community on proposals for future sites where growth for housing, community, commercial and other uses. It will again follow the requirements of the Statement of Community Involvement to do this.  Neighbourhood plans are yet to be enacted - they are currently a measure in the Localism Bill. The Council will ensure again that it involves the local community in work on any detailed area plans -



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				within the airport to prevent airport sprawl.	<p>e.g. the proposed Heathrow Area Development Plan Document.</p> <p>The Council's series of proposed Core Strategy strategic objectives and policies seek to protect and enhance the local environment (policy BE1), heritage (policy HE1) and communities (strategic objective SO6 and policy CI 1).</p> <p>The extent of the Heathrow Opportunity area is not yet defined - this is a proposal in the London Plan and has yet to be brought forward by the Mayor of London.</p> <p>The Council makes clear its intention (at Table 5.3) that development within the Airport boundary should be directly related to airport operations - with the intention that this will partly reduce any pressure for development in surrounding residential areas.</p> <p>No proposed change.</p>
36	Table 5.4	British Waterways		This section does not recognise the asset of the Grand Union Canal in Uxbridge and should make reference to its value and potential in supporting sustainable growth, for sustainable transport and health and well-being.	<p>Policy EM3 already gives general recognition to the value of the borough's canals in these respects. Consequently the Council does not consider it necessary to further alter the Core Strategy as proposed and highlight the role of the canal specifically in Uxbridge.</p> <p>No proposed change.</p>
37	Table 5.4	British Waterways		This section does not recognise the asset of the Grand Union Canal in Uxbridge and should make reference to its value and potential in supporting sustainable growth, for sustainable transport and health and well-being.	<p>Policy EM3 already gives general recognition to the value of the borough's canals in these respects. Consequently the Council does not consider it necessary to further alter the Core Strategy as proposed and highlight the role of the canal specifically in Uxbridge.</p> <p>No proposed change.</p>

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83	Map 5.2	VSM Estates	GVA Grimley Ltd	The boundary of the town centre extension into RAF Uxbridge as shown on Map 5.2 should be redrawn to reflect the area specified as the extension quarter on Map 8 of the adopted RAF Uxbridge Supplementary Planning Document (January 2009). This change will ensure that draft policy E4 of the Core Strategy and the guidance in the RAF Uxbridge SPD can be effectively implemented.	Disagree - indicative Map 5.4 in the Core Strategy reflects the latest position on the town centre extension at RAF Uxbridge following the planning application considered by the Council in 2010. No proposed change.
134	Policy E4: Uxbridge	Client unspecified	Quod Planning	Policy E4 does not explicitly refer to residential as an acceptable use. This is an obvious omission in drafting.	<p>As both national guidance and London-region policies already refer to the acceptability of residential uses in town centres, there does not need to be a further specific reference to this in the Core Strategy.</p> <p>The reference to mixed-use development in policy E4 effectively covers the point that residential housing could be incorporated within existing town centre redevelopments in Uxbridge. It could be seen to be appropriate growth as specified in Strategic Objective 16, helping to support the viability of the town centre by increasing potential "footfall" there.</p> <p>No proposed change.</p>
492	Policy E4: Uxbridge	Mr John McDonnell MP		More account should be taken of health needs with a growing population.	<p>Policy CI 1 does recognise the need for adequate health care provision to be made for the borough's community - partly in response to the growing population. The Strategy aims to locate health care facilities in existing town centres and other accessible locations to maximise community access.</p> <p>No proposed change.</p>
562	Policy E4: Uxbridge	Individual		<p>LATE SUBMISSION:</p> <p>Rather than "will" should state: "the Council must make improvements...".</p>	The proposed change is not considered to add any helpful further emphasis to the policy. No proposed change.

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259	5.31	IKEA	RPS on behalf of IKEA	Reference to Town & Neighbourhood Centres should be changed to Town Centres - to be consistent with the wording in PPS4.	<p>The Council has previously used a hierarchy of centres within its Unitary Development Plan which was divided into several categories of centres. Local businesses and residents organisations have become familiar with that categorisation. The Core Strategy has now simplified that hierarchy. The Council views the designation of its larger Town centres and other more local "neighbourhood" centres as comparable with that previous approach - and so easily understood by local businesses and residents - whilst also complying with the requirements of PPS4.</p> <p>No proposed change.</p>
543	5.31	Bride Hall Developments Ltd		Para 5.31 states that District, Minor and Local Centres are referred to as neighbourhood centres. Later in the paragraph references are made to local centres and previous paragraphs make references to town and neighbourhood centres. This inconsistent approach needs to be addressed.	<p>The Council has previously used a hierarchy of centres within its Unitary Development Plan which was divided into several categories of centres. Local businesses and residents organisations have become familiar with that categorisation. The Core Strategy has now simplified that hierarchy. The Council views the designation of its larger Town centres and other more local "neighbourhood" centres as comparable with that previous approach - and so easily understood by local businesses and residents - whilst also complying with the requirements of PPS4.</p> <p>No proposed change.</p>
63	Map 5.3	Mr John McDonnell MP		Lack of appreciation of the challenges facing Hayes Town Centre, the Uxbridge Road shopping area in Hayes and the local shopping parades, particularly the lack of commitment to improving the public realm in these areas and community involvement in improving these areas. There needs to be a greater emphasis placed upon improving the public realm in all the shopping areas and centres in the south of the borough, including engaging the local community in developing local plans to	The Core Strategy already contains a commitment at policy E5 to protect its local shopping centres and parades. It regularly surveys its retail centres annually to assess their nature and character and keep under review changes affecting them. Future work on the Site Allocations Development Plan Document can be expected to bring forward opportunities for new uses in town centres to support their continued functioning.

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				<p>implement these improvements. There also needs to be a commitment stated to ensuring community safety within the shopping areas and making these areas child friendly.</p>	<p>A Heathrow Area Development Plan Document is to be prepared as a later stage of the Local Development Framework. It can be expected to address the detailed policy aspects of improving the public realm in the town centres across the south of the borough. The Core Strategy deals with the borough as a whole and already broadly deals with the built environment standards the Council expects to see in all public spaces.</p> <p>Community safety for the whole community is already a requirement of the main policy in the Core Strategy dealing with the Built Environment - policy BE 1.</p> <p>No proposed change.</p>
243	Map 5.3	Yiewsley and West Drayton Town Centre Action Group		<p>Despite Yiewsley and West Drayton having a disproportionate amount of the borough's major residential developments the retail sector, alongside the rest of the infrastructure, has declined considerably. The legend for (Map 5.3) the map on page 48 does not include giving support to specialist retail or independent shops or strengthening core shopping areas in Yiewsley &amp; West Drayton. These policies should be included to stop the retail sector going into terminal decline.</p>	<p>Map 5.3 is purely illustrative. It will be for later parts of the Local Development Framework (rather than the broad strategic approach in the Core Strategy) to set out the detailed development management policies to be adopted for each centre - e.g. with respect to strengthening the retail core in a particular centre.</p> <p>No proposed change.</p>
135	Map 5.3	c/o Turley Associates	Turley Associates	<p>Map 5.3 shows the hierarchy of the shopping centres in the Borough and classifies South Ruislip as a Local Centre. When referring to the hierarchy of centres as defined in PPS4 Policy XC3, South Ruislip has the characteristics of a District Centre and should be accorded this status.</p> <p>The Sainsbury's at 11 Long Drive, South Ruislip is still only partially included within the Local Centre Boundary of South Ruislip. The store itself is included within the Local Centre</p>	<p>Annex 2 of the 2009 draft Replacement London Plan specifies the network of Metropolitan, Major and District centres across London. The Core Strategy needs to be in general conformity with the London Plan and has followed the designations contained in the London Plan policies.</p> <p>The nature of the South Ruislip centre has been kept under review through the Council's annual shopping centre surveys and these support the London Plan's definition of the centre's role as</p>

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				<p>Boundary and the Core Shopping Area. However the car park and petrol filling station lay to the south of the store, with only the northern half of the car park falling within the Local Centre Boundary, the southern half together with the petrol filling station falling outside this boundary.</p> <p>Given these facilities provide an important local service for the community the southern half of the site should be included in the Local Centre Boundary and the Core Shopping Area.</p>	<p>being a local centre.</p> <p>The issue of the detailed boundary of the centre is not to be addressed by the Council in the Core Strategy. It will be analysing current shopping centre boundaries as part of work on other parts of the Local Development Framework - primarily in the Development Management Development Plan Document.</p> <p>No proposed change.</p>
136	Map 5.3	c/o Turley Associates	Turley Associates	<p>With reference to the hierarchy of centres as defined in PPS4 EC3.1(b) Uxbridge Road, including the Lombardy Retail Park, has the characteristics of a District Centre, and should be accorded this status</p> <p>Furthermore, Lombardy Retail Park is included within the town centre boundary of Uxbridge Road. The character and retail offer of Lombardy Retail Park is considered to be complementary to the existing Primary Shopping Frontage of Uxbridge Road, Hayes, and as such the Retail Park should be afforded equal status. It is suggested, therefore, that the Lombardy Retail Park be identified as Primary Shopping Frontage.</p>	<p>The current hierarchy of centres in the Core Strategy reflects that set out in the 2009 draft Replacement London Plan. The Core Strategy has to be in general conformity with the policies and proposals in the London Plan.</p> <p>In the case of Uxbridge Road and the Lombardy Retail Park the Council is aware of the changing nature of both and their inter-relationship. The Council will be considering the detailed boundaries and status of its local centres in later work for the Local Development Framework - for the Development Management Development Plan Document and will undertake to re-assess the designation of the centre as a whole then, together with the extent of primary and secondary shopping frontages.</p> <p>No proposed change.</p>
107	5.32	Lafarge Aggregates Ltd		<p>Prior to the final sentence of paragraph 5.32, we suggest additional wording as follows "Allocations will be put forward only if they are found consistent with National Policy".</p>	<p>The Council would have to take national policy into account when deciding on future designations in a Development Plan Document in order for it to be found sound at a future examination in public. It does not require a qualification adding here to the Core Strategy to specify this.</p> <p>No proposed change.</p>

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261	5.33	IKEA	RPS on behalf of IKEA	Paragraph 5.33 should be clear that it relates to the comparison goods floorspace needs of the Borough. The Core Strategy should not preclude additional comparison goods retail floorspace elsewhere within the Borough particularly in relation to the need identified over and above that indicated in Table 5.5 and Table 5.4 provided that such proposals comply with the policy tests set out in PPS4. applications	Paragraph 5.33 makes clear the requirement for comparison goods floorspace in the borough upto 2026. The accompanying Table 5.5 highlights the requirements for the individual district centres. Elsewhere the expected provision of floorspace will be expected to be in Uxbridge and at locations which have yet to be identified through later work on detailed parts of the Local Development Framework - the Site Allocations, Proposals Map, Heathrow Area and Development Management Development Plan Documents. No proposed change.
415	5.33	Greater Manchester Pension Fund	Capita Symonds on behalf of Greater Manchester Pension Fund	Paragraph 5.33 needs to bring into account convenience shopping requirements for the plan period to 2026.	<p>For the purposes of the Core Strategy the Council considers that the 2006 study together with the 2010 Position Statement on Employment Land and Comparison Retail Floorspace give the necessary evidence base for the broad approach set out on retailing and need not delay adoption of the Strategy.</p> <p>The Council will bring forward further research on town centres and retailing in connection with later work on the Local Development Framework - notably in support of the Site Allocations and Development Management Development Plan Documents which will look at detailed retail capacity in the borough's town centres and at detailed town centre boundaries and shopping frontage designations. No proposed change.</p>
281	Table 5.5	Legal and General Property Partners (Life Fund) Ltd	Drivers Jonas Deloitte on behalf of Legal & General Property Partners (Life Fund) Ltd	Support the roles of Ruislip & Ickenham town centres in the table.	Noted.  No proposed change.
412	Table 5.5	Greater Manchester Pension Fund	Capita Symonds on behalf of Greater Manchester Pension Fund	The Core Strategy does not have an up to date retail study and any assumptions regarding retail growth are unsound as a result	For the purposes of the Core Strategy the Council considers that the 2006 study together with the 2010 Position Statement on Employment Land and Comparison Retail Floorspace give the

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				It follows that table 5.5 should reflect and quantify convenience shopping needs.	<p>necessary evidence base for the broad approach set out on retailing and need not delay adoption of the Strategy.</p> <p>The Council will bring forward further research on town centres and retailing in connection with later work on the Local Development Framework - notably in support of the Site Allocations and Development Management Development Plan Documents which will look at detailed retail capacity in the borough's town centres and at detailed town centre boundaries and shopping frontage designations.</p> <p>No proposed change.</p>
174	5.34	Waitrose Ltd	Barton Willmore	Amend paragraph 5.34 to refer to an additional 1,300 sq m of additional convenience floorspace instead of 415sq.m.	<p>For the purposes of the Core Strategy the Council considers that the 2006 study together with the 2010 Position Statement on Employment Land and Comparison Retail Floorspace give the necessary evidence base for the broad approach set out on retailing and need not delay adoption of the Strategy.</p> <p>The Council will bring forward further research on town centres and retailing in connection with later work on the Local Development Framework - notably in support of the Site Allocations and Development Management Development Plan Documents which will look at detailed retail capacity in the borough's town centres and at detailed town centre boundaries and shopping frontage designations. No proposed change.</p>
260	5.34	IKEA	RPS on behalf of IKEA	The Council should give serious consideration to updating the Retail Study to ensure that it adequately covers the Core Strategy vision period to 2026. This will ensure the evidence base is consistent with the national policy requirement set out in PPS4.	For the purposes of the Core Strategy the Council considers that the 2006 study together with the 2010 Position Statement on Employment Land and Comparison Retail Floorspace give the necessary evidence base for the broad approach set out on retailing and need not delay adoption of the Strategy.

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				<p>In particular the Retail Study should consider the need arising from increases to the residential population of the borough by reference to proposed housing growth (policy H1 and Table 6.5) and how this informs the town centre improvements shown on Map 5.3.</p> <p>Paragraph 5.34 should be amended to exclude reference to 415sqm convenience floorspace need and should be replaced with a statement which requires new convenience goods retail floorspace to be directed to existing centres in accordance with policy E5 and tested against PPS4.</p> <p>The Core Strategy should not preclude proposals for new retail floorspace within the Borough provided that such proposals comply with the policy tests set out in PPS4.</p>	<p>The Council will bring forward further research on town centres and retailing in connection with later work on the Local Development Framework - notably in support of the Site Allocations and Development Management Development Plan Documents which will look at detailed retail capacity in the borough's town centres and at detailed town centre boundaries and shopping frontage designations.</p> <p>No proposed change.</p>
273	5.34	Lidl (UK) GmbH	RPS	<p>The Retail Study should be updated to ensure that it adequately covers the Core Strategy period to 2026. This will assist in ensuring that the retail strategy is justified by credible evidence, is effective and also consistent with the national policy requirements set out in PPS4.</p> <p>In particular, the Retail Study should consider the need for convenience goods retail floorspace arising from the planned increases in housing and the residential population of the Borough as proposed by Policy H1.</p> <p>The reference to convenience retail needs within the Borough at paragraph 5.34 should be amended to reflect the findings of the updated Retail Study.</p> <p>Further to the above, the Core Strategy should not preclude proposals for new food stores</p>	<p>For the purposes of the Core Strategy the Council considers that the 2006 study together with the 2010 Position Statement on Employment Land and Comparison Retail Floorspace give the necessary evidence base for the broad approach set out on retailing and need not delay adoption of the Strategy.</p> <p>The Council will bring forward further research on town centres and retailing in connection with later work on the Local Development Framework - notably in support of the Site Allocations and Development Management Development Plan Documents which will look at detailed retail capacity in the borough's town centres and at detailed town centre boundaries and shopping frontage designations.</p> <p>No proposed change.</p>



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				<p>within the Borough coming forward, provided that they comply with the policy tests set out in PPS4. This is not only inconsistent with national policy but will stifle economic growth and job creation.</p> <p>The retail strategy should also recognise the benefits that can be provided by discount/LAD retailers in terms of improved choice and competition and social inclusion.</p>	
542	5.34	Bride Hall Developments Ltd		<p>LATE SUBMISSION:</p> <p>The Retail Study only assessed the period up to 2016 and does not account for retail growth in the Core Strategy. As such, it does not accord with PPS4, or provide a robust evidence base for the Core Strategy. The Retail Study should be updated to provide a sound evidence base.</p>	<p>For the purposes of the Core Strategy the Council considers that the 2006 study together with the 2010 Position Statement on Employment Land and Comparison Retail Floorspace give the necessary evidence base for the broad approach set out on retailing and need not delay adoption of the Strategy.</p> <p>The Council will bring forward further research on town centres and retailing in connection with later work on the Local Development Framework - notably in support of the Site Allocations and Development Management Development Plan Documents which will look at detailed retail capacity in the borough's town centres and at detailed town centre boundaries and shopping frontage designations.</p> <p>No proposed change.</p>
86	Policy E5: Town and Local Centres	Orbit Developments (Southern) Ltd	The Emerson Group	<p>It should be stated in paragraph 5.31 or policy E5 that the strategic town has become the metropolitan centre (Uxbridge). The major town centre has become a district centre and local centres remain local centres (I have established this from the definitions in the core strategy). It should be listed which centres identified in the current UDP fall into which of the new four categories of centre. The glossary should have a definition for a parade referred to in E5. The</p>	<p>The purpose of the Core Strategy is to set out the general spatial policy approach being taken across the borough. Detailed matters are to be dealt with in other parts of the Local Development Framework.</p> <p>Metropolitan, Major and District centre designations used in the Core Strategy reflect those already laid down in the London Plan and do not need to be explained as such in the Core</p>

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				<p>definitions in the glossary should more closely reflect the definitions in PPS4. Where do the previously defined corner shops and parades fall - are they in the local centres now and if so this should be stated. Each local centre and parade should be identified on a plan/listed.</p>	<p>Strategy. They are shown diagrammatically at Map 5.3. It will be for subsequent parts of the Local Development Framework - notably the Development Management Development Plan Document - to specify designated frontages within those local centres and shopping parades.</p> <p>No proposed change.</p>
173	Policy E5: Town and Local Centres	Waitrose Ltd	Barton Willmore	<p>Further clarification is requested in relation to the monitoring of convenience and comparison floorspace in both the Core Strategy and subsequent Annual Monitoring Reports (under Indicator BD4 (Core)). In our view the identified convenience retail floorspace would be met at the extended Waitrose store in Ruislip, and the Core Strategy would include this as a strategic allocation now.</p>	<p>For the purposes of the Core Strategy the Council considers that the 2006 study together with the 2010 Position Statement on Employment Land and Comparison Retail Floorspace give the necessary evidence base for the broad approach set out on retailing and need not delay adoption of the Strategy.</p> <p>The Council will bring forward further research on town centres and retailing in connection with later work on the Local Development Framework - notably in support of the Site Allocations and Development Management Development Plan Documents which will look at detailed retail capacity in the borough's town centres and at detailed town centre boundaries and shopping frontage designations. This will be informed by the Council's annual town centre surveys and analysis of planning permissions for the Annual Monitoring Report.</p> <p>No proposed change.</p>
175	Policy E5: Town and Local Centres	Waitrose Ltd	Barton Willmore	<p>Amend second paragraph in 'Implementation of Policy E5' to refer to change in town centre boundary to Uxbridge and add sentence to refer to other town centre boundary changes that will be identified in the Site Allocations DPD.</p>	<p>Map 5.2 already illustrates the proposed boundary change for Uxbridge town centre and a further statement at the implementation section of policy E5 is considered unnecessary by the Council.</p> <p>The Council will bring forward further research on town centres and retailing in connection with later work on the Local Development Framework -</p>

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					notably in support of the Site Allocations and Development Management Development Plan Documents which will look at detailed retail capacity in the borough's town centres and at detailed town centre boundaries and shopping frontage designations. No proposed change.
97	Policy E5: Town and Local Centres	Northwood Residents Association		Policy E5 (page 52) refers to the development of Town and Local Centres but no provision seems to have been made for additional parking. The council should not assume that additional journeys will be made by public transport.	Policy T1 in the Core Strategy aims to ensure that local centres providing services and facilities have good access. The emphasis in the policy is on securing more sustainable travel modes to provide that access, but does not preclude the provision of further car parking. The Council does keep car parking demand under review. It will also bring forward a Site Allocations Development Plan Document as a later part of the Local Development Framework which might provide further options for car parking provision in some centres.  No proposed change.
129	Policy E5: Town and Local Centres		Gleeson Developments Ltd	Policy E5 & Map 5.3 - we support the identification of Harlington as a Local Centre.	Noted.  No proposed change.
148	Policy E5: Town and Local Centres	WM Morrison Supermarkets Plc	Peacock and Smith Ltd	The retail study is out of date - the Core Strategy should reflect the findings of an up-to-date retail study, as required by the guidance set out in PPS4.	For the purposes of the Core Strategy the Council considers that the 2006 study together with the 2010 Position Statement on Employment Land and Comparison Retail Floorspace give the necessary evidence base for the broad approach set out on retailing and need not delay adoption of the Strategy.  The Council will bring forward further research on town centres and retailing in connection with later work on the Local Development Framework - notably in support of the Site Allocations and Development Management Development Plan Documents which will look at detailed retail capacity in the borough's town centres and at

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					<p>detailed town centre boundaries and shopping frontage designations.</p> <p>No proposed change.</p>
258	Policy E5: Town and Local Centres	IKEA	RPS on behalf of IKEA	<p>The Council should give serious consideration to updating the Retail Study to ensure that it adequately covers the Core Strategy vision period to 2026 including the projected growth in new housing within the Borough. This will ensure the evidence base is consistent with the national policy requirement set out in PPS4.</p> <p>Policy E5 should reasonably set out, by reference to a similar table to Table 5.5, comparable convenience goods needs within the Borough arising from the conclusions of any new Retail Study with particular regard areas promoted for significant housing growth (policy H1 and Table 6.5). Furthermore, the Retail Study should provide justification for the range of improvements planned for each of the centres as indicated on Map 5.3 and have regard to any major development sites, the development of which could affect the role and function of individual centres over the Core Strategy period and increase the need for additional retail floorspace.</p> <p>Policy E5 should not preclude additional retail floorspace within the Borough over and above that indicated in Table 5.5 (and any equivalent table relating to convenience goods) provided that such proposals comply with the policy tests set out in PPS4.</p>	<p>For the purposes of the Core Strategy the Council considers that the 2006 study together with the 2010 Position Statement on Employment Land and Comparison Retail Floorspace give the necessary evidence base for the broad approach set out on retailing and need not delay adoption of the Strategy.</p> <p>The Council will bring forward further research on town centres and retailing in connection with later work on the Local Development Framework - notably in support of the Site Allocations and Development Management Development Plan Documents which will look at detailed retail capacity in the borough's town centres and at detailed town centre boundaries and shopping frontage designations.</p> <p>No proposed change.</p>
553	Policy E5: Town and Local Centres	English Heritage		Policy E5: Town Centre and Local Centres (pg 50)-It is noted that the opportunity for Policy E5 to include a reference to investment into the historic environment as part of improvements to town centres has not been taken. This objective	Throughout the Core Strategy importance is given to the need to conserve and enhance the local historic environment. The Vision statement makes clear the importance of the borough taking full advantage of its distinctive strengths with regard

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				<p>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." We would suggest that Policy E5 should recognise the importance of the historic environment as part of the strategy to improve the quality of Hillingdon's town centres.</p>	<p>to places, communities and heritage. Later policy HE 1 directly covers the approach the Council will take to the conservation and enhancement of the historic environment and policy BE 1 sets out general design criteria which the Council will use to assess new development. These include ensuring that new development is "...designed to be appropriate to the identity and context of Hillingdon's buildings (and) townscapes...and make a positive contribution to the local area in terms of layout, form, scale and materials..."</p> <p>No further level of explanation is considered necessary by the Council. No proposed change.</p>
274	Policy E5: Town and Local Centres	Lidl (UK) GmbH	RPS	<p>The Core Strategy should be supported by an up to date Retail Study. The current Retail Study does not adequately cover the Core Strategy vision period to 2026. Furthermore the Retail Study should reasonably assess the need for additional retail floorspace arising from the projected growth in new housing units within the Borough. An updated study will assist in ensuring the evidence base is consistent with the national policy requirements set out in PPS4.</p> <p>Policy E5 should reasonably set out, by reference to a similar table to Table 5.5, comparable convenience goods needs within the Borough arising from the conclusions of any new Retail Study.</p> <p>Policy E5 should not preclude additional retail floorspace within the Borough over and above that indicated in Table 5.5 provided that such proposals comply with the policy tests set out in PPS4. This is not only inconsistent with national policy but will stifle economic growth and job creation.</p>	<p>For the purposes of the Core Strategy the Council considers that the 2006 study together with the 2010 Position Statement on Employment Land and Comparison Retail Floorspace give the necessary evidence base for the broad approach set out on retailing and need not delay adoption of the Strategy.</p> <p>The Council will bring forward further research on town centres and retailing in connection with later work on the Local Development Framework - notably in support of the Site Allocations and Development Management Development Plan Documents which will look at detailed retail capacity in the borough's town centres and at detailed town centre boundaries and shopping frontage designations.</p> <p>The Core Strategy already makes clear that it will be flexible in its approach to the figures quoted in Table 5.5, that it will monitor them and keep them under review.</p> <p>No proposed change.</p>

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				The retail strategy should also recognise the benefits that can be provided by discount/LAD retailers in terms of improved choice and competition and social inclusion.	
367	Policy E5: Town and Local Centres	Bell Farm Christian Centre		The change in town centre boundaries has not been defined - there is no indication of the magnitude of development nor of potential areas that might be adversely affected. The boundaries of town centre expansion should be defined.	<p>Detailed consideration of individual town centre boundaries is not a requirement for the Core Strategy.</p> <p>Work on a subsequent Development Management Development Plan Document is expected to consider existing town centre boundaries (and designated shopping frontages) in detail and come forward with proposals for any necessary changes in the light of current information.</p> <p>No proposed change.</p>
493	Policy E5: Town and Local Centres	Mr John McDonnell MP		The policy should refer to reducing anti-social behaviour and removing Heavy Goods Vehicles from local / town centres; no real measures are set out to protect and improve local / town centres - and there is no effective parking strategy. The influx of betting shops and pawn shops in Hayes town centre is damaging its vitality & viability and should be controlled more tightly. There needs to be recognition of the threat large, out-of-centre supermarkets pose. The Strategy should be more proactive in attracting a diversity of retail outlets and improving the environment of existing centres. The amount of non-retail uses should be reduced.	<p>The Core Strategy already aims to help build safe and inclusive local communities through its policies - e.g. at policy BE 1 (7). Detailed policies for local town centres will be addressed in later parts of the Core Strategy - notably the Development Management and Heathrow Area Development Plan Documents. These can be expected to address the composition of existing shopping frontages and approach to further shopping provision in individual centres.</p> <p>A parking strategy and the routing of Heavy Goods Vehicles are outside the remit of the Core Strategy and will be addressed in other Council documents - e.g. the Local Implementation Plan.</p> <p>No proposed change.</p>
533	Policy E5: Town and Local Centres	Arla Foods UK Plc	BNP Paribas Real Estate	Generally support the policy but call for redesignation of South Ruislip town centre as a minor centre rather than a local one to recognise its existing retail offer, its catchment area and	The Council will bring forward further research on town centres and retailing in connection with later work on the Local Development Framework - notably in support of the Site Allocations,

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				potential to further cater for everyday needs of the local area. The Arla Food former dairy site offers potential to expand and improve the retail, residential and commercial offer of South Ruislip.	Proposals Map and Development Management Development Plan Documents which will look at detailed retail capacity and role of the borough's town centres and at detailed town centre boundaries and shopping frontage designations. No proposed change.
424	Policy E5: Town and Local Centres	Tesco Stores Ltd	GL Hearn on behalf of Tesco Stores Ltd	Policy lacks consistency with Site Allocations document. And SO16. Map 5.1 does not acknowledge town centre improvements that are likely to accrue from the redevelopment of the Master Brewer Site. Reliance on specialist retail and independent shops will not secure retail led development of the site.	<p>The Council is in the process of substantially redrafting the Site Allocations Development Plan Document. What will effectively be a new document will produced later by the Council. At present it is uncertain what approach will be taken to individual sites across the borough and it would be premature to include a commitment in the Core Strategy concerning the Master Brewer Site.</p> <p>The Council would also note that it will be producing a Development Management Development Plan Document which will consider the issue of detailed town centre boundaries and shopping frontage designations.</p> <p>No proposed change.</p>
544	Policy E5: Town and Local Centres	Bride Hall Developments Ltd		Policy E5 sets out the proposals for the provision of additional retail floorspace and proposals for town centres up to 2026. It is considered that the Council should update its retail study to take account of population increases and growth up to 2026. In accordance with PPS4 the level of convenience floorspace required should be set out in a similar fashion to comparison floorspace. Further depth should be provided to set out how town centres will be improved and how this will be accommodated over the period of the Core Strategy.	<p>For the purposes of the Core Strategy the Council considers that the 2006 study together with the 2010 Position Statement on Employment Land and Comparison Retail Floorspace give the necessary evidence base for the broad approach set out on retailing and need not delay adoption of the Strategy.</p> <p>The Council will bring forward further research on town centres and retailing in connection with later work on the Local Development Framework - notably in support of the Site Allocations and Development Management Development Plan Documents which will look at detailed retail capacity in the borough's town centres and at detailed town centre boundaries and shopping frontage designations.</p>

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					The Core Strategy already makes clear that it will be flexible in its approach to the figures quoted in Table 5.5 that it will monitor them and keep them under review. No proposed change.
38	Policy E6: Small and Medium-Sized Enterprises (SME)	British Waterways		The Grand Union Canal offers opportunities for supporting SMEs through business barges, particularly suitable for small creative and ITC businesses that would complement adjacent employment and mixed use land uses. Barges, as at Tottenham Hale and Paddington Basin, also provide activity on the waterspace and passive surveillance, encouraging better use of this resource.	The Council would consider such proposals within the overall planning policy framework provided on canals by the London Plan and the Core Strategy.  No proposed change.
164	Policy E6: Small and Medium-Sized Enterprises (SME)	Workspace Group	Ransome and Company Ltd	Add an additional criterion to policy E6 that sets out how small and medium sized accommodation can be delivered through enabling development whereby a higher value land use is included within a mixed-use development to bring forward modern employment space for SMEs.	The policy already clearly states the Council's intention to seek provision of affordable accommodation for SME firms across the borough. It is also undertaking to keep the provision of SME accommodation under review through its Annual Monitoring Report. The Council appreciate that enabling development could be sought to provide SME accommodation as proposed by the objector - e.g. through the use of a planning obligation with an appropriate site. It is not considered necessary to detail this approach in addition within the Core Strategy.  No proposed change.
534	Policy E6: Small and Medium-Sized Enterprises (SME)	Arla Foods UK Plc	BNP Paribas Real Estate	Support the development of accommodation for small and medium size firms but do not support any reference to affordability in the policy - which suggests the policy would control market and rental levels for these businesses.	Support for further accommodation noted. The Council would not seek to control market or rental levels but would seek to provide a range of different types of business accommodation so as to ensure a range of premises are available to support different sized firms in the borough. No proposed change.
356	5.39	Hayes Town Partnership		The Plan should be amended to recognise that in addition to promoting retraining the Council's economic strategy should seek to build on the	This is a matter for the Council's Economic Strategy rather than the spatial Core Strategy.



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				existing skill base and to target appropriate industries to come to the Borough and use these skills.	No proposed change.
165	Policy E7: Raising Skills	Workspace Group	Ransome and Company Ltd	Workspace supports the promotion of links between local businesses and universities.	Noted. No proposed change.
368	Policy E7: Raising Skills	Bell Farm Christian Centre		Does not set targets for jobs for local people - the policy should set targets which demonstrate it is effective.	The Core Strategy is a spatial policy document - the setting of targets as proposed would instead be covered by the Council's Economic Strategy. The Core Strategy's role here is more one of identifying a need for further employment growth and then to make broad spatial provision for that (included at section 5), rather than to set a detailed jobs target for local people. No proposed change.
59	6	Individual		<p>With regard to housing, there are suggestions:</p> <ol style="list-style-type: none"> <li>1. Better water usage and sustainability methods taken into consideration with regard to housing density</li> <li>2. Residents in the local area where housing is to be built should be better consulted and their views taken into consideration rather than being disregarded lightly. After all, the changes will impact upon them and their area of residence.</li> <li>3. Better placing of the road drainage systems so no localised flooding occurs</li> <li>4. Making sure that the correct Brownfield sites are developed, and this doesn't cause Hillingdon to move facilities to a new location without any need. This would be a waste of money, time and resource.</li> <li>5. Instead of building lots of offices (which is already surplus at Stockley Park) or hotels, it would be better to consider these sites for</li> </ol>	<p>Responses to the above points are as follows:</p> <ol style="list-style-type: none"> <li>1. Housing density will need to reflect guidance in the Mayor's London Plan and is addressed in paragraph 6.24 of the document.</li> <li>2. Residents are consulted throughout the production of the Core Strategy and other development plan documents, in accordance with the Council's Statement of Community Involvement.</li> <li>3. Issues related to drainage and water provision have been considered as part of the production of the Infrastructure Schedule in Appendix 2 and the Strategic Infrastructure Plan. This takes account of water supplies over the period of the Core Strategy. Discussions with Thames Water indicate the some drainage improvements may be required along the A4 to accommodate growth. Site specific drainage issues would be addressed as part of the determination of planning applications, through discussion with statutory consultees.</li> </ol>

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				<p>housing (provided the transport links are also considered alongside)</p> <p>6. Better (and longer than the minimum) consultation with residents located around an area that is going to be developed, whether that is for waste management or housing. I mean that residents are actively consulted and made aware of changes rather than being passively notified by the minimum legal requirement-this is not the best method as it involves the Council resident to be always looking actively. This would be a constant worry as sometimes Council deadlines are changed and delayed. Surely, it would be better to have a better notification e.g. signs posted up in the affected area? Also, to take their views into consideration with empathy in the decisions that are made.</p> <p>7. Better usage of currently unoccupied council housing stock so that the housing needs can also be met that way; it must be better than letting houses become derelict. That is a waste of resource when the need of more housing is always being publicly declared in the media.</p>	<p>4 and 5. Specific sites will be identified for development in the forthcoming Site Allocations DPD. Sites will be identified to meet targets for housing provision or office space in the London Plan or other evidence based documents. The Site Allocations document will be consulted on to allow residents to comment.</p> <p>6. The Council has held two six week rounds of consultation on the Core Strategy. This included a range of drop in sessions across the borough.</p> <p>7. Issues related to social housing will be addressed in other Council housing strategy documents, including the Council's Housing Market Assessment.</p> <p>No proposed change.</p>
244	6	Yiewsley and West Drayton Town Centre Action Group		<p>Concern has been expressed as to the allocation of space in Yiewsley &amp; West Drayton to provide more housing. As stated previously, this area has taken the brunt of major developments with more to come. Current policy has let this area down badly by failing to ensure a commensurate upgrading of the infrastructure. There is no definitive policy detail in this document that indicates the current situation would change, if this Core Strategy is adopted. It has been noted that the document states that developments will have 50% affordable housing. The definition of affordable housing continues to cause some confusion as it now seems to</p>	<p>The Council is considering introducing the Community Infrastructure Levy as a new mechanism of funding community infrastructure. The following paragraph will be introduced in the supporting text to policy CI1.</p> <p>The Council currently secures developer contributions towards infrastructure by way of planning obligations, with the support of Hillingdon's adopted Planning Obligations Supplementary Planning Document. In November 2010, the government confirmed that this mechanism of funding infrastructure will be replaced with the Community Infrastructure Levy</p>

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				<p>indicate 'Social Housing' rather than affordable property for those wishing to purchase their homes. The strategy should define, unambiguously, what affordable housing means. There is no definitive data as to the need for more housing in Yiewsley &amp; West Drayton. The allocation of sites, as laid down in the Core Strategy, for such a purpose would indicate a contradiction in relation to Chapter 5. Page 60 indicates an underestimate of the housing trajectory (pages 54-65)</p>	<p>(CIL). Unlike S106, CIL payments will apply to the majority of new development in the borough. The Council has undertaken to prepare a CIL Charging Schedule and will be consulting on this in accordance with Government Guidance.</p> <p>The Core Strategy includes the definition of affordable housing as set out in government planning guidance for housing. It contains a borough-wide target for provision; this is not broken down into area specific targets. No proposed change.</p>
238	6	Individual		<p>If housing growth is to take place, there should be a clear link to the number of additional educational places that will be required locally - and the amount of additional parking for teachers and parents.</p>	<p>The Core Strategy acknowledges that 18 new primary school forms of entry are required to address population growth. The majority of these places are required in the south of the borough. No proposed change.</p>
294	6.6	Garden City Estate Residents' Association		<p>The retention of indicative density targets in the draft Replacement London Plan is unacceptable. High densities for housing are having an adverse effect on the accommodation available to residents and resulted in pressure on local schools, health and community infrastructure. Densities must be reduced to enable a balanced provision of these to be made.</p>	<p>The Core Strategy is required to be in general conformance with the Replacement London Plan. Densities figures are provided as a guide and are subject to local circumstances. No proposed change.</p>
521	6.6	L B Hillingdon (Labour Group)		<p>Para 6.6 (4) The retention of indicative density targets in the Replacement London Plan is unacceptable.</p>	<p>The Core Strategy is required to be in general conformance with the London Plan. This provides indicative densities and the implementation section of policy H1 notes that these guideline densities will be applied subject to local characteristics and circumstances.</p>
98	6.10	Northwood Residents Association		<p>[NOTE: The submitted letter refers to Policy E6 but the page reference (page 56) appears to refer to paragraph 6.10 and the Council has replied on that basis] The section at paragraph 6.10 covering new homes makes no mention of provision for the elderly. There is a specific need for pensioners who own their own homes to</p>	<p>The issue of equality of opportunity for all is a key theme running throughout the Core Strategy. The Vision statement includes an objective of securing improved accessibility for all sections of the community to housing in the borough - this includes the specialised needs of older residents. The Strategy notes the need to meet specific local</p>

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				<p>downsize into good quality suitable housing. Neither is there mention of additional sheltered accommodation, private or otherwise.</p> <p>As stated before, no mention is made of the Southall development.</p>	<p>housing needs alongside its overall housing targets (at paragraph 6.5) and the need for affordable housing development in particular to include provision for older people (at paragraph 6.29). Housing developments are monitored annually by the Council and will be kept under review to assess whether housing provision for different sectors of the population - notably the growing proportion of older people in the borough - is sufficient.</p> <p>No proposed change.</p>
468	6.11	Mayor of London	Greater London Authority	<p>The borough is asked to consider whether the promotion and support for student accommodation could be appropriate. The Mayor's DRLP recognises there may be scope for a more dispersed distribution of student accommodation in London. The borough may also wish to consider how student housing can contribute to mixed and balanced communities.</p>	<p>Hillingdon is home to Brunel University, which has provided some 1,600 new halls of residence in recent years. It is considered unlikely that further provision will be made in the near future. No proposed change.</p>
469	6.12	Mayor of London	Greater London Authority	<p>The London SHMA should be recognised in Para 6.12 as a 'relevant document'. The Council needs to be mindful that London's housing market is unique and is generally considered as a single housing market area, with little regard to borough boundaries. Although the Council is correct to consider its own housing needs and challenges as a priority, the Council should also consider the impact of its approach on London as a whole. This is in accordance with Para 3.39 of the Draft Replacement London Plan.</p>	<p>The London-wide SHMA is recognised as a relevant document at paragraph 6.12.</p>
357	6.16	Hayes Town Partnership		<p>It is recommended that Policy H1 Housing Growth should recognise that the strategic dwelling requirement should take into account the need for family accommodation with 2, 3 or 4 beds</p>	<p>Paragraph 6.30 reflects the need for larger accommodation. This paragraph will be amended to refer specifically to family accommodation.</p>
16	Policy H1: Housing Growth	Individual		<p>1) There is no overall thought/action to housing and the infrastructure e.g. the roads / traffic /</p>	<p>No proposed change. 1) Infrastructure providers have been consulted as part of the production of</p>

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				<p>health / education. Needs to have proper regard to housing density and the effect of the same on the environment and health demands, education now and in the future, traffic requirement, pollution etc.</p> <p>2) There is inadequate planning /monitoring / enforcement of infill sites and their effect. Present standards are inadequate with regard to all planning matters particularly smaller infill site / outbuildings and all aspects of enforcement. The standard of enforcement is terrible.</p> <p>3) There is inadequate response / monitoring / enforcement of the use of outbuildings.</p>	<p>the Core Strategy and the results have fed into the production of the Strategic Infrastructure Plan. No significant physical infrastructure requirements were identified as being necessary to support planned growth in the short to medium term. The provision of community infrastructure and in particular additional school places to address the current and expected increase in birth rates is seen as a key priority for the Core Strategy. 2) Issues related to infill sites will be addressed in the DMDPD. 3) Issues related to outbuildings and enforcement will be addressed in the DMDPD.</p>
176	Policy H1: Housing Growth	Waitrose Ltd	Barton Willmore	We support the Council's housing target at Policy H1.	Support noted
108	Policy H1: Housing Growth	Lafarge Aggregates Ltd		Para 6.23 - we suggest additional wording at the end of this sentence "...and conformance to National Policy".	Any future planning decision on site allocations would need to take national planning guidance into account - there is no need for this to be highlighted in the Core Strategy. No proposed change.
126	Policy H1: Housing Growth		Gleeson Developments Ltd	Paragraphs 6.1 / 6.7 / 6.8 / 6.13 & Policy H1- we support the Councils identification that the delivery of more housing, and particularly affordable housing is a key priority of the Council. Moreover, we note the statements regarding the London Plan and whilst we object to the reduction in the Councils target as set down within the emerging replacement London Plan, this is not the arena within which to detail these objections. Furthermore, we note the statement that the draft HMA indicates an annual requirement to provide 2,623 affordable dwellings, and whilst this level cannot be actively planned for we support the Council's position as set out within policy H1 that they will meet and exceed their minimum strategic dwelling	Support noted

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				requirement. We also support the Councils comment regarding flexibility and the identification that proposed growth figures may change as a result of the London Plan EiP.	
133	Policy H1: Housing Growth	Hillingdon Hospital NHS Trust	Broadway Malyan on behalf of Hillingdon Hospital NHS Trust	We support Policy H1 Housing Growth.	Support noted
140	Policy H1: Housing Growth	Hillingdon Inter Faith Network		We would ask for the inclusion of 'public buildings and spaces' to be part of the implementation and monitoring of H1 and H2.	It is agreed that community facilities are essential to support housing growth. The issues raised in policy C11 (community infrastructure provision) will be cross-referenced to this policy.
149	Policy H1: Housing Growth	Thorney Farm Developments	Boyer Planning	Suggested rewording for policy H1: After the final paragraph of H1 the following should be inserted: "The Council will in certain, special circumstances in accordance with national policy release land outside the built up area to tackle the escalating demand and current deficit of affordable housing. Broad areas of the Borough should be identified within the Allocated Sites DPD where there is a specific demand which will provide alleviation to the current escalating need."	Policy H1 reflects the proposed minimum annual monitoring target for housing provision. In addition, Policy H2 will be amended to refer to the provision of the 'maximum reasonable proportion' of affordable housing. The Council's Economic Viability Assessment indicates that in the current market conditions 35% of total housing provision would constitute a reasonable proportion for affordable housing. The policy allows sufficient flexibility for more affordable housing to be delivered by RSLs, developers or the Council. It is considered unlikely that a significant amount of affordable housing will be delivered from Green Belt sites. In accordance with national policy, affordable housing could be delivered in the Green Belt, subject to very special circumstances tests. This point does not need to be re-iterated in the Core Strategy.
166	Policy H1: Housing Growth	Workspace Group	Ransome and Company Ltd	Workspace supports the housing growth approach, which seeks to exceed its minimum strategic dwelling requirement.	Support noted
187	Policy H1: Housing Growth	British Airways plc	Lichfield Planning	The following policy wording is proposed:  Policy H1: Housing Growth	The proposed additional sentence at paragraph 6.23 is a development management issue and will be covered in the forthcoming Development Management Development Plan Document.

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				<p>The Council will meet and exceed its minimum strategic dwelling requirement, where this can be achieved, in accordance with other Local Development Framework policies.</p> <p>The borough's current target is to provide an additional 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 to 2026, 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, and will be a subject to a number of impact assessments.</p> <p>'6.23 The specific locations for new housing contained in the Site Allocations DPD will be subject to an assessment of impacts on flood risk, ecology and conservation, the ability to deliver decentralised energy, sustainable transportation, access to green infrastructure and social quality. The sites will also be assessed in terms of the suitability of their location in relation to Heathrow Airport's Noise Contours and the Airport's potential expansion to the north.'</p>	<p>The Replacement London Plan and associated borough wide housing targets have now been tested at EIP. The proposed annual monitoring target of 425 units has been agreed with the GLA and will be referred to directly in policy H1.</p> <p>No proposed change.</p>
229	Policy H1: Housing Growth	McCarthy & Stone Retirement Lifestyle Ltd	The Planning Bureau Ltd	<p>Policy H1 Paragraph 4.2 (Additional policy in Chapter 6)</p> <p>There is already a great deal of evidence at national level as to the need for more housing aimed at meeting the needs of an ageing UK population. Older people's accommodation should have the same priority - and a more positive policy emphasis in the Core Strategy - as affordable housing. Specialist retirement</p>	<p>Paragraph 6.29 refers to the specific needs of older people and for groups in need of supported housing. More detailed policies will be included in the DMDPD.</p> <p>No proposed change.</p>

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				<p>housing meets a number of Core Strategy aims yet is given little weight. Sheltered housing and assisted living close care brings older people closer to transport links, local shops and services reducing car dependency. It enables older people to free up the housing chain, reduces under occupation and meets the wider Core Strategy aims of retaining and enhancing much-needed housing stock for families. The Core Strategy strategic objectives should identify the implications for an ageing population in relation to social, economic and housing need for the borough. There should be a specific policy or supporting text at Chapter 6 to draw out the importance and planning implications of an ageing population: "The Government's desire to provide greater housing choice for older people means there will be a need for a variety of housing choices to be made available, including support for older people living independent lives in their own homes, sheltered or extra care housing.....for a significant number the benefits of sheltered or extra care housing will be essential if they are to maintain an independent lifestyle. The provision of such housing offers choice frees up under-occupied family-sized homes and offers an improved quality life including improved mental and physical wellbeing of people".</p>	
343	Policy H1: Housing Growth	Individual		Paragraph 1 - the policy is not robust - the Council should work to provide the strategic dwelling requirement.	Housing policy in the Core Strategy reflects the provisions of the current and Replacement London Plans.
276	Policy H1: Housing Growth	Legal and General Property Partners (Life Fund) Ltd	Drivers Jonas Deloitte on behalf of Legal & General Property Partners (Life Fund) Ltd	Draft Replacement London Plan target of 425 homes pa should be quoted in the Core Strategy.	The Replacement London Plan and associated borough wide housing targets have now been tested at EIP. The proposed annual monitoring target of 425 units has been agreed with the GLA and will be referred to directly in policy H1.
277	Policy H1: Housing	Legal and	Drivers Jonas	A higher target for housing development north of	The Core Strategy sets a borough wide target for



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	Growth	General Property Partners (Life Fund) Ltd	Deloitte on behalf of Legal & General Property Partners (Life Fund) Ltd	the A40 should be set in the Core Strategy and consideration should be given to the release of Green Belt land.	housing provision based on the London Plan annual monitoring targets. No proposed change.
317	Policy H1: Housing Growth	Individual		<p>There is already an over-concentration of housing development in the south of the Borough. I would like the policy to commit to a more even geographical dispersal of development. I would like the policy to require local neighbourhood consultation on the location, design, and layout of housing development. I would like to see a clear policy statement on re-utilisation of empty properties. The policy should state that housing development must be accompanied by the provision of satisfactory access to community resources, such as transport, primary health care, schools, play areas for children, communal meeting space. The policy should commit to the capital income from housing development to be invested in the local area where the development has been agreed.</p>	<p>Map 6.1 shows the possible distribution of large housing sites in Hillingdon based on the Mayor's identification of sites over 0.25 hectares. The forthcoming Site Allocations document will identify specific housing sites and the geographical dispersal of housing development in the borough. Housing growth will need to take place in sustainable locations and be supported by appropriate levels of social, physical and green infrastructure.</p> <p>The issue of empty properties will be addressed in other Council policy documents.</p> <p>The Core Strategy has been subject to two six week rounds of consultation and other development plan documents, including the Site Allocations document will follow this model.</p> <p>Policy C11 addresses the provision of community infrastructure to support growth. The Council is considering the introduction of a Community Infrastructure Levy as one means of funding infrastructure provision to support growth.</p>
326	Policy H1: Housing Growth	CEMEX	Drivers Jonas Deloitte	CEMEX proposes that its Harlington site should be used to meet future housing needs in the Borough and should be released from the Green Belt. Furthermore, CEMEX questions the approach behind the suggested housing target of 365 units per annum, and urges the Council to give greater weight to the Draft Replacement London Plan and subsequent Technical Assessment, including the higher housing target of 425 dwellings per annum.	Site specific issues will be addressed in the Site Allocations DPD. The proposed annual monitoring target of 425 units per annum has been approved at the Replacement London Plan EIP and will be carried forward in the Core Strategy.

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377	Policy H1: Housing Growth	Planning Perspectives LLP		(Policy H1 and Tables 6.1 to 6.5) Given the stage of the London Plan, and the certainty that can be attributed to the adjusted target, it is considered that in accordance with Paragraph 55 of PPS3 the Core Strategy should seek to demonstrate how the adjusted housing target can be met.	In accordance with PPS 3 the Site Allocations DPD will identify appropriate sites to meet the Replacement London Plan Annual Monitoring target. Beyond 2021, the document will identify broad areas for housing growth. No proposed change.
381	Policy H1: Housing Growth	Planning Perspectives LLP		<p>H1 - Tables 6.1 to 6.5:</p> <p>"The emerging London Plan annual monitoring target has now been agreed with the GLA. As the target will be adopted during 2011 it is considered that Hillingdon should be planning to meet the adjusted target of 6,375 over the 15 year plan period rather than the adopted target. The Core Strategy does not adequately demonstrate how the existing housing target of 5,475 will be met over the plan period, let alone the adjusted target. In fact, it states that it "cannot be demonstrated that the target will be met beyond 2021". Given the stage of the London Plan, and the certainty that can be attributed to the adjusted target, it is considered that in accordance with Paragraph 55 of PPS3 the Core Strategy should seek to demonstrate how the adjusted target can be met. This is particularly important given the potential need to release land for housing from alternative uses to meet the housing target. In these circumstances, it is considered that the Core Strategy should be based on the adjusted annual target and furthermore that the Core Strategy should demonstrate that this target is deliverable. This is essential in order to underpin and validate that the Core Strategy is sound."</p>	In accordance with PPS 3 the Site Allocations DPD will allocate appropriate sites to meet the housing target up to 2021. Beyond this period the document will identify broad areas for growth. No proposed change.
494	Policy H1: Housing Growth	Mr John McDonnell MP		Policy is not strong enough in addressing housing needs, poor quality of existing stock - particularly in the private rented sector e.g. due to overcrowding and a lack of basic amenities.	The Core Strategy needs to strike a balance between meeting housing needs and proposing a level of affordable housing that is realistic and achievable across the borough. Evidence

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				<p>Need to assess more carefully the population density and to ensure a fairer distribution of housing across the borough. Greater emphasis on consultation with local people is needed on housing schemes - avoiding piecemeal development. RAF Uxbridge should be a key site for housing development. Retrospective planning permissions should be addressed as they have led to too much back garden development. Insufficient weight is given to ensuring all housing has sufficient social / Community infrastructure. The Core Strategy also fails to address the need for greater provision for people with special housing needs.</p>	<p>indicates that a target to provide 35% of all new housing as affordable housing is economically viable and deliverable. Measures to address the condition of new housing are contained in other Council documents. It is acknowledged that specific references to the need for family and specialist accommodation should be included in the document.</p> <p>The distribution of housing identified in policy H1 and the allocation of specific sites will be addressed in the forthcoming Site Allocations DPD. The issue of back garden development is addressed in policy BE1. Part 9 of this policy states that all new development should not result in the inappropriate development of back gardens that erode the character and bio-diversity of sub-urban areas. Policy C11 sets out the measures the Council will use to ensure appropriate provision of community infrastructure. No proposed change.</p>
535	Policy H1: Housing Growth	Arla Foods UK Plc	BNP Paribas Real Estate	Support the policy.	Support noted.
423	Policy H1: Housing Growth	Tesco Stores Ltd	GL Hearn on behalf of Tesco Stores Ltd	Policy H1 does not take account of the Master Brewer site and does not take account of the contribution that the site can make to maximising housing potential in the borough. Map 6.1 should be updated to reflect this change.	The housing target in policy H1 reflects the current London Plan. The policy will be amended to reflect the proposed housing target in the Replacement London Plan, which has now been tested at the EIP. This is a minimum target and has been set through discussions with GLA, taking account of sites identified in the GLAs SHLAA.
436	Policy H1: Housing Growth	Royal Brompton & Harefield NHS Trust	DP9 on behalf of Royal Brompton & Harefield NHS Foundation Trust	Policy should be amended to refer to the proposed Replacement London Plan annual monitoring target of 425 units, rather than the current target of 365 units per annum.	The revised target has been tested in the Replacement London Plan EiP and will be incorporated into policy H1.
565	Policy H1: Housing Growth	Individual		<p>LATE SUBMISSION:</p> <p>Most recent properties have been built too small. Family housing in particular needs more</p>	The Council's room size standards are currently contained in its Housing, Design and Accessibility Statement (HDAS). Revised room size standards, reflecting the Replacement London Plan, will be

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				spacious provision with utility rooms, separate bathrooms and toilets, etc.	outlined in the forthcoming Development Management Policy Document. No proposed change.
453	Policy H1: Housing Growth	Hayes and Harlington Community Development Forum		Policy H1- The target should be increased to at least 425 new homes per annum to comply with the revised target in the draft replacement London Plan. [ The housing trajectory evidence would support 494 homes per annum over the 1st 5 years and 755 homes pa over years 6 -10 so a case could be made for more housing if this was desirable].	The Replacement London Plan annual monitoring target has been tested at EiP and will be incorporated in policy H1.
456	Policy H1: Housing Growth	Hayes and Harlington Community Development Forum		Whilst density and design will be covered in detail in the Development Management DPD, there should be strategic direction in Policy H1, to complement what is said in the text (paragraph 6.24). The density of developments should be within set ranges to comply with the London Plan. To be sound there should be reference to exemplary standards of design and protecting the character of places.	The current and Replacement London Plans provide guidance on appropriate densities for central, urban and suburban locations. The implementation section of policy H1 notes that the provisions of policy H1 will be achieved by promoting the design and density of new homes to reflect the specific and different land use characteristics in the north and south of the borough. Further guidance on density will be contained in the forthcoming Development Management Policies Document. No proposed change.
454	Table 6.2	Hayes and Harlington Community Development Forum		Table 6.2 demonstrates that in excess of 425 homes per annum can be achieved in 4 of the next 5 years. The housing trajectory (Appendix 3, figure 10) demonstrates a large increase in completions for years 6-10, only tailing off in years 11-15. However, the housing trajectory appears to be based on data from the 2004 London Housing Capacity Study and may not be reliable.	The housing trajectory is based on sites with an existing planning permission and/or those where the Council accepts the principle of residential development. No proposed change.
554	6.20	English Heritage		Design and density (pg 59). Welcome the changes made to para 6.20, subject to the local and historic context of the site and its surroundings being taking into account when identifying the optimum density levels. This reflects more closely PPS1 and PPS5.	Support noted

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455	Table 6.4 Proposed units to be delivered from large and small SHLAA sites	Hayes and Harlington Community Development Forum		<p>Tables 6.4 and 6.5 do not show an assessment of identified sites. Planning policy Statement 3 requires that sites for inclusion in the 5 year supply are assessed to show they are available now, offer a suitable location and that housing will be delivered on the site in the next 5 years. Nor is there an indication of how many sites have outstanding planning permissions, the number that have been allocated in existing plans and the number that depend on allocation in future Development Plan Documents.</p> <p>The spatial distribution of housing in table 6.5 has not been considered against alternatives.</p>	Tables 6.4 and 6.5 relate to sites identified by the GLA in its SHLAA. Table 6.2 sets out Hillingdon's five year supply of housing land. This is based on the Housing Trajectory in the Council's Annual Monitoring Report, which is summarised at Appendix 3 of the Core Strategy. No proposed change.
268	Table 6.5 Proposed delivery of units from large SHLAA sites, by area	Cathedral Group	Nathaniel Lichfield & Partners	Given the development potential identified in the London Plan and in the Core Strategy, the housing estimate for Hayes / West Harlington needs increasing to account for the managed release of employment land and higher building densities envisaged.	Tables 6.4 and 6.5 provide an indication of large sites identified in the Mayoral SHLAA. It is acknowledged that additional residential sites may come forward through the Site Allocations process.
438	Table 6.5 Proposed delivery of units from large SHLAA sites, by area	Royal Brompton & Harefield NHS Trust	DP9 on behalf of Royal Brompton & Harefield NHS Foundation Trust	The SHLAA identifies sites for housing land, can it be confirmed how these sites have been identified? In the context of the need to reflect the higher housing figure identified in the Replacement London Plan the Core Strategy should acknowledge that other sources of supply will be required.	Potential housing sites were identified in accordance with the GLA's SHLAA methodology. No proposed change.
417	Map 6.1	Skylark CA		It is indicated that there is a proposed delivery of 130 housing units with a possible 524 more – the area which this affects has not been outlined. There are no large brownfield sites north of the Uxbridge Road in Yeading/Hayes End leaving only current open green space to be used. Therefore this policy is contradictory to that of Policy 8 Environmental Improvement in maintaining, expanding an protecting greenbelt/sites of metropolitan interest and all other sites mentioned this Policy	Map 6.1 is based on sites over 0.25 hectares identified in the Mayor's SHLAA. These sites are not located in the Green Belt. No proposed change.

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117	6.24	Environment Agency		We support the inclusion of “ensuring development makes the most use of brownfield land” as redevelopment is one of the best ways to remediate existing contaminated land.	Support noted
150	Policy H2: Affordable Housing	Thorney Farm Developments	Boyer Planning	Suggested rewording for policy H2: "Housing provision is expected to include a range of housing to meet the needs of all types of households. The Council will seek to maximise the delivery of affordable housing from all sites with certain sites to be identified as exception sites which could deliver up to 100% affordable housing. These will be appropriately identified and allocated through the Site Allocations DPD to ensure appropriate mitigation against current demand."	The Council proposes amendments to state that the Council will seek to maximise the delivery of affordable housing. The proposed minimum target of 35% provision is not arbitrary and is informed by the Council's Affordable Housing Viability Assessment, which has been completed.
167	Policy H2: Affordable Housing	Workspace Group	Ransome and Company Ltd	To make this policy sound, it should be redrafted to state:  “An indicative tenure mix of 70:30 between social rented accommodation and intermediate housing will be sought. Where it is considered that the affordable housing dwelling tenure mix is not appropriate, applicants will be required to justify a more appropriate mix. The Council will take into consideration factors such as the latest available affordable housing evidence, the site context, viability and regeneration benefits”.	Comments noted and accepted. The provisions of this text will be incorporated within 6.28, 6.29 and 6.30.
198	Policy H2: Affordable Housing	The Ballymore Group		Policy should be reworded so that the proposed tenure split reflects that in the Replacement London Plan.	No proposed change. The proposed tenure split reflects housing need in the borough, but is flexible to allow for local market conditions.
237	Policy H2: Affordable Housing	Individual		Paragraph 6 - given the level of local need, the policy is not robust and developers should not be able to avoid providing a fixed number of affordable homes within any development with arguments based on scheme viability. Independent experts should set the number of homes that any developer must provide - reflecting local need - and this number should be	Policy H2 has been developed to take account of the Mayor's policy on affordable housing provision. It sets a borough wide target based on housing needs and a realistic assessment of the level of affordable housing that could be delivered over the period of the Core Strategy. The policy wording will be changed to seek 'the maximum reasonable proportion' of affordable housing from

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				rigidly adhered to by the developer.	new development.
256	Policy H2: Affordable Housing	Warren Park Residents Association		Policy needs to be aligned more closely with that in the draft Replacement London Plan e.g. re-aiming to provide balanced communities.	The Council acknowledges and supports the aim of the London Plan to create mixed and balanced communities. This is an objective of the London Plan and does not need to be repeated in the Core Strategy. However, it is suggested that the second sentence of paragraph 6.28 should be reworded as follows: These include an acknowledgement of the role that intermediate housing can play in helping to get Londoners on the first step of the housing ladder, reducing the call on the social rented sector and creating mixed and balanced communities in accordance with the London Plan.
269	Policy H2: Affordable Housing	Cathedral Group	Nathaniel Lichfield & Partners	Support recognition that the level of affordable housing provision will need to reflect viability considerations.	Support noted
279	Policy H2: Affordable Housing	Legal and General Property Partners (Life Fund) Ltd	Drivers Jonas Deloitte on behalf of Legal & General Property Partners (Life Fund) Ltd	Support the policy as now worded.	Support noted
536	Policy H2: Affordable Housing	Arla Foods UK Plc	BNP Paribas Real Estate	The tenure split refers to the 2009 Replacement London Plan and should now be updated - with any split reflecting the most up to date information.	The proposed tenure split takes account of the provisions of the Replacement London Plan and the conclusions of Hillingdon's Strategic Housing Market Assessment. No proposed change.
439	Policy H2: Affordable Housing	Royal Brompton & Harefield NHS Trust	DP9 on behalf of Royal Brompton & Harefield NHS Foundation Trust	The policy should not include the stated figures of 35% provision and 60/40 tenure split. The requirements of the Replacement London Plan to provide the 'maximum reasonable proportion' of affordable housing should be included.	Policy will be amended to take account of the wording in the Replacement London Plan and the recently published Panel Report.
566	Policy H2: Affordable Housing	Individual		LATE SUBMISSION:  Current system of affordable home allocation seems unfair as it does not meet people's needs and often a first offer of accommodation cannot be refused.	No proposed change. This issue will be addressed in other Council documents.

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457	Policy H2: Affordable Housing	Hayes and Harlington Community Development Forum		<p>Policy H2</p> <p>The delivery of affordable housing is a priority in the Sustainable Community Strategy and emphasised as a main challenge in paragraph 6.10. The Housing Market Assessment (HMA) recommends 50% affordable housing For Policy H2 to propose 35% affordable housing is therefore unjustified.</p> <p>Policy H2 should be changed to 50% affordable housing to comply with the statutory London Plan 2008 and to provide a strategic direction over the next 15 years. Retaining the wording in the policy “subject to viability” already gives flexibility to deal with all circumstances. Since the economic viability assessment has not been completed (paragraph 6.27) there is no substantive evidence to indicate that a 50% threshold would not be viable over the 15 years of the Plan.</p> <p>The Core Strategy is unsound as it does not make adequate provision for family housing. The reference in Policy H2 to larger social rented family units does not provide strategic direction. The policy should include a target for housing mix that is consistent with the HMA as recorded in paragraph 6.15. For example, that 75% of social rented housing should have 3 bedrooms or more.</p> <p>Under housing policy there is no mention of student housing, supported housing, special needs housing, and protection of existing social rented housing. These are important: they should be addressed.</p>	<p>Policy H2 will be amended to reflect the provisions of the Replacement London Plan and its associated Panel Report. The wording of policy H2 will be amended to state that Hillingdon will seek to maximise affordable housing provision. The supporting text will refer to the conclusions of Hillingdon's economic viability assessment and the recently published Panel Report. The Panel Report notes that boroughs ‘should aspire towards securing 50% of all new housing as affordable.</p>
467	Policy H2: Affordable Housing	Mayor of London	Greater London Authority	The Council will need to consider how it will address the recent proposed changes to the	Comments noted. Policy H2 will refer to achieving the maximum reasonable amount of affordable



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				<p>PPS3 definition of affordable housing. Although it is in draft form, the direction of travel has been established. The council need to ensure it provides sufficient flexibility in the text to make the necessary policy changes as new Government policy on affordable housing emerges.</p> <p>The Councils' approach to affordable housing is supported. However, the Mayor asks the borough to consider whether it is necessary to include the 35% 'viable' affordable housing target in the Policy box, as well as in the supporting text. This is likely to cause confusion when negotiating on a reasonable amount. The borough needs to be clear whether 35% is based on current economic circumstances. If it is, the borough should make it clear that over the life of the plan, the 35% will change. The Mayor would recommend the removal of the figure and the inclusion of either the aspiration 50% target (based on need) and/or 'maximum reasonable amount subject to viability'. If the borough wishes to include the 35% in the policy box as well as the supporting text, this should clearly be stated as a minimum. This will also allow the 35% to be updated as economic conditions change, if the borough wished to do so, without having to re-write the policy.</p>	<p>housing subject to viability. References to the conclusions of Hillingdon's Economic Viability Assessment will be reallocated to the supporting text of this policy.</p>
511	Policy H2: Affordable Housing	L B Hillingdon		Policy H2 needs to be altered to emphasise the key priority of affordable housing by deleting the words "seek to".	Policy H2 to be amended as proposed.
64	6.29	Mr John McDonnell MP		Lack of reference to mixed cohesive communities, special housing needs, the upgrading of existing housing to tackle substandard housing in the area. greater emphasis on family housing and the involvement of the community of site selection. There needs to be a commitment to creating socially mixed	Chapter 6 of the Core Strategy deals with new homes and refers to housing needs in the borough. Paragraph 6.30 notes the requirement for 'larger accommodation'. This paragraph will be amended to include reference to 'family accommodation'.

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				cohesive communities with more family housing and greater commitment to tackling existing substandard housing. In addition greater attention should be paid to site selection regarding accessible local services.	The contribution that housing can make to the creation of mixed and balanced communities is already addressed in policy 3.10 of the Mayor's London Plan. This policy would not be repeated in the Core Strategy.
24	Policy H3: Gypsy and Traveller Pitch Provision	Traveller Law Reform Project		<p>Policy H3 Gypsy and Traveller Site provision</p> <p>We welcome the presence of a policy to address these issues but we have concerns about the criteria and also the evidence base on which plans will be made and a lack of information about when and how pitches will be developed. This leads us to object to the plan on the grounds that it is not justified and will not be effective.</p> <p>The Policy</p> <p>We welcome the decision to retain the Colne Park site, the only site in the Borough which was established in 1980. Since then there has been no additional provision and no other sites established.</p> <p>Circular 1/2006 stands as current national guidance and it is clear that local authorities must allocate sufficient sites in terms of the number of pitches required by the RSS (in this case the London Plan) in site allocations DPDs (para 33). Whilst policy is in a state of flux at the moment the indications contained in the Chief Planning Officer's letter of 6th July 2009 that local authorities should continue to determine the right level of site provision reflecting local need and historic demand and for bringing forward land in relevant DPDs.</p> <p>The London Plan was examined in relation to Gypsy and Traveller Policy in December of 2009</p>	Support noted. Issues related to pitch provision are linked to the Mayor's policy in the London Plan. The recently published Panel Report for the Replacement London Plan identifies sub-regional targets and these will be referred to in the emerging policy.

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				<p>and we await the result of the examination. Whether or not the policy decided upon give pitch requirements or not (and the Mayor declined to take a view on this issue) the boroughs will be required to make provision. This should be based on the best available evidence.</p> <p>The policy declines to take a view on the level of need despite the presence of a robust GTAA commissioned by the Boroughs. That GTAA found a need in the Borough for 35 residential pitches for 2007-12 and a further 8 pitches for 2012 -17. The CLG and GOL guidance states that any minimum figure has no validity. This contrasts with policy H1 which sets a target and gives annualised figures. The core strategy is thus internally inconsistent.</p> <p>In our view the policy should, given the presence of an adequate evidence base, set out a borough target, recognise that the need for additional pitches is immediate and real and begin the process of site identification, assembly and development. It should following the guidance encourage the provision of Gypsy and Traveller pitches within major development schemes and incorporate them within the definition of social/affordable housing that is used for negotiating s 106 agreements.</p> <p>There must be a timetable of delivery.</p> <p>Criteria:</p> <p>Hillingdon should be mindful that the main barrier to the construction of Traveller sites is public and official prejudice. We consider that the statement that site should 'have no significant adverse effects on the amenity of</p>	

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				<p>occupiers of adjoining land' to be contrary to the guidance of Circular 1/2006 and an invitation to express prejudice through the planning process. It should therefore be deleted.</p> <p>Para 6.32 As stated above the outcome of the London plan examination remains to emerge so that this statement is inaccurate in relation to pitch targets.</p> <p>Para 6.33 Whilst acknowledging the problems surrounding availability of suitable sites the lack of commitment to explore the role of sec 106 agreements in relation to major developments is disappointing and remiss and should be inserted.</p> <p>Implementation</p> <p>As stated above needs have already been identified - the West London Partnership research is mentioned but we have no sight of this material and no numbers of pitches are mentioned. As such this statement is meaningless in policy terms and gives no certainty in terms of pitch provision. It makes no statement of a timetable for provision and should do so.</p> <p>Flexibility and Monitoring</p> <p>These issues are partly left open and uncertain dependent upon the outcome of the London Plan. Policy H1 Housing growth seems to be able to set annualised targets for housing provision and absence of such a target for Gypsy and Traveller sites means that monitoring will be meaningless, especially if no target is set by the London Plan as the Mayor argued for at the EIP.</p>	

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				<p>1. The policy should be changed to commit the council to delivering in an appropriate Site Allocations DPD to meet the needs identified in the existing GTAA.</p> <p>2. The policy should encourage the provision of sites via major development schemes and incorporate them in the definition of social/affordable housing.</p> <p>3. There should be a timetable for delivery with targets.</p> <p>4. Delete criterion referring to amenity.</p> <p>5. Make necessary corrections to para 6.32 as above.</p> <p>6. Add in commitment to explore role of sec 106 agreements in para 6.33</p>	
65	Policy H3: Gypsy and Traveller Pitch Provision	Mr John McDonnell MP		Lack of recognition of the need for increased number of sites and improvement of existing site. The local authority should commit itself to the provision of additional sites spread throughout the borough and the upgrading of existing site.	Policy H3 is required to reflect the provisions of the Replacement London Plan. The Mayor's policy on this issue has changed a number of times during the production of this document. The recently published Replacement London Plan Panel Report proposes sub regional targets for additional pitch provision. These will be reflected in policy H3.
154	Policy H3: Gypsy and Traveller Pitch Provision	Individual		Any policy that LBH have must ensure that the diversity of people across the borough is mixed. This removes the possibility of no-go areas for any section of the community. Whilst at this point in time there is no need for further Gypsy sites, the plan spans a number of years and the need may arise that further site(s) are required. There is already a site in the south of the borough at the Colne Park site. To ensure this diversity the Council should select one or two sites within the	Policy H3 to be amended to make clear additional sites for gypsy and traveller pitch provision will be addressed in the Site Allocations DPD as appropriate, to reflect the latest position as recommended in the Replacement London Plan Panel Report.

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				borough and protect them for future use.	
159	Policy H3: Gypsy and Traveller Pitch Provision	Individual		Any policy that LBH have must ensure that the diversity of people across the borough is mixed. This removes the possibility of no-go areas for any section of the community. Whilst at this point in time there is no need for further Gypsy sites, the plan spans a number of years and the need may arise that further site(s) are required. There is already a site in the south of the borough at the Colne Park site. To ensure this diversity the Council should select one or two sites within the borough and protect them for future use.	Policy H3 to be changed to make clear additional sites for gypsy and traveller pitch provision will be addressed in the Site Allocations DPD as appropriate, to reflect the policies in the Replacement London Plan.
376	Policy H3: Gypsy and Traveller Pitch Provision	Bell Farm Christian Centre		C i) should read that sites will be made available in an area that is environmentally acceptable for residential occupation. C ii) should read that sites will be found that have no significant effect on the amenity of occupiers of adjoining land.	The Council seeks to minimise adverse effects on adjoining land. No proposed change.
458	Policy H3: Gypsy and Traveller Pitch Provision	Hayes and Harlington Community Development Forum		<p>Policy H3</p> <p>To be sound the policy should contain a target for new pitches linked to the evidence of need. The policy should provide clarity about how, and in which development plan document, specific site allocations for gypsies and travellers will be carried forward.</p>	Policy H3 to be amended to make clear that additional pitch provision will be based on guidance contained in the Replacement Plan and its associated Panel Report.
548		English Heritage		<p>LATE SUBMISSION</p> <p>Historic Environment- In general many of the detailed points made in our response to the consultation draft Core Strategy have been addressed. However there are still shortcomings with the Core Strategy approach to managing Hillingdon's historic environment. In particular there are concerns that the distinctiveness of Hillingdon's historic environment is not fully reflected in the policies or the supporting text. For example the only sense of the area's unique characteristics is reflected in the limited</p>	Agree - amend supporting text of the 'Heritage' section to include reference to the distinctive qualities of the Borough's historic environment, the following text added after paragraph 7.3: "There is evidence to confirm that parts of the borough, such as Harmondsworth, and Harefield were occupied in prehistoric times. Up until the 20th century, the borough was mainly rural in character; today it is predominantly suburban, with its main urban centre at Uxbridge. This was an important market town that took advantage of the stage coach route between Oxford and London in the 18th century and developed further

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				<p>reference made to the Borough's 'Metrolands' (para 7.3). It is noted that the Borough contains an extensive range of designated and other heritage assets, which should be used to help describe in more detail the unique historic environment of Hillingdon and inform the framing of the Borough's approach to creating a positive and proactive strategy that is locally specific to the conservation of Hillingdon's historic environment. For example the Borough's conservation area appraisals and relevant management plans could help inform this current deficiency of the Core Strategy. PPS5 Policy HE3 supports this approach by expecting plans to take into account the variations in type and distribution of heritage assets, their contribution to the character of the environment in their area. This includes highlighting how the Borough's approach to conservation is delivered through the whole Core Strategy including in areas such as Environmental Improvements (Core Strategy Section 8), and Transport and Infrastructure (Core Strategy Section 9). For example opportunities could exist through the application of other policies that could enable a number of the heritage assets currently 'At Risk' to be removed from the Register through appropriate implementation of these policies. This could include highway enhancement schemes that coincide with a conservation area that may be 'At risk'. Through good high quality contextually sensitive design the highway measures proposed (i.e. public realm improvements) could address the current deficiencies of the conservation area and ensure it is no longer on the 'At Risk' register. However to successfully deliver this approach and establish a robust conservation strategy that is specific to Hillingdon, it is essential that a robust evidence base is developed that justifies the method</p>	<p>with the building of the Grand Junction Canal, the GWR and more recently the Metropolitan and Piccadilly Lines. There are also a number of smaller town centres across the borough, such as Northwood, Ruislip, Eastcote, Hayes, Yiewsley and West Drayton. Most of these were originally villages, some dating back to medieval times, which grew as local transport links developed."</p> <p>The 'Implementation of Policy HE1' outlines the Council's overall approach to conservation. Point 2 highlights that the Council will update and review its character appraisals and management plans for conservation areas. Reference to existing Conservation Area Appraisals and Management Plans added to bullet point 1 of paragraph 7.4 to read: "30 Conservation Areas (with Appraisals for Longford Village, Harmondsworth Village, Ruislip Village, The Glen and Eastcote Park Estate and Management Plans for The Glen and Eastcote Park Estate)".</p> <p>Paragraph 7.4 identifies that '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.' Point 3 of 'Implementation of Policy HE1' sites examples, it is not considered necessary to provide a full list. No proposed change.</p>

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				taken. In terms of the Implementation section we welcome the Council's commitment to proactively managing heritage assets, including those that are 'At Risk'. However it is with surprise that the Manor Farm barn at Harmondsworth (listed grade 1) has not been identified in the text.	
217	7.5	Heathrow Airport Ltd		Clarification should be provided as to the meaning of the terms Archaeological Priority Areas (APAs) and Archaeological Priority Zones (APZs).	Agree - explanation of Archaeological Priority Areas (APAs) and Archaeological Priority Zones (APZs) to be provided in the 'Glossary'.
551	7.5	English Heritage		<p>LATE SUBMISSION</p> <p>Proposals Map - It is not clear from the information provided whether significant changes are proposed to the Proposals Map. If they are then we would seek to ensure that the development of the Proposals Map is in compliance with PPS12 (para 8.1) and the requirement that it identify all areas of protection, such as nationally protected landscapes and internationally, nationally and locally designated areas and sites. We would advise that this includes designated assets such as conservation areas, registered parks and gardens, and Scheduled Monuments, plus any other spatially defined local designations, such as Archaeological Priority Areas.</p>	The Proposals Map will be updated as part of the consultation on the Development Management DPD and Site Allocations DPD. A final Proposals Map will be published when the LDF is completed. No proposed change.
54	Policy HE1: Heritage	Hayes Conservation Area Advisory Panel		While supporting the aspirations set out in Policy HE1, we are sceptical that they are all deliverable and therefore could be considered unsound. Our recent experience is that LBH does not adequately enforce planning regulations in Conservation Areas and Areas of Special Local Character, nor actively support local groups who wish to make use of access provisions in Section 106 agreements. Their attempts to promote community engagement	Enforcement of planning regulations in Conservation Areas/ Areas of Special Local Character is a Development Management matter. The Council's approach to planning obligations is already set out in detail in the Planning Obligations Supplementary Planning Document. Paragraph 7.4 identifies that '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.' It is



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				<p>tend to be 'top-down' while we consider two-way communication would be more effective. The criteria that have been identified for monitoring do not cover all of the areas identified in the policy, perhaps because their effects are qualitative rather than quantitative and hence difficult to assess. We are also concerned that the examples given under the notes on implementation of the policy all relate to sites in the north of the borough and feel this selection, while justified in itself, does not adequately reflect the needs and potential across the whole of the borough. Our comments reflect general unease rather than specific issues. We would, however, like to see mention of some of the 'at risk' Conservation Areas and buildings in the south of the borough, such as the Great Barn at Harmondsworth, added to the examples in the implementation policy.</p>	<p>not necessary to provide a full list in the 'Implementation of Policy HE1'.</p> <p>No proposed change.</p>
67	Policy HE1: Heritage	Mr John McDonnell MP		<p>Lack of proactive action in raising awareness and seeking protection. The local authority should place greater emphasis on a programme to raise awareness within the local community, decision makers and developers of the need to protect our local heritage and on its role to be proactive in inspecting, preserving, protecting and enhancing local heritage sites, particularly the sites and buildings at risk.</p>	<p>These points are addressed in Policy HE1. Point 2 seeks to ensure consultation with the local community on heritage matters and point 3 seeks to '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' thus raising awareness. No proposed change.</p> <p>Also, point 3 of 'Implementation of Policy HE1' seeks to proactively manage heritage assets including those considered 'at risk' working with heritage groups and partners. No proposed change.</p>
245	Policy HE1: Heritage	Yiewsley and West Drayton Town Centre Action Group		<p>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>	<p>The Council considers that policies HE1 and BE1 are sufficiently robust to preserve and enhance the borough's historic and built environment. No change proposed.</p>

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168	Policy HE1: Heritage	Workspace Group	Ransome and Company Ltd	<p>1) Policy should reflect PPS5 and include a section to allow enabling development to secure the future conservation of a heritage asset.</p> <p>It is considered that to make this policy sound an additional criterion is needed that states that the Council will consider enabling development to secure the future of heritage assets.</p> <p>2) Enterprise House on Blyth Road is a locally listed building that has structural and damp problems. It is necessary that a higher value residential use is included in the refurbishment of this building to ensure viability of the scheme and therefore secure the future of this building.</p>	<p>1) Enabling development is covered by point 2 of Policy HE1, under “actively encouraging the regeneration of heritage assets”. This approach will include the consideration of enabling development where appropriate and particularly for assets which are considered “At Risk”. No proposed change.</p> <p>2) The Core Strategy is a high-level strategic document and details of specific sites will be considered through the Development Management policies, forthcoming Heritage Strategy SPD and relevant Area Action Plans. It should be noted that Enterprise House is grade II listed. No proposed change.</p>
555	Policy HE1: Heritage	English Heritage		<p>1) Historic environment (pgs 66 – 70)- Support in general the majority of changes. However we would still seek to ensure that Policy HE1 makes an explicit reference to ensuring that all developments are appropriate to its historic context and that regeneration proposals make use of heritage assets and reinforce their significance. Inserting this reference would reflect the principles of PPS5 (para 7) and the promotion of sustainable development as set out in PPS1.</p> <p>2) In addition under Implementation the 6th point needs to be expanded so that records of heritage assets that are lost (in accordance with PPS5) are disseminated so enabling increased understanding, as well as being deposited with the GLHER.</p>	<p>1) Disagree, the suggested text was considered more relevant to Policy BE1 and therefore incorporated within points 2 and 5. No proposed change.</p> <p>2) Agree, amend point 6 of Implementation of Policy HE1 to read: "Where the loss of a heritage asset is justified, ensure that there will be a commitment to recording the structure and to disseminating this information to enable increased understanding of the heritage asset. Copies of these documents will, where appropriate, be deposited with local libraries and the Greater London Historic Environment Record (HER)"</p>
407	Policy HE1: Heritage	CES Properties (Ickenham) Ltd	DP9 on behalf of CES Properties (Ickenham) Ltd	<p>It is widely regarded that the best way to protect vacant listed buildings is to bring the building back into active use. While Policy HE1 (Point 2) does encourage the regeneration of heritage assets, we believe it is equally important to stop heritage assets from falling into further</p>	<p>The ‘At Risk Register’ includes a number of buildings that are in reasonable condition, but are at risk because they are vacant. Agree to amend Policy HE1 (criteria 2) to include reference to vacant buildings to read:</p>

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				<p>dilapidation through vacancy and abandonment. As Policy HE1 is currently worded, it would seem to want to regenerate those assets which have already fallen into disrepair and not actually prevent asset from reaching that state in the first place. By adding the words "...particularly those which are vacant and have been included..." this strengthens the argument for regenerating vacant heritage assets to prevent their loss.</p> <p>Point 2 of Policy HE1 should be revised to read:</p> <p>"2. Actively encourage the regeneration of heritage assets, particularly those which are vacant and have been included in English Heritage's 'Heritage at Risk' register."</p> <p>Implementation of Policy HE1 should be revised to read:</p> <p>"3. Pro-actively manage heritage assets, including those vacant and considered "At Risk" by English Heritage, working with heritage groups and partners where appropriate, to ensure buildings and structures such as those at Eastcote House Gardens, RAF Uxbridge and Breakspear House are repaired and reused."</p>	<p>"Actively encourage the regeneration of heritage assets, particularly those which have been included in English Heritage's 'Heritage at Risk' register or are currently vacant".</p>
488	Policy HE1: Heritage	Mr John McDonnell MP		<p>Policy HE1: Heritage - the local authority should place greater emphasis on a programme to raise awareness within the local community, decision makers and developers of the need to protect our local heritage and on its role to be proactive in inspecting, preserving, protecting and enhancing local heritage sites, particularly the sites and buildings at risk.</p>	<p>These points are addressed in Policy HE1. Point 2 seeks to ensure consultation with the local community on heritage matters and point 3 seeks to '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' thus raising awareness. No proposed change.</p> <p>Also, point 3 of 'Implementation of Policy HE1'</p>

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					seeks to proactively manage heritage assets including those considered 'at risk' working with heritage groups and partners. Whilst desirable for local authorities to have as full a record as possible for historic assets, legal and other documents may not be readily available and may be held more appropriately elsewhere. No proposed change.
440	Policy HE1: Heritage	Royal Brompton & Harefield NHS Trust	DP9 on behalf of Royal Brompton & Harefield NHS Foundation Trust	Policy wording should be amended from conserve and enhance to preserve and enhance.	Disagree, PPS 5: Planning for the historic Environment recommends the use of the term 'conserve'. No proposed change.
563	Policy HE1: Heritage	Individual		LATE SUBMISSION:  Enforcement is not being carried forward to prevent the loss of heritage buildings as a result of fire, dereliction and/or compulsory purchase. Paragraph 2 - rather than "Actively encourage" should state the Council will: "Actively support...".	Disagree, the term 'encourage' is considered more appropriate in this context. No proposed change.
474	Policy HE1: Heritage	Mayor of London	Greater London Authority	The GLA supports HE1, however it would be useful to reference non-designated assets that still have heritage value to be more in line with PPS5 and Draft Replacement London Plan Policy 7.8 and 7.9.	Support welcomed.  BE1 already makes reference to non designated heritage assets as defined by PPS5, these include Locally Listed Buildings Areas of Special Local Character and Archaeological Priority Areas and Zones. Some heritage assets may, however, be identified through the decision making process. To cover this point criteria 1 of Policy HE1 is to be amended by deleting "their wider historic environment" and replacing with "the wider historic environment" to read:  "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

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					Buildings, Areas of Special Local Character, and Archaeological Priority Zones and Areas, their settings and the wider historic environment."
57		Individual		Has serious consideration been given to the allocation of housing sites and also office/hotel sites? It may be more beneficial to have fewer offices (surplus space in Stockley Park, also offices near Hayes and Harlington station are empty) and have more of the land given to building houses. The same may apply to hotels too. Better consideration as to whether we really need more hotels/offices in Hillingdon, when there seems to be too many anyway.	<p>The Council has undertaken work to assess current housing land needs and provision. Its housing trajectory shows that at present and in the immediate future it has capacity to meet its housing needs. It will keep this situation under review and monitor housing growth in the borough. Work on other parts of the Local Development Framework - e.g. the Site Allocations Development Plan Document - are expected to bring forward further local housing capacity.</p> <p>Offices and hotels are examples of other land uses which the Council must look to provide locally to meet other objectives in the Core Strategy - e.g. to secure local employment and tourism opportunities. Again the council will keep their provision under review as part of its annual monitoring process.</p> <p>No proposed change.</p>
549	7.11	English Heritage		<p>LATE SUBMISSION</p> <p>Built Environment: Tall buildings (paragraph 7.11 and 7.12, pg 71)</p> <p>Following EH/CABE Guidance and the emerging Mayor's Replacement London Plan (policy 7.7 part e – Consolidated Draft Replacement London Plan December 2010), 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, with greater specificity than demonstrated at present, which areas of the borough that may be</p>	Due to the presence of tall buildings within parts of Uxbridge and Hayes, these areas were identified as appropriate for tall buildings. An assessment of tall buildings will be carried out as part of the Borough's proposed Character Study which will follow the CABE/ English Heritage guidance. Detailed criteria will be identified in the Development Management DPD. Agree a firm commitment to produce a Character Study is required. Amend 3rd bullet in the 'Implementation' section, delete 'Consider the production of' and replace with 'Produce a borough-wide Character Study'.

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				<p>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. This needs to be spatially expressed in the Core Strategy supported by clear and concise textual detail. 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 approach proposed is not robust and does not provide a sufficiently clear plan-led approach to the management of tall buildings. The details provided are not appropriately supported by existing evidence, which raises concerns with regard to its deliverability and justification. This therefore makes this part of the Core Strategy unsound.</p>	
118	7.22	Environment Agency		<p>We support this paragraph as it lays the foundation to ask for biodiversity improvements on both small and large scale developments.</p>	<p>Support welcomed.</p>
68	Policy BE1: Built Environment	Mr John McDonnell MP		<p>There is a lack of acknowledgement of the many areas with poor environments, excessive housing densities, excessive infill developments in gardens and poor housing standards. There should be greater emphasis on tackling areas that have poor and unattractive community areas and poor local environments on estates.</p>	<p>Point 5 of Policy BE1 seeks to improve areas of poorer environmental quality, including within the areas of relative disadvantage of Hayes, Yiewsley and West Drayton. Point 9 of Policy BE1 seeks to prevent the inappropriate development of gardens that erode the character and biodiversity of suburban areas. No proposed change.</p>

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				<p>Housing densities in the south of the borough are resulting in population concentrations that are swamping local services. This is not addressed adequately in the document. There needs to be a local policy preference to protect gardens and prevent any excessive further infilling development.</p>	
141	Policy BE1: Built Environment	Hillingdon Inter Faith Network		<p>1) Policy BE1 – the built environment section 7 mentions the importance of public spaces but there appears to be a lack of this being linked to policy H – an example of the need for a more holistic methodology mentioned in the HIFN overview.</p> <p>2) In addition to providing 'neighbourhood space', future developments should be approved only if maximum opportunity for outlook onto green space has been sought. Evidence on the mortality age differential across the borough is not just an economic factor.</p>	<p>1) Disagree, it is unclear which housing policy this representation seeks linkages with. It is not considered appropriate to include reference to public spaces specifically in Policies H1, H2 or H3 as Policy BE1 is relevant to all developments, including new housing. In addition, provision of and access to open spaces is also covered by Policy EM4 both of which would be taken into account alongside the housing policies where relevant. No proposed change.</p> <p>2) Disagree, it is not considered that outlook onto a green space should be a minimum requirement for new developments. Access to public spaces is covered by Policy EM4. No proposed change.</p>
169	Policy BE1: Built Environment	Workspace Group	Ransome and Company Ltd	<p>1) Whilst Workspace supports the promotion of high quality design in new developments, it is considered that the requirement to achieve a Building for Life Assessment rating of at least silver is too inflexible and makes no allowance for other factors such as feasibility and viability. It is likely that such a requirement will not be feasible for many schemes, particularly conversions of historic buildings. Delete criterion (5) from Policy BE1.</p> <p>2) Workspace objects to the Sustainable Code Level and BREEAM requirements set out in Policy BE1(10) on the basis that significant changes to national policy result in this policy not being necessary. The Climate Change Act 2008 introduced statutory targets of reducing carbon</p>	<p>1) Disagree, a new indicator (H6) is set for 2010-2011 in the Council's Annual Monitoring Report which requires the Council to increase the number and proportion of total new build completions on major housing sites (ten units or more) reaching very good or good ratings against the Building for Life criteria. In addition, Policy HE1 (point 4) seeks to 'address the need to conserve the historic environment when implementing climate change mitigation and adaptation measures'. No proposed change.</p> <p>2) Part agree, criterion (10) of Policy BE1 deleted and replaced with "Maximise the opportunities for all new homes to contribute to tackling and adapting to climate change and reducing emissions of local air quality pollutants. The</p>

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				<p>emissions and the framework for delivering these targets i.e. through building regulations. It is considered that the current London Plan (2004 consolidated with changes), the Replacement London Plan (2009) and Part L of the Buildings Regulations will provide sufficient policy cover.</p> <p>Furthermore, Workspace considers that if such requirements are to be incorporated they should be considered on a site-by-site basis. Delete criterion (10) from Policy BE1 - or ensure it refers to viability and feasibility.</p>	<p>Council will require all new development to achieve reductions in carbon dioxide emission in line with the London Plan targets through energy efficient design and effective use of low and zero carbon technologies. Where the required reduction from on-site renewable energy is not feasible within major developments, contributions off-site will be sought. The Council will seek to merge a suite of sustainable design goals, such as the use of SUDS, water efficiency, lifetime homes, and energy efficiency into a requirement measured against the Code for Sustainable Homes and BREEAM. These will be set out within the Development Management DPD."</p>
199	Policy BE1: Built Environment	The Ballymore Group		<p>We acknowledge and support Policy BE1 point 11 particularly that appropriate locations for tall buildings include Hayes. We consider the gateway location of Hayes and Harlington Station including Blyth Road to be appropriate, subject to the safeguarding outlined.</p>	<p>Support welcomed.</p> <p>An assessment of tall buildings will be carried out as part of the Borough's proposed Character Study. Details of specific sites and boundaries will be considered through the Site Allocations DPD and Proposals Map. Detailed criteria will be identified in the Development Management DPD. No proposed change.</p>
218	Policy BE1: Built Environment	Heathrow Airport Ltd		<p>Object to Council's proposal that all new non-residential development should achieve BREEAM Very Good status - recommend policy refers to all applicable development.</p>	<p>Part agree, criterion (10) of Policy BE1 deleted and replaced with 'Maximise the opportunities for all new homes to contribute to tackling and adapting to climate change and reducing emissions of local air quality pollutants. The Council will require all new development to achieve reductions in carbon dioxide emission in line with the London Plan targets through energy efficient design and effective use of low and zero carbon technologies. Where the required reduction from on-site renewable energy is not feasible within major developments, contributions off-site will be sought. The Council will seek to merge a suite of sustainable design goals, such as the use of SUDS, water efficiency, lifetime homes, and energy efficiency into a requirement</p>



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					measured against the Code for Sustainable Homes and BREEAM. These will be set out within the Development Management DPD.'
230	Policy BE1: Built Environment	McCarthy & Stone Retirement Lifestyle Ltd	The Planning Bureau Ltd	There is no justification to exceed the requirements of the current Building Regulations in meeting design requirements such as Code for Sustainable Homes Level 4 for all new residential development. The Strategy should follow the regulations set out at national level to meet sustainable housing & renewable energy targets. The wording of the policy should be amended to allow a more flexible approach to the standards to be applied - taking into account site viability and balanced against the need to meet other policies in the Strategy. It is recommended that the wording of such a policy is amended to enable a more flexible approach to such standards taking into account site viability and balanced against the need to ensure other policies in the Local Plan are satisfied.	Part agree, criterion (10) of Policy BE1 deleted and replaced with 'Maximise the opportunities for all new homes to contribute to tackling and adapting to climate change and reducing emissions of local air quality pollutants. The Council will require all new development to achieve reductions in carbon dioxide emission in line with the London Plan targets through energy efficient design and effective use of low and zero carbon technologies. Where the required reduction from on-site renewable energy is not feasible within major developments, contributions off-site will be sought. The Council will seek to merge a suite of sustainable design goals, such as the use of SUDS, water efficiency, lifetime homes, and energy efficiency into a requirement measured against the Code for Sustainable Homes and BREEAM. These will be set out within the Development Management DPD.'
547	Policy BE1: Built Environment	English Heritage		<p>LATE SUBMISSION</p> <p>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. It is noted that the Implementation of Policy BE1 (bullet point 3) considers the production of a borough-wide Character Study to address this</p>	Proposed growth is generally focused 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 and forthcoming Heritage SPD. It is proposed that a Character Study will be produced to help inform these growth areas including appropriate locations for tall buildings. Amend 3rd bullet in the 'Implementation' section, delete 'Consider the production of' and replace with 'Produce a borough-wide Character Study'.

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				issue, including the appropriateness of tall buildings. However we would advise that this evidence should be produced to inform the development of the Core Strategy as a policy framework, rather than after it has been finalised. This delay in developing a robust evidence base and weak commitment to undertaking this type of work undermines the justification and deliverability of the Core Strategy.	
295	Policy BE1: Built Environment	Garden City Estate Residents' Association		Lifetime homes need at least one parking space per home to be available for use by residents with impaired mobility or their carers. Paragraph 3 should be amended to read: "Be designed to include `Lifetime Homes' principles including the provision of at least one parking space so that..."	Car parking standards will be considered as part of work on the Development Management Development Plan Document. No proposed change.
318	Policy BE1: Built Environment	Surrey County Council		Core Strategy Policy BE1 misses an important opportunity to promote the sustainable management of CDEW and therefore fails to reinforce the intentions of Policy EM11 and strategic objective SO13 of the Core Strategy, and lacks coherence with policies 4A.3 and 4A.21 of the London Plan and policies 5.3, 5.16 and 5.18 of the Consultation Draft Replacement London Plan. As a consequence, the Core Strategy is considered to be unsound and not effective. The London Borough should propose a minor amendment to Policy BE1 requiring all new development to include sustainable design and construction techniques to increase the re-use and recycling of construction, demolition and excavation waste and reduce the amount disposed to landfill.	Agree, add sentence to end of point 10 of Policy BE1 to read:  "and include sustainable design and construction techniques to increase the re-use and recycling of construction, demolition and excavation waste and reduce the amount disposed to landfill."
321	Policy BE1: Built Environment	Surrey County Council		Policy BE1 and EM1  There is some concern that neither Core Strategy policies BE1 or EM1 promote the efficient use of natural resources. In order to	Agree, amend point 10 to include reference to "making the most efficient use of natural resources whilst safeguarding historic assets and their settings and local amenity"

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				address this point, the London Borough should propose a minor amendment to either Policy BE1 or Policy EM1 to encourage the design of all development to make the most efficient use of natural resources.	
537	Policy BE1: Built Environment	Arla Foods UK Plc	BNP Paribas Real Estate	The set of standards in this policy should more appropriately be included in Supplementary Planning guidance where they can be revised and updated more readily - as they may be subject to change or could impact on project viability.	Disagree, the Core Strategy is a high-level strategic document, Policy BE1 is an overarching policy that seeks to improve the quality of the built environment. More detailed criteria will be contained in the Development Management DPD and supplementary planning documents.
564	Policy BE1: Built Environment	Individual		LATE SUBMISSION:  Paragraph 4 - it is not clear how this "silver" rating will create a certain amount of "Buildings for life".	All developments of 10 dwellings or more will need to achieve a building for life scoring. Further clarification will be provided in para 7.9 and Policy BE1 to explain that the 'silver' standard includes 'good' or 'very good' ratings. Policy BE1 and para 7.9 amended to reflect this.
475	Policy BE1: Built Environment	Mayor of London	Greater London Authority	The GLA supports Built Environment policy BE1 – particularly in relation to promoting the principles of Lifetime Neighbourhoods. However in relation to Tall Buildings (paragraph 11), the Core Strategy should clearly identify the locations appropriate for tall buildings. Currently it states that appropriate locations including parts of Uxbridge and Hayes will be defined as in the Character Study; this however would only form part of the evidence base and would not be formally examined. In the section on how the policy will be implemented, it states that “consideration” will be given to undertaking a Characterisation Study – as opposed to a firm commitment. To be fully consistent with Draft Replacement London Plan Policy 7.7 it would also be helpful to identify if the rest of the borough is sensitive to tall buildings or indeed whether there are locations that are inappropriate for tall buildings.	Support welcomed. Due to the presence of tall buildings within parts of Uxbridge and Hayes, these areas were identified as appropriate for tall buildings. Other appropriate locations will be identified as part of the Borough's proposed Character Study. Agree a firm commitment to produce a Character Study is required. Amend 3rd bullet in the 'Implementation' section, delete 'Consider the production of' and replace with 'Produce a borough-wide Character Study'.

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519	Policy BE1: Built Environment	L B Hillingdon (Labour Group)		All dwellings should include one parking space so that they can be designed to a true "Lifetime Homes" standard. For people in wheelchairs or too elderly or disabled to walk any distance a car is the only of leaving the house and accessing other facilities. In many cases these residents are also dependent on carers or other service providers being able to access them by car - so a minimum of one parking space per home is required. Paragraph 3 should be amended to read: "Be designed to include "Lifetime Homes" principles including the provision of at least one parking space so that...".	Car parking standards will be considered as part of work on the Development Management Development Plan Document. No proposed change.
88	8	Natural England London Region		As per previous comments we recommend that a Green Infrastructure (GI) policy be included. A number of policies (such as EM1 – Climate Change Adaptation and Mitigation and EM7 - Biodiversity) have objectives linked to the delivery of GI (living roofs and wall etc). As such, incorporating a GI policy would further strengthen GI delivery.	The Council consider its environmental management policies, notably policies EM1 and EM7 give sufficient guidance of the strategic approach being taken by the Council towards Green Infrastructure. More detailed policies on its provision can be brought forward in the Development Management Development Plan Document. No proposed change.
246	8	Yiewsley and West Drayton Town Centre Action Group		The aspirations for Environmental Management are welcomed. This section is too vague as to how the Council intends to improve, for example, air quality. Given the statistics for the amount of traffic Heathrow generates alongside residents and workers from outside the Borough, it should be imperative that a definitive policy should be included.	The approach to addressing air quality issues is the policy requirement for all new development in the borough to demonstrate its impact on air quality. More detailed measures will be outlined in subsequent DPDs and Council Strategies. No proposed change.
550		English Heritage		LATE SUBMISSION  Environmental Improvement: Climate Change (pg 77-82) - 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	Agree suggested wording added to section on 'Climate Change Adaptation and Mitigation' at the end of paragraph 8.9 to read "There will also be a requirement to address the need to conserve the historic environment when implementing climate change mitigation and adaption measures taking a balanced approach between the extent of the mitigation of climate change involved against the potential harm to the heritage asset or its setting."

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				<p>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. At present there is insufficient consideration given to this issue with this part of the Core Strategy, contrary to national policy. It is noted that Core Strategy Policy HE1 point 4 makes a reference to the need for a balanced approach; however this important message is not reflected in this key section of the Core Strategy. To ensure the soundness of the Core Strategy we would advise stronger references are made to the messages of PPS5 (Policy HE1) in this section, along with cross references to the Core Strategy heritage policy.</p>	
52	8.5	Individual		<p>Not effective in monitoring the noise and air pollution. Time given to digest the details of the PDP far too short.</p>	<p>The monitoring of noise and air pollution will be amplified in the proposed Development Plan Document for the Heathrow area. No proposed change.</p>
53	8.7	Individual		<p>Not enough notice given to go through the Core Strategy. How can the CO2 emissions for Hillingdon be controlled if Heathrow pollution is excluded?</p>	<p>Figures for reducing CO2 emissions in Hillingdon take account of national targets and regional targets in the London Plan (2008). No proposed change.</p>
358	8.11	Hayes Town Partnership		<p>Amend Policy EM1 and paragraph 8.11 to give increased emphasis to an area-based approach to climate change adaptation and mitigation concentrating particularly on town centres.</p>	<p>Policy EM1 sets out the broad policy criteria that will be considered throughout the development of the LDF. The subsequent Site Allocations DPD and Development Management DPD will come forward with detailed proposals and standards as to how the local open space and other features might be used to help address local climate change issues - e.g. the use of water for local cooling schemes. No proposed change.</p>

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69	Policy EM1: Climate Change Adaptation and Mitigation	Mr John McDonnell MP		None of the actions are sufficiently decisive, recommending and promoting action rather than insisting or ensuring action is taken. There should be more assertive action taken to ensure action takes place, with targets set and systems in place to both monitor and enforce compliance. In particular there is inadequate attention given to developing and installing renewable energy sources in the borough.	Disagree - the Core Strategy provides the strategic approach to meeting the challenge of climate change. However, it will be the Development Management Development Plan Document that will provide the more detailed policy direction. The DMDPD will also take into account the replacement London Plan as well as the broad objectives of the Core Strategy. The carbon reduction targets are set within the regional London framework and the Council adopts the replacement London Plan approach to allowing specific development to assess the best method for reducing carbon. The replacement London Plan moves away from setting specific targets for renewable energy and instead provides flexibility on how to achieve carbon reduction targets. The Council adopts the same principles. No proposed change.
70	Policy EM1: Climate Change Adaptation and Mitigation	Mr John McDonnell MP		Lack of requirements on developers to tackle climate change. There should be greater emphasis on requiring action from developers and others to tackle climate change rather than simply exhorting them to. Words like promoting and encouraging should be changed to requiring to.	Disagree - the Core Strategy provides the strategic approach to meeting the challenge of climate change. However, it will be the Development Management Development Plan Document that will provide the more detailed policy direction. The Core Strategy is part of the development plan system that includes the London Plan. It should not reiterate requirements or set specific development management policies. Instead, the development management document will set the specific aims for the Council which reflects the requirements of the London Plan and the aspirations set out in the Core Strategy. No proposed change.
119	Policy EM1: Climate Change Adaptation and Mitigation	Environment Agency		We support points 7, 10, 11 and 13 of EM1: Climate Change Adaptation and Mitigation and the monitoring indicator E1.	Support welcomed.
170	Policy EM1: Climate Change Adaptation and Mitigation	Workspace Group	Ransome and Company Ltd	The policy simply repeats draft Replacement London Plan policy and is unnecessary - nor does it reflect the need for feasibility. This policy	Disagree - the Core Strategy does not require developers to link into decentralised energy networks. It provides the strategic basis for

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				<p>repeats the energy policy coverage of the Replacement London Plan and is therefore not necessary. Furthermore, it does not take account of feasibility. Not all development sites will be able to incorporate renewable technologies for reasons such as location and orientation. As such, this requirement should be considered on a site by site basis.</p>	<p>including policies within the Development Management Development Plan Document which will be worded to ensure feasibility is considered. The London Plan states that "LDFs boroughs should develop policies and proposals to identify and establish decentralised energy network opportunities. Boroughs may choose to develop this as a supplementary planning document and work jointly with neighbouring boroughs to realise wider decentralised energy network opportunities." The Council's Core Strategy provides the strategy for other documents within the LDF to prescribe the necessary approach to decentralised energy without setting specific requirements. This allows for flexibility in approach and to establish more specific development management policies that is relevant to the emerging evidence base. No proposed change.</p>
344	Policy EM1: Climate Change Adaptation and Mitigation	Individual		<p>The policy lacks instructions on what should be included in new housing schemes - e.g. solar panels, salvaged construction materials and other "green" facilities such as waste/rain water flush WCs.</p>	<p>Noted - 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>However, these requirements for new housing will be spelt out in detail in the emerging Development Management DPD.</p> <p>No proposed change.</p>
345	Policy EM1: Climate Change Adaptation and Mitigation	Individual		<p>Recycling should be noted - as fundamental to tackling climate change - and there should be a commitment to promoting education amongst borough residents on these issues.</p>	<p>Noted.</p> <p>However, recycling forms part of waste management process which in turn contributes to tackling climate change. The London Plan sets out targets for recycling and composting for waste from households, businesses and industry. The</p>

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					London Plan requires that the majority of waste generated in London is managed in London to enable the capital to move towards self-sufficiency.
346	Policy EM1: Climate Change Adaptation and Mitigation	Individual		Paragraph 1-The policy should also only permit development in urban & town centres where there is sufficient local infrastructure to cope with this.	The Council will keep the position regarding local community infrastructure under review as new development comes forward. It will look to steer development towards existing town centres as these represent the most sustainable locations in terms of public transport accessibility and access to local services. No proposed change.
314	Policy EM1: Climate Change Adaptation and Mitigation	PRUPIM	CB Richard Ellis on behalf of PRUPIM	We broadly support the aim of this policy to ensure that new developments contribute towards the sustainable development and climate change agenda.	Support welcomed.
287	Policy EM1: Climate Change Adaptation and Mitigation	Garden City Estate Residents' Association		The policy omits a reference to trying to reduce road traffic from Heathrow Airport - this should be included.	<p>The Council's aim for a reduction in the use of private vehicles in the borough including Heathrow Airport is expressed extensively throughout the document and forms part of its Strategic Objective (SO) as expressed in SO20, SO21 and SO22 and Policy T2.</p> <p>Policy T2 will be delivered through the Local Implementation Plan (LIP) and partnership working with TfL, transport providers and other partners.</p>
289	Policy EM1: Climate Change Adaptation and Mitigation	Garden City Estate Residents' Association		A safe cycle route to Heathrow - a major employer in the borough - could help modal shift away from the car. Both EM1 and SO12 should be amended to include provision for designated cycle routes segregated in heavily trafficked areas such as Heathrow.	Provision for designated cycle routes is already noted in the infrastructure schedule (Appendix 2) of the Core Strategy - to be delivered between 2015 and 2017.
334	Policy EM1: Climate Change Adaptation and Mitigation	Southstream Holdings Ltd	Montagu Evans on behalf of Southstream Holdings Ltd	Green Belt policy is unsound, no evidence submitted to justify the approach in policy EM2. The Core Strategy notes that a Green Belt review is being undertaken, but does not yet form part of the evidence base. As such, the	Noted - Green Belt designations are carried forward from the current Unitary Development Plan which has been subject to a previous examination in public. Work on the review of Green Belt study is continuing as part of the



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				Core Strategy is not informed by a formal review which identifies the likely areas of change or to assess the role, function and quality of the Green Belt. Without this evidence, it is unclear as to whether the current approach to make minor adjustments to the boundary at a later stage in the LDF process is the most appropriate. It is therefore considered to be unjustified.	evidence base for the emerging Site Allocation DPD. When work on the review of Green Belt study is completed it will be made available for public information. No proposed change.
369	Policy EM1: Climate Change Adaptation and Mitigation	Bell Farm Christian Centre		Objects to prioritising higher density development in urban areas - such developments erode the amenity of the generally open residential estates. Would like to see the provision of additional land for allotment gardening.	The Council will seek to ensure proposed development in existing residential areas respects the existing character and amenity of those areas as new development comes forward (policy BE1 sets out the Council's general approach to the design of new developments). Later work on the Local Development Framework for the Site Allocations and Proposals Map Development Plan Documents may bring forward proposals for further allotment land in the borough. No proposed change.
489	Policy EM1: Climate Change Adaptation and Mitigation	Mr John McDonnell MP		Policy EM1: Climate Change Adaptation and Mitigation - There should be more assertive action taken to ensure action takes place, with targets set and systems in place to both monitor and enforce compliance. In particular there is inadequate attention given to developing and installing renewable energy sources in the borough.	The emphasis in the Replacement London Plan consultation and within the Core Strategy is on energy efficiency and reducing carbon emissions. Figures for reducing CO2 emissions in Hillingdon take account of national targets and regional targets in the London Plan (2008) monitored through Core Indicators which sets a 20% target of energy needs from renewable sources for larger applications (or any other targets set by Government). This is monitored annually in Annual Monitoring Report.  No change proposed.
495	Policy EM1: Climate Change Adaptation and Mitigation	Mr John McDonnell MP		The entire section is too weak in setting out definite actions - and there is no reference to environment in the Vision statement. The overall aim is not mitigation of climate change - it should be halting & reversing it. There is no specific	Both the first and third bullet points in the Vision statement cover the Council's goals for the borough's future environment. Policy EM1 does cover the broad approach being taken to encourage use of renewable energy, promoting

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				<p>reference to extending the use of solar or wind power and inadequate reference to recycling. There should be an aim not just to prevent the loss of green spaces but to create new ones. The reference to local waterways misses such aims as Little Britain pond, flooded gravel pits and the River Frays. Seeking air quality neutrality is not enough - the Strategy should seek an improvement - and there is no reference to tackling the impact of Heathrow &amp; Northolt airports on the environment. There is a lack of explanation on some issues - e.g. "living walls" or "quiet areas". Much more explanation is needed on how policies will be achieved - e.g. how developments are tested re sustainability - and too often developers are asked to consider actions to tackle climate change rather than required to do so. The Strategy does not link local employment helping to reduce travel demand and thereby affecting climate change. Nor does it address better building insulation in the housing stock or reducing housing waste production. It should also acknowledge the lack of a biodiversity plan which needs to be urgently addressed and look to involve the community in monitoring policies on climate change.</p>	<p>living walls and generally upgrading the housing stock - which might encompass better building insulation. Detailed policy on these aspects can be brought forward in a Development Management Development Plan Document. Policy EM4 looks to maintain existing open space and expects developers to address local deficiencies of open space when new development comes forward. The Borough's Blue Ribbon network is depicted at Map 8.2 and covered at policy EM3 and includes the full range of water spaces and areas in Hillingdon. The Core Strategy is a spatial planning document and sets out broad planning policies towards air pollution issues - e.g. by such measures as looking to locate major developments in existing town centres with good public transport access to try to reduce reliance on use of the car and reduce air pollution. No proposed change.</p>
538	Policy EM1: Climate Change Adaptation and Mitigation	Arla Foods UK Plc	BNP Paribas Real Estate	<p>Have concerns over the promotion of decentralised energy and the installation of renewable energy on a site by site basis. It may be more appropriate to look to incorporate sustainable energy provision, rather than costly, front-loaded renewables which in the medium- to long-term often prove to be unsuccessful.</p>	<p>Disagree - the Council has deliberately not specified renewable or decentralised energy targets for new development as this can reduce flexibility in other approaches to minimise carbon emissions. Policy EM1 allows for the development management document to set more specific policies in line with the replacement London Plan. This requires a site by site assessment to be made at planning application stage so a developer is not forced into using renewables if they are not the most appropriate solution. The Core Strategy is considered to provide enough flexibility to make a feasibility assessment on a</p>

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					site by site basis. No proposed change.
559	Policy EM1: Climate Change Adaptation and Mitigation	Individual		<p>LATE SUBMISSION:</p> <p>Paragraph 1 - offers no alternative to prioritising higher density development in urban &amp; town centres. Paragraph 2 - we cannot reduce car dependency in the borough without better public transport; redevelopment going ahead without adequate public transport will only create more car use. Paragraph 7 - rather than "encouraging" the Strategy should state that developers "must" have sustainable techniques. Paragraph 9 - rather than "encouraging" the Strategy should state that developers "must" install renewable energy. Paragraph 12 rather than seeking to avoid losing green areas the Strategy should aim to create further green areas.</p>	<p>Paragraph 1 - Where higher density development is proposed, the Council will seek to locate it at the most sustainable locations - which are normally the borough's town centres where there is a higher level of public transport accessibility and other services readily available to serve the development (policy T1).</p> <p>Paragraph 2 - Policies T2 and T3 seek to improve the borough's public transport network so as to encourage modal shift away from car use.</p> <p>Paragraph 7 - all policies have to be flexible in their approach to meet national planning guidance requirements. It is not possible for the Council to insist on the installation of renewable energy.</p> <p>Paragraph 9 - Disagree - the Core Strategy should not be worded to set development management policies. Instead it provides the strategic approach to allow more specific policies to be included within the development management document. The Development Management Development Plan Document will therefore set the requirements that will have to be followed by developers and applicants.</p> <p>Paragraph 12 - Policy EM4 does state that the Council will extend the network of open spaces to meet local community needs - and require local development proposals to address deficiencies in the quantity of open spaces. No proposed change.</p>
470	Policy EM1: Climate Change Adaptation and Mitigation	Mayor of London	Greater London Authority	Policy EM1 broadly reflects the energy hierarchy but contains very little detail on how the policy would be applied. To ensure these policies are applied effectively the policy should be complemented in more detail in the	Noted - the Council will look at how to emphasise application of the policy in more detail when drafting the subsequent Development Management DPD. No proposed change.

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				Development Management Plan document (i.e. expanded in line with Policy 5.2, 5.3, 5.6 and 5.7 of the draft replacement London Plan.)	
514	Policy EM1: Climate Change Adaptation and Mitigation	L B Hillingdon (Labour Group)		SO12 and EM1:  Should include reference to those unable to walk or cycle any distance - add words to SO12: "...whilst making adequate provision for elderly or disabled people who are unable to walk or cycle any distance."	Equality of access for all sections of the community is already a requirement of Strategic Objectives SO2 and SO 6. Ensuring access for all the community is a theme running through the Core Strategy and is highlighted in some key policies - e.g. policy BE 1 on design of the built environment. No proposed change.
517	Policy EM1: Climate Change Adaptation and Mitigation	L B Hillingdon (Labour Group)		The policy should state that measures will be taken to reduce road traffic movements to and from Heathrow Airport.	Policy T4 in the Core Strategy covers this objective and states that the Council will support the sustainable operation of Heathrow by facilitating improvements to public transport, public transport interchanges and cycle links to provide the opportunity for a modal shift from the use of private cars to sustainable transport modes. No proposed change.
40		British Waterways		The Strategic Objective should also include 'sustainable transport' as one of the opportunities presented by the borough's canals, as recognised by the London Plan and the Mayor's transport strategy.	This is noted in the Core Strategy at paragraph 8.17. No proposed change.
71	8.12	Mr John McDonnell MP		Inadequate reference to determination to protect green belt land and open spaces. A clear statement should be made of the absolute determination of the borough to protect all green belt land and to protect our open spaces for the long term.	Policy EM2 reflects national and regional policies which emphasise the need to protect Green Belt land from development. No proposed change.
449	8.14	Henry Streeter Automotive Ltd	CGMS Ltd on behalf of Henry Streeter Automotive Ltd	The plan fails to deal with a strategic reassessment of the Green Belt boundaries. The review of Green Belt boundaries is a matter for the Core Strategy, not for some unspecified subsequent review.	The Core Strategy does not propose changes to the Borough's Green Belt boundary. This will be assessed in the emerging Site Allocation DPD.  The Council intend setting out any detailed changes to the Green Belt designations in its area when preparing the Site Allocations Development Plan Document. No proposed change.

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41	8.15	British Waterways		<p>We would suggest this paragraph be amended to read:</p> <p>"The river and canal corridors and associated hinterlands (also known as the Blue Ribbon Network) link across borough boundaries and also have a strategic function in west London. The Grand Union Canal originated as an arterial freight route that carried materials between sites from London and links all the way to Birmingham - today, the scale of industrial activity on the water has been largely outgrown by leisure use. It is therefore a very important link between boroughs and provides much wider opportunities for walking, angling and cycling.</p>	<p>Agree to the inclusion of "and provides much wider opportunities for walking, angling and cycling" at the end of the last sentence in paragraph 8.15 to recognise the leisure and recreational value of the canal.</p>
450	8.18	Henry Streeter Automotive Ltd	CGMS Ltd on behalf of Henry Streeter Automotive Ltd	<p>The plan fails to deal with a strategic reassessment of the Green Belt boundaries.</p> <p>The Council has indicated that they intend to review boundaries and this in our view is function of the Core Strategy. In response to our previous submission it was indicated that 'no significant release of Green belt are required'. This implies that some release of Green Belt is required that is not dealt with in the Core Strategy.</p>	<p>The Core Strategy does not propose changes to the Borough's Green Belt boundary. This will be assessed in the emerging Site Allocation DPD.</p> <p>The Council intends setting out any detailed changes to the Green Belt designations in its area when preparing the Site Allocations Development Plan Document. No proposed change.</p>
82		Individuals		<p>Particularly concerned about the future of Hayes Park field. It is vital that the council maintain the land in the green belt and that it is fully protected from development. The area cannot sustain further development of housing or commercial types, the pressure on the local community would be terrible. It is the responsibility of us all to ensure that the green belt (the lungs of our community) is maintained for our future generations. Once it has gone it has gone for ever. Please protect it.</p>	<p>The Core Strategy does not propose changes to the Borough's Green Belt boundary. This will be assessed in the emerging Site Allocation DPD.</p> <p>The Council intends setting out any detailed changes to the Green Belt designations in its area when preparing the Site Allocations Development Plan Document. No proposed change.</p>

## Appendix 1: Responses received to the Pre-Submission Draft Core Strategy

ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
105		Individual		Need to protect Green Belt from inappropriate development.	<p>The Core Strategy does not propose changes to the Borough's Green Belt boundary. This will be assessed in the emerging Site Allocation DPD.</p> <p>The Council intends setting out any detailed changes to the Green Belt designations in its area when preparing the Site Allocations Development Plan Document. No proposed change. No proposed change.</p>
219	8.19	Heathrow Airport Ltd		In line with our comments on Map 4.1, HAL would like to see the figure of 4,970 hectares of Green Belt revised to reflect revisions to the Green Belt boundary.	<p>The Core Strategy does not propose changes to the Borough's Green Belt boundary. This will be assessed in the emerging Site Allocation DPD.</p> <p>The Council intends setting out any detailed changes to the Green Belt designations in its area when preparing the Site Allocations Development Plan Document. No proposed change.</p>
2	8.20	London Green Belt Council		We consider that paragraph 8.20 represents a concise and accurate description of the function Green Belts, which we fully support.	Support welcomed.
3	8.26	London Green Belt Council		We welcome Hillingdon's commitment to maintaining the Green Belt. We trust that this Core Strategy principle will inform any policies or minor adjustments which will be brought forward as part of the Site Allocations DPD and the Development Management DPD. (Para 8.24 above)	Support welcomed.
220	Map 8.1	Heathrow Airport Ltd		<p>In line with our comments on Map 4.1 (key diagram) HAL wish to see the Green Belt designations adapted to remove land at Terminal 5 and Longford Meadows.</p> <p>Alternatively, the precise boundaries of the Green Belt could be omitted from the Core Strategy and presented on the Proposals Map once these are determined. There are two options to resolve this, as follows:</p>	<p>The Core Strategy does not propose changes to the Borough's Green Belt boundary. This will be assessed in the emerging Site Allocation DPD.</p> <p>The Council intends setting out any detailed changes to the Green Belt designations in its area when preparing the Site Allocations Development Plan Document. No proposed change.</p>

## Appendix 1: Responses received to the Pre-Submission Draft Core Strategy

ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				<ul style="list-style-type: none"> <li>• Amend Map 4.1 and Map 8.1 so it is more strategic in nature (rather than making site specific designations). This would include removal of Green Belt from the plan for definition in the Proposals Map at a later date and avoid this providing conflicting information.</li> <li>• Amending the boundary of the Green Belt so that land at Terminal 5 and Longford Meadows is removed;</li> </ul>	
387	Map 8.1	Royal Brompton & Harefield NHS Trust	CGMS Consulting	The trust requests the identification of Harefield Hospital as a major developed site in the Green Belt within this map.	Major developed sites are not identified in Map 8.1 which illustrates the main open space designations. Proposals for Major Developed Site designations will be considered as part of further work on the Site Allocations and Proposals Map Development Plan Documents. No proposed change.
4	8.27	London Green Belt Council		We are concerned by the sentence "In very exceptional circumstances the Council will consider the release of greenfield sites for schools. "First, it appears to be redundant. PPG2 empowers the Planning Authority to allow inappropriate developments in the Green Belt in very special circumstances and this sentence appears to be trying to say the same thing specifically in relation to schools. Second, it does not use the expression "very special circumstances" as used in para 3.1 of PPG2 in relation to allowing inappropriate developments in Green Belt. Instead, it says "exceptional circumstances". This term is used in PPG2 in relation the situations in which a Planning Authority may change the established boundaries of Green Belt (paras 2.6 and 2.7). By using a different term from PPG2, para 8.27 raises the possibility that its meaning differs from PPG2, which would amount to an unsound	Agreed.  Replace the text 'exceptional' in paragraph 8.27 by 'special'.

## Appendix 1: Responses received to the Pre-Submission Draft Core Strategy

ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				departure from national policy. Preferably: Omit the sentence "In very exceptional circumstances the Council will consider the release of greenfield sites for schools. "As a second best: replace "exceptional" by "special".	
5	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	London Green Belt Council		This policy is not clearly in accordance with national policy as expressed in PPG2 because of the reference to "the exceptional circumstances test". As mentioned in relation to para 8.27, PPG2 used the word "exceptional" in relation to the variation of Green Belt boundaries in the plan production process. Where it refers to allowing inappropriate development in Green Belt, it uses the phrase "very special". Using a different word in Policy EM2, raises the possibility of introducing a meaning different from PPG2. Such a difference would make Policy unsound. We cannot see how the "Monitoring" section of the policy would be effective. The number of applications refused and/or appropriate developments allowed is going to depend on the number and nature of projects people bring forward in the Green Belt. It is not even clear to us whether a high or low number would be regarded as success. The third limb of the Monitoring section is more promising but defective in two ways: (a) When inappropriate development is allowed on Green Belt, because very special circumstances, the site does not cease to be Green Belt (so that any subsequent re-development has to be appropriate in Green Belt or itself justified by very special circumstances). The area of Green Belt is not reduced or "lost". (b) The use of the word "Net" implies that if, when Green Belt land is used for inappropriate development, an equivalent amount of land is added to the Green Belt, then the policy has succeeded. This is a fallacy. It is where the Green Belt land is that is	Agreed - replace 'exceptional' in Policy EM2 by 'very special'.  No proposed change to the Monitoring section as each development proposal involving the loss of Green Belt land will be considered on its merits and in accordance with the criteria contained in PPG2 and the emerging Development Management DPD.



## Appendix 1: Responses received to the Pre-Submission Draft Core Strategy

ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				important rather than the amount of it there is. If land adjoining the built up area is built on inappropriately, then, even though more Green Belt be added elsewhere, the Green Belt has failed in its objective of preventing urban sprawl.	
+	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Individual		Policy EM2: Green Belt, Metropolitan Open Land and Green Chains - I support the Council's commitment to maintain and protect the Green Belt within Hillingdon Borough. I am particularly keen to ensure that the Green Belt around Hayes Park is protected from development. I note the policy states that minor adjustments to the Green Belt will be undertaken as part of the Site Allocations Development Plan Document. I trust that this will simply relate to amendments to historical Green Belt boundaries that no longer reflect the existing situation, rather than releasing large areas of Green Belt for residential development, such as Hayes Park. Having regard to the housing policies and the background evidence on housing provision, I understand that there is no requirement to release large expanses of Green Belt for housing development to meet housing targets/need. To do so would mean that the Local Development Framework would fail to meet the tests of soundness and in those circumstances I would expect the Inspector to find the Core Strategy unsound.	Support welcomed
127	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains		Gleeson Developments Ltd	Paragraphs 8.19 / 8.20 & Policy EM2- we note the Council's comments regarding the Green Belt that lies within the Borough and the recognition that the most important attribute of green belts is their openness. We also support the Council's position that minor adjustments to the Green Belt will be undertaken in the Site Allocations DPD.  Whilst the representations jointly submitted by	Support welcomed. Site specific issues will be addressed through the Site Allocations Development Plan Document.

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				<p>Gleeson Developments Ltd and Mr J Walls relate to the pre-submission draft Core Strategy, they have been prepared as part of the ongoing promotion of land off the High Street, Harlington. We are promoting the land, which is located to the north of the settlement of Harlington and within the Heathrow Opportunity Area. Harlington is a sustainable settlement with a number of services and amenities that serve the settlement. Indeed, as will be commented later, the emerging planning strategy for the Borough identifies Harlington as a Local Centre.</p> <p>The land is adjacent to the settlement boundary with access to the existing road network. The site measures approximately 4 acres and is well related to the existing residential area of Harlington, which is to the south and west of the submission site. It is expected that the site could accommodate a range of dwelling numbers depending upon different densities, with access onto the existing highway network, via Bletchmore Close or directly onto the High Street.</p> <p>The land is under the control of a single family, with Gleeson Developments having an interest in the land. The site can achieve the delivery of residential development in accordance with the tests within PPS3. Housing can be delivered within 2 years of a consent being granted.</p>	
131	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Hillingdon Hospital NHS Trust	Broadway Malyan on behalf of Hillingdon Hospital NHS Trust	We note that Policy EM2 states that Mount Vernon Hospital is designated as a Major Developed Site within the Green Belt. But the northern area of the site is almost entirely developed with buildings and hard standing. It adjoins the settlement of Northwood to the east and we consider that there is no justification for it to be designated as Green Belt. This area of the	A review of the 2006 Green Belt Study is being carried out against the criteria/test as set out in PPG2. Site specific issues will be addressed through the Site Allocations Development Plan Document with the proposed Green Belt review as part of its evidence base documents. No proposed change.

## Appendix 1: Responses received to the Pre-Submission Draft Core Strategy

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				<p>site does not fulfil any of this purposes or uses of Green Belt as set out in PPG2. It is appropriate therefore that it is excluded from the Green Belt and included within the settlement.</p> <p>Policy EM2 is therefore not consistent with national policy and we consider that it should be amended to make clear that the developed area of the Mount Vernon site will be excluded from the Green Belt.</p>	
151	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Thorney Farm Developments	Boyer Planning	<p>"Policy should specifically state that Green Belt boundaries will be adjusted to meet development requirements within the Site Allocations DPD. Suggested additional wording for policy EM2: The second paragraph should be replaced with the following wording:</p> <p>"Outside of existing urban areas, the overall integrity of the Green Belt and Metropolitan Open Land will be maintained, but a review of existing boundaries will be undertaken and adjustments proposed to meet development requirements in sustainable locations, as outlined in the Site Allocations Development Plan Document."</p>	<p>The Core Strategy does not propose changes to the Borough's Green Belt boundary. This, including site specific issues, will be considered in the emerging Site Allocation DPD. However, significant releases of Green Belt land are not considered to be appropriate and would not be supported.</p> <p>No proposed change.</p>
183	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	ACS International Schools	Preston Bennett Holdings Ltd	School site should be classified as a Major Developed Site within the Green Belt.	A review of the 2006 Green Belt Study is being carried out against the criteria/test as set out in PPG2. Site specific issues will be addressed through the Site Allocations Development Plan Document. No proposed change.
221	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Heathrow Airport Ltd		Object to "maintain the current Green Belt" - the Core Strategy needs to reflect Green Belt de-designation at T5 - or omit this from Core Strategy and deal with in Proposals Map. The same issues are raised in relation to para. 4.1.	The Council is aware of the need to reconsider the Green Belt boundary further to the development of Terminal 5. A borough wide review of Green Belt and other detailed land use designations is being carried out. Detailed proposed changes will be brought forward as part of the Site Allocations and Proposals Map Development Plan Documents. No proposed

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
					change.
252	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Threadneedle Property Investments	Indigo Planning on behalf of Threadneedle Property Investments	We welcome Policy EM2 and highlight an anomaly in the Green Belt boundary, particularly the Lodge and Aviation House in Harmondsworth, where part of the site is included within the Green belt and should be removed. We request that this anomaly is recognised in the review of the Green Belt study referred to at Section 8.24 of the Core Strategy and is rectified in future DPDs including the Proposals Map and the Site Allocations DPD.	Site specific issues will be addressed through the Site Allocations Development Plan Document with the proposed Green Belt review forming part of the evidence base. No proposed change.
232	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Individual		Green space is already short in the heavily built-up south of the borough and the loss of Green Belt land there is not justified. The Council has a duty to maintain Green Belt land for future generations. Loss of green Belt land would not be consistent with the draft Replacement London Plan. The policy should be changed to state: at paragraph 1 - The Council will maintain... (etc.); paragraph 2 - No adjustments will be made to Green Belt - minor adjustments to Metropolitan Open Land will be undertaken in the Site Allocations Development Plan Document; paragraph 4 - The Council will firmly resist any proposals for development in Green Belt land. Metropolitan Open Land will be assessed against national and London Plan policies, including the exceptional circumstances test.	The Core Strategy supports the retention of the Green Belt, and only minor changes will be made through the Green Belt review. National planning guidance does allow certain development / uses on Green Belt land in very special circumstances. Policy EM2 has to reflect this. No proposed change.
233	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Individual		Green space is already short in the heavily built-up south of the borough and the loss of Green Belt land there is not justified. The Council has a duty to maintain Green Belt land for future generations. Loss of green Belt land would not be consistent with the draft Replacement London Plan. The policy should be changed to state: at paragraph 1 - The Council will maintain... (etc.); paragraph 2 - No adjustments	The Core Strategy supports the retention of the Green Belt, and only minor changes will be made through the Green Belt review. National planning guidance does allow certain development / uses on Green Belt land in very special circumstances. Policy EM2 has to reflect this. No proposed change.

## Appendix 1: Responses received to the Pre-Submission Draft Core Strategy

ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				will be made to Green Belt - minor adjustments to Metropolitan Open Land will be undertaken in the Site Allocations Development Plan Document; paragraph 4 - The Council will firmly resist any proposals for development in Green Belt land. Metropolitan Open Land will be assessed against national and London Plan policies, including the exceptional circumstances test.	
235	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Individual		Wording should be changed to make clear that the Green Belt is important for local flora & fauna - e.g. for wildlife corridors - and its loss will be resisted. Monitoring of the policy should be made stronger.	Policy EM7 of the Core Strategy already seeks to protect and enhance biodiversity and geological resources in the borough. No proposed change.
239	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Individual		The Green Belt at Hayes should be retained to prevent any development there causing flooding by affecting local underground streams. Local bungalows built in back gardens have already caused flooding to neighbouring gardens. The policy should be changed from seeking to maintain the current extent of the Green Belt to state it must be maintained.	The Core Strategy does have to build in some flexibility into its policies to reflect national planning guidance. Detailed policy on the prevention of flood risk from new developments will be dealt with by the Development Management Development Plan Document.  No proposed change.
240	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Individual		Given the presence of several major road routes and airports, the Green Belt should be retained to protect local air quality and as a habitat for local flora & fauna. The policy should be changed from seeking to maintain the current extent of the Green Belt to state it must be maintained.	Policy EM2 reflects national and London-region policies aimed at protecting all existing Green Belt land. The policy has to be framed with some flexibility to comply with national planning policy requirements. No proposed change.
398	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Brunel University	VRG Planning Ltd on behalf of Brunel University	It is necessary to ensure that the Core Strategy meets the tests of soundness, more specifically the requirements for the document to be effective and consistent with National policy. The draft Core Strategy departs from National planning policy guidance, as contained at Annex C of PPG2 (Green Belts) which specifically states that the needs of Higher Education institutions located within the Green Belt should	Support for additional growth at Brunel University would need to be discussed and agreed on a site specific basis as part of the work for the Site Allocations Development Plan Document. No proposed change.

## Appendix 1: Responses received to the Pre-Submission Draft Core Strategy

ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				be given due consideration in preparing development plan documents. It states that such reviews represent the appropriate time at which to consider whether Green Belt boundaries should be changed, in order to facilitate such growth. The document must therefore consider the future needs of the University and seek to work proactively with it as a key delivery partner.	
399	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Brunel University	VRG Planning Ltd on behalf of Brunel University	Add following text to first paragraph: In addition, consideration will be given within this document to an adjustment to accommodate the future needs to Brunel University.	<p>The Council intends 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>No change proposed.</p>
400	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Brunel University	VRG Planning Ltd on behalf of Brunel University	Remove reference to Brunel University as a Major Developed Site. To acknowledge that the Brunel University site should be removed from the Green Belt, given that it does not form open land within the countryside and could not be considered to perform any of the functions set out at paragraph 1.5 of PPG2.	A review of the 2006 Green Belt Study is being carried out against the criteria/test as set out in PPG2. This will determine the status of site within the Green Belt. Site specific issues will be addressed through the Site Allocations Development Plan Document with the proposed Green Belt review forming part of its evidence base documents.
401	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Brunel University	VRG Planning Ltd on behalf of Brunel University	Change word 'exceptional' for 'very special' circumstances.	<p>Agreed.</p> <p>Replace 'exceptional' in Policy EM2 by 'very special'.</p>
278	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Legal and General Property Partners (Life Fund) Ltd	Drivers Jonas Deloitte on behalf of Legal & General Property Partners (Life Fund) Ltd	Delivery of housing beyond 2014 is uncertain and the Core Strategy should give consideration to major Green Belt changes now to assist in meeting future housing needs.	Disagree - the Council has identified sufficient capacity to meet requirements up to 2021 - in accordance with the guidance in PPS3. Further work on other LDF documents - the Site Allocations and Proposals Map Development Plan

## Appendix 1: Responses received to the Pre-Submission Draft Core Strategy

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					Documents - can be expected to bring forward further proposals for long term housing capacity. No proposed change.
337	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Kerville Associates	Montagu Evans on behalf of Kerville Associates	Green Belt policy is unsound, no evidence submitted to justify the approach in policy EM2. The Core Strategy notes that a Green Belt review is being undertaken, but does not yet form part of the evidence base. As such, the Core Strategy is not informed by a formal review which identifies the likely areas of change or to assess the role, function and quality of the Green Belt. Without this evidence, it is unclear as to whether the current approach to make minor adjustments to the boundary at a later stage in the LDF process is the most appropriate. It is therefore considered to be unjustified.	The general context for the protection of Green Belt land is already laid down in national planning guidance and in London Plan policies. A review of the Council's Green Belt and other detailed land use designations is being carried out as part of work on the Site Allocations Development Plan Document. No proposed change.
388	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Royal Brompton & Harefield NHS Trust	CGMS Consulting	The trust supports the continued identification of Harefield Hospital as a major developed site in the Green Belt. However, the trust requests that within the supporting text paragraphs 8.19-8.26, it is also stated the detailed boundaries, scale and mix of uses within the Harefield Major Developed Site within the Green Belt will be reviewed as part of the Site Allocation DPD, given that during the plan period Harefield Hospital will be developed.	The review of Green Belt boundaries will cover the whole borough. It is unnecessary to make the detailed point regarding the hospital site in the Core Strategy text. The Council will continue to liaise with RBHT as their future proposals for Harefield Hospital are brought forward. No proposed change.
327	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	CEMEX	Drivers Jonas Deloitte	CEMEX notes that Policy EM2 of the Core Strategy seeks to maintain the current extent, hierarchy and strategic functions of the Green Belt. However, it does state that minor adjustments to the Green Belt will be undertaken in the Site Allocations DPD. 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	Site specific issues will be addressed through the Site Allocations Development Plan Document.

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				targets in a sustainable location.	
378	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Planning Perspectives LLP		The Plan fails to categorically demonstrate how it will meet its adjusted housing target beyond 2021 and that there will not be a requirement to release Green Belt land to assist in achieving its target. If the Housing target cannot be met over the plan period then consideration needs to be given to strategic releases of Green Belt. Furthermore, the Green Belt Study has not been formally published and in such circumstances the evidence base on which the Core Strategy is predicated is considered to be questionable if not unsound and it has clearly not been demonstrated that the policies are deliverable.	Disagree - the Council has identified sufficient capacity to meet requirements up to 2021 in accordance with the guidance in PPS3. Further work on other LDF documents - the Site Allocations and Proposals Map Development Plan Documents - can be expected to bring forward further proposals for long term housing capacity. A review of existing Green Belt designations will form part of that work. No proposed change.
379	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Planning Perspectives LLP		The Green Belt and Green Chains should be reviewed to ensure that they achieve the priorities and objectives outlined in Policy EM2 and its supporting text. Without a thorough review of the existing Green Belt and Green Chains, it is considered that the Core Strategy may be unsound, as it does not demonstrate whether these areas meet the requirements identified in Policy EM2. The Core Strategy also fails to demonstrate how increased access to the Green Belt and Green Chain can be achieved in circumstances where large swathes are in private ownership. Models and case scenarios need to be examined and investigated to ensure that the Green Belt and Green Chains are made accessible to the general public through public/private partnerships. Unfortunately the absence of a sound evidence base in the formulation of the plan leaves it open to interpretation and clearly does not deliver the original aspirations of the plan. In these circumstances, the plan cannot be considered to be sound.	The broad approach on Green Belt and Green Chains in policy EM2 reflects national planning guidance and London Plan policies. A review of the Borough's Green Belt and other major land use designations is being undertaken as part of work for the Site Allocations Development Plan Document. No proposed change.



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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
382	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Planning Perspectives LLP		A thorough evidence base is needed to justify the existing extent of Green Belt and the Green Chain. This is particularly important in circumstances where there is uncertainty regarding the Borough's housing figures. This is needed before the Council can develop a strategy for the Green Belt and Green Chain.	The broad approach on Green Belt and Green Chains in policy EM2 reflects national planning guidance and London Plan policies. A review of the Borough's Green Belt and other major land use designations is being undertaken as part of the work for the Site Allocations Development Plan Document. The Council's housing trajectory meets the requirements of PPS3. No proposed change.
496	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Mr John McDonnell MP		The density of local housing development means that a stronger statement is needed that all Green Belt and local open spaces must be protected from incremental incursions. Similarly, allotments must be protected - and new ones sought. Provision for local sports activities needs greater emphasis. There should be more emphasis on upgrading existing open space.	<p>The Core Strategy covers a period of 15 years, and as such it is unlikely to be effective if it cannot deal with changing circumstances. The Core Strategy does not propose changes to the Borough's Green Belt boundary. This will be assessed in the emerging Site Allocation DPD. However, significant releases of Green Belt land are not considered to be appropriate and would not be supported.</p> <p>The provision of local sports activities is supported in Policies C11 and C12. Similarly, Policy EM4 seeks the protection and other informal recreational spaces. It is anticipated that the Site Allocations Development Plan Document will allocate specific sites for formal and informal recreational spaces.</p> <p>No proposed change.</p>
441	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Royal Brompton & Harefield NHS Trust	DP9 on behalf of Royal Brompton & Harefield NHS Foundation Trust	Status of the Hospital as a major developed site in the Green Belt is welcomed. Core Strategy should acknowledge opportunities for infilling. Site allocations DPD should carefully consider adjustments to Green Belt. The Trust would like to be closely involved in the Site Allocations DPD and a pragmatic approach should be adopted to the hospital site.	<p>Support welcomed. As a result of the status of the hospital being a major developed site in the Green Belt, it affords it the opportunity for infilling to take place in accordance with the criteria contained in PPG2 (and the emerging Development Management DPD).</p> <p>Additional growth at Harefield Hospital would need to be discussed as part of work for the Site Allocations Development Plan Document. No proposed change.</p>

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
416	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Individual		<p>Policy EM2 starts “The Council will seek to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains.....</p> <p>I am not happy with the term ‘seek to’ in the first paragraph of this policy. I would expect my council to state positively that they are going to maintain the “current extent.... of the Green Belt...” You are either going to do something or not do something, not something in between. The words ‘seek to’, is a meaningless phrase and would not make this policy at all effective.</p> <p>Please delete the words ‘seek to’ from the first paragraph of Policy EM2 so that the policy reads:</p> <p>The Council will maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains.....</p>	<p>The Core Strategy covers a period of 15 years, and as such it is unlikely to be effective if it cannot deal with changing circumstances. The work "seeks" allows that flexibility and provides deliverability and monitoring of the policy as required by Planning Policy Statement 12 (PPS12).</p> <p>No proposed change.</p>
435	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Individual		<p>First paragraph - change to state the Council will maintain the current extent of the Green Belt.                      Second paragraph - change to state that no adjustments will be made to the Green Belt.                      Fourth paragraph - change to state that the Council will firmly resist any proposals for development in the Green Belt.</p>	<p>The Core Strategy covers a period of 15 years, and as such it is unlikely to be effective if it cannot deal with changing circumstances. The work "seeks" allows that flexibility and provides deliverability and monitoring of the policy as required by Planning Policy Statement 12 (PPS12).</p> <p>Any development proposal involving the loss of Green Belt land will be considered on its merit and in accordance to criteria contained in PPG2 and the emerging Development Management DPD.</p> <p>No proposed change.</p>
569	Policy EM2: Green Belt, Metropolitan	Individual		LATE SUBMISSION:	All policies have to be flexible in their approach to meet national planning guidance requirements.

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	Open Land and Green Chains			Rather than "will seek to" should state : "...The Council must maintain..."	The work "seeks" allows that flexibility. No proposed change.
451	Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	Henry Streeter Automotive Ltd	CGMS Ltd on behalf of Henry Streeter Automotive Ltd	The plan fails to deal with a strategic reassessment of the Green Belt boundaries. Strategic changes to the Green belt should be addressed in the Core Strategy, not at some later date.	The Core Strategy does not propose changes to the Borough's Green Belt boundary. This will be assessed in the emerging Site Allocation DPD. However, significant releases of Green Belt land are not considered to be appropriate and would not be supported.
485	8.28	Mayor of London	Greater London Authority	Blue Ribbon Network - the Mayor considers the BRN as 'Green Infrastructure' rather than 'open space' (see GLA Note to the EIP Panel clarifying the relationship between green infrastructure and open space <a href="http://www.london.gov.uk/sites/default/files/eip/E111GLAMatter71.pdf">http://www.london.gov.uk/sites/default/files/eip/E111GLAMatter71.pdf</a> )	Agreed - reference to 'open space' to be replaced by 'green infrastructure' in paragraphs 8.28 and 8.30.
42	8.31	British Waterways		We are very pleased that a dedicated policy has been introduced to address the value and significance of the waterways in the borough.  We would suggest expanding the first point here to:  •The need to improve the quality of and access to open spaces, rivers and canals for a wide variety of uses, exploiting their full potential for the benefit of all groups of people in the community;  Para 8.37 We support this statement.	The policy already provides a broad approach to increasing access to the borough's Blue Ribbon Network for a variety of uses. Its value to the borough's open space network is stressed - e.g. the Grand Union Canal is of regional importance as it crosses several local authority boundaries - and its multi-functional role is also highlighted. The policies in the Core Strategy recognise this and a number of policies support its implementation - e.g. policies covering landscape, flood risk, open space, sport & leisure and sustainable transport.  The Strategy also notes that the Council is keen to ensure that canals benefit from any waterside development. No proposed change.
43	8.32	British Waterways		The Grand Union Canal does not present the same flood risk as other rivers and tributaries in the borough.	Noted. No proposed change.
44	Policy EM3: Blue Ribbon Network	British Waterways		We strongly support this policy and the intention for a waterspace strategy for the Grand Union Canal, which will help to realise its potential in	The Section 8 on Environmental Management carries the main section on the borough's "Blue Ribbon Network". It notes that the borough has 20

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				<p>supporting the strategic aims of the Core Strategy for healthy, sustainable communities. However, the wording of policy EM3 could be amended to highlight the multi-functional role of the waterways, which represents opportunities for not just wildlife habitats, visual amenity, transport and leisure, but also tourism, education and promoting skills and training, such as through volunteering projects, both corporate and community, and community payback schemes through collaboration with probation services. We would recommend the policy read:</p> <p>"The Council will continue to promote and contribute to the positive enhancement of the multi-functional strategic river and canal corridors, in supporting the local character, visual amenity and furthering opportunities for ecology, transportation, leisure opportunities, sustainability, education, tourism and skills training. This will be supported by the Biodiversity Action Plan and the Thames River Basin Management Plan, and developer contributions where appropriate."</p> <p>The Council will collaborate with adjacent local authorities to ensure that Hillingdon's river and canal corridors complement and link with cross boundary corridors.</p> <p>Under Implementation, we would suggest an amendment to the final point to read:</p> <p>"•Improving access to and the quality of Hillingdon's river and canal corridors, thereby providing a healthier lifestyle accessible to all, through positive design of waterside developments and developer contributions."</p> <p>Under Monitoring, we would not support the</p>	<p>km of the Grand Union Canal (GUC) - including the Main Line, Paddington and Slough Arms. Their value to the borough's open space network is stressed - e.g. the GUC is of regional importance as it crosses several local authority boundaries. The multi-functional role played by the GUC (and the rest of the Blue Ribbon network) is also highlighted. The policies in the Core Strategy recognise this and a number of policies support its implementation - e.g. policies covering landscape, flood risk, open space, sport &amp; leisure and sustainable transport. The Strategy also notes that the Council is keen to ensure that canals benefit from any waterside development.</p> <p>The Council wishes to improve access to the Canal as a leisure resource and does wish to monitor the success of providing new access and use of the system in future regeneration initiatives. No proposed change.</p>

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				proposal for "Number of new and improved access points to the river and canal network" as a measure of success, as this could be misleading and does not necessarily guarantee high quality water environments. British Waterways monitors pedestrian counters along our network to count visitor numbers, and also undertakes customer surveys. The amount of waterborne freight or other boat traffic could also be monitored as a way of assessing the success of the policy.	
120	Policy EM3: Blue Ribbon Network	Environment Agency		We support Policy EM3, its Implementation and Monitoring. We also support the inclusion of Map 8.2 River and Canal Corridors.	Support welcomed.
359	Policy EM3: Blue Ribbon Network	Hayes Town Partnership		<p>In order to achieve their full potential there is a need for a specific canals strategy. This would include the following elements:</p> <ul style="list-style-type: none"> <li>• Development of vibrant water fronts in both Hayes and West Drayton which can become open and attractive focal points in our town centres.</li> <li>• Potential to replace old and worn out buildings with modern well designed schemes that could include housing, offices and public services.</li> <li>• Exploitation of local heritage and retention and sensitive development of old features such as Shackles Dock in Hayes Town.</li> <li>• Temporary moorings for visitors and permanent fully serviced moorings for people to live in the heart of our town centres.</li> <li>• Use of the canal for freight transport, trip boats, water taxis and canoes.</li> <li>• Improved access for pedestrians and cyclists</li> </ul>	The Council will bring forward proposals for making full use of the Blue Ribbon Network as part of its subsequent Site Allocations, Proposals Map and Heathrow Area Development Plan Documents. No proposed change.

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				<p>together with purpose-built walking and cycling routes which are traffic free, quiet and safe</p> <ul style="list-style-type: none"> <li>• Places to fish, to enjoy nature and to relax.</li> <li>• Recycling of canal water for sustainable cooling for factories and offices.</li> </ul>	
370	Policy EM3: Blue Ribbon Network	Bell Farm Christian Centre		No comments	None
510	Policy EM3: Blue Ribbon Network	Councillor A Macdonald		<p>Policy EM3 and Paragraph 8.105</p> <p>The Core Strategy does not set out adequately the full range of opportunities the canals can offer throughout the borough - it should give greater detail on such issues as water quality; transport (people &amp; materials); leisure - where the canals could be opened up to residents in Hayes, West Drayton &amp; Yiewsley; tourism and business / job opportunities alongside the canals - notably by increasing links from the canals to local historical and cultural sites.</p>	<p>The importance of the canal and the opportunities it offers are well documented in the Core Strategy. Section 8 on Environmental Management carries the main section on the borough's "Blue Ribbon Network". It notes that the borough has 20 km of the Grand Union Canal (GUC) - including the Main Line, Paddington and Slough Arms. Their value to the borough's open space network is stressed - e.g. the GUC is of regional importance as it crosses several local authority boundaries. The multi-functional role played by the GUC (and the rest of the Blue Ribbon network) is also highlighted. The policies in the Core Strategy recognise this and a number of policies support its implementation - e.g. policies covering landscape, flood risk, open space, sport &amp; leisure and sustainable transport.</p> <p>The Strategy also notes that the Council is keen to ensure that canals benefit from any waterside development - policy EM3 states: "The Council will continue to promote and contribute to the positive enhancement of the strategic river and canal corridors and the associated wildlife and habitats through the Biodiversity Action Plan and the Thames River Basin Management Plan, and developer contributions where appropriate. The Council will continue to enhance the local character, visual amenity, ecology, transportation,</p>

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					<p>leisure opportunities and sustainable access to rivers and canals. The Council will collaborate with adjacent local authorities to ensure that Hillingdon's river and canal corridors complement and link with cross boundary corridors."</p> <p>Elsewhere in the Core Strategy the value of the GUC as a having potential to offer attractive waterside locations for regeneration scheme is noted at Table 5.3 where it is considered to have particular importance in the regeneration of the Hayes-West Drayton Corridor and in Hayes Town Centre where the canal "...offers an attractive and sustainable alternative for pedestrian and cycle routes through the area."</p> <p>Exploiting and exploring the full range of opportunities the canals can offer is outside the scope of this document as they have to be carried out in conjunction with other external bodies including statutory bodies charged with such responsibility. The Council will deal with any future proposals to exploiting their potential through the relevant Development Plan Document (DPD) and the usual development management process and in conjunction with the British Waterways. No proposed change.</p>
15	Policy EM4: Open Space and Informal Recreation	Individual		No response to Hayes End Community Park Green Flag failure. No further action - why? Public survey has shown demand in the park for 1) lockable gates, 2) public toilets, 3) skate board and BMX ramp, 4) quiet area, 5) dog training area and 6) a defined cycle track. These are necessary to comply with public concerns and health and safety / environmental issues. The community centre in the park should be improved.	<p>These detailed park management matters are not covered in the Core Strategy - which is a strategic level planning policy document. These concerns will be relayed to the relevant Council department for consideration.</p> <p>No proposed change.</p>
143	Policy EM4: Open Space and Informal	Hillingdon Inter Faith Network		Policy EM4 and the related implementation markers need to be more robust in addressing	Policy EM4 does state that the Council will extend the network of open spaces to meet local

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	Recreation			the need for additional open spaces.	community needs - and require local development proposals to address deficiencies in the quantity of open spaces. No proposed change. Elsewhere in the Strategy policy EM 5 looks towards using the development management process to securing additional leisure spaces that meet local community needs. The Council consider this to be sufficient a policy framework expressing its intention to address the need for further open space - and its Vision statement notes that an objective for the Strategy is that more residents will have access to open space during the plan period. No proposed change.
349	Policy EM4: Open Space and Informal Recreation	Individual		The Council should state it will not allow the closure of current allotments and will work to expand them where possible and create new sites where there is a need.	The Core Strategy has a more general commitment to preventing the loss of open space generally across the borough at policy EM4; other policies in the Strategy effectively give and additional protection - e.g. policy EM5 looks to protect spaces for leisure activities within walking distance of people's homes and policy CI 1 seeks to prevent the loss of uses which constitute community infrastructure - which might include local allotments. No proposed change.
280	Policy EM4: Open Space and Informal Recreation	Legal and General Property Partners (Life Fund) Ltd	Drivers Jonas Deloitte on behalf of Legal & General Property Partners (Life Fund) Ltd	The policy should acknowledge that there will be occasions when development can be permitted despite significant adverse environmental or quality of life impacts as it helps to meet other important planning objectives.	Disagree - there is no need to highlight possible exceptions being made in one particular Core Strategy policy. Development proposals will be considered on their individual merits and applied flexibly - to meet with the requirements of national planning policy guidance. No proposed change.
371	Policy EM4: Open Space and Informal Recreation	Bell Farm Christian Centre		The policy does not provide for the provision of additional land for allotment gardening. Would like to see the provision of additional land for allotment gardening.	The Core Strategy sets out the Council's broad strategic level planning policies to meet its key land use challenges over the next fifteen years. Further work for the Local Development Framework will consider the need for various land uses to meet identified detailed community needs in the borough - e.g. housing, leisure and recreation. Where opportunities for further open space use such as allotments can be identified



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					these will be brought forward in a Site Allocations or Proposals Map Development Plan Document. No proposed change.
383	Policy EM4: Open Space and Informal Recreation	Planning Perspectives LLP		Policy EM4 is welcomed but needs to be grounded on a sound evidence base, identifying existing areas of deficiency. It also needs to acknowledge that accessibility to existing green spaces is restricted in many instances. Strategies need to be developed to open up access to these spaces in order to address existing deficiencies. Simply safeguarding existing areas of open space is not sufficient to address areas of deficiency. In order for this to happen, alternative models need to be looked at to deliver greater access and meet deficiencies in circumstances where public sector finances are under strain.	The Council has an Open Space study in preparation which can be expected to identify areas of open space deficiency in the borough and which will support the policies in the Core Strategy and inform further preparation of the Local Development Framework. No proposed change.
391	Policy EM4: Open Space and Informal Recreation	Hillingdon Play Association		<p>We want to see play being explicitly addressed in this policy. The London Plan states that LDFs 'should address this by providing policies on play provision, including for high quality design.</p> <p>"We therefore propose the following wording to be included in Policy EM4:</p> <p>'The Council understands the cross-cutting nature of children and young people's play, and will therefore develop a new play strategy. It will ensure this policy for play provision is integrated into this overall open space strategy and every other relevant strategy. Consultation with children and young people in the different parts of the borough will be undertaken, about the design of new provision and to understand their changing needs. The Council will make appropriate provision for different age groups, and for providing environmentally friendly and natural designs including roof gardens and indoor space for young children. It will also make</p>	<p>The Core Strategy does not need to repeat the provisions of The London Plan. The issue of play space is addressed in the infrastructure schedule at Appendix 2 and also in the emerging Open Space Strategy as areas of public open space. The detail of how additional play space will be provided will be addressed in forthcoming DMDPD, however it is suggested that an additional sentence is added to policy 8.64 as follows:</p> <p>Play space is classified as public open space and detailed policies on this issue will be contained in the forthcoming DMDPD. No proposed change.</p>

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				arrangements for management and maintenance of play and communal facilities. It will ensure that the Council Planning Department works with a wide variety of relevant community groups such as Hillingdon Play Association to integrate play in all areas of provision – housing, transport etc' . "	
570	Policy EM4: Open Space and Informal Recreation	Individual		LATE SUBMISSION:  The basis for the statement that there will be a presumption against a net loss of open space in the borough is unclear. Rather than "will seek to protect" should state: "...The Council must protect..."	The presumption against the loss of open space places a significant level of protection on this valuable resource. In order to justify release developers would be required to demonstrate that no other suitable sites were available. No proposed change.
350	Policy EM5: Sport and Leisure	Individual		Paragraph 3 - not robust and needs to state that the Council will ensure that where there is a lack of private garden space provision will be sought for communal gardens with areas to grow fruit or vegetables - or allotments will be created.	Policy EM4 in the Core Strategy already requires developers to address local deficiencies in the quantity and accessibility of local open space. Rather than specify what should be provided the Council would wish to retain flexibility in the policy and use the development management process to achieve whatever any local community needs may be at the time. The Council would note that it intends producing detailed garden space provision standards as part of work on a subsequent Development Management Development Plan Document. No proposed change.
360	Policy EM5: Sport and Leisure	Hayes Town Partnership		Policy EM5 should be amended to include specific reference to physical exercise other than sport including walking and cycling.	Policy 5 already refers to "active sports and active lifestyle" which encompasses physical exercise other than sport (including walking and cycling). No proposed change.
429	Policy EM5: Sport and Leisure	Individual		Use of the words "the Council will" is too frequent - it has not always been able to achieve its aims. The Strategy is not specific enough in detailing where future services (e.g. for sport and leisure) will be provided - and these are not provided within easy walking distance of peoples' homes. Children's play spaces are only	The Core Strategy is a broad policy document and later parts of the Local Development Framework can be expected to come forward with detailed proposals for further leisure, recreation and playspace or community needs. It is anticipated that the Site Allocations Development Plan Document will allocate specific sites for

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				<p>encouraged in the Strategy - there should be much greater detail on how they will be supported, renovated and created. No mention is made of the need for provision for teenagers or of youth centres - which are particularly needed in the south of the borough. The wording "youth facilities" is too ambiguous - and should be replaced with youth centres if that is what is envisaged. Loss of a facility in one area and its reprovision elsewhere in the borough results in a community being worse off - this is not addressed in the Strategy.</p>	<p>formal and informal recreational spaces. Criteria for the siting or retention of leisure / recreational centres will be considered in the proposed Development Management DPP. No proposed change.</p>
571	Policy EM5: Sport and Leisure	Individual		<p>LATE SUBMISSION: Rather than "Providing opportunities for improved cycleways" should state : "...Provide improved cycleways..."</p>	<p>The Council is not always responsible for direct provision of cycleway. The proposed policy as worded refers to creating opportunities for the creation of cycleway by third party organisations such as developers. No proposed change.</p>
121	Policy EM6: Flood Risk Management	Environment Agency		<p>We support Policy EM6, its Implementation and Monitoring. We also support paragraphs 8.76-8.93 and the inclusion of Map 8.3 Flood Risk Assessment.</p>	<p>Support welcomed.</p>
222	Policy EM6: Flood Risk Management	Heathrow Airport Ltd		<p>We object to the wording of final paragraph of proposed Policy EM6: Flood Risk Management. We believe it is essential that there are caveats to implementation of this policy to reflect the practical implications of implementing Sustainable Urban Drainage Systems (SUDS). There would be two possible approaches to this:</p> <ol style="list-style-type: none"> <li>1. We would encourage the Council to adopt the approach proposed in the Draft Replacement London Plan, Policy 5.13 which suggests "Development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so."</li> <li>2. HAL strongly feel that the policy could acknowledge the unique circumstances</li> </ol>	<p>Site specific issues relating to SUDS will be considered through the usual development management process in accordance with national and regional policies. No proposed change.</p>

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				applicable at Heathrow and the existing campus wide approach to flood risk management and pollution control. On that basis, SUDs would not be applicable to most developments at the Airport.	
560	Policy EM6: Flood Risk Management	Individual		LATE SUBMISSION:  Rather than "encourage" should state: "The Council must use sustainable...".	Agreed in part as to the choice of word used. The Council cannot 'require' developers in all cases. There has to be flexibility built into the policy. Nevertheless, Policy EM6 has been changed to read: "The Council will require all development across the borough to use sustainable urban drainage systems (SUDS) unless demonstrated that it is not viable. The Council will encourage SUDS to be linked to water efficiency methods. The Council may require developer contributions to guarantee the long term maintenance and performance of SUDS is to an appropriate standard".
472	Policy EM6: Flood Risk Management	Mayor of London	Greater London Authority	The Council seeks to 'encourage' sustainable urban drainage systems in policy EM6 (Flood risk). This wording appears to be weak, considering that the Flood and Water Management Act 2010 gives the London boroughs the responsibility to ensure the use of sustainable drainage in new developments. The sustainable urban drainage systems should be "required."	Agreed - change EM6 text to "The Council will require all development across the borough to use sustainable urban drainage systems (SUDS) unless demonstrated that it is not viable. The Council will encourage SUDS to be linked to water efficiency methods. The Council may require developer contributions to guarantee the long term maintenance and performance of SUDS is to an appropriate standard".
486	Policy EM6: Flood Risk Management	Mayor of London	Greater London Authority	The Council seeks to 'encourage' rather than "require" sustainable urban drainage systems. This wording appears to be weak, considering that the Flood and Water Management Act 2010 gives the London boroughs the responsibility to ensure the use of sustainable drainage in new developments.	Agreed - change EM6 text to "The Council will require all development across the borough to use sustainable urban drainage systems (SUDS) unless demonstrated that it is not viable. The Council will encourage SUDS to be linked to water efficiency methods. The Council may require developer contributions to guarantee the long term maintenance and performance of SUDS is to an appropriate standard".

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329		London Geodiversity Partnership		The Partnership welcomes your recognition of areas of geological importance and the need to protect them. Hillingdon already contains one geological SSSI at Harefield Pit. This is potentially an important site for research and education. At present it is threatened by vegetation and the build up of screen. The Partnership is hoping to assist in improving this site with the Harrow and Hillingdon Geological Society. We welcome the inclusion of The Gravel Pits as a Regionally Important Geological and Geomorphological Site (RIGS). This site is recreation land close to Northwood, which is an excellent site for school education and interpretation and already has an information board describing the pits.	Support welcomed.
223	Map 8.4	Heathrow Airport Ltd		HAL object to the designation of land at Terminal 5 as a "Nature Conservation Site of Metropolitan or Borough Grade 1 Importance". The area defined is the former Perry Oaks site but is now all operational land as part of Heathrow Airport and does not have any particular nature conservation importance.	The Council is aware of the need to reconsider the designation of the land at Terminal 5 and will bring forward any proposed detailed changes as part of the work for the Site Allocations Development Plan Document. No proposed change.
89	Policy EM7: Biodiversity and Geological Conservation	Natural England London Region		Point 2  It is our opinion that all SINCS regardless of grade should be protected from adverse development. In principal, we do not support the development of SINCS. New developments should seek at first to protect the natural environment, secondly mitigate against adverse effects and thirdly seek to enhance and protect biodiversity. With this in mind, we recommend that this section be re-worded to state that all SINCS within the borough will be protected from any adverse impacts and loss.	Disagree - it is not possible or feasible to provide the same level of protection for all SINCS. SINCS have been designated for a variety of reasons, and given a hierarchical grade. Local and Grade 2 level SINCS should not command the same level of protection as Grade 1 and Metropolitan designations. The London Plan requires nature conservations sites to be afforded a level of protection commensurate with their status. Policy EM7 provides suitable criteria to ensure the borough's ecological features are properly protected allowing for compensation where necessary.
90	Policy EM7: Biodiversity and	Natural England		Point 6	Agreed - add point 7:

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	Geological Conservation	London Region		We are encouraged by the reference to living roofs and walls, however the provision of other greening measures (such as rain gardens and SUDSs) which can contribute to the development of ecological connectivity are not included. GI encompasses all of these measures and we therefore recommend that GI is reference accordingly.	"The use of sustainable drainage systems that promote ecological connectivity and natural habitats".
122	Policy EM7: Biodiversity and Geological Conservation	Environment Agency		We support Policy EM7, in particular point 6 which champions the provision of green roofs and living walls.	Support welcomed
351	Policy EM7: Biodiversity and Geological Conservation	Individual		The Council should seek to provide nectar bars that create a joined link across the borough to ensure the protection of valuable insects.	Disagree - the requirement for nectar bars is too detailed for the Core Strategy. The requirement for considering ecological enhancements is already included within the Core Strategy without specifying the specifics. The development management document (DMDPD) will provide more specific details of what is required in terms of ecological improvements. The Council will consider the use of nectar bars as part of this more detailed policy document. No proposed change.
330	Policy EM7: Biodiversity and Geological Conservation	London Geodiversity Partnership		Policy should include the following wording "Planning permission will be conditioned to conserve and maintain important geological features and, in cases where no permanent features can be retained, temporary geological exposures should be recorded."	Disagree - The Core Strategy is not the tool for setting specific conditions for planning conditions as suggested. Furthermore, the Council needs to ensure each site is considered on a site by site basis. Decisions on planning applications need to be made at the detailed proposal stage when more information is available. No proposed change.
572	Policy EM7: Biodiversity and Geological Conservation	Individual		LATE SUBMISSION:  Rather than "The Council will seek to designate..." should state: "...The Council must designate...". The statement at paragraph 2 that harmful impacts will be mitigated through appropriate compensation weakens the	Disagree - It is not possible or feasible to provide the same level of protection for all SINCS. SINCS have been designated for a variety of reasons, and given a hierarchical grade. Local and Grade 2 level SINCS should not command the same level of protection as Grade 1 and Metropolitan designations. The London Plan requires nature

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				protection from harmful impacts for Borough Grade 2 and Sites of Local Importance for biodiversity and geological conservation.	conservations sites to be afforded a level of protection commensurate with their status. Policy EM7 provides suitable criteria to ensure the borough's ecological features are properly protected allowing for compensation where necessary. No proposed change.
123	8.107	Environment Agency		We support paragraphs 8.107- 8.110 as they highlight the importance of the ground water beneath the borough.	Support welcomed.
99	Map 8.5	Northwood Residents Association		Map 8.5 (page 113) and associated paragraphs make no mention of aircraft flight paths and their attendant noise.	In the text accompanying Map 8.5 the Council draws attention to the issue of aircraft noise at paragraph 8.121. The Council opposes any further capacity increase at Heathrow, including any further runway expansion. The general approach taken to noise pollution in the Core Strategy is set out at policy EM8. No proposed change.
224	8.135	Heathrow Airport Ltd		Refers to Heathrow Opportunity Area dpd - elsewhere this is denoted as Heathrow Area dpd - should be a consistent title used throughout.	Agreed - change reference to "Heathrow Opportunity Area DPD" in the document to "Heathrow Area DPD" for consistency and also to tally with the title of the development plan document in the published Local Development Scheme.
124	Policy EM8: Land, Water, Air and Noise	Environment Agency		We support Policy EM8 in particular the sections on water Quality and Land contamination.	Support welcomed.
257	Policy EM8: Land, Water, Air and Noise	Warren Park Residents Association		<p>Any new development should not only protect the environment but contribute actively to improvement of air quality, in the area.</p> <p>In policy EM8 at paragraph 3: "Council seeks" should be replaced by "Council will" to make the objective more focused and challenging. In addition, setting measurable targets for reduction of pollutants and evaluating outcomes is more likely to protect the environment and improve air quality.</p>	Where practical the Council will look towards encouraging more sustainable modes of access to new developments to minimise the need for car use and thereby aim to reduce potential air pollution. This will be allied to its seeking use of renewable energy in new developments where practicable - again partly with the aim of reducing air pollution. Whilst understanding the request that the wording in the policy should be made stronger, the Council is required by national planning guidance to retain a degree of flexibility in its policies and does not propose to amend the

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					wording used. No proposed change.
561	Policy EM8: Land, Water, Air and Noise	Individual		<p>LATE SUBMISSION:</p> <p>Water Quality - rather than "seek" should state : "the Council must safeguard...". Ponds should have been included in the Source Protection Zones list. Air Quality - rather than "seek" should state : "the Council must safeguard..." and "...must reduce the levels of pollutants". Noise - rather than "seek" should state : "the Council must identify..."; rather than "seek" should state : "the Council must ensure...". The word mitigated is not sufficient - the Strategy should state that noise must be controlled and stopped. Land Contamination - rather than "expect" should state : "the Council must have proposals...". Similarly, the words "Major development proposals will be expected to demonstrate..." should be replaced with "...must demonstrate...".</p>	Disagree - The policy provides sufficient strategic aims for more detailed policies to be included within the Development Management Development Plan Document. The policy also provides an approach to be adopted on a site specific basis. No proposed change.
471	Policy EM8: Land, Water, Air and Noise	Mayor of London	Greater London Authority	<p>Water resources/supply is not covered at all within the policy EM8. – This needs to be included to provide a 'hook' for the requirement of water efficiency measures. The only mention of water resources is in para 8.129, but the 105 litres per person per day target for residential (which is in line with the London Plan) should be in the policy rather than the supporting text (or the policy should refer to the relevant London Plan policy - 4A.16 (DRLP 5.15))</p> <p>The water quality aspect of the policy does not explicitly relate to the role/impact of development. Highlighting that adequate sewerage infrastructure capacity has to be available would represent a tangible addition (or a reference to the relevant London Plan policy 4A.17 (DRLP 5.14))</p>	<p>Agree in part. Add to policy:</p> <p>Water Resources:</p> <p>The Council will require that all new development demonstrates the incorporation of water efficiency measures within new development to reduce the rising demand on potable water. All new development must incorporate water recycling and collection facilities unless it can be demonstrated it is not appropriate. For residential developments, the Council will require applicants to demonstrate that water consumption will not surpass 105 litres per person per day.</p> <p>Comments on Water Quality:</p> <p>The Development Management Development Plan Document will use the Core Strategy</p>



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					wording as a basis for more detailed protection measures.
6	8.146	Mineral Products Association		Quantify the contribution towards delivering the West London apportionment (and of any revised apportionment emerging from the Minor Alterations to the London Plan process) .	Agreed - following publication of the Panel Report on the draft Replacement London Plan the Council accept that there is now an agreed annual target for mineral extraction in the London Plan and this should be reflected in the Core Strategy. Paragraph 8.146 to be amended by adding wording at end of bullet point to read:"... of 250 000 tonnes per annum upto 2031."
13	8.148	Mineral Products Association		A new policy should be inserted to deal with secondary and recycled aggregates, as follows: 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. Suitable locations for permanent recycled and secondary aggregates facilities include: general industrial land; waste transfer stations; permanent waste management sites; railheads Suitable locations for temporary recycled and secondary aggregates facilities include: mineral sites & major development areas (brownfield land). Also, a new policy should be inserted to deal with railhead capacity, as follows: The sustainable transport of minerals will be encouraged. Railheads and ancillary facilities will be identified, encouraged and safeguarded. Development that could prejudice the potential use of the protected transport facility for the transport of minerals will not be permitted.	Accept in part - to reflect the requirements of Minerals Planning Statement 1 and the London Plan - by inserting section at end of 8.148 to read: "Provision for the production and supply of recycled and secondary aggregates will be made through the Site Allocations DPD whereby permanent and long term temporary recycling facilities across the Borough which will make a significant contribution to the production of recycled and secondary aggregates will be identified. Railheads and ancillary facilities will be identified, encouraged and safeguarded to provide for the sustainable transport of minerals."
353	Map 8.6	SITA UK		We welcome the identification of 'minerals areas for safeguarding' in Map 8.6 of the Core Strategy. However, we'd welcome clarification of	For clarification the Council proposes to amend the wording of policy EM9 to better reflect the guidance in Minerals Planning Statement 1.

## Appendix 1: Responses received to the Pre-Submission Draft Core Strategy

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				<p>the areas identified at paragraph 8.151 as 'Land west of the present Harmondsworth Quarry' and 'Land north of the village of Harmondsworth' since the areas outlined in Map 8.6 of the Core Strategy do not match Map 8.3 (Suggested Preferred Areas) of the Minerals Technical Background Report (2008). We would welcome further discussion on this point.</p>	<p>Policy to read: "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</p> <ul style="list-style-type: none"> <li>a. the mineral concerned is no longer of any value or potential value, or</li> <li>b. the mineral can be extracted prior to the development taking place, or</li> <li>c. the development will not inhibit extraction if required in the future, or</li> <li>d. there is an overriding need for the development and prior extraction cannot be reasonably undertaken, or</li> <li>e. the development is allocated in a local development plan document, or</li> <li>f. the development is not incompatible.</li> </ul> <p>The Council will also safeguard areas within 250m of the Preferred 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'."</p> <p>Map 8.6 in the Core Strategy is diagrammatic - if it requires further change the Council will make any necessary drafting change to match the background technical report.</p>

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7	8.152	Mineral Products Association		The DPD should identify Mineral Safeguarding Areas (para 13, MPS1) including following agreed methodologies to identify MSAs which should identify the entire sand and gravel resource that needs to be safeguarded.	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. In addition, detailed policy on Safeguarding Mineral Areas will be brought forward in the emerging Development Management DPD. No proposed change.
8	8.152	Mineral Products Association		The DPD should identify Mineral Safeguarding Areas (para 13, MPS1) including following agreed methodologies (see below) to identify MSAs which should identify the entire sand and gravel resource that needs to be safeguarded. This comment reflects our previous comments on the Consultation Draft in June 2010. The 2008 BGS 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. 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	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. In addition, detailed policy on Safeguarding Mineral Areas will be brought forward in the emerging Development Management DPD. No proposed change.

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				<p>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>	
9	Policy EM9: Safeguarding Mineral Resources	Mineral Products Association		<p>Policy EM9 should also set out how the safeguarding of the resource is to be implemented by stating in what circumstances development that may sterilise the resource may be permitted. Our comments are similar to those made on the previous Consultation Draft in June 2010: Policy EM9 should be amended as follows (additions in bold; deletions in strikethrough); 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</p> <p>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. The Council will also safeguard areas within 250m of the Preferred Mineral Safeguarding Area as a buffer for the future extraction of the sand and gravel reserve, to safeguard the resource from</p>	<p>Agreed - to amend wording of policy EM9 to better reflect the guidance in Minerals Planning Statement 1. Policy to read:</p> <p>"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</p> <p>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</p>

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				the impact of 'proximal development'.	f. the development is not incompatible.  The Council will also safeguard areas within 250m of the Preferred 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'."
109	Policy EM9: Safeguarding Mineral Resources	Lafarge Aggregates Ltd		We feel that Policy EM9 does not sufficiently cover the aspects of MPS1 - there is no reference to the safeguarding of facilities for the transport of aggregates or processing facilities which is a clear requirement of MPS1.	Agreed - this has been raised by another representation, and to clarify how the Council intends to meet the requirements of MPS1 and the London Plan, additional wording (in response to representation 13) is to be added at the end of paragraph 8.148 to clarify that: "Provision for the production and supply of recycled and secondary aggregates will be made through the Site Allocations DPD whereby permanent and long term temporary recycling facilities across the Borough which will make a significant contribution to the production of recycled and secondary aggregates will be identified. Railheads and ancillary facilities will be identified, encouraged and safeguarded to provide for the sustainable transport of minerals." .
324	Policy EM9: Safeguarding Mineral Resources	Henry Streeter (Sand and Ballast ) Ltd	Consultant Planning Group	The current position is described (page 38) and includes reference to the associated businesses, including hotels, that are located around the perimeter just outside the airport boundary, where there is a "... requirement to balance demand for hotel and employment uses in order to manage economic growth" (page 38). Further "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 the designated employment areas" (page 38). (Hotels are, of course, one form of employment use.) There would appear to be no policy on hotels, other than that they should not be located in designated employment areas, and not	Map 5.1 in the Core Strategy (which is to be amended to include the Bath Road area - see objection 419) shows the broad areas in the borough which are proposed for hotel and office growth - i.e. Uxbridge and the Hayes - West Drayton corridor. this is also noted at paragraph 5.20. Given the guidance available in PPS 4 on economic regeneration and in the London Plan on town centre development, the Council considers there is a sufficient strategic planning policy framework for future hotel development in the borough. It will be for later, more detailed parts of the Local Development Framework - the Site Allocations, Proposals Map, Heathrow Area and Development Management Development Plan Documents to bring forward detailed policies and

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				necessarily on the airport itself	proposals on hotel development. No proposed change.
325	Policy EM9: Safeguarding Mineral Resources	Henry Streeter (Sand and Ballast ) Ltd	Consultant Planning Group	In view of the continuing need for minerals in and beyond the Plan period the safeguarding of Cranford Park will allow for flexibility within the Core Strategy and also add robustness to the mineral deposits identified for working. Changes considered to be necessary a) the inclusion of Cranford Park as a safeguarded area b) separation of the Policy so that it considers preferred areas and safeguarded areas separately	Detailed proposals for the future designation of sites will be dealt with in the Site Allocations and Proposals Map Development Plan Documents. No proposed change.
12	8.155	Mineral Products Association		The Borough's apportionment proposed by the London RAWP and included in the 2010 Minor Alterations to the London Plan (Policy 5.20) is 0.25 mtpa	Agreed. Following publication of the Panel Report on the draft Replacement London Plan the apportionment figure for the borough is 250 000 tonnes per annum upto 2031. This should be reflected in the Core Strategy and paragraph 8.155 is to be amended to quote the revised figure by deleting the reference to 0.5 million tonnes per annum and replacing this with 0.25 million tonnes.
10	Policy EM10: Mineral Extraction	Mineral Products Association		Policy EM10 should be amended as follows 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 0.25 million tonnes per annum. The principal Broad Locations for mineral development are land west of the present Harmondsworth Quarry, land north of the village of Harmondsworth, and land at Sipson Lane, east of the M4 spur. Outside the allocated areas identified in this Plan mineral extraction will not be permitted except where: it is demonstrated that the proposal is sustainable, essential to maintain the West London land bank in	Agreed in part - to update the Core Strategy to accurately reflect the findings of the Panel Report into the draft Replacement London Plan and reflect more accurately the wording of Minerals Planning Statement 1 by amending policy EM10. Existing wording after "London Plan" in first paragraph and whole second paragraph to be deleted and replaced by wording: "...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 0.25 million tonnes per annum. The principal Broad Locations for mineral development are land west of the present Harmondsworth Quarry, land north of the village of Harmondsworth, and land at Sipson Lane, east of the M4 spur. Outside the allocated areas

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				<p>accordance with national policy, and necessary to maintain apportioned provision for West London as set out in the London Plan; suitable measures and controls can be put in place to ensure there is not an unacceptable adverse impact on the environment or human health; 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>	<p>identified in this Plan mineral extraction will not be permitted except where: ...".</p> <p>Final part of policy to reflect recommendation of Sustainability Appraisal regarding restoration of sites.</p>
11	Policy EM10: Mineral Extraction	Mineral Products Association		<p>Policy EM10 should be amended as follows                      “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 0.25 million tonnes per annum. The principal Broad Locations for mineral development are: land west of the present Harmondsworth Quarry, land north of the village of Harmondsworth, and land at Sipson Lane, east of the M4 spur. Outside the allocated areas identified in this Plan mineral extraction will not be permitted except where: 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; suitable measures and controls can be put in place to ensure there is not an unacceptable adverse impact on the environment or human health; 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>	<p>Agreed in part - to update the Core Strategy to accurately reflect the findings of the Panel Report into the draft Replacement London Plan and reflect more accurately the wording of Minerals Planning Statement 1 by amending policy EM10. Existing wording after "London Plan" in first paragraph and whole second paragraph to be deleted and replaced by wording: "...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 0.25 million tonnes per annum. The principal Broad Locations for mineral development are land west of the present Harmondsworth Quarry, land north of the village of Harmondsworth, and land at Sipson Lane, east of the M4 spur. Outside the allocated areas identified in this Plan mineral extraction will not be permitted except where: ...".</p> <p>Final part of policy to reflect recommendation of Sustainability Appraisal regarding restoration of sites.</p>

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156	Policy EM10: Mineral Extraction	Individual		<p>Policy EM10 should refer to monitoring the impact on the environment or human health - and sites should be restored within a set time of 12 months following the cessation of works.</p> <p>The text in policy EM10 implementation should include:</p> <p>Suitable measures and controls will be put in place to ensure there is no adverse impact on the environment or Human health.</p> <p>Promoting the restoration of the site to the highest standards within 12 months of extraction being completed</p>	<p>Concerns as to the health aspects of mineral workings are effectively dealt with elsewhere in the Core Strategy at policy EM8, which sets out the Council's broad approach regarding land, water, air and noise aspects of any development. The development management process will require environmental impact assessment of any new significant development, including mineral workings, to ensure that any adverse impacts are addressed prior to development taking place. Site restoration requirements will vary from case to case and the Council must maintain a degree of flexibility in its policies. It would not be possible to insist on a set restoration period.</p> <p>No proposed change.</p>
161	Policy EM10: Mineral Extraction	Individual		<p>The text in policy EM10 implementation should include:</p> <ol style="list-style-type: none"> <li>1. Suitable measures and controls will be put in place to ensure there is no adverse impact on the environment or Human health.</li> <li>2. The Council will promote the restoration of the site to the highest standards within 12 months of extraction being completed.</li> </ol>	<p>Concerns as to the health aspects of mineral workings are effectively dealt with elsewhere in the Core Strategy at policy EM8 - which sets out the Council's broad approach regarding land, water, air and noise aspects of any development. The development management process will require environmental impact assessment of any new significant development, including mineral workings, to ensure that any adverse impacts are addressed prior to development taking place. Site restoration requirements will vary from case to case and the Council must maintain a degree of flexibility in its policies. It would not be possible to insist on a set restoration period.</p> <p>No proposed change.</p>
322	Policy EM10: Mineral Extraction	Surrey County Council		<p>Strategic Objective SO5 and Policy EM10 seeks to make a proportionate / appropriate contribution to West London's target to extract 0.5 million tonnes per annum (mtpa) of minerals. However, the Core Strategy contains no indication of what this contribution might be. In order to address this issue, the London Borough</p>	<p>Agreed. Following publication of the Panel Report on the draft Replacement London Plan the apportionment figure for the borough is 250,000 tonnes per annum up to 2031. This should be reflected in the Core Strategy and both policy EM10 and paragraph 8.155 are to be amended to quote the revised figure by deleting the reference</p>



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				<p>should propose a minor amendment to Policy EM10 to explain the actual contribution that Hillingdon propose to make to the 0.5 mtpa apportionment figure contained in the London Plan. A further proposed amendment to the first sentence of para 8.155 should also be proposed as it is factually incorrect to say that Hillingdon's apportionment is 0.5 mtpa.</p> <p>Draft Replacement London Plan included proposed revisions to Policy 5.20 on aggregates. This proposed that the LB of Hillingdon LDF should make provision for 250,000 tpa of land-won aggregates until 2031. Should these minor alterations be endorsed in the Inspector's Report which is understood to be imminent, then the London Borough will need to propose a further minor amendment to Policy EM10 prior to the Examination to confirm that Hillingdon will make provision to provide 0.25 mtpa of land-won aggregates throughout the plan-period</p>	<p>to 0.5 million tonnes per annum and replacing this with 0.25 million tonnes.</p>
567	Policy EM10: Mineral Extraction	Individual		<p>LATE SUBMISSION:</p> <p>The policy needs to be worded more strongly: rather than "seek" should state : "the Council must safeguard..." ; rather than "can" should state : "...suitable measures and controls must be put in place..."; rather than "can" should state : "...the minerals must be restored to...".</p>	<p>The Core Strategy covers a period of 15 years, and as such it is unlikely to be effective if it cannot deal with changing circumstances. The work "seeks" allows that flexibility and provides deliverability and monitoring of the policy as required by Planning Policy Statement 12 (PPS12). No proposed change.</p>
55	8.159	Individual		<p>With regard to the re-examination of the waste sites, I feel that further consideration should be made to retaining existing waste sites. Maybe current sites could be updated to make them more efficient (this may be better than spending a lot of money on building one brand new site).</p> <p>I was unable to find a copy of the West London Waste Plan - would it be possible to make this more available?</p>	<p>This representation primarily concerns the draft West London Waste Plan which was published for consultation concurrently with the Pre-Submission Core Strategy.</p> <p>The Core Strategy does include a commitment to safeguarding existing waste sites at paragraph 8.159. The Council would also note that a proposed change to policy EM11 in response to representation 465 from the Mayor of London</p>

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				<p>Has further consideration been given to:</p> <ol style="list-style-type: none"> <li>1.the impact of the consolidated waste management areas on the surrounding areas eg. air, noise and traffic pollution?</li> <li>2. the impact on nearby residents?</li> <li>3. the green jobs that come out of this seem to be positive, but are usually heavily subsidised by Government.</li> </ol> <p>Certain waste sites already have the appropriate facilities for heavy traffic (eg road surfaces) - these sites would benefit from redevelopment rather than being scrapped.</p> <p>Has consideration been given to generating energy from waste incineration in Hillingdon? This may be more feasible and more environmentally friendly-I think it is being done in other areas.</p>	<p>would incorporate similar wording there. The environmental impact of proposed waste management sites and impact on local residents would be taken into account through the development management process. The draft West London Waste Plan Development Plan Document (DPD) does contain a policy setting out key criteria which all six boroughs would use to assess the quality of future waste management proposals when assessing applications. The draft DPD also includes a proposed policy encouraging the generation of renewable energy from waste. No proposed change.</p>
19	Policy EM11: Sustainable Waste Management	London Borough of Richmond		As one of the West London Waste Boroughs, the London Borough of Richmond supports policy EM11.	Support welcomed.
319	Policy EM11: Sustainable Waste Management	Surrey County Council		<p>EM11 and SO13</p> <p>The London Borough should propose a minor amendment to include a policy promoting sustainable site waste management which applies the main principles contained in WLWP Policy 4 to all new development in Hillingdon.</p>	<p>As noted in the draft West London Waste Plan Development Plan Document (DPD) the London Plan waste apportionment does not include a Construction, Demolition and Excavation Waste (CDE) component - although it is a significant waste stream.</p> <p>Work on the next stage in the preparation of the Waste Plan DPD may provide more detailed data for the evidence base on CDE arisings - and where this is dealt with. At present the six West London boroughs are keeping to the general commitment at policy 4 in the Waste Plan DPD</p>

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					<p>that the preferred option with CDE waste is to ensure through the development management process that more on-site recycling and re-use of materials takes place. It will not be for the individual West London borough Core Strategies to come forward with detailed policies on the treatment of CDE waste in future. This should be dealt with by the specific joint Waste Plan DPD. There is a broad guideline set out in the third paragraph of policy EM10 in the Hillingdon Core Strategy that the Council will promote waste as a resource and encourage the increased re-use of materials and recycling through the development management process. The detailed approach to be taken by the six west London boroughs on CDE waste can be expected to come forward as part of the next stage of the West London Waste Plan DPD.</p> <p>The Council would note that policy EM10 covers all new development - not simply waste management sites. No proposed change.</p>
352	Policy EM11: Sustainable Waste Management	SITA UK		We welcome Hillingdon's approach to delivering sustainable waste management which is to identify suitable sites and policies through the joint West London Waste Plan. In particular, we support the wording of your Core Strategy Policy EM11 on Sustainable Waste Management which seeks to promote waste as a resource and to maximise the use of existing waste management sites through the intensification or co-location of facilities.	Support welcomed.
395	Policy EM11: Sustainable Waste Management	Hillingdon Motorist Forum		Paragraph 8.159, Waste Management - The West London Waste Plan must ensure that the road network feeding the waste processing sites is improved to handle the additional heavy lorries that will be used to transport the waste.	Noted - with regard to the location of sites, the Council will be guided by the locational criteria provided in PPS10 which include access including sustainability and durability of the surrounding road network. No proposed change.

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497	Policy EM11: Sustainable Waste Management	Mr John McDonnell MP		The Strategy does not adequately cover the need for better and proactive waste management, greater recycling facilities and do more to promote opportunities for renewable energy from waste.	As noted at paragraph 8.158, the Council is working with its neighbouring west London partner boroughs to produce a joint West London Waste Plan Development Plan Document (DPD) - a draft of which was published concurrently with the Pre-Submission Core Strategy for consultation. This DPD deals with the detailed issues raised by this respondent regarding better waste management; encouraging waste minimisation and increasing recycling (in accordance with the waste hierarchy as identified in the Waste Strategy for England (DEFRA, 2007) and the requirements of the London Plan); and seeking opportunities to generate renewable energy from waste. Policy EM10 and its supporting section in the Core Strategy seek to provide a broad policy statement on the approach the borough will take towards sustainable waste management during the Plan period, which will then be detailed in the accompanying West London Waste Plan DPD. No proposed change.
568	Policy EM11: Sustainable Waste Management	Individual		LATE SUBMISSION:  Rather than "will aim to" should state : "...the Council must promote..." ; rather than "recycling and seek to maximise" should state : "...recycling and must maximise...".	Where policy EM11 is applicable its objectives will need to be met unless material considerations indicate otherwise. The Council does not consider that the proposed wording compromises this principle or detracts from the strength of the policy. Balanced against this is the need to incorporate flexibility into policy wording and an acknowledgement that the delivery of policy objectives is dependant on a range of organisations, not just the Council. No proposed change.
465	Policy EM11: Sustainable Waste Management	Mayor of London	Greater London Authority	Policy EM11 refers to the Joint West London Waste Plan which will provide sufficient capacity to meet the apportionment requirements of the London Plan. This policy should clearly set out the apportionment target for Hillingdon which is 270 thousand tonnes per annum by 2026.	Agreed - to ensure conformity with the requirements of the London Plan two wording changes are to be made to policy EM11: (1) add the following words at the end of the first paragraph: "...which is 382 thousand tonnes per annum for Hillingdon by 2026." and (2) add further sentence at end of third paragraph to read: "The

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				The supporting text at paragraph 8.159 states that the council will safeguard existing waste sites unless compensatory provision is made. This commitment to safeguard all waste sites needs to be within the Policy in the core strategy as well as in the Joint Waste Plan.	Council will safeguard existing waste sites unless compensatory provision can be made."
45	9	British Waterways		The Grand Union Canal represents a transport facility for walking and cycling, but also for waterborne freight, with a 26 mile section of lock free canal. We recently made representations in response to the Local Implementation Plan and requested that the use of the canal for waterborne freight be highlighted and promoted, which should also be referenced within this section. There are waterside sites within LB Hillingdon that could make use of this and help reduce road congestion.	The opportunities for the GUC to be used as a means of transporting freight are limited. Consideration to this will be given in the Local Implementation Plan. No proposed change.
247	9	Yiewsley and West Drayton Town Centre Action Group		The aspirations for Transport and Infrastructure are welcomed. However, there is no indication that current policy will change substantially. The consultation in 2005 and 2009 on the Porters Way SPD failed, in the main, to take into account the views expressed in the consultation process. Both developments have/will not provide the commensurate upgrade to the infrastructure, for example, health provision, education, leisure/sports, transport (pages 126-145)	The Implementation section sets out how the key provisions of the policy will be delivered. No proposed change.
503	9	Councillor L J Allen		SO6,SO12, SO17 & SO18:  The Core Strategy needs to address traffic congestion within Hayes Town Centre leading down to Pump Lane. A bus service should be extended to the end of Pump Lane to reduce car traffic there.	The policy in relation to traffic congestion is to focus on 'congestion hotspots'. These are identified on Map 9.1.
51	9.5	Individual		Time given to understand such a comprehensive document, PDP is much too short. Monitoring of air pollution for Hillingdon, already the 4th	The Core Strategy is a strategic planning document. Further detail on carbon emissions in the borough is contained in other Council

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				highest CO2 emitter in London is worrying, especially when this excludes the Heathrow effect; aviation fuel and motorway travel. It will need far more effective monitoring followed by precise and emphatic legal action.	documents.
50	9.6	Individual		Not effective in reducing Heathrow noise and flight control. The night time flight ban is often broken. It needs more effective representation to Heathrow to stop breaking the agreed night time ban.	This issue will be addressed in other Council policies and strategies.
556	9.7	English Heritage		Transport and infrastructure (pgs 126-145) - We note that the Core Strategy seeks to reflect the six goals of the Mayor's Transport Strategy (MTS), which we welcome. However as part of delivering improvements in the quality of life of the Hillingdon through transport provision and management we would urge you to identify opportunities for investment in the historic environment as part of the Borough's transport objectives. A more explicit link to this aim would help ensure the Core Strategy complies with the MTS. This includes the principles of 'Better Streets' (para 4.3 and 5.18), policy 14 (under para 4.4.4 Enhancing the built and natural environment) and its applications through Proposals 83, 84, 85, 90 and 113. In addition ensuring that transport provision and management is of high quality contextual design that conserves and enhances the historic environment would, in line with PPS5, contribute towards Hillingdon's commitment to developing a robust strategy for the conservation of the Borough.	No proposed change.
25	9.14	Individual		The issue of high dependency on private vehicles and low proportion of trips made by cycling, walking and public transport is to be addressed by policy T1, T2 & T4 and Planning Policy Statement 12 on aspects of the town	The Strategic Infrastructure Plan is being updated as an evidence base for the Core Strategy and will be available for discussion at the forthcoming Examination in Public.

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				planning framework. These issues cannot be considered without reference to the strategic infrastructure plan (SIP) which is currently in preparation to support the Core Strategy. This also governs paragraphs 9.34 & 9.35.	
46	Map 9.1	British Waterways		The Grand Union Canal offers potential for waterborne freight and this should therefore be highlighted in this map.	If appropriate, this issue will be addressed in the Council's emerging Local Implementation Plan.
144	Policy T1: Accessible Local Destinations	Hillingdon Inter Faith Network		There is no mention of the 110 plus faith community centres or the important role they play both for their religious community or their involvement with the wider community. Subsequently, T1 fails to address the strengths and requirements in supporting these facilities.	The Core Strategy is a strategic planning document. Policy C11 recognises the importance of community infrastructure and sets general criteria for its provision. Apart from primary school provision where there is specific evidence of need, the policy does not provide a definitive list of the facilities that will be supported. Further more detailed policies for specific types of facility may come forward in subsequent development plan documents.
145	Policy T1: Accessible Local Destinations	Hillingdon Inter Faith Network		The current Travel Plan initiative depends on alternative transport to the car being available. The LDF needs to consider how to improve community cohesion by recognising the changing demographics both in faith need and in age and having SMART objectives, which will address the issues.	The Core Strategy recognises the importance of community facilities but does not provide locational criteria. This issue may be covered by the provisions of subsequent development plan documents.
200	Policy T1: Accessible Local Destinations	The Ballymore Group		Support the policy.	Support noted.
348	Policy T1: Accessible Local Destinations	Individual		All developments should be fully accessible - and uneven surfacing should not be used.	Comments noted. Issues related to accessibility will be addressed in the forthcoming Development Management Policies Document.
396	Policy T1: Accessible Local Destinations	Hillingdon Motorist Forum		Paragraph 9.5:  This paragraph suggests that road travel is not sustainable. The pollution levels emitted by road transport has been significantly reduced in recent times. There is every reason to expect that this trend will continue in the period covered	As an outer London borough it is accepted that local residents will continue to use private cars over the period of the Core Strategy. However, measures such as improved interchanges are proposed to maximise public transport use. Improvements to the road network are highlighted in the infrastructure schedule contained in

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				by this strategy. The strategy should take account of this development and while improving Public transport there should be steps taken to improve the travelling experience by private vehicles. It should be noted that an improved road network will reduce congestion for all types of vehicle.	Appendix 2.
498	Policy T1: Accessible Local Destinations	Mr John McDonnell MP		The Strategy fails to address the problem of heavy traffic congestion; nor does it detail how interchanges in town centres will be improved or how North-South links will be improved - or cross-borough links in the South.. Cycle routes are often insufficiently protected from other traffic. Greater use of the Canal towpath should be positively recommended.	The Implementation section of Policy T1 notes that measures to improve north/south public transport links will be identified in the Council's Local Implementation Plan. This document identifies specific sources of funding for improvements to the borough's transport network.
539	Policy T1: Accessible Local Destinations	Arla Foods UK Plc	BNP Paribas Real Estate	Support the policy.	Support noted
573	Policy T1: Accessible Local Destinations	Individual		LATE SUBMISSION:  Rather than "The Council will steer development..." should state : "...The Council must develop...". The statement that "All development should encourage access by sustainable modes.." is weak and vague - to improve the public transport network and the flow of traffic roads and pavements must be enlarged and resurfaced. Cycle paths must be located away from road traffic. Wheelchair users should have paths specifically for their use. Many public rights of way are often not accessible - e.g. due to gates being permanently locked in the Beck Theatre area.	Comments noted. Whilst the Council undertakes development on its own land the majority of planning applications are submitted by private developers or land owners. The Council cannot force developers to submit planning applications for development away from congested areas. However, the impact of development on the transport network will be a key factor in the determination of planning applications. The Core Strategy is a strategic planning document and specific details of improvements to Hillingdon's transport network are outlined in the Council's Local Implementation Plan and the Strategic Infrastructure Plan.
460	Policy T1: Accessible Local Destinations	Hayes and Harlington Community Development Forum		Policy T1  To be sound the policy should require that new development will not result in any material increase in traffic congestion or on-street parking pressure.	The Council will request the submission of site specific Transport Assessments to support development proposals that are likely to have an impact on the transport network. A requirement that new development should not result in traffic congestion is not a test of soundness.



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				<p>To be sound the Core Strategy must demonstrate it can deliver significant increases in cycling and walking. Paragraphs 9.8 and 9.13 show the need for a step-change in policy. There should be policy reference to safe and separate cycle paths It is very dangerous to cycle in the borough and without safe cycle paths the policy of encouraging people to use bicycles instead of cars will not work.</p>	<p>Specific improvements to the transport network are outlined in the Council's LIP.</p>
466	Policy T1: Accessible Local Destinations	Mayor of London	Greater London Authority	<p>The Core Strategy should make reference to Crossrail specifically as a strategic infrastructure project and should highlight the relevant London Plan Policies (3C.12A 6A.4 and 6A.5 of London Plan Crossrail Alterations, April 2010) and SPG (July 2010) under which s106 funding will be sought from office and retail development through Planning Obligations and the proposed Mayor's CIL. TFL suggests that the Core Strategy should include a general policy on transport-related planning obligations, including the need to collect planning obligations for public transport, walking and cycling. TfL suggests the overall policy on planning obligations should include explicit support for pooled contributions, as advocated in circular 05/05, but having regard to the limitation on such contributions as specified in the Community Infrastructure Regulations (CIL) 2010. Transport for London suggests that the following wording is incorporated: "Contributions will be sought for transport infrastructure and service improvements to ensure that efficiency and capacity on the transport network is maintained and that the impact of the development on the transport network is mitigated. In circumstances where the combined impact of a number of developments creates the need for the provision of additional transport infrastructure and or</p>	<p>Crossrail is referred to in the Infrastructure Schedule at Appendix B of the Core Strategy. Specific reference will be made to CIL by adding an additional clause in policy CI1.</p> <p>A new section has been added at the end of section 3 referring to Crossrail as a strategic infrastructure project and to the relevant London Plan policies and SPG on Section 106 funding and to the Mayor's proposed CIL.</p>

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				<p>services, it will be appropriate to pool the contributions from these developments having regard to the limitations on pooling arrangements imposed by the Community Infrastructure Regulations 2010. The level of contribution, whether pooled from a number of developments or not, may be based on a formula or standard charge which reflects the actual impact of the development.”</p> <p>A clear distinction should be made between a Community Infrastructure Levy (CIL), should the Borough propose to raise one, and legally binding planning obligations to avoid limiting the scope for funds; this is particularly important for Bus Network contributions which at present are not considered as infrastructure under the CIL.</p>	
476	Policy T1: Accessible Local Destinations	Mayor of London	Greater London Authority	<p>It is recommended that the policy states that developments and businesses should be encouraged to produce a Delivery &amp; Servicing Plan (DSP) or Construction Logistics Plan (CLP) to rationalise servicing/ deliveries or construction vehicle movements across both the TLRN and the Borough's highway network. It should be noted that the A40 is extremely congested during peak hours; therefore the Borough should set out policies which would encourage deliveries to take place during the off-peak periods.</p>	<p>No proposed change. This issue will be addressed in the forthcoming Development Management Policies Document.</p>
101		Northwood Residents Association		<p>No consideration is made to improving parking at stations to take cars off local roads. Such parking should be included in ticket prices.</p>	<p>The transport policies in the Core Strategy look towards encouraging more sustainable modes of transport generally across the borough - and to steering development towards the most accessible locations to reduce their impact on the transport system. To prevent "rail heading" where commuters seek to park their cars near stations to carry on their journeys by rail / Tube into central London the Council is using parking controls where appropriate to prevent commuters' cars</p>

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					creating congestion on local streets. No proposed change.
102		Northwood Residents Association		Traffic into Heathrow will increase. No consideration has been given to creating drop-off/pick-up points outside the airport perimeter, such as Stockley Park, so that passengers can complete the last/first part of their journey by public transport.	Detailed issues of this nature will be addressed in the subsequent Development Management Policies document.
479	9.19	Mayor of London	Greater London Authority	TfL note typo in relation to 9.19 which should be amended to read:  'Uxbridge is home to a regionally important Underground / bus interchange that cannot accommodate current or future demand without significant improvements. The bus station has inadequate capacity for the number of vehicles which currently use it. The surrounding area is in need of upgrading to improve accessibility for people with restricted mobility.'	Agreed, text will be amended in accordance with representation. Paragraph 9.19 will be amended to read:  'Uxbridge is home to a regionally important Underground / bus interchange that cannot accommodate current or future demand without significant improvements. The bus station has inadequate capacity for the number of vehicles which currently use it. The surrounding area is in need of upgrading to improve accessibility for people with restricted mobility.'
480	9.20	Mayor of London	Greater London Authority	Transport for London does not agree with the statement that the Uxbridge service is "slow and deficient" compared to similar centres in London. TfL maintains this view and suggests that the wording which states that Uxbridge be described as being 'deficient in good public transport links' be taken out.	No proposed change. The Council maintains the view that Hillingdon's transport service is slow and deficient in comparison with other metropolitan centres.
100	9.21	Northwood Residents Association		Public Transport (page 132) No mention is made of how the north/south public transport network is to be funded – so far TfL has refused to provide funds. The Metropolitan line is going to be very slow, and unreliable, until the extensive track and signalling works are completed in 2018 and yet paragraph 9.2.1 states that there is scope to improve both the frequency and travel times. How is this comment justified?	The Implementation section associated with policy T3 notes that some improved north - south public transport links will be delivered from funding sources identified in the Local Implementation Plan. These sources have been discussed and agreed with the TfL.

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226	9.23	Heathrow Airport Ltd		Text states Crossrail will provide a direct connection from Maidenhead to Heathrow - but the Airport will be on a spur link from Hayes & Harlington.	Agreed. Reference to the Heathrow spur will be included in the policy.
361	9.23	Hayes Town Partnership		There are various mentions of Crossrail in the document but in view of its enormous potential significance for the south of the Borough it is suggested that there would be strong arguments in favour of a specific policy in the Plan in order to achieve the maximum possible benefits for local people.	The primary benefits of Crossrail will be accrued in the South of the borough. The exact nature of these benefits are as yet unknown however they are likely to consist of regeneration opportunities around Crossrail Stations and the associated jobs. Overall, Crossrail could affect commuter patterns, providing a direct route to the City from the west of London. Increased demand for new housing could result. These points are reflected in point 3 of the Vision for Hillingdon.
481	9.23	Mayor of London	Greater London Authority	Paragraph 9.23 notes the Crossrail links in the Borough. The Borough may wish to amend the CS pointing out that Crossrail will bring extra travellers through these stations who will need to travel on to/from their origin/destination by a feeder mode. TfL will be looking to work with the Borough 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. For Hayes and Harlington, TfL Interchange and Crossrail are considering an Urban Integration study.	Agreed, wording to be amended in accordance with representation. Final sentence will read:  The improved Crossrail stations will provide the catalyst for the regeneration of Hayes and West Drayton (see Table 5.3) and will bring extra travellers through these stations who will need to travel to and from their original destination by feeder mode.
482	9.24	Mayor of London	Greater London Authority	TfL has assessed the possibility of achieving an interchange between the Metropolitan and Piccadilly lines and the Central line and Chiltern Railway in the Ruislip area and have concluded that there is no business case for this and hence it will not be taken further.	This paragraph will be updated to reflect the latest discussions regarding the proposed Central Line extension.
201	Policy T2: Public Transport Interchanges	The Ballymore Group		Support the policy.	Support noted.
282	Policy T2: Public	Legal and	Drivers Jonas	Support the policy - particularly seeking	Support noted.

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	Transport Interchanges	General Property Partners (Life Fund) Ltd	Deloitte on behalf of Legal & General Property Partners (Life Fund) Ltd	improved public transport interchange at West Ruislip.	
574	Policy T2: Public Transport Interchanges	Individual		<p>LATE SUBMISSION:</p> <p>Due to pedestrianised shopping centres near transport interchanges it is often difficult to continue a journey there by bicycle.</p>	Policy T2 notes that proposed public transport interchanges will accommodate measures to encourage shorter journeys by foot or cycle. The detail of these measures will be outlined in subsequent development plan documents.
483	Policy T2: Public Transport Interchanges	Mayor of London	Greater London Authority	<p>The intention to improve public transport interchanges and facilities for passengers is welcomed. However additional infrastructure for increased bus services such as garages and terminating space would also need to be considered with land and funding secured through various channels, including developer contributions.</p> <p>Additional bus priority measures should be provided to improve journey times and to enhance the attractiveness of public transport use within the Borough.</p>	Supported noted. Specific transport improvement schemes will be identified in Hillingdon's Local Implementation Plan.
362	9.27	Hayes Town Partnership		Amend Policy T3 to recognise that improving north-south transport links is not just to provide links for people in the north of the Borough to gain access to employment areas and transport interchanges in the south and that people living in the south have legitimate reasons for travelling to the north. Also give greater emphasis to the need to improve public transport interchange facilities as part of an overall plan to achieve a fundamental shift towards the use of public transport rather than cars.	Improved north/south transport links are provided for the benefit of all residents to provide access to and improve the delivery of new jobs. As an outer London borough many residents will continue to rely on travel by car however improvements to public transport interchanges will increase public transport options.
484	9.27	Mayor of London	Greater London Authority	The bus network is under constant review. Capacity is one of the key concerns of Transport for London Network Development. It is worth noting that if passengers are standing it does not necessarily mean buses are over capacity. On	Comments noted.

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				<p>busy routes it is not always possible for all passengers to be seated, and appropriately fitted out standing areas are provided.</p> <p>Transport for London will continue to work with the Borough to ensure that bus services suit passenger demands in a cost-effective way.</p>	
509	9.27	Councillor P Harmsworth		Measures should be taken to restrict vehicles using the main road through Yiewsley to cars, vans and buses only - to improve safety for all - including cyclists.	The Core Strategy is a strategic planning document. Detailed measures of this nature will be identified in the Council's forthcoming Development Management Policies Document.
298	9.29	Garden City Estate Residents' Association		The paragraph should state that in any consideration of High Speed 2 the Council will seek to support measures to mitigate any damaging effects of High Speed 2 on the environment and residents.	Hillingdon Council is supportive in principle to high speed rail travel, however it does not support the current 'preferred route' through Hillingdon.
524	9.29	L B Hillingdon (Labour Group)		The Plan should include a section in this paragraph that the Council will support measures to mitigate any damaging effects of High Speed 2 on the environment and residents.	The Government's proposals for HS2 are currently out for consultation and are detailed at paragraphs 3.7 - 3.9 of the Core Strategy. Hillingdon Council is supportive in principle to high speed rail travel, however it does not support the current 'preferred route' through Hillingdon. No proposed change.
271	Policy T3: North-South Sustainable Transport Links	Individual		I'm not aware of a full consultation – more of a last minute rush I found it difficult to understand how these policies can be delivered	The consultation was undertaken in accordance with the Council's Statement of Community Involvement. The deliverability of policies is detailed in the 'implementation' section for each policy.
302	Policy T3: North-South Sustainable Transport Links	Garden City Estate Residents' Association		The residential areas of Hayes are not linked to the Pump Lane employment area and workers consequently use their cars to travel there. He policy should include a reference to how this will be done - e.g. a gating system is needed in Pump Lane.	No proposed change. The Core Strategy is a strategic planning document and detailed issues of this nature will be addressed in subsequent development plan documents.
461	Policy T3: North-South Sustainable Transport Links	Hayes and Harlington Community		<p>Policy T3</p> <p>The Core Strategy emphasises the importance</p>	Evidence of specific transportation improvements is contained in the borough-wide Local Implementation Plan. Issues related to

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		Development Forum		<p>of improving the north-south transport links across the Borough but does not provide evidence of improvements can be achieved.</p> <p>There is a need for policy concerning disabled people's access to public transport. Investment in community transport is much needed. The Dial –a-ride service continues to be very poor as evidenced by reports from the London Assembly. Neither are mentioned in the Core Strategy.</p>	accessibility are addressed in Hillingdon's Accessibility SPD and will be covered by the provisions of the Development Management Policies Document.
527	Policy T3: North-South Sustainable Transport Links	L B Hillingdon (Labour Group)		Concerned at the amount of private car use required to access employment area at Pump Lane - better public transport services are required to link the two - the policy should explain how this will be done - a gating system could be used in Pump Lane.	The Core Strategy does not address site specific planning issues. These will be dealt with in subsequent Development Plan Documents.
87	Policy T4: Heathrow Airport	Orbit Developments (Southern) Ltd	The Emerson Group	<p>The policy requires developers to provide a transport solution which includes public transport, walking, cycling &amp; the use of electric vehicles, low emission vehicles &amp; car clubs.</p> <p>The policy does not have sufficient regard for the fact different scales of development will enable different scales of transport solution. The use of low emission vehicles &amp; electric vehicles will not be appropriate in every case, nor will public transport solutions.</p>	No proposed change. The Core Strategy identifies support for sustainable transport measures and is in accordance with Government policy. More detailed policies on specific transport measures will be contained in subsequent policy documents.
191	Policy T4: Heathrow Airport	British Airways plc	Lichfield Planning	<p>Policy T4, SO21, Table 3.1 / Transport</p> <p>Please refer also to Sheet 1 for British Airways detailed argument about:</p> <p>1. inconsistency between The Council's appreciation of the important contribution that Heathrow Airport makes to the local economy, and the Council's intentions of curtailing the growth of Heathrow's capacity: without growth</p>	<p>1. The Council supports the development of operational uses within the airport boundary, however the extension of such uses beyond the airport boundary will be resisted.</p> <p>2. The Heathrow Opportunity Area is a London Plan policy and will need to be progressed by the Mayor.</p> <p>3. Support for policy T4 is noted.</p>

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				<p>the airport's economic activity is bound to decline with dire impacts on the welfare of the local population.</p> <p>2. To ensure feasibility of the Heathrow Opportunity Area, British Airways should be party to its planning.</p> <p>British Airways support Policy T4 for improvement of public transport services to and from Heathrow in all directions and sees a need for clear support for HS2 link to Heathrow to encourage shift from short haul flights to high speed rail.</p> <p>BA are conscious of the high levels of vehicular traffic and the resultant emissions in the south western corner of Hillingdon. Although Heathrow related transport movements play a large part in that situation, the Core Strategy should acknowledge the considerable amount of passing traffic on the M25, M4 and A30 which is not related to Heathrow, while Heathrow operators have undertaken to reduce emissions in accord with statutory requirements.</p>	
225	Policy T4: Heathrow Airport	Heathrow Airport Ltd		<p>We would suggest subtle amendments to Policy T4 as follows:</p> <p>“The Core Strategy will support the sustainable development, renewal and operation of Heathrow and growth in the.....” This would then provide explicit policy support for projects to enhance Heathrow Airport as the UK's only Hub Airport.</p>	Proposed wording agreed, however the supporting text should also be amended to clarify that the Council would consider development or expansion of the airport beyond the existing boundary to be unsustainable.
374	Policy T4: Heathrow Airport	Bell Farm Christian Centre		<p>What is the nature of the growth referred to - is this an expansion of the area ? If so, where is this growth defined and what is the magnitude of the expansion ? The Strategy should define what is meant by "growth".</p>	The Replacement London Plan proposes housing and employment growth in the Heathrow Opportunity Area. It is the Mayor's responsibility to implement this policy through discussions with the Council and other key stakeholder groups.



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504	Policy T4: Heathrow Airport	Imperial College NHS Trust		Within the Heathrow development cleaner vehicle technologies such as electric vehicles should be imprint in our planning policies ensuring that any new development does not adversely impact on the local air quality and offers protection to both existing residents and new residents.	This detailed issue will be considered as part of the production of the Development Management Policies Document.
575	Policy T4: Heathrow Airport	Individual		LATE SUBMISSION:  How can the Strategy reduce noise and improve air quality for local communities which are located so close to Heathrow Airport?	Policy T4 proposes a number of measures to reduce road traffic congestion, which is a key contributor to noise and air pollution.
505	Policy T4: Heathrow Airport	Councillor P Curling		Policy T4 and Paragraph 9.45:  The Strategy should identify new school sites as there is a shortage of school places. It should also address the issue of schools without playing fields. Amend paragraph 9.45 to state after "Greenfield sites" : "if no council land or brownfield sites are available" and add at the end of this paragraph:" and the provision of playing fields for schools with no or inadequate playing fields."	The identification of new sites for schools will be addressed in the forthcoming Site Allocations document. In order to justify the release of greenfield sites the Council would need to demonstrate exceptional circumstances. Such circumstances could be that no suitable brownfield sites are available.
506	Policy T4: Heathrow Airport	Councillor P Jarjussey		T2 and T4:  There is nothing in the Strategy on how traffic problems will be solved in Hayes, North Hyde Road, the A312, etc.. North / south public transport provision needs urgent attention.	Measures to address traffic congestion will focus on 'congestion hotspots' identified on map 9.1. Sources of funding for improved north/south public transport with be identified in Hillingdon's Local Implementation Plan
103		Northwood Residents Association		Social and Community infrastructure (page139). This section almost completely ignores the needs of the elderly, particularly in the Leisure, Recreation and Culture part yet there are thousands of reasonably fit pensioners who have every right to be considered.	Agreed. Reference to the needs of Hillingdon's aging population will be made in paragraph 9.42.
328	9.34	Highways Agency		Appendix 2	The Strategic Infrastructure Plan will be made available for comment prior to the submission of

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				SIP should be made available prior to submission to submission of the Core Strategy. Welcome inclusion of infrastructure schedule.	the Core Strategy to the Secretary of State.
397	9.34	Hillingdon Motorist Forum		Community Infrastructure -  Para 9.34 mentions a Strategy Infrastructure Plan which will also deal s with Transport issues. It is difficult to comment fully on Transport issues without seeing the SIP. A separate consultation is required on this document.	The Strategic Infrastructure Plan sets out the plans of key infrastructure providers and will be made available prior to the submission of the Core Strategy to the Secretary of State.
74	9.35	Hillingdon Primary Care Trust		Page 140-text says primary and acute care although there is nothing in the documentation  to show how acute care will be supported in the future (currently the only support is via S106 contributions to primary care and at the time of planning applications. Can the London wide HUDU planning model be introduced to Hillingdon this time around).	The Core Strategy will be amended to reflect the government's latest policy on health.
363	9.35	Hayes Town Partnership		Policy CI1 is supported with the following qualifications:  • The range of community facilities listed is very limited and there is no specific reference in the policy to youth centres and although they were mentioned in the Strategic Infrastructure Plan in the draft core strategy they do not appear to feature in the Infrastructure Schedule (Appendix 2)  • Similarly there is nothing about facilities such as restaurants and cinemas which are particularly important in developing a night time economy in Hayes and other town centres.  • Faith centres are mentioned in paragraph 9.39 and in the Infrastructure Schedule (page 154) which states that the Council should identify	As a general principle Policy CI1 supports the retention and provision of new community facilities to support growth. Those listed in relation to the policy are provided as examples and other community uses, such as youth centres, would be subject to the same policy provisions.  Restaurants and cinemas are not considered to be community facilities; however the importance of the night time economy is recognised - specifically regarding Uxbridge at paragraph 5.27. Further wording will also be inserted at Table 5.3 in the section dealing with Future Growth of the Hayes - West Drayton Corridor at the end of the second sentence to read: "...and development of a night time economy."

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				<p>appropriate locations for places of worship. However there is no mention of this in the policy. It is an especially important issue in Hayes where some ethnic communities have places of worship and others do not while groups are often moving into premises without planning permission and then in conflict with the Council as a result of enforcement notices. There is a clear need for the Council to take the lead in helping groups to find suitable sites.</p> <ul style="list-style-type: none"> <li>• The improvement of children's play areas is mentioned in the Infrastructure Schedule (Page 159) but the resources for the second phase of the scheme were not used for this purpose.</li> </ul>	
411	9.39	Heathrow Airport Ltd		<p>"My comments are on "Sites for New Schools"</p> <p>Strategy needs to identify suitable sites for new schools in the borough rather than keep building on current schools. By so doing, the children are being deprived of play areas. As there is an urgent need for these, I would like to see specific mention of sites which would be suitable for this development.</p> <p>Please ensure this is picked up.</p> <p>Also generally, I would like to see words like "seek" changed to "will" or "must". Let's make this document more trusting and committed."</p>	<p>In order to meet the demand for additional school places the Council will provide capacity in existing schools wherever possible. Where this capacity cannot be met new school places may need to be provided.</p>
389	9.44	Royal Brompton & Harefield NHS Trust	CGMS Consulting	<p>We would request that within the supporting text paragraph 9.44 is amended to recognise that not all new community facilities can and should be located in town centres, or in locations of maximum accessibility. Harefield Hospital is in the Green Belt and yet a new hospital and other community uses are established on the site.</p>	<p>The Council will seek to ensure that all new community facilities are located in accessible locations. No proposed change.</p>

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285	9.45	Garden City Estate Residents' Association		Despite an increasing shortage of school places, no new sites for schools are identified. Some schools lack playing fields and this is not addressed. Any attempt to build in the Green Belt to meet exceptional circumstances is unjustified - new provision should be in the developed areas of the borough. Proposed changes: delete "exceptional" from last sentence. Amend the paragraph to state (after "greenfield sites")... "if no Council land or brownfield sites are available." At the end of the paragraph add: "...and the provision of playing fields for schools with no or inadequate playing fields."	Specific sites will be allocated in the Site Allocations DPD. The demand for school places continues to grow and may result in the need to release greenfield sites. Proposals involving development of Greenfield land would need to meet tests of very special circumstances identified in PPG 2. No proposed change.
512	9.45	L B Hillingdon (Labour Group)		There is an increasing shortage of school places in the borough yet no new sites for schools are identified. As the most affordable option will probably be on council-owned land this should be done as a matter of urgency and identified in the Strategy. Also there are schools without playing fields in the borough yet there is no mention in the Strategy that this is something which should be addressed. Identifying where new school places and facilities are to be located is a priority if development continues at the same high residential density as child yield has undergone a step change in the borough. The Plan should not advocate a school being developed in the Green Belt - there is ample land in the developed area and this is where they should be located. Delete "exceptional" from last sentence of paragraph 9.45 and amend it to state after "greenfield sites" : "...if no council land or brownfield sites are available." At the end of the paragraph add: "...and the provision of playing fields for schools with no or inadequate playing fields."	Specific sites for new schools will be identified in the forthcoming Site Allocations Policy Document.
402	9.46	Brunel University	VRG Planning Ltd on behalf of Brunel	Revise Para 9.46 as follows:	It is not yet known if the Development Management Policies Document will contain

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
			University	"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 these institutions are facilitated in their aim to continue improving accommodation for research and teaching provision over the period of the Core Strategy"	policies related to accommodation for Higher Education provision. No proposed change.
23	Policy CI1: Community Infrastructure Provision	Thames Water Utilities Ltd		<p>There is no specific policy on utility infrastructure within the pre submission version of the Core Strategy. The pre submission version of the Core Strategy makes reference to a Strategic Infrastructure Plan, but this has yet to be completed. We suggest that the following policy is included in the Core Strategy to ensure the Core Strategy meets the tests of soundness, particularly having regard to ensuring that infrastructure is in place to meet the proposed growth proposed in the Borough.</p> <p>Utility Infrastructure will be required to serve the requirements of the Borough's residents and businesses. New development proposals must ensure that adequate infrastructure capacity is available to meet the needs of future occupiers and not intensify existing deficiencies. The necessary infrastructure should be put in place in a timely manner, and where appropriate prior to the occupation of the development.'</p> <p>We also consider that the following sub-text should be included in the policy to reinforce the important references to water and sewerage infrastructure capacity:-</p> <p>"The Council will also seek to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will be</p>	This policy reflects the provisions of government guidance and does not need to be repeated in the Core Strategy. Detailed policies related to the provision of physical infrastructure may be included the DMDPD. It is accepted that there is scope to make reference to the need for physical infrastructure in paragraphs 9.34 - 9.38.

## Appendix 1: Responses received to the Pre-Submission Draft Core Strategy

ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				<p>required to demonstrate that there is adequate infrastructure both on and off the site to serve the development and that it would not lead to problems for existing users or future occupiers.</p> <p>In some circumstances a drainage strategy will need to be produced by the developer in liaison with the statutory undertaker to ensure the appropriate upgrades are in place ahead of occupation of the development. Where there is a capacity problem or potential adverse amenity impact on future occupiers, and no improvements are programmed by the statutory undertaker, the Council will require the developer to fund in full the appropriate improvements which must be completed prior to occupation of the development.</p> <p>The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact and that any such adverse impact is minimised."</p> <p>These type of policies proposed by Thames Water have been adopted into recent Core Strategies in other Districts and Boroughs.</p>	
104	Policy CI1: Community Infrastructure Provision	Yiewsley and West Drayton Town Centre Action Group		I believe the policy is unsound because it does not fully take into account the increased number of school places, both primary and secondary required, in the stipulated period. To meet the requirements of the increased number of school places required as indicated in the forecast of the Local Education Authority, up to and	Paragraphs 9.43 - 9.45 refer to the number of school places needed in the borough over the period of the Core Strategy. Potential sites for new school development will be identified in the forthcoming Site Allocations DPD.

## Appendix 1: Responses received to the Pre-Submission Draft Core Strategy

ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				including the year 2026, Council owned land will have to be made available to accommodate an additional 34 classes of 30 pupils at the Primary Level, which could involve an additional 17 two form entry schools followed on by an additional 4 large Secondary Schools mostly in the South of the Borough.	
110	Policy C11: Community Infrastructure Provision	M D Homes	Howard J Green	My client's representation is that the Core Strategy should acknowledge that there is also a "...pressing need..." for Pre-School Nursery places and policies should be flexibly worded to enable them to be established; including allowing the change of use of residential accommodation.	At this stage the Council does not have an evidence base on which to justify a statement or policy regarding the need for additional nursery places.
132	Policy C11: Community Infrastructure Provision	Hillingdon Hospital NHS Trust	Broadway Malyan on behalf of Hillingdon Hospital NHS Trust	We support Policy C11 Community Infrastructure.	Support noted.
146	Policy C11: Community Infrastructure Provision	Hillingdon Inter Faith Network		The LDF does not recognise the role played by the faith community centres for neither faith or other use. There needs to be greater provision for future populations.	The current wording of policy C11 provides general support for community facilities and allows more detailed policies to be developed in subsequent development plan documents.
184	Policy C11: Community Infrastructure Provision	ACS International Schools	Preston Bennett Holdings Ltd	Support the policy.	Support welcomed.
253	Policy C11: Community Infrastructure Provision	English Democrats (Hillingdon)		The document states that it supports extensions to existing schools, yet the council have already told us that they cannot provide new buildings on school grounds due to lack of funds and the cut in the Local Area Grant from central government. Therefore, this aim cannot be achieved with current central government policy.	As a land use policy document the Core Strategy supports the development and extension of existing schools.
254	Policy C11: Community Infrastructure Provision	English Democrats (Hillingdon)		The document states how many houses are to be built over the next 10 years. The national government have been unable to accurately predict immigration rates, and therefore cannot gauge how much housing will be needed in	Housing targets reflect annual monitoring targets in the Replacement London Plan. These are based on the availability of suitable sites, rather than assessed housing need.

## Appendix 1: Responses received to the Pre-Submission Draft Core Strategy

ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				Hillingdon to accommodate population growth. Because England no longer controls her borders, the calculations are flawed	
338	Policy C11: Community Infrastructure Provision	Individual		Paragraph 1 - policy wording is weak and does not allow for growth. Where growth takes place community facilities should be fully expanded to cope - and no community facility should be closed without an improved replacement.	Policy C11 seeks to ensure there is no net loss of community facilities. The Strategic Infrastructure Plan identifies infrastructure required to support growth, a key area being additional school places.
339	Policy C11: Community Infrastructure Provision	Individual		Paragraph 3 - should only support the expansion of schools where this will not cause overcrowding, stress to local infrastructure or a loss of playing fields or playgrounds.	Additional school places are being provided to minimise overcrowding of existing facilities. No proposed change.
340	Policy C11: Community Infrastructure Provision	Individual		Paragraph 7 - Rather than locate health facilities in town centres they should be located in the centre of local residential areas - e.g. with 2000 or more dwellings - making them more accessible to all and reducing the need for transport and parking spaces.	Paragraph 9.42 notes that further social infrastructure will be required to meet the needs of Hillingdon's growing population and that such provision will respond to changing needs. No proposed change.
403	Policy C11: Community Infrastructure Provision	Brunel University	VRG Planning Ltd on behalf of Brunel University	Add new item:  "10. Encouraging and facilitate expansion and improvements to the accommodation of Higher Education Institutions, to ensure their continued success."	The Council will only allow the expansion of higher education institutions within the parameters of existing policy and subject to the provisions of forthcoming development plan policies. No proposed change.
275	Policy C11: Community Infrastructure Provision	Her Majesty's Court Service (HMCS)	DPP on behalf of Her Majesty's Court Service	Court services should be recognised as a community facility & social infrastructure in the policy and addressed in the Strategic Infrastructure Plan. Note of the need for criminal justice facilities should be included in paragraphs 9.35 & 9.39.	The list of social infrastructure provision in paragraphs 9.35 and 9.39 is not definitive. The absence of facilities in this list does not necessarily mean they would not be supported.
296	Policy C11: Community Infrastructure Provision	Garden City Estate Residents' Association		Measures should be taken to restrict heavy goods vehicles using the main road through West Drayton & Yiewsley - a reference should be included to excluding heavy goods vehicles from town & local centres in order to preserve the vitality and viability of the centres and make them safer and less polluted for residents and	This issue will be addressed in the forthcoming Development Management Policy Document.



## Appendix 1: Responses received to the Pre-Submission Draft Core Strategy

ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				visitors.	
301	Policy C11: Community Infrastructure Provision	Garden City Estate Residents' Association		The policy should include provision for the night-time economy as many town centres are currently "no-go" areas after dark. It should state that the Council "...will seek to make a more varied provision of entertainment & attractions for evening visitors."	The importance of the night time economy is recognised - specifically regarding Uxbridge at paragraph 5.2 in the Core Strategy. Further wording will also be inserted at Table 5.3 in the section dealing with Future Growth of the Hayes - West Drayton Corridor at the end of the second sentence to read: "...and development of a night time economy."
303	Policy C11: Community Infrastructure Provision	Garden City Estate Residents' Association		The lack of youth facilities and initiatives is a major problem and the policy should state that the Council "...will provide programmes of youth facilities and initiatives for young people."	Youth facilities are categorised as community infrastructure and are covered by the provisions of Policy C11. A number of new youth centres have recently been provided as part of the Hillingdon Improvement Programme. A suitable evidence base would need to be provided to justify references to a specific need for further facilities. The provision of such facilities will be addressed the emerging strategic infrastructure plan.
390	Policy C11: Community Infrastructure Provision	Royal Brompton & Harefield NHS Trust	CGMS Consulting	The Trust would also request the amendment of Policy C11, point 7 to also acknowledge that there are other established sites within the borough that are not necessarily in accessible locations - such as Harefield Hospital - and yet where new health care facilities are to be supported given the established use.	The Council acknowledges that a limited number of existing community facilities are within the Green Belt. However as a general principle new facilities should be located in areas of maximum accessibility.
375	Policy C11: Community Infrastructure Provision	Bell Farm Christian Centre		(1) The policy should seek to grow and expand the provision of community facilities. (6) There should be a measure of success for demonstrating this. (7) Does not recognise or support the building of community outside town centres - this should be recognised, supported and promoted. (9) Localisation is at odds with the centralisation of facilities only available in town centres. Appropriate social infrastructure is not currently being considered in planning applications for new housing development. What changes are to be made to ensure this happens	The policy supports the retention and enhancement of community facilities. New community facilities would generally be supported where a need can be demonstrated. The monitoring of policy C11 is identified on page 141 of the Pre-Submission document.  Community facilities are to be located in areas with high levels of public transport accessibility to maximise use. Policy C11 states that appropriate social infrastructure should be provided to cater for the needs of the existing community and future

## Appendix 1: Responses received to the Pre-Submission Draft Core Strategy

ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				in future ?	populations. The policy criteria will be key in the determination of planning applications. Further, more detailed policies will be set out in the forthcoming Development Management Policies Document (DMDPD).
499	Policy CI1: Community Infrastructure Provision	Mr John McDonnell MP		The Strategy fails to register local concern at the loss of community facilities and failure of new developments to include these - which needs the Council to ensure planning agreements are adhered to. Developers should fully fund community facilities - based on an independent assessment of their need.	Paragraph 9.40 states that social infrastructure is essential in providing people with better life opportunities. Additional information will be added to this paragraph to register concern at the loss of such facilities. In addition, the intention to introduce a borough-wide CIL will be stated in the supporting text associated with policy CI1.
540	Policy CI1: Community Infrastructure Provision	Arla Foods UK Plc	BNP Paribas Real Estate	Support the principles of the policy.	Support noted
420	Policy CI1: Community Infrastructure Provision	PRUPIM	Maddox & Associates on behalf of PRUPIM	It is proposed that Policy CI1, part 6 is revised to state: "development that will impact on the community infrastructure of the Borough should contribute towards the provision of community facilities to meet the needs of new communities and mitigate impact on existing communities."	Under the provisions of the Government's CIL Regulations most new development will be required to make a contribution towards community infrastructure. In anticipation that Hillingdon will be preparing a CIL charging schedule no changes are proposed to this aspect of the policy.
430	Policy CI1: Community Infrastructure Provision	Individual		Loss of a facility in one area and its reprovision elsewhere in the borough results in a community being worse off - this is not addressed in the Strategy.	<p>The policy states that where the loss of community facilities is justified, the Council will seek to ensure that the resulting development compensates the uses to ensure no net loss.</p> <p>Developments proposing the loss of community facilities would firstly need to demonstrate that the loss of community facilities was justified and then address the issue of compensation to obtain planning consent. This is a stern test for developers and the policy will be developed further in the Development Management Policies Document.</p>
459	Policy CI1: Community Infrastructure	Hayes and Harlington		Policy CI 1	The policy states that where the loss of community facilities is justified, the Council will

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
	Provision	Community Development Forum		<p>For the policy to be sound, there needs to be an additional bullet point which addresses the needs of the voluntary and community sector for accessible and affordable premises and meeting spaces. We regard the policy justifying the loss of community facilities and their replacement as unsound as currently worded. There should be more emphasis on protecting the present social and community facilities, the loss of which should only be permitted where it can be demonstrated it is supported by the local neighbourhood, an important protection for retaining the vitality of local communities.</p> <p>The policy should refer specifically to the protection and enhancement of community premises. Otherwise, there is the risk that community premises will be lost and replaced by other community uses.</p> <p>More account should be taken of the need for social and community infrastructure to meet the needs of increased population. With planned population increases, there is a need for more community premises and other social infrastructure.</p> <p>These should be located spatially in accordance with those parts of the borough where the population is planned to increase significantly. The diversity of the borough and the community needs which flow from this should also be recognised in meeting population needs.</p> <p>There are plenty of empty properties in different use classes, which community and faith organisations could use. A successful town centre or neighbourhood centre is one which contains a diverse mix of uses, including social and community use, and there should be</p>	<p>seek to ensure that the resulting development compensates users to ensure no net loss.</p> <p>Developments proposing the loss of community facilities would firstly need to demonstrate that the loss of community facilities was justified and then address the issue of compensation to obtain planning consent. This is a stern test for developers and the policy will be developed further in the Development Management Policies Document.</p> <p>The purpose of the policy is to provide general support for the retention of community facilities. The list of facilities is not exhaustive and the policy would therefore apply to places of worship. More detail would be included in the Development Management Policy document.</p>

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				<p>planning tools to enable social and community use of properties which have been empty for a considerable period of time.</p> <p>The list of community facilities in point 7 should include faith centres, for which evidence is given in paragraph 9.39. This list contains the only reference to health; to be sound the Core Strategy needs a stand alone policy on health in conformity with draft replacement London Plan Policy 3.2.</p> <p>Point 9 should be more explicit about having local neighbourhood facilities within a short walking distance (this could be 400 metres or 800 metres), as an essential characteristic of local life. To be sound the policy should give support to walkable neighbourhoods.</p>	
515	Policy C11: Community Infrastructure Provision	L B Hillingdon (Labour Group)		<p>C11, SO16 and SO18:</p> <p>Specific reference must be made to Heavy Goods Vehicles which must be excluded from town &amp; local centres in order to preserve vitality &amp; viability of the centres and make them safer and less polluted for residents &amp; visitors.</p>	No proposed change. This issue will be addressed in the forthcoming Development Management Policies document.
528	Policy C11: Community Infrastructure Provision	L B Hillingdon (Labour Group)		Need more varied facilities in town centres to provide a "night time economy" - the policy should state that it "Will seek to make a more varied provision of entertainment and attractions for evening visitors."	Agreed - reference to the night time economy is already included in the Core Strategy, specifically regarding Uxbridge at paragraph 5.27. Further wording will also be inserted at Table 5.3 in the section dealing with Future Growth of the Hayes - West Drayton Corridor at the end of the second sentence to read: "...and development of a night time economy."
529	Policy C11: Community Infrastructure Provision	L B Hillingdon (Labour Group)		The current lack of youth facilities and initiatives is one of the main causes of anti-social behaviour in the borough. The policy should state that it: " Will provide programmes of youth facilities and initiatives for young people."	It is agreed that the provision of youth facilities will be important over the period of the Core Strategy. Such facilities are covered by the provisions of policy C11 and more detailed policies on community infrastructure provision will be

## Appendix 1: Responses received to the Pre-Submission Draft Core Strategy

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					contained in the forthcoming Development Management Policy Document.
47	Policy C12: Leisure and Recreation	British Waterways		This section could include the promotion of canalside leisure and recreation facilities, such as cafes, bike hire, and canoe and boat hire, to encourage active and healthy communities.	Reference to the canal as a leisure resource will be included in para 9.54.
73	Policy C12: Leisure and Recreation	Hillingdon Primary Care Trust		Page 143 - correct text where duplicated.	No duplication of text occurs on page 143. No proposed change.
341	Policy C12: Leisure and Recreation	Individual		Paragraph 3 - this seeks to improve the geographical spread of leisure and recreational facilities - it does not include anything within Yiewsley, West Drayton, Harlington, Harmondsworth and Sipson - and should do.	No proposed change. Policy C12 sets out proposed measures to improve the geographical spread of leisure and recreation facilities and does not identify areas of specific deficiency.
342	Policy C12: Leisure and Recreation	Individual		Paragraphs 5 & 6 - the policy is weak here and needs to ensure development proposals improve or increase existing leisure & recreation facilities - or replace them with facilities that will be of greater benefit.	The policy wording is considered wide-ranging in scope and to adequately refer to leisure and recreation potential. No proposed change.
372	Policy C12: Leisure and Recreation	Bell Farm Christian Centre		Current provision of indoor facilities for older people should be defined and targets set to demonstrate this is being increased.	It is agreed that there should be a greater emphasis on the provision of facilities to take account of Hillingdon's aging population in paragraph 9.42.
500	Policy C12: Leisure and Recreation	Mr John McDonnell MP		The words "seek to" should be change to a more positive "will".	The delivery and maintenance of leisure facilities is dependant on a range of organisations and other Council departments. The words 'seek to' reflect that this is key strategic objective for the Council.
421	Policy C12: Leisure and Recreation	PRUPIM	Maddox & Associates on behalf of PRUPIM	It is proposed that the last bullet point of Policy C12, is revised to state: "Where there is a direct impact, developer contributions will be sought towards improvements to the quality and quantity of leisure and recreational facilities"	No proposed change. Developer contributions are currently subject to the provisions of the Council's Section 106 SPD and in future will relate to the forthcoming CIL. The Core Strategy does not need to specify the circumstances in which this document would apply.

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
557	Policy C13: Culture	English Heritage		<p>Culture (pgs 144-145) - Policy C13: Culture and its supporting text should make reference to the historic environment as a cultural resource that invested in as part of the Borough's conservation strategy (PPS5 Policy HE3 – '...positive, proactive strategy for the conservation and enjoyment of the historic environment in their area..'). For example many cultural activities take place in, or are magnets for visitors because they are buildings, spaces and landscapes of historic interest. This includes places such as Uxbridge Town Centre, which contains and is defined by a number of heritage assets (i.e. listed buildings, conservation area), as well as Manor Farm, which is an interesting complex of listed buildings and Scheduled Monument.</p>	<p>It is agreed that the historic environment is a cultural resource and should be included in the definition of culture in the glossary. A further bullet point will be added to Policy C13, stating that the historic environment will be protected as a cultural resource.</p>
270	Policy C13: Culture	The Theatres Trust		<p>Objectives SO6 and SO18 overlap in that they both deal with access to all community facilities. Their distinction is not clear. However we are surprised that the Glossary entry for Culture does not include the word 'theatres'. As cultural anchors these buildings provide the basis for your cultural offer and should be afforded an entry in this item.</p>	<p>Theatres to be included in the definition of culture in the glossary.</p>
501	Policy C13: Culture	Mr John McDonnell MP		<p>The affordability of some facilities for community use is not acknowledged - and greater emphasis given to addressing the diversity of the local community.</p>	<p>Financial issues are not a matter for the Core Strategy. Recognition of the diversity of the borough's communities is given in the Vision statement where the Council looks to Hillingdon taking full advantage of its distinctive strengths - this includes its range of local communities and also to closing the social and economic inequality gaps that exist at present. No proposed change.</p>
48	Appendix 1	British Waterways		<p>This section should include reference to the Town and Country Planning Association's Policy Advice Note: Inland Waterways (2009) and the recent English Heritage-BW guide, England's</p>	<p>It is not possible to list all potential sources of evidence for the Core Strategy. Only those that are directly relevant or have informed its production have been listed in Appendix 1. The</p>

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				Historic Waterways: A working heritage.	<p>Town and Country Planning Association is a non statutory organisation and its advice notes have not been included as sources of evidence.</p> <p>Whilst the historic significance of the Canal is acknowledged the Core Strategy sets a broad development strategy for the borough. In this context the role of the canal is to act as a focus for sustainable development and regeneration in the Hayes/West Drayton corridor. No proposed change.</p>
545	Appendix 1	English Heritage		<p>LATE SUBMISSION:</p> <p>Evidence base - Although many changes have been made to the text of the Core Strategy there unfortunately still appears to be a lack of robust evidence base on the historic environment for Hillingdon, beyond the inclusion of the Borough's conservation area appraisals and management plans (as listed in Appendix 1). It is noted that the Spatial Portrait (pg 10-11) lists key heritage assets, but as stated in our previous letter, 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. It is a requirement of PPS1 (paragraph 19) and PPS5 (policy HE 2) that local plans be based on up-to-date evidence of local environmental characteristics such as the historic environment and its heritage assets, and that this evidence be documented and made publicly available. For example Hillingdon's web page does not include any reference to the borough's character or historic environment as part of its evidence base.</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. 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. The Council intends to produce a Character Study as part of its evidence base including appropriate locations for tall buildings.</p> <p>A link to the current heritage documents to be provided under the 'Evidence base' documents for the LDF on the Council's website. No proposed change.</p>
331	Appendix 1	London Geodiversity Partnership		Appendix 1 (Evidence Base) should list London's Foundations, The London Plan Implementation Report, GLA, March 2009 ( <a href="http://www.london.gov.uk/who-runs-">http://www.london.gov.uk/who-runs-</a>	Agreed - include 'London's Foundations, The London Plan Implementation Report: Protecting the geodiversity of the capital (Greater London Authority, March 2009)' in Appendix 1.

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				london/mayor/publications/planning/londons-foundations).	
49	Appendix 2	British Waterways		<p>We have the following comments to make on the references to works on the Grand Union Canal:</p> <p>The first project, relating to the approved mooring scheme at Hayes should be described as "offside" rather than "offline". Offline moorings are those within a dock or marina, off the main navigation, which is not what has been approved.</p> <p>The second project, relating to repairs at Iron Bridge Narrows, has already been completed in the last financial year. We would also suggest that towpath/National Cycle Network improvements be referred to, which British Waterways are coordinating with TfL and LB Hillingdon (Bob Castelijm) and which are described within the current draft Local Implementation Plan.</p>	Noted. Comments will be included.
75	Appendix 2	Hillingdon Primary Care Trust		Page 153, the table setting out planned/potential developments needs reference to a potential development at Eastcote Health Centre added under the PCT section.	Comments noted. Proposed changes will be included.
76	Appendix 2	Hillingdon Primary Care Trust		As a general note the text refers to joint working and sharing of facilities across public sector organisations, although the developments noted in the summary tables (pages 153, 154 etc) don't reflect this.	Comments noted.
248	Appendix 2	Yiewsley and West Drayton Town Centre Action Group		The contents of the London Borough of Hillingdon Draft Infrastructure Schedule have been noted and on issues such as Crossrail and a new Health Centre for Yiewsley the Council is to draw up contingency plans in the event that neither project materialises. It has also been noted that Hillingdon Hospital is applying for an extension to their original planning permission	The Primary Care Trust was consulted as part of the production of the Core Strategy and the Infrastructure Schedule. Amendments have been made to the Schedule in response to these comments.



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				for a new hospital. Also the long awaited upgrade of Hayes Station by 2015. The issues regarding health provision are not 'sound' as they do not take into account the implications of the government's reforms which are still being rolled out and will require input from each Local Authority.	
249	Appendix 2	Yiewsley and West Drayton Town Centre Action Group		Residents have objected to the inclusion of the Old Coal Depot site in Tavistock Road as a site for recycling facilities. The site is surrounded by residential units and the impact of traffic in and out of the site has been estimated at 2,000 journeys. If this site is approved under the West London Waste Plan the Core Strategy indicates that the site will be safeguarded for this purpose. The environmental impact on the community will mitigate against any proposal on environmental improvements contained in the Core Strategy.	Comments noted - they refer to a proposal in the West London Waste Plan Development Plan Document (DPD), a draft of which was published concurrently with the Pre-Submission Draft Core Strategy and are being considered as part of the consultation responses for that DPD. No proposed change.
404	Appendix 2	Brunel University	VRG Planning Ltd on behalf of Brunel University	Revise as follows:  "To enable the University to deliver international standards of research and teaching facilities, which necessitates continued expansion and improvements to its accommodation."	Comments noted. Proposed wording will be included in the infrastructure schedule as an aspiration of the University, however the Council cannot provide unqualified support for proposals which could involve development on Green Belt land.
405	Appendix 2	Brunel University	VRG Planning Ltd on behalf of Brunel University	Revise as follows: "The key outstanding project from the existing master plan is phase 1 of  the Eastern Gateway Building, which is  due for completion in 2012 and an extension to the  main refectory building, due for completion in 2013  / 2014. A number of future projects are being	Comments noted and agreed.

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				considered for the next master planning period from 2014 to 2021.	
406	Appendix 2	Brunel University	VRG Planning Ltd on behalf of Brunel University	Revise as follows: "Current master planning period comes to an end in 2014. Production of new master plan is currently under preparation."	Comments noted and agreed.
558	Appendix 2	English Heritage		Infrastructure (appendix 2, pgs 148-154): We note that an infrastructure schedule is set out within the appendix, but it is still not clear how the Council seeks to deal with planning obligations. For example planning obligations can provide an important source of funding for the conservation of the historic environment. In addition it should be recognised that the historic environment is a valuable asset that can be harmed through investment in the infrastructure, unless sufficient mechanisms are in place which help continue to conserve appropriately the Borough's heritage assets. With this in mind we would seek to be involved in the production of any further planning policy on this matter.	The Council's approach to dealing with Planning Obligations is contained in its Planning Obligations SPD. It is also considering introducing a borough-wide Community Infrastructure Levy (CIL) and reference to this will be included in Policy C11.
437	Appendix 3	Royal Brompton & Harefield NHS Trust	DP9 on behalf of Royal Brompton & Harefield NHS Foundation Trust	Trajectory should be amended to reflect housing figures from the draft Replacement London Plan. Can it be confirmed how the Trajectory relates to published five year supply of deliverable land for housing (2007).	<p>The housing trajectory is Hillingdon's assessment of expected completions. It includes sites with an outstanding planning permission and those that are expected to come forward for development and gain planning consent. Borough-wide targets in the Replacement London Plan are based on the GLA's SHLAA. The housing trajectory demonstrates how Hillingdon's annual monitoring target will be met.</p> <p>Hillingdon's housing trajectory is updated on an annual basis as part of the production of the Annual Monitoring Report and demonstrates a five year land supply. The five year supply of deliverable land for housing (2007) was produced as a separate document for that year. No</p>

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ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
					proposed change.
332	Appendix 4	London Geodiversity Partnership		Appendix 4 (Glossary) should give a definition of Geodiversity.	Agreed - add definition to read "Geodiversity: The variety of rocks, fossils, minerals, landforms and soils along with the natural processes that shape the landscape."
SA1	Sustainability Appraisal	Individual		<p>There are a number of issues regarding the creation of the waste management locations. They are:</p> <ol style="list-style-type: none"> <li>1. the impact of the consolidated waste management areas on the surrounding areas eg. air, noise and traffic pollution.</li> <li>2. the green jobs that come out of this seem to be positive, but are usually heavily subsidised by Government.</li> </ol> <p>With regard to housing, there are issues:</p> <ol style="list-style-type: none"> <li>1. Hillingdon is in a region that is water-stressed so care will need to be taken with regard to housing density</li> <li>2. Residents in the local area where housing is to be built should be better consulted and their views taken into consideration rather than being disregarded lightly. After all, the changes will impact upon them and their area of residence</li> <li>3. loss of permeable surfaces will lead to increased water run off and increase the risk of flooding.</li> <li>4. I have noticed that the road drainage systems seem to be placed in inappropriate places and simply add to localised road flooding when it rains. I have no idea how this can continue to happen.</li> </ol>	<p>No proposed change to the Sustainability Appraisal (SA).</p> <p>These concerns are addressed through the application of the SA on the Core Strategy. Issues regarding waste management locations will be considered through the West London Waste Plan. The other issues raised about environmental impacts, such as flood risk, water consumption and brownfield development are all considered within Core Strategy policies. These are considered to answer the issues raised and no further changes are necessary.</p> <p>With regards to the issues about consultations on planning applications, there are already a number of methods for the public to get involved in the planning process. Experience in the planning department suggests that the Hillingdon public already actively engage to a high standard in planning applications and the Core Strategy will continue to support this.</p>

## Appendix 1: Responses received to the Pre-Submission Draft Core Strategy

ID	Policy/para/section/ map/ table	Consultee	Agent	Summary	Officer's Recommendation
				<p>5. Brownfield sites are not necessarily the easiest to develop. Sometimes, they will need a lot of preparation (eg foundation and sewer system placing or land decontamination) before any housing can be built. Has the true cost of these been considered? It is likely that this will be a burden on the Council.</p> <p>6. Instead of building lots of offices (which is already surplus at Stockley Park) or hotels, it would be better to consider these sites for housing (provided the transport links are also considered alongside).</p> <p>Better consultation with residents located around an area that is going to be developed, whether that is for waste management or housing. I mean that they are actively consulted and made aware of changes rather than being passively notified by the minimum legal requirement-this is not the best method as it involves the Council resident to be always looking actively. Surely, it would be better to have a better notification eg. signs posted up in the affected area? Also, to take their views into consideration with empathy in the decisions that are made.</p> <p>Better usage of currently unoccupied council housing stock so that the housing needs can also be met that way-it must be better than letting houses become derelict.</p> <p>Better usage of current waste facilities rather than building a new facility. Surely it would be easier (and cheaper) to upgrade/demolish and upgrade existing facilities than getting a new facility built on land that has to be pre-prepared for it?</p>	

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SA2	Sustainability Appraisal	Regional Urban Designer - English Heritage		In terms of the Updated Sustainability Appraisal we would still suggest that the concerns above have not been fully addressed as part of the SA. For example the lack of a robust approach on the management of tall buildings (as promoted in policy BE1) would not improve the sustainability scoring against the heritage and landscape Sustainability Objective.	Disagree – no proposed change.  The consideration of tall buildings in BE1(11) provides a satisfactory level of control to ensure they will not have an adverse impact on existing townscapes. The SA is therefore considered to adequately consider the historic environment.
SA3	Sustainability Appraisal	Hillingdon Motorist Forum		<p>West London Sub Regional Development Framework guidance</p> <p>The strategic priorities for the West London sub-region will be to:</p> <p>The West London Tram Project has been abandoned.</p> <p>Under the Transport strategy road transport is not mentioned.</p> <p>Page 36: Table 5. Plans, Programmes, Strategies and Initiatives</p> <p>A Hillingdon Transport Strategy is mentioned. Where can a copy of this document be obtained.</p> <p>Page 38 - Topic: Transport and Air Quality Causal Factors</p> <p>The West London Tram Project is again mentioned.</p> <p>Page 61 - Table 6. Key Sustainability Issues Identified for Hillingdon</p> <p>Comment:</p>	Noted.  No proposed change.

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				<p>Car ownership and use is high in comparison with other London boroughs and is likely to increase with the 35,000 jobs and 8,900 homes in opportunity areas to be provided as requirements of the London Plan. What the plans to accommodate this increase.</p> <p>Page 65 Traffic Congestion:</p> <p>Congestion issues have been highlighted with the identification of key junctions for improvement in the Local Implementation Plan (LIP). The Forum have submitted comments on the LIP.</p> <p>Page 88 Air Quality Objective. Traffic congestion is identified as a contributor to poor air quality. No active plans to reduce congestion.</p>	