

London Borough of Hillingdon
LOCAL DEVELOPMENT FRAMEWORK

**HILLINGDON DESIGN AND
ACCESSIBILITY STATEMENT
SUPPLEMENTARY PLANNING
DOCUMENT (2006)**

**ADOPTION /SUSTAINABILITY
APPRAISAL STATEMENT**



Policy and Environmental Planning Team
Planning and Transportation Group
London Borough of Hillingdon
July 2006

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1.0 Introduction

- 1.1 The Hillingdon Design and Accessibility Statement (HDAS) Supplementary Planning Document (SPD) was approved for adoption by the London Borough of Hillingdon's Cabinet on 20th December 2005 and was formally adopted and published on 31st July 2006. This statement outlines the consultation process that was undertaken during the evolution of the SPD and describes how the Sustainability Appraisal for the HDAS SPD helped to create a more sustainable guidance document.
- 1.2 A key component of the Local Development Framework (LDF) will be a new 'Hillingdon Design and Accessibility Statement' (HDAS), an important document containing a range of design and accessibility guidance for new development in the borough. The HDAS will have the status of a Supplementary Planning Document, comprising a number of separate sections on a range of topics including residential extensions and new residential layouts, accessibility, public realm, transport interchanges and shopfronts/signage. Work on the HDAS has been led by external consultants, Llewelyn Davies, working closely with a Steering Group comprising Council officers and a representative from Disablement Association Hillingdon (DASH).
- 1.3 In accordance with Regulation 16(b) and 16(c) of the Town and Country Planning (Local Development) (England) Regulations 2004, any person aggrieved by this Supplementary Planning Document (SPD) may apply to the High Court for permission to apply for judicial review of the decision to adopt the SPD; and that any such application for leave must be made promptly and in any event no later than 3 months after the date on which the SPD was adopted.

2.0 Background

- 2.1 The majority of current design and accessibility guidance in the London Borough of Hillingdon is over 10 years old and has now been superseded by more recent planning policy including the London Plan, Planning Policy Statement 1 and various amendments to Planning Policy Guidance 3 Housing.
- 2.2 Much of the current guidance was prepared as part of the first deposit draft of the Hillingdon Unitary Development Plan (UDP) in 1993. The need to update the guidance responds to a specific request from the ODPM (Office of the Deputy Prime Minister, now known as Department for Communities and Local Government) to revise existing design guidance at the earliest possible opportunity. A failure to undertake this work is likely to diminish the ability of the Local Planning Authority to secure good quality design and accessibility across all forms of new development.

- 2.3 Consultants (Llewelyn Davies) were instructed to lead on the preparation of the Hillingdon Design and Accessibility Statement (HDAS) in July 2004, following approval of their appointment by Cabinet in June 2004. The consultants have worked with a steering group of Council officers and a representative of DASH to develop a series of sections which will ultimately comprise the complete HDAS. The sections of the HDAS are as follows:
- i. Residential Extensions
 - ii. Residential Development
 - iii. Accessible Hillingdon
 - iv. Transport Interchanges
 - v. Shopfronts and Signage
 - vi. Public Realm
- 2.4 Owing to the size of the final HDAS document, it was split into a number of sections for the purposes of public consultation. The Accessible Hillingdon, Transport Interchanges and Shopfronts and Signage sections were approved by Cabinet in April 2005 for public consultation. The Residential Extensions and Residential Layouts sections were approved in June 2005. The final section, Public Realm, has been through a six week consultation period and was subsequently approved by Cabinet on 20th July 2006.
- 2.5 **The key components of the HDAS are summarised as follows.**
- Residential Extensions**
- 2.6 The revised guidance for the development of residential extensions and other alterations to dwellings is targeted at householders. Its content and format have been written so as to provide clear and unambiguous guidance on the types of residential extensions and alterations which are likely to be considered acceptable in Hillingdon. Through a combination of text and colour illustrations, it is hoped that house builders will be in a better position to assess for themselves whether they are likely to receive planning permission for their extensions or alterations. Ultimately this should both help to improve the quality of householder development and facilitate clarity and consistency in the decision making process.
- Residential Layouts**
- 2.7 The primary aims of the 'New Residential Layouts' section are to ensure that new residential development in the borough relates well to the area in which it is being developed and provides a good environment for those living within and around new developments. It is not the role of the Guidance to restrict residential development across the borough and it is the function of the Unitary Development Plan and the forthcoming LDF Core Strategy to set out policies for controlling land use. However, where

residential development on a site is considered to be acceptable in principle, it is intended that the HDAS can respond to the issues raised by new development and in particular, the pressure for higher densities.

Accessible Hillingdon

- 2.8 The Disability Discrimination Act and recent accessibility policy and guidance from the GLA has increased the responsibilities and role of the Local Authority in ensuring that all public buildings are accessible to all individuals. New homes will need to be easily capable of alteration throughout an individuals lifetime where they are not wheelchair accessible from the outset; the London Plan seeks that 100% of all new housing is built to these 'Lifetime Homes' standards, although only 10% of homes are required to be fully wheelchair accessible.
- 2.9 The submission of Access Statements alongside planning applications is now being sought as a consequence of the London Plan and the provisions of Part M of the Building Regulations. Access Statements are an important means of ensuring that access is considered at the earliest stage in the development process. Consequently, the HDAS provides specific guidance on the submission of Access Statements (including an example of a completed Access Statement) to help ensure that new development accords with the requirements of the Disability Discrimination Act.

Shopfronts and Signage

- 2.10 The HDAS incorporates a section on shopfronts and signage to provide those converting or developing shop premises with a set of design principles from which to develop proposals. The HDAS clarifies what will be taken into consideration when assessing planning applications since the installation of new shopfronts and/or signage normally requires the consent of the Local Planning Authority.
- 2.11 The HDAS does not seek to impose traditional shopfront design where the site context can accommodate more modern designs and formats. Nevertheless, the importance of site context is continuously emphasised and the need for signage and advertisement to relate to and remain in proportion with the building and wider streetscene.

Transport interchanges

- 2.12 The HDAS sets out a range of important design principles and detailed guidance for development within and around Interchanges (up to around 800m away from the Interchange). In considering Transport Interchanges in Hillingdon and for the purposes of applying design guidance and clarification in terms of residential density, the HDAS sets out categories of Interchange in Hillingdon.

- 2.13 The HDAS promotes the concept of Transport Development Areas as a means of securing well-designed, higher density development around specific public transport interchanges. The HDAS also sets out a broader Transport Development Zone where varying degrees of development can be considered without necessarily generating a proportionate increase in road traffic and parking demand.

2.14 Key Stages involved in the preparation of the HDAS SPD and its Sustainability Appraisal.

These are:

- Consultants (Llewelyn Davies) were instructed to lead on the preparation of the Hillingdon Design and Accessibility Statement (HDAS) in July 2004
- Production of the draft HDAS Supplementary planning Document - April 2005
- Production of Sustainability Appraisal of Draft HDAS SPD - June 2005
- Consultation on the draft HDAS SPD and Sustainability Appraisal – July/August 2005
- Cabinet Approval for formal adoption of the HDAS SPD, December 2005
- HDAS SPD, Adoption/Sustainability Appraisal Consultation Statement - July 2006

3.0 Consultation Process

- 3.1 This statement sets out, in accordance with regulation 18 (4) (b) of the Town and Country Planning (Local Development) (England) Regulations 2004, the public participation and consultation process undertaken for the HDAS SPD.
- 3.2 Formal public consultation on the Draft SPD ran for 6 weeks from 24th August to the 30th September 2005.
- 3.3 Copies of the draft SPD and the accompanying Sustainability Appraisal were sent to approximately 137 statutory bodies in electronic format on CDROM. Posters advertising the consultation were sent to GP's, post offices, community centres and higher and further educational establishments.
- 3.4 Approximately 1068 letters were sent to other individuals and organisations informing them of where the consultation documents could be viewed and where CD's and hard copies could be obtained. Hard copies of the consultation documents were made available at all 17 Hillingdon libraries, Hayes One Stop Shop and the Planning and

Transportation Group reception in the Civic Centre. Appendix 1 of the report contains the full list of consultees for the HDAS SPD which conforms to Hillingdon's Statement of Community Involvement.

- 3.5 The formal consultation exercise on the draft HDAS received a total of 29 written responses, which are detailed in Appendix 2 to this report with the officer's response.

Table 1.0: Results of Consultation Process for the SPD.

Representation	Amendments to SPD	Implications for any further Sustainability Appraisal
Transport Interchanges: Welcome the recognition to improve transport interchange but recommend that guidance includes the principles of Security by Design.	HDAS SPD amended to include reference to Secure by Design SPD.	No implications anticipated.
Residential Layouts: Para3.3: Max of 10% redevelopment is putting planning into a numerical regressive level and not judging on the suitability of individual projects.	No amendments made. It is necessary to have some numerical thresholds to aid the assessment process.	No implications anticipated.
Residential Extensions: Concerns over 'back garden development', freestanding building separate from the house, believe these should require planning permission. Distorts local area, destroys parking space n the property forcing parking onto roads. The residents association believe that these developments should require specific planning permission before they are completed, and that the council should have the	No change to the SPD. This issue will be further raised with the Planning Enforcement team.	No implications anticipated.

power to halt construction until this is achieved.		
Accessible Hillingdon: Agree with accessibility SPD. One problem is street furniture, sign posts, advertising etc, cluttering up the pavement causing problems for people with poor eyesight.	No change to the SPD.	No implications anticipated.
Shopfronts: Agree with SPD. Shop doors should be wide enough for invalid access (wheelchair), with no obstructive displays.	No change to the SPD.	No implications anticipated.

4.0 Sustainability Appraisal Statement

- 4.1 A Sustainability Appraisal was prepared for the draft HDAS SPD under the requirements of the Town and Country Planning (Local Development) (England) Regulations. This section provides the details of the consultation on the Sustainability Appraisal (SA) for the HDAS Supplementary Planning Document (SPD) including information on how the SPD was changed as a result of the Sustainability Appraisal, responses to consultation and any implications for the SA.
- 4.2 In addition, the ODPM guidance on Sustainability Appraisal for Regional Spatial Strategies and Local Development Documents, section 4.5.6 and Environmental Assessment of Plans and Programs Regulations 2004 (which covers the European Directive 2001/42/EC on Strategic Environmental Assessment) section 16.3-16.4, requires a Consultation Statement, after the adoption of the SPD, that lists the following information:
- How sustainable considerations have been integrated into the SPD?
 - How the sustainability appraisal report has been taken into account?
 - List of consultation bodies and the availability of relevant documents
 - How the results of any trans-boundary consultations entered into have been taken into account?
 - Reasons for choosing the SPD as adopted in the light of the other reasonable alternatives dealt with.

- Measures that are to be taken to monitor the significant sustainable effects of the implementation of the SPD.

4.3 How sustainability (environmental, social and economic) considerations have been integrated in to the plan or programme.

The Sustainability Appraisal for the draft HDAS SPD was carried out in July 2005 and the following key sustainability issues were identified:

- Energy Efficiency
- Air Quality
- Town centre regeneration
- Accessibility for the disabled
- Social deprivation
- Traffic generation
- Noise

4.4 The following highlight the considerations for the SPD in order to address the above-mentioned sustainable issues.

4.5 Energy Efficiency

The HDAS should encourage energy efficiency in new business and housing.

4.6 Air Quality

The HDAS must seek to ensure development does not exacerbate the existing air quality issue and seek to aid implementation measures to help reduce predicted levels.

4.7 Town centre regeneration

The HDAS should seek to maintain and promote the primary retail function of town centres and widen the range of uses to ensure a balanced evening economy.

4.8 Accessibility for the disabled

The HDAS must ensure enough new housing and employment and other publicly accessible buildings are accessible for the mobility impaired

4.9 Social deprivation

The HDAS should ensure that social and economic sustainability objectives are taken into consideration, in order to reduce deprivation in key wards.

4.10 Traffic congestion

The HDAS should ensure that development, in locations of high public transport accessibility, does not contribute to further traffic problems such as congestion.

4.11 Noise

Measures to reduce road and air noise must be implemented. Sensitive receptors (schools, hospitals) should be sited away from noise sources.

4.12 How the Sustainability Appraisal Report has been taken into account in the final HDAS SPD

4.13 The sustainability appraisal identified some key areas where the inclusion of certain changes will help mitigate for some of the impacts identified. The following table identifies the recommendations made in the SA and the consequential changes (or otherwise) that were undertaken.

Table 2.0: List of the changes adopted in the final HDAS and the Sustainability Appraisal recommendations

Sustainability Appraisal recommendations for the HDAS SPD	Changes made to the HDAS SPD or reasons why SPD was not changed.
The SA assessment has identified that the HDAS does not contain guidance for the potential to reduce anti-social behaviour in residential areas.	The Council has previously produced an SPG "Community Safety by Design" The HDAS will make reference to this document.
A further issue that has arisen in the assessment concerns residential development adjacent to noise sources. The HDAS does not contain any specific guidance for building design in these areas to mitigate for noise impacts.	The Local Development Framework contains an SPD on noise that will provide mitigation for development adjacent to noise sources. The HDAS will be changed to make reference to this document.
The residential design guidance, by allowing for conversions of front gardens to hard standing for use to park motor vehicles, is not compatible with the SA objective to reduce dependence on motor vehicles.	The design guidance for residential areas also states that bicycle racks must be provided as part of the development. Policies contained elsewhere in the LDF will provide an increased opportunity for the use of sustainable transport. The HDAS documents were not changed.

4.14 How the results of any consultations relevant to the Sustainability Appraisal have been taken into account in the final HDAS SPD

4.15 A detailed summary of all the responses made to the SPD and the comments on them can be found in Appendix 2 of this statement. No comments were received on the Sustainability Appraisal Report. However, comments on the SPD have been taken into account as part of the Sustainability Appraisal process which resulted in some of the amendments to the SPD, these are shown in table 2 above.

4.16 The reasons for choosing the plan or programme as adopted, in light of the other reasonable alternatives dealt with;

4.17 Several options were considered as part of the sustainability appraisal of the HDAS SPD. The production of a HDAS SPD was considered to be the option most able to meet the sustainability objectives.

Do Nothing Option

4.18 This option proposes that the Borough will take no specific action and employ no method to meet the aims of the HDAS or address the existing transport, access and shopfront amenity issues identified. It does not mean, “maintaining the status quo” because the status quo involves the existing UDP provisions which promote accessibility provisions for shops, business uses, services, community and other facilities open to the public, transportation policies and policies which restrict specific uses in Town Centres, Local Centres and Parades.

4.19 This method would make no provision for proactively increasing the accessibility levels of public and private buildings in the borough nor would it meet Disability and Discrimination Act (DDA) and London Plan requirements. This method would not meet legislative requirements and would not promote Lifetime Homes standards, which are homes for all people of all ages and disabilities. By not implementing Accessibility Guidance and/or Accessibility Statements, the quality and quantity of accessible homes in the borough will not increase and could decrease over time.

4.20 Current shopfront guidance is not particularly robust and relates mainly to Conservation Areas. It cannot guarantee that new Shopfronts will respect the existing character and appearance of an area. New guidance would ensure that shopfronts in Conservation Areas are not only sympathetic to the surrounding area but are also accessible for all people of all ages.

4.21 There is currently no guidance for Transport Interchanges in the Borough. This guidance will ensure that higher density development is located in areas of good public transport accessibility where owner/occupiers can

easily commute to and from work on public transport and reduce the need for vehicle trips and help to decrease pollution levels.

- 4.22 The 'do nothing' option, which implies not publishing the HDAS documents, will have a possible negative impact on the environment including the retention of high dependency on the car, buildings with poor accessibility, and new shop-frontages that do not fit with their surroundings. However, there are unlikely to be neither positive nor negative effects on the economy as increasing the accessibility of shopfronts and other buildings cannot guarantee economic benefits.
- 4.23 The 'do nothing' option will have a possible negative impact socially including the erection of new residential units which are smaller in size than could be if the HDAS documents are approved, and houses which do not provide the accessibility levels for easy alteration throughout the inhabitants lifetime. However, there are also likely to be positive economic effects as houses will be designed from the onset to be easily adaptable and should be less expensive and less likely to convert at a later date. There are likely to be neither positive nor negative effects on the environment than existing.
- 4.24 Current new residential layouts design guidance does not include provisions for amenity space for flatted development. Without specific amenity standards the Council cannot guarantee that all new development will provide sufficient amenity space for habitants to enjoy. Additionally, existing guidance does not provide minimum unit sizes or the requirement for houses to be built to Lifetime Homes Standards. New guidance would ensure that all new residential development and residential extensions would provide sufficient living and amenity space and easily adaptable homes for all ages.
- 4.25 The "do nothing" option would therefore not meet the test of sustainable development in terms of social progress, the effective protection of the environment, and the prudent use of natural resources. This option is subsequently ruled out as a valid alternative.
- 4.26 Status Quo – retaining the existing situation
The principal alternative to the implementation of the HDAS is to retain the status quo, being the policies in the UDP, the London Plan and the Borough's own works programmes. Under the new amendments to the Planning and Compulsory Purchase Act 2004, the majority of the existing UDP provisions must be replaced by the LDF by 2007. The status quo would imply that the existing policies relating to transport, accessibility and shopfronts in the UDP would be saved or transferred to the core strategy of the LDF but the HDAS itself would not be developed.

- 4.27 The nature of the status quo option means that there is unlikely to be any change in the environmental baseline, other than that consistent with existing trends.
- 4.28 The inclusion of residential extensions, new residential development, accessibility, transport and shopfronts within the core strategy of the LDF would ensure matters such as accessibility, transport and shopfront design were still considered as part of the process of determining planning applications. However, it would not provide the framework required to meet recent changes to legislation policy and guidance, which promote higher density housing and mixed-use densities and improved accessibility. The need to meet legislative requirements such as the DDA is essential. Options that cannot provide principles and guidance to meet these legislative requirements cannot be realistically considered.
- 4.29 While the status quo option does make provision for access this would not include specific provision for recent legislative requirements. It would not, however, be the most effective means of achieving the objectives sought through the development and implementation of the HDAS and has therefore been ruled out as a valid alternative.

Adoption of the HDAS as an SPD

- 4.30 The preferred option is the development and implementation of the HDAS as an SPD. This option would mean that the objectives of the HDAS could be considered as a matter for material consideration in the assessment of land use planning applications. It would also mean that the HDAS would provide and promote actions required to achieve and meet local, regional and national requirements. The HDAS would thus meet legislative requirements and provide more robust guidance for residential extensions/layouts, shopfronts, accessibility and transport interchanges in Hillingdon.
- 4.31 The measures that are to be taken to monitor the significant sustainability issues of the implementation of the plan or programme**
- 4.32 The significant issues discussed above, and given in detail in the Sustainability Appraisal, will be monitored as part of the Local Development Framework Annual Monitoring Report (AMR). The AMR includes monitoring of sustainability criteria including those indicators listed in the Sustainability Appraisal Report of the HDAS SPD.

5.0 Outcome

The HDAS SPD was approved for adoption on 20th December 2005 following Cabinet approval and was formally adopted and published on 31st July 2006. The accompanying Sustainability Appraisal was

developed in tandem with the SPD and helped to establish stronger monitoring mechanisms and identified some key sustainability issues.

- 5.1 The HDAS SPD will form part of the Local Development Framework LDF), a new planning framework, which the Council is required to produce to promote and manage land-use within our area. The inclusion of the HDAS SPD in the LDF ensures it will be integrated with, and make a contribution to, the new spatial planning system being developed in the borough.
- 5.2 The HDAS SPD has been prepared in anticipation of the development of specific policies in the LDF 'Core Strategy'. In the interim period the SPD will be taken into account by the Council in determining planning applications as supplementary to relevant policies in the adopted Unitary Development Plan 1998.

Appendix 1: Consultation list for HDAS Supplementary Planning Document

Chamber of Commerce

Eastcote Chamber of Commerce
Hayes Chamber of Commerce
Hillingdon Chamber of Trade Commerce & Industry
Northwood & Pinner Chamber of Trade
Ruislip Chamber of Commerce
Uxbridge & Drayton Chamber of Trade & Commerce

Community Groups

DASH
Hillingdon Association of Voluntary Services
The Hayes Town Partnership

Housing

Acton Housing Association
Airways Housing Association
Anchor Housing Association
Apex Housing Group
Bellway Homes
Catalyst Housing Group
Co-op Home Services
Ealing Family Housing Association Ltd
Fairview New Homes plc
Family Housing Association
Frays Charitable Housing Association Ltd
Home Group
Inquilab Housing Association
John Grooms Housing Association
Laing Homes Thames Valley
Metropolitan Housing Trust
Network Housing Association Ltd
Notting Hill Home Ownership
Notting Hill Housing Trust
Paradigm Housing Group Ltd
Pathmeads Housing Association
Shepherds Bush Housing Association
Slough Estates

Spelthorne Housing Association
Sutherland Housing Association
Thames Valley Housing Association
Warden Housing Association

Residents and Tenants Associations

Auriol Drive Residents Association
Avondale Tenants and Residents Association
Bell Farm Estates Residents Association
Botwell Common Area Tenants & Residents Association
Botwell Tenants and Residents Association
Bovis Residents Association Group
Braybourne Close Residents Association
Brearley Close Residents Association
Brook Green Residents Association
Chapel Lane Residents Association
Chiltern View Residents Association
Cleave and Savoy Residents Association
Cleveland Road Residents Association
Cobden Close Riverside Residents Association
Colham Green Road Residents Association.
Colham Manor Residents Association
Colham Residents Association
Connaught Residents Association
Court Drive Householders Association
Cowley Tenants and Residents Association
Crane Ward Residents and Tenants Association
Cranford Cross Residents Association
Croyde Avenue Residents Association
Dell Farm Residents Association
Dene Road Residents Association
Eastcote Residents Association

Eastcote Park Estate Association
Ferndale Area Residents Association
Frayslea and Cowley Road Residents Association
Friends of Hillingdon House Farm
Gatehill (Northwood) Residents Association
Gatehill Residents Association
Gledwood Residents Association
Grange Park Residents Association
Glebe Tenants and Residents Association
Harefield Tenants & Residents Association
Harlington Village Residents Association
Harmondsworth and Sipson Residents Association
Hayes Garden Village Residents Association
Hayes Park Residents Association
Hayes Town Centre Residents Association
Hercies Road Residents Association
Hill Road Residents
Hillingdon Council Tenants Federation
Hillingdon Court Park Residents Association
Hillingdon Disabled Tenants and Residents Association
Hillingdon Village Residents Association
Hobart Road Residents Association
Holloway Lane Residents Co. Ltd.
Home Farm Residents Association
Ickenham Residents Association
Lake View Estates Residents Association
Langworth and Forsters Residents Association
Laurel Lane Residents and Tenants Association

Longford Residents Association
Lych Gate Walk Tenants Association
Mayfield Close Residents Association
Nestles Avenue Action Group
North Hayes Residents Association
North Hyde Road Residents Association
North Uxbridge Residents Association
Northwood Hills Residents Association
Northwood Residents Association
Oakfarm Residents Association
Parkfield Road/Oak Avenue Petition Group
Pastures Mead Residents Association
Philpots Farm Residents Association
Pield Heath Residents Association
Robinwood Grove Residents Association
Rodwell Close Residents Association
Rose Park Residents Association
Ruislip Residents Association
South Ruislip Residents Association
St Laurence (Cowley) Residents Association
St Vincent's Tenants and Residents Association
Stockley Residents Association
The Association of the Residents of the Drive
The Avenue Residents Association
The Larches Residents Association
Townfield Residents Association
Tudor Way Residents Association
Uxbridge Common Residents Association
Uxbridge Moor Residents Association
Victoria Road Tenants and Residents Association
Vine Lane Residents Association
Violet Avenue Tenants and Residents Association

Waterloo Road Residents Association
Waye Avenue Residents Association
West Drayton Amenity Association
West Drayton Garden City Residents Association
West Drayton Initiative Group
West Drayton Residents Association
Whitehall Residents Association
Whitehorn Estate Residents Association
Willow Tree Lane Area Residents Association
Willows Residents Association
Wise Lane Residents Association
Yeading Residents Association
Yiewsley and West Drayton Town Centre Action Group

Statutory Agencies

British Telecom
Building Research Establishment
CAA
Commission for Architecture & Built Environment
Commission for Radical Equality
Countryside Agency
DASH
Disability Rights Commission
English Heritage
Equal Opportunities Commission
Estates and Wayleavers
GLA - Strategy Directorate
Government Office for London
Greater London Authority
Health and Safety Executive
Highways Agency LNCS Area 24
London Ambulance Accident & Emergency Service
London Ambulance Service West Sector HQ
London Borough of Ealing
London Borough of Harrow
London Borough of Hounslow
London Bus Service

London Fire & Emergency Planning Authority
London Fire Brigade
London Transport Planning
London Underground Limited
Metropolitan Police
Ministry of Defence
Network Rail
North London LDZ
Slough Borough Council
South Bucks District Council
Spelthorne District Council
Surrey County Council
Hertfordshire County Council
Buckinghamshire County Council
TFL Street Management
The Environment Agency
The Housing Corporation
Three Rivers District Council
Transport For London

Local Strategic Partnership

BAA (Heathrow Airport Ltd)
Brunel University
Chimes Shopping Centre
Connecting Communities
Ealing Family Housing
Groundwork Trust
Hillingdon Association of Voluntary Services
Hillingdon Chamber of Commerce
Hillingdon Fire Service
Jobcentre Plus
Metropolitan Police
Older Peoples Forum
Pensions Service
Primary Care Trust
Uxbridge College
Uxbridge Retailers Association
Uxbridge Town Centre Manager
West London Learning and Skills Council

Parish Councils

Abbots Langley Parish Council - Three Rivers
Burnham Parish Council - South Bucks
Beaconsfield Town Council - South Bucks

Chorleywood Parish Council - Three Rivers
Croxley Green Parish Council - Three Rivers
Denham Parish Council Offices - South Bucks
Dorney Parish Council - South Bucks
Farnham Royal Parish Council - South Bucks
Fulmer Parish Council - South Bucks
Iver Parish Council - South Bucks
Sarratt Parish Council - Three Rivers
Stoke Poges Parish Council - South Bucks
Taplow Parish Council - South Bucks
Watford Rural Parish Council - Three Rivers
Wexham Parish Council - South Bucks

Libraries and Hayes One Stop Shop

West Drayton Library
 Northwood Hills Library
 Ickenham Library
 Yeading Library
 Hayes End Library
 Oaklands Gate Library
 Oak Farm Library
 Kingshill Library
 South Ruislip Library
 Manor Farm Library
 Eastcote Library
 Yiewsley Library
 Ruislip Manor Library
 Central Library
 Hayes Library
 Harlington Library
 Harefield Library
 Hayes One Stop Shop

Random Selection of Residents

50 random residents per ward
 50 random businesses per ward

Appendix 2: Summary of Representations

Org and / or Name	Ref Nb	Summary of comments received	Officer Response
Goldcrest Homes PLC		Acknowledged the consultation document, no response to the consultation.	Noted.
Whitethorn Estate Residents Association		Acknowledged the consultation document, no response to the consultation at this time but will respond over the coming months if time allows. PEP contacted Mr Carney on two occasions and he was unable to provide comments due to time constraints but did reiterate his interest in applications for the Whitethorn Estate only.	Noted.
London Underground Limited		Acknowledged the consultation document, no response to the consultation.	Noted.
Colin Gooderson Resident		Acknowledged the consultation document, no response to the consultation.	Noted.
The Environment Agency		Residential Extensions Will resist residential extensions that bring the built development within 8M of a watercourse. Section 2 should include “How to Submit a Planning Application, Part F – Information Required to Submit a	Comments noted, annotated accordingly. Comments noted, annotated accordingly.

		Planning Application and Sample Drawings”. Flood Risk Assessment (FRA) should be submitted as part of planning applications for residential extensions that fall within Flood Zone 2 or 3 as show on the Environment Agencies Flood Zone Maps. Flood proofing measures should be made into the design and construction of development in flood risk areas. New Residential Layouts In Table 1 – Design Statement: Checklist of elements to be considered in the appreciation of the context and site assessment. The following should be added: a) Whether site falls within flood risk zone and if so, details of the appropriate Flood Risk Assessment (FRA) that will be carried out. b) The previous use of the site and whether this could have resulted in land contamination occurring. If land could possibly be contaminated a desk top study should be carried out. Para 3.2; mention should be made to the need to carry out a detailed site investigation to establish if the site is contaminated, to assess the degree and nature of the contamination present and to determine its potential for the pollution of the water environment. Details of appropriate measures to prevent pollution of groundwater and surface	Comments noted, annotated accordingly. Comments noted, annotated accordingly. Comments noted, annotated accordingly. Comments noted, annotated accordingly.
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		water, including provisions for monitoring, must be submitted to and approved by the Planning authority before development is able to commence. Paragraph 4.4; the following bullet point should be added • “The impact of the proposed development on the physical environment i.e. whether the development will increase the risk of flooding or impact on watercourses or put excess strain on water resources. Where physical features exist on site the potential to enhance and improve these features as part of the development should be considered” Table 3 – Essential Local Area Distinctiveness and Character: Landscape Setting and Features. The note should read, “Note main features and layouts, which contribute to the landscape context, such as the occurrence and variety of trees and planting and common features, such as lawns, hedges, <u>watercourses and other water features such as ponds and ditches.</u>” Table 3 – Add a row entitled “Physical Constraints” which should read “Identify any physical constraints such as whether site is located in an Environment Agency Flood Zone i.e at risk of flooding, falls within a Groundwater Source Protection Zone, includes a watercourse or water feature”.	Comments noted, annotated accordingly. Comments noted, annotated accordingly. Comments noted, annotated accordingly.
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		Accessibility, Transport Interchanges and Shopfronts – No comments.	Noted.
The Theatres Trust		Acknowledged the consultation document, no responses to the consultation documents as they fall outside the cultural policy remit.	Noted.
Brunel University		Acknowledged the consultation document, no response to the consultation.	Noted.
Bellway Homes		Residential Layouts Para3.3: Max of 10% redevelopment is putting planning into a numerical regressive level and not judging on the suitability of individual projects. Para4.7/T2: It is not the responsibility of Local Planning Authority to judge suitable internal space standards. Table2 should be deleted. Fig 4.1: Bellway support this context. Para 4.15 Amenity spaces proposed are too rigid. Para 4.38: Disabled parking should be part of, not in addition to required parking provision.	Comments noted. Research currently underway regarding this query. Comments noted. Internal spaces standards will ensure that decent living environments are achieved. Noted. Comments noted, however, amenity space standards will ensure that sufficient private amenity space is provided as part of every proposal. Comments noted, annotated accordingly.

Broadway Malyan		Design Policies should avoid unnecessary prescription to detail. PPS1 states at paragraph 17 that: Planning policies should seek to protect and enhance the quality, character and amenity value of the countryside and urban areas as a whole. Paragraph 2.1 takes the matter further than envisaged by PPS1 by making this a requirement rather than something to be sought. Para 4.5 - Second bullet point does not relate to the main matter of the paragraph. Para's 4.6-4.8: Not clear whether Table 2 is net internal or gross external floorspace. Para's 4.15-4.17 -The amenity space standards are not supported by evidence; as such they are arbitrary and unsubstantiated. Para 4.16 - is a judgement made without substantiation. This approach is likely to prevent proper implementation of PPG 3 in achieving higher density development.	Comments noted. In line with Planning Policy Statement 1 (PPS1), high quality design will be sought on all planning applications, to ensure high quality environments. Comment noted and annotated accordingly. Comment noted, annotated accordingly. Comment noted and floorspace annotated accordingly. The amenity space standards for houses are a continuation of the existing 'Residential Layouts and House Design Guidance' standards. The standards for flats clarify existing guidance, which was non-specific and ensures that
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		Para 4.18 - It is unreasonable and too prescriptive to expect all ground floor units to have a private patio or garden. The requirement that communal amenity space should be solely for use by residents and secured is contrary to the central aim of creating integrated communities. Para 4.20 - Useable amenity space should be suitably located not “centrally” located Para 4.23 - This is too prescriptive and will not necessarily result in high quality design. Whilst it may be justified in areas of special character, there are also areas of poor or uninteresting character that can benefit from the uplift associated with modern and imaginative design that does not necessarily follow the established form or pattern of development. Para 4.34 - Parking guidance is too prescriptive and effectively rules out shared space. Para 4.38 - Clarification of the meaning of '10% of spaces over and above the allowed parking allocation' is requested	flatted schemes achieve satisfactory private amenity space. Comments noted. Comments noted, annotated accordingly. Comments noted, paragraph will be clarified to ensure that new development complements existing, or where relevant improves the area. Comments noted. The guidance does not resist shared parking but seeks to ensure safety and security in design where possible. Comment noted, the 10% disabled parking is included
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		Para 4.39 - Paragraph is inconsistent “cycle” not “bike”. “Guidance on cycle parking” not “car”.	within the overall parking allocation. Annotated accordingly. Comments noted. Annotated accordingly.
Harmonds worth & Sipson Residents' Association		Residential Layouts: Number of houses in Multiple Occupation should be reduced to reduce burden of local services (sewerage etc). They believe there is an imbalance in housing types, need more family housing. Disable access should be included as part of projects The 3rd runway would make 1200 homes unusable. All new schemes should include children’s play facilities and at least 2 car parking spaces.	Comment noted, this point is, however, more relevant to the LDF Core Strategy. Comments will be included as part of the Core Strategy Consultation. Comment noted, this is required with the Lifetime Homes standards. Comment noted, unable to incorporate as part of this document but is more relevant to the LDF Core Strategy, comments have been included as part of the Southern Hillingdon Area Action Plan consultation response to consultation. Comments noted. Childrens play facilities should indeed be

		Residential Extensions: Concerns over 'back garden development', freestanding building separate from the house, believe these should require planning permission. Distorts local area, destroys parking space n the property forcing parking onto roads. The residents association believe that these developments should require specific planning permission before they are completed, and that the council should have the power to halt construction until this is achieved.	incorporated where necessary. Paragraph 7.9 from Design Guide: Residential Layouts and House Design to be included in the Residential Layouts Guidance. However, 'at least 2 car parking spaces' can not be ensured due to the parking policy advice in the London Plan. Comments noted. Only outbuildings within the General Permitted Development Order are acceptable without planning permission. Houses in rear gardens require planning permission. In most cases, these are built under the GPDO; it is not lawful for these outbuildings to be used for living accommodation. As a result these are mostly built under the GPDO and as a result these are very difficult to monitor. This issue will be further raised with the Planning Enforcement team.
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		Concerns regarding “massive” side and rear extensions to existing homes and the subsequent distortion of the local area and is more serious when houses are converted into HMO’s. Accept comments on drainage of surface water for front garden parking. Accessible Hillingdon: Agree with accessibility SPD. One problem is street furniture, sign posts, advertising etc, cluttering up the pavement causing problems for people with poor eyesight. Immediate repair and maintenance of pavements and country footpaths to a standard suitable for elderly and disabled people.	Comments noted. This comment is more related to the existing situation as opposed to the new guidance. Each extension is assessed on a case-by-case basis and should be assessed in relation to bulk, scale and massing. Comments noted. Comments noted. The public realm element of the HDAS will consider this. The Public Realm document seeks approval for consultation at the December 2005 Cabinet meeting. Comment noted and forwarded to highways.
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		Transport Interchanges: Agreement with SPD. Opposed to Gov's policy of restricting parking space, mistakenly believed to reduce car use. Welcome increase of security on public transport. Shopfronts: Agree with SPD. Shop doors should be wide enough for invalid access (wheelchair), with no obstructive displays. Like shops windows to display goods not advertising, concerns expressed regarding obtrusive advertising.	Comments noted. Comments noted. Comment noted. Shop window advertising is outside the control of the local planning authority. External shop advertising is, however, within the control of the local planning authority.
Ruislip Residents Association		Acknowledged the consultation document as a comprehensive review of the subjects proposed policies, however, due to limited resources were unable to comment in detail.	Comments noted.

Rolfe Judd Planning on behalf of Domaine Developme nts Ltd (subsidiary of Ballymore properties Ltd)		Transport Interchanges Para 1.10: Support the designation of Hayes & Harlington Station as Category A interchange and the inclusion of Hayes Scrap Yard. Para 2.0: Part Support, As well as maximising high density housing, other intensive land uses ie, offices, retail & leisure to create a balanced integrated community. Para 2.8: Object. Measures of density extracted from the London Plan should be used flexibly, not prescriptive as to the upper ranges of density. Table1: Object. Table 1 does not reflect Table 4B.1 and should be replaced or deleted. Para's 2.16 - 2.17: Part Object. Car parking standards included in HDAS should reflect those in Table 4B.1. Table 3: Part Object. Table 3 should reflect Table 4B.1. Should encourage high-density residential development at Category A interchanges.	Comment noted. Comment noted. Mixed use development is acceptable in certain locations. Comment noted. The London Plan density matrix is a tool for assessing density levels, it is not static. Comments noted. The table has been modified to reflect the characteristics of Hillingdon. Comment noted, each application will be assessed on a case by case basis. Table will be altered or deleted. Comments noted. The table states "high-medium" which is considered acceptable in the borough context.
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		Residential Layouts Para 1.4: Part Support. HDAS Guidance on dimension standards should be applied flexibly. Para's 4.1 - 4.5: Part Support, should be mentioned that in certain circumstances densities in excess of the recommended standards would be acceptable. 3.3 - 3.5: Object. Preventing redevelopment of more than 10% of properties on a residential street conflicts with the aims of National & Strategic Policy. 4.6 - 4.8 - Table2: Object.	Comment noted. Comments noted. The documents are 'guidance' there is therefore no need to mention that varying densities would be acceptable. Comments noted. Research currently underway regarding this query. Comments noted, recommended floor space standards will help to ensure that an increase in density, will not compromise the habitable quality of homes.
London Fire Brigade		Acknowledged the consultation document, no response to the consultation.	Noted.
P.T Sherwood		Mentions concerns over recent/current loft conversions in the borough, which do not follow council policy, this is particularly highlighted in the Residential Extensions document Para 7.6.	Comments noted and forwarded on to the Planning and Transportation Group Enforcement Team.

RPS Planning on behalf Fairview New Homes Ltd		New Residential layouts should offer guidance, "should" implies required. Object that a formal design statement needs to be submitted for all new build. Should only be 40+. Accessible Hillingdon object to meeting J Rowntree standards, disabled access to 10% may not always be viable. Development at Transport Interchanges should be applied on a site by site basis, directly relating to the proposed development and reasonable in all aspects.	Comments noted and "should" is altered where necessary instances. Design Statements will not be required for householder applications but will be required for all other developments, in order to ensure that the application has fully considered the design of the neighbouring buildings as well as the proposed development. Lifetime Homes standards allow all members of the community access to their home throughout their lifetime and will help avoid major adaptations to houses and the need to move house for accessibility purposes in later years. Comments noted.
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CgMs Ltd, for Metropolitan Police		Para 1.8: Welcome the aim to 'design out crime at the early planning stages. Metropolitan Police Authority(MPA) support close liason with architects, Crime Prevention Design Advisor and Council officers. Para 2.34: Welcome the recognition to improve transport interchange but recommend that guidance includes the principles of Security by Design. Recognise the need for contributions towards policing for new developments.	Comments noted. Security by Design principles will be included where necessary. Section 106 financial contributions comments will be forwarded on to the Projects and Implementation Team.
B Buford /Resident		Worried that these guidelines will not be adhered to.	Comment noted. The Council aims to ensure that all applications are thoroughly assessed before approval.
South Ruislip Residents' Association		Supports good design as part of all planning applications. Infilling concerns, suggested that it is curtailed by setting maximum redevelopment percentages. Respect of the building line should be relevant to all applications. Concerned over workshops in gardens being converted into living accommodation, unlawfully.	Comment noted, design statements should help to improve design in the borough. Comment noted. This has been included in the Residential Layouts document, a 10% redevelopment maximum on the one street. Comment noted. The importance of respecting the building line will be reiterated where necessary. Comments noted. Only outbuildings within the General

			Permitted Development Order are acceptable without planning permission. Houses in rear gardens require planning permission. In most cases, these are built under the GPDO, although be used for living accommodation is not lawful. As a result as these are mostly built under the GPDO they are very difficult to monitor. This issue will be further raised with the Planning Enforcement team.
English Heritage		Transport Interchanges: Makes reference to impact of Conservation Areas upon applying the proposed Transport Development Areas principles but no indication how principles would be altered. No ref to impact on assets such as listed buildings, Historic Parks etc. Shop Fronts: Welcome the guidance. Residential Extensions: Welcome guidance but concerned over no reference to residential extensions on listed buildings or in conservation areas.	Comments noted, annotated accordingly. Comments noted, annotated accordingly. Comment noted. Comment noted, each application is assessed on a case-by-case basis.

		Residential Layouts: Would like the checklist of elements to include the need for applicants to demonstrate an understanding and appreciation of the historic environment. Accessible Hillingdon: Easy Access to Historic Buildings published by English Heritage may help inform how to develop a framework for the requirements of each property and its users.	Comments noted, annotated accordingly. Comments noted and included.
Hayes & Harlington Local History Society / Hayes & Harlington Community Development Forum		Accessible Hillingdon: Clarify that 'external environment' includes both public and private domains, 100% support. Proper access (ramps) should not be as secondary add-ons but be fully integrated from the onset. Shop Fronts: A well considered document, not everyone will know what PPG6 or UDP means, worth referring to Accessibility Statement. Transport Interchanges: Caution that Table1 densities are not necessarily appropriate for Hillingdon (para 1.8), PTALs rarely exceed level 4, could be a licence for unacceptably dense developments. Residential Layout: Para 4.3, Applicable to Conservation Areas as well as Areas of Special Local Character.	Comments noted Comments noted. Annotated accordingly. Comments noted. Comments noted, each application will be assessed on

		Large unbroken areas of parking within developments are also unacceptable. Residential Extensions: portray only examples of good presentation rather than the 'average' shown here. Front garden parking is an increasing concern.	its own merits. Comments forwarded on to traffic DC. Comments noted.
Force Group		Concerns about the previous development near by Carmichael Close, the flats now dwarf the houses and many gardens now contain buildings that appear to be homes.	Comments noted, the buildings in gardens query has been passed on to the Planning and Transportation Group Enforcement Team.

Transport for London		Accessible Hillingdon: Support and welcome the proposals, would be useful to mention accessible bus stops. Transport Interchanges: Welcome the SPD but seems to have a number of different themes, not clear on the purpose of document. No clear definition of Transport Interchanges, para 1.10-1.16 are unclear. Generally the design principles relating to Transport Interchanges are good. Like to see stronger recognition of TfL as a major stakeholder in respect of transport interchanges. Residential Layouts: A well-considered detailed guidance. Elements in Table 1 relating to the checklist for design statements could be expanded to include more transport elements eg, cycle routes, walkways, routes to public transport etc. Welcomes the statement regarding PTAL method and mention that this will not be the sole means of assessing the appropriateness of new housing proposals.	Comments noted, document annotated accordingly. Comments noted, more clear definition of the Transport Interchanges and the purposes to be included. Comments noted. Annotated accordingly. Comments noted, items added to check list. Comments noted.
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British Waterways London		Residential Layouts; 2.3: Support any watercourses and potential to retain and enhance them. Development & Transport Interchanges: 1.5; Object, this paragraph should reflect national, regional and local transport policy to encourage waterbourne freight and passenger transport. Transporting construction materials etc by water would contribute to sustainable development. Developers should fully explore opportunities to for freight and should be taken into account during the determination of planning applications, policies and planning guidance. BW considers that the LDF should give recognition of and support the transport of freight by inland waterways and the potential of waterbus, taxi and boat trip services. 3.4; Object, the appraisal of PPG13 should also mention; Local Authorities should work with BW & other navigation authorities to protect and re-use disused waterways, wharves and basins; retain boatyards and other associated services to develop the potential of inland waterways.	Comments noted. Comments noted. These points are, however, more relevant to the LDF Core Strategy, these comments will be included as part of the Core Strategy Consultation. Comments noted. These points are, however, more relevant to the LDF Core Strategy, these comments will be included as part of the Core Strategy Consultation.
Oak Farm Residents Association		Residential Layouts: 1.6: Planners are encouraged to discuss pre-applications with local community. 1.8: Applications should incorporate the aims of The Council S.P.G. Community Safety by Design 2004.	The Council provides a duty planner service, which allows the public to visit the civic centre or specific library for planning advice.

		Page very helpful on all planning applications. 3.4: Backland development. Houses-flats built within garden of existing properties. The plot should be sufficient depth to accommodate new housing in a way, which provides a quality residential environment. plots less than 80m are unlikely to be acceptable. Residential conversions & Accessible Hillingdon: P16- 2.24: Facilities for waiting at public transport interchanges should include shelter, seats, clocks, telephones, toilets. P32: Tradesmen who carry tools need cars and vans also many have jobs miles from home, public transport is not practical. Not practical for people who would need to use two or three bus routes to work, especially when buses are taken out of service as so frequently happens.	Comment noted. Annotated accordingly. Comments noted. All planning applications are assessed on their own merits. All comments noted. Annotated accordingly. Comments noted.
K.Peggs		Strong objections to the lack of road signs in the area, ie; Harmondsworth village. Poor public transport links from the villages and airport to Uxbridge. Would like to see Brunel University with its own separate transport links.	Comments noted and forwarded to the Highways Department and the Environmental Protection Unit. Comment noted, this point is, however, more relevant to the LDF Core Strategy. Comments forwarded.

Internal Officer Comments	<u>HDAS</u> <u>Residential Extensions</u> 1.11 - consider including garage dimensions. 9.5 – Should the dimension be 2.4m not 1.2m 2.1 -p.7 A-What Do I do First? Re-title: Issues to consider p.7 cl. 2.1 – Possible addition of the following sentence “<i>Are there trees, or other significant landscape features, on or close to the site. Will they be retained or removed as part of the proposed development?</i>” p.9 cl. 2.10 -Possible addition of the following sentence “<i>Any trees, hedges or other significant landscape features on, or close to, the site. (Tree survey information, in accordance with the relevant British Standard, should be provided)</i>”. p.9 cl.2.10 - Possible addition of the following sentence “<i>Any proposed changes to levels or new services near to retained trees</i>” p.9 cl.2.10 - Possible addition of the following sentence “<i>New landscape, including planting and hard surfacing</i> p.10 Site layout 1:500 SHOW/ANNOTATE <i>Tree to be removed... New tree planting ...New hedge planting</i> (with appropriate/conventional graphical symbols)	Comment noted. Comment noted, annotated accordingly. Comment noted. Para 2.1, annotated accordingly. Comment noted. Para 2.10, annotated accordingly. Comment noted. Para 2.10, annotated accordingly. Comment noted. Para 2.10, annotated accordingly. Comment noted. Page 10, annotated accordingly.
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		p.20 cl.5.14 line 9 Consider revising sentence to read: ..."windows and 24m from window to patio <i>window</i>" (for clarity) p.31 Front gardens and parking needs altering. p.31 cl.11.2 ...'may...at least 25%' – is this justified? p.31 cl.11.2 Gravel is not necessarily an appropriate form of ground cover for parking(although it can look good and be good for SUDS). Refer to surface materials section in 11.4. p.31 cl.11.4 'compliment' should read '<i>complement</i>' ? General Comment: Also noted in this guide and/or residential layouts, the inconsistent use of 'usable/useable'...should be usable? P.3 Para 1.1 alter ' known as a Lawful Development Certificate' to "known as a Certificate of Lawful Development". There is a reference to 2 appendices in para 1.2 and para 1.3, however, there are no appendices attached to	Comment noted. Para 5.14, annotated accordingly. Comment noted. Para's 11.0-11.2, annotated accordingly. Comment noted. Para 11.2, wording slightly altered. Comment noted. Para 11.2, annotated accordingly. Comment noted. Para 11.4, annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly.
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		the document. Place Para 1.19 as a bullet point on 1.17. (Regarding satellite dishes). P.6 Important notes – insert “Only attached” before “Extensions built prior to this date”. P.6 Add a new paragraph 1.21 – <u>Conservation Areas and Areas of Special Local Character</u> Proposals for sites within a Conservation Area or an Area of Special Local Character will require: • A higher standard of design • Traditional materials • Features that are complementary to the existing building. P.6 Add a new paragraph 1.22 – <u>Listed Buildings</u> Please note the following for proposals to Listed Buildings: • You will need listed building consent • You must preserve the historic integrity and character of the Listed Building. • Listed Building consent will be required for all internal and external works including drainage, pipe work, ductwork affecting walls, floors and ceilings and all internal and external finishes	Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly.
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		ceilings and all internal and external finishes. • It is a criminal offence to carry out unauthorised works to a listed building. • Applications should include large scale plans of existing and proposed development. P.7 before ‘In Person’ add – Local Library as a new topic and the following information “Planning Officers will also be available one morning per week, in two local libraries from September 2005.” P.8 after Email – Insert “Please be aware that the advice given is informal officer advice and not a legally binding decision of the local planning authority. If you wish to have such a decision it will be necessary to apply for either a Certificate of Lawful Development or for the relevant planning permission.” P.8 Add Building Control to the Numbers listing 01895 250555. P.8 - 2.8 - insert after “the required information”, “including the correct ownership certificate.” P.8 – 208 – after “two adjacent roads” add, “with the road names given”.	Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly.
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		P.9 – 2.9 change “buildings regulations department” to “Planning Reception, where a fee will be charged”. P.9 – 2.9 change bullet 1 from “The application site (normally your house and garden)” to “ All of the land to which the application relates (normally your house, garden, the drive and any shared access)”. P.9 – 2.14 – after “office hours” insert “and via the Council’s website until such time as the application has been determined”. P.11 – 2.17 – Delete “Head of Planning and Transportation” and insert “Director of Planning and Transportation”. P.11 – 2.17 – Delete “Head of Service” and insert “Director”. P.11 – 2.17 – Delete “delegated” and insert “delegation”. P.11 – 2.17 – Delete “council” and insert “Council”. P.11 – Add 2.21 – “Please ensure that your builders are considerate about your neighbours in terms of hours of	Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly.
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	working and noise. They are not allowed to store materials on or work from neighbours land without their consent.” P.12 – 3.0 – after “the appearance of the original house” insert “the amount of garden remaining”. P.12 – 3.0 – replace “ the criteria for single storey rear extensions (as set out in section 3 below)” with “the criteria for single storey rear extensions (as set out in Section 4 below). P.12 – 3.1 after “overhanging roof” add “and guttering”. P.12 – 3.2 – replace “5m wide-3.3m:” with “5m wide – an extension up to 3.3m deep is acceptable.” P.12 – 3.3 – replace “5m wide – 3.6m (12ft)” with “5m wide – an extension up to – 3.6m deep is acceptable”. P.12 – 3.4 – replace “Detached houses 3.6m (12ft) or 4m (13.33ft) if the” with “ Detached houses and extension up to 3.6m deep or 4m deep if the”. P.12 – Para 3.4 – after “habitable room.” Insert “are acceptable.” P.13 – Para 3.5 - after “limits being exceeded.” Add,	Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly.
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		“Extensions added onto extensions may not be in character with the original house. P.13 – Para 3.5 – Give “planning department” capital letters. P.13 – Para 3.7 – replace “page 13” with “page 14”. P.14 – 3.11 Name this paragraph “Windows and Doors”. Name 3.12 “Materials” P.14 – Para 3.11 – replace “ If windows are located on a side-wall they should be at a high level, non-opening or fitted with” with “If windows are located on a side-wall they should be at high level or non-opening below 1.8m above internal finished floor level and fitted with”. P.15 – Para 3.14 after “unacceptable” add “because an extension added to an extension does not always respect the character of the original building; and because size thresholds may be exceeded”. P.16 - Para 4.1 – After “ A flat roof over a single storey side extension will” insert “generally will be acceptable where these are characteristics of an area otherwise they will”.	accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly.
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		P.17 – 4.7 – Change the title of the paragraph from “Windows, Doors & Materials” to “Windows and Doors”. P.17 – 4.7 – before “non opening “ insert “or. After “non opening” delete “or” and replace with “and”. After “and” insert “below 1.8m above internal finished floor level”. P.17 – Para 4.8 – entitle “Materials”. P.17 – Para 4.10 – delete “Granny” from title, the new title should read “Annexes”. P.17 – Para 4.10 & 4.11 – delete all “Granny”. P.17 – Add a new para 4.12 “The door should be set back 6m from the highway to allow a vehicle to enter the site and not interfere with the safe and free flow of traffic”. P.18 – para 5.0 - after “overall street”, insert “scene”. P.18 – para 5.0 - after “It should be noted that where a two storey” delete “rear” and replace with “side”.	Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly.
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		P.18 – para 5.0 – “(as set out in section 5 below)” replace 5 with “6”. P.18 – Para 5.2 – line 2 insert “the” after “and”. P.18 – Para 5.3 – delete “(see fig 4.2)”. P.19 – Para 5.4 – last line, capitalise “areas”. P.19 – Para 5.10 – replace “The width and height of the extension to all house” with “The width and height of the extension in relation to the original house”. P.20 – Para 5.11 – change title to “Windows & Doors”. P.20 – Para 5.11 – after non-opening delete “or” and insert “below 1.8m above internal finished floor level and”. P.20 – Para 5.12 – entitle “Materials”. P.20 – Para 5.14 – replace “However, in some situations,” with “ However, in these situations where”.	accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated
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		P.20 – Para 5.15 – delete “Granny” from title, the new title should read “Annexes”. P.20 – Para 5.15 & 5.16 – delete all “Granny”. P.21 – Para 6.0 – delete “and the character of the street”. P.21 – Para 6.2 – replace “mid-point” with “nearest”. P.21 – Para 6.3 – delete “(see figure 5.3 previous page)”. P.21 – Para 6.4 – after “overhanging roof” add “guttering”. P.21 – Para 6.4 – delete both references to “(12ft)”. P.22 – Para 6.5 – after “being exceeded” add “and be out of character with the original building”. P. 22 – Para 6.9 – Change the title to “Windows & Doors”.	accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly.
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		P.22 – Para 6.9 – delete “or” and replace with “below 1.8m above internal finished floor level and”. P.22 – Para 6.10 – Entitle “Materials.” P.22 – Para 6.11 – Delete “New residential development” and replace with “Extensions”. P.22 – Para 6.11 – delete “its” replace with “their”. P.22 – Para 6.14 – Add a sentence at end, “Living rooms at first floor may require insulation if adjacent attached properties have bedrooms adjoining.” P.23 – Para 6.14 – delete “Within new housing layouts it”. Replace with “It”. P.23 – Para 6.15 – Delete “each side of the normal”. P.23 – Para 6.17 – After “fixed obscure glazing” insert “or non-opening obscure glazing below 1.8m above internal finished floor level”. P.23 – Para 6.17 – Delete “Obscure windows are only	Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly.
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		acceptable to non-habitable rooms” and insert “Obscure glazed windows are only acceptable to non-habitable rooms. It is not acceptable to provide bedrooms with obscure glazing or high-level windows”. P.24 – Para 7.1 – delete “ahead of more detailed advice:” P.24 – Para 7.2 – Delete “Roof Extensions” replace with “Dormer Windows”. P.24 – Para 7.2 – after “unless” insert “this is”. P.24 – Para 7.3 – replace “varys” with “varies”. P.24 – Para 7.3 – after “it is common for” insert “the”. P.24 – Para 7.3 – after “public roads and car parks” add “and on corner plots”. P.24 – Para 7.4 – delete “still matter” replace with “do impact on residential amenity” and “impact on” with “affect”.	Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly.
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		P.24 – Para 7.5 – delete “clearly”. P.24 – Para 7.5 – Delete “a large box” and replace with “an effective flat roofed third storey”. P.24 – Para 7.5 – Delete “”so-called”. P.24 – Para 7.5 – Add inverted commas to “ “conservation rooflights” “. P.24 – Para 7.5 – Delete “discrete” replace with “discreet”. P.24 – Para’s Hipped to Gable 7.6, 7.7, 7.8 – Move to after Para 7.13 and renumber. P.25 – Para 7.9 – move to after 7.5 (after diagram). P.25 – Para 7.6 – insert “a” before “pair of semi-detached”. P.25 – Para 7.6 – insert “a” before “terrace”.	accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly.
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		P.25 – Para 7.8 – replace “planning office” with “Planning Department”. P.25 – Para 7.12 – delete “you intend to use”. P.26 – Para 7.14 – place a full stop after “prior to approval”. P.26 – Para 7.14 – capitalise “groups”. P.26 – Para 7.14 – bullet 3 – replace “will” with “should”. P.26 – Para 7.15 – replace “while the” with “whilst the”. P.26 – Para 7.15 – Capitalise “listed building”. P.26 – Para 7.16 – Capitalise “Conservation Areas”. P.26 – Para 7.16 – Capitalise “listed building”. P.26 – Para 7.16 – Delete “Conservation Area Consent”.	Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly.
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		P.26 – Para 7.16 –Delete “/or”. P.26 – Para 7.16 – Replace “have regard for” with “have regard to”. P.26 – Para 7.16 – Replace “roof lights are” with “roof lights is”. P.26 – Para 7.17 – “While” – replace with “Whilst”. P.26 – Para 7.17 – After “properties or gardens” insert “such that there is no over looking”. P.27 – Para 8.1 – delete “do”. P.27 – Para 8.1 – delete “adjacent”. P.27 – Para 8.2 – insert “Pastiche” before historic. P.27 – Para 8.2 – Add a new bullet point after bullet 2. “Any porch should not diminish the scale, design, character or appearance of any bay window”.	Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly.
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		P.27 – Para 8.3 change title to “Front Bay Windows”. P.27 – Para 8.3 line one – replace “bays” with “bay windows”. P.28 – Para 9.0 – delete “Amongst other things”. P.28 – Para 9.0 – replace “an” with “An”. P.28 – Para 9.0 – delete “who would like to” and replace with “can”. P.28 – Para 9.0 – delete “can do so”. P.28 – Para 9.0 – replace “under” with “as”. P.28 – Para 9.0 – replace “a planning officer”. P.28 – Para 9.0 – after “sleeping purposes or” insert “separate cooking or bathroom facilities or”. P.28 – Para 9.1 – Delete “However, there are a number of	Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly.
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		new properties that have had these rights removed. Similarly, there are many". Replace with "There are a number of new properties that have had these rights removed, and there are many". P.28 – Para 9.4 – After "house. These" insert "uses". P.28 – Para 9.4 – delete "home workshop" and replace with "use as a". P.28 – Para 9.4 – insert "gym" after "shed". P.29 – Para 9.4 – replace "for either" with "for any". P.29 – Para 9.5 – delete "to". P.29 – Para 9.5 – delete "outbuilding" replace with "garage". P.29 – Para 9.5 – delete "and is to be used as a garage". P.29 – Para 9.7 – Delete "Depending on when the house or garage was originally granted planning permission."	Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly.
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		P.29 – Para 9.7 – after “attached to the” insert “original planning”. P.29 – Page 9.8 – delete “conditioned” and replace with “limited by condition to use for storing a motor vehicle only and no other use”. P.29 – Page 9.8 – after “convert it” insert “to living accommodation”. P.29 – Page 9.8 – replace “is not conditioned” with “is not limited by a condition”. P.29 – Page 9.8 – capatilise “the council”. P.29 – Page 9.8 –replace “overall street” with “street overall”. P.30 – Para 10.1 – replace “Front walls and fences over 1m in gardens” with “Walls and fences over 1m in front gardens”. P.31 – Para 11.1 – delete “in respect of a new vehicle crossover or dropped kerb” and replace with “to ensure that new vehicle cross over or dropped kerb complies with the requirements of the Highways Department”.	Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly.
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		P.31 – Para 11.1 – Insert new line at end of paragraph “A wide crossover will not be acceptable where there will be a danger to pedestrians”. P.31 – Para 11.2 – delete “we may require”. P.31 – Para 11.2 after “front garden” insert “may be required”. P.31 – Para 11.2 capitalise “council”. P.31 – Para 11.3 – Add to bullet 5 “to meet the requirements of Part M of the Building Regulations, normally 1m or access for a wheelchair user.” P.31 – Para 11.4 – replace “compliment” with “complement”. Insert Paragraph on Building Line, no specific location: Building Lines Careful consideration should be given to the location of extensions to buildings, building lines, frontages and entrances should be respected. Building lines within schemes should relate to the street pattern, although in	Comment noted. Annotated accordingly. Comment noted. Annotated accordingly.
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		some instances varied buildings lines can achieve diversity and interest. Development should have a clearly defined building line creating a clear visual edge. Insert paragraph on daylight and sunlight, no specific location: Daylight / Sunlight Daylight is the volume of natural light, which is required to enter a dwelling to provide satisfactory illumination of internal accommodation between dawn and dusk. The Building Research Establishment's report ' Site Layout Planning for Daylight and Sunlight 1991 ' recommends that suitable daylight to habitable rooms is achieved where a 25 ° vertical angle taken from a point 2 metres above the floor of the fenestrated elevation is kept unobstructed. When this criteria is applied to the rear of a dwelling the resulting dimension will normally be satisfied within the length of the smallest recommended size for a private garden. However, where main habitable rooms are located to the front of a dwelling daylight may be affected if dwellings on the opposite side of the street are very close (i.e. less than 10m. in the case of two storey dwellings). Insert Image - Building Research Establishment – Recommended Daylight Criteria Similarly, large two storey extensions, which are positioned close to a boundary, may not be acceptable if they have a	
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		• Planting Detail • Landscape Structures • Relationship to Building Proposals • Management Plan • Context • Identity • Connection Add the following as essential elements to consider when preparing a planning application: • Presentation • Landscape Design Quality • Landscape Design Statement • Site Layout • Elements in the Landscape • Existing Trees • New Tree Planting • Hedges and Shrub Planting • Grass • Standards and Specification • Establishment, Management and Maintenance • Hard Surfacing • Conflicting Site Demands Include reference to PPS1 at the beginning of the document The current title targets a detailed and control-led	Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly.
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	perspective on future development, and as a result will not be able to address larger development schemes effectively. 'New development sites' could be an alternative title. 4.4 – The Council currently uses PTALs for less than 10 dwellings. 4.38 - incorrect - the min. 10% disabled parking provision is inclusive 5.6 & 5.7 – This section may benefit from a note on adequate vehicular visibility. Issue of locating residential housing in areas of current poor environmental quality should be mentioned. Para - 1.3, line 3 Include after intensification and “<i>regeneration of brownfield sites</i>”. 1.5 This guidance, instructing applicant to approach individual officers, is contradictory to the recently introduced procedure which encourages applicants to write in and submit pre-applications to Development Control or Major Development Applications Team (depending on the character of the application) for a joint assessment in the recently established pre-application meetings on Fridays. From an urban design point of view, the Residential Layout	Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly.
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		document takes a too narrow, and development control led approach, rather than approaching new development from a strategic and sustainability perspective. 1.5 The correct name of the section is: Urban Design and Conservation. Correct telephone number is 01895 277937 1.7 This is not particularly helpful. Please make reference directly to the website. 2.0 Design Statements This section lacks an introduction referring to new policy on this matter (Design Statements), which is key. 2.2 It is not recommended to use the word <i>elements</i>, since it is exactly what the current reform on heritage and the ethos of urban design is trying to move away from. It is a holistic, sustainable approach based on existing qualities and characteristics that should be guiding any changes/improvements of use. 2.2 NB. Design Statements will not be required for household applications – please change text. Please make reference to national guidance. Please see me for further details. 2.3 Alter ‘site assessment’ change to ‘assessment of the area, comprising the application site and its context.’	Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly.
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		Table 1 – Alter ‘elements’ to ‘key aspects’. The contents of the table takes a too narrow perspective. Suggestions: • Any site specific planning designations such as: Metropolitan Green Belt, Conservation Area, Area of Special Local Character, Statutorily or locally Listed buildings, TPO;s • Adjoining planning designations. • Existing land use and site history. Type of land use, scale, character, age and history of existing built elements on the application site. • Surrounding context, landuse, scale, character, age and history. Townscape, height, massing, scale and rooflines, Views, vistas, landmarks , • Boundary treatment character, material, height • Building line, location and extent of gardens (front/back), configuration of plot • Existing vegetation on the site • Prevalent building pattern in the neighbourhood 3.0 New development opportunities 3.1 ...character dating from Victorian, Edwardian or inter-war periods..... This statement is too specific and could be detrimental to its aim, by excluding other valuable buildings/areas of local distinctiveness from other periods. The guidance should make reference to local distinctiveness and be more	Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly.
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		make reference to local distinctiveness and be more generic. The text could be reinforced by photographs exemplifying the above (Northwood – large plots, inter-war buildings in Old Uxbridge Conservation Area etc). 3.2 The need for establishing a robust green structure in industrial areas should be mentioned here. 3.3 Every site needs to be assessed on its own merits. This applies also to neighbourhoods/streetscapes, and indicating a general percentage of how many detached houses that can be re-developed into flats without harming the character and appearance of the neighbourhood is unwise. 3.4 Please make reference to the overall character. It is not about percentage. 3.5 See 3.4. 4.0 Design Guidance This chapter would benefit from an introduction, putting the quantitative aspects into a broader qualitative and visionary context. 4.10 Change 'dictated' and 'rule' to more appropriate words.	accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly.
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		4.15 Stretch the boundaries of the blue table in order to create more spacing and make the text more clear cut 4.17 See 4.15 4.24 Change to - Over time (not historically). 4.26 Start with...contribute to the local distinctiveness, enhance private...quality of streetscene and help to reduce crime. Figure 4.5 This illustration is misleading – not a particularly well designed car park! 4.37 Where parking is located to the front – nb make reference to the importance of size of the car park, proportions between the car park and the development, the choice of suitable hard landscaping materials. We should make it clear that the location of any car park is subject to the local circumstances. Sometimes car parking at the front of the building will not be achievable in order to retain and enhance the local character of the area. 4.42 In designing.....height, massing, proportions and	accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly.
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		roofscape..... Last sentence:: Garages and other outbuildings should always be subordinate in size and appearance to the main dwelling, and relate well to the design of the surrounding buildings. 5.0 Integrating Development in Residential Areas 5.1 & 5.2 These paragraph needs to be re-written. Table 3 – Re-write the title and reconsider the contents of the table. 6.0 Glossary also to include Brownfield sites, Local distinctiveness, Planning designations, built elements, Conservation Area, Area of Special Local Character, Listed buildings – statutorily and locally listed ones, TPO. Add to P.7 – Para 4.9 Further information on new building work close to trees and tree protection may be obtained from various documents including: British Standard BS 5837 (1991) “Trees in Relation to Construction”; the National House – Building Practice Note 3 “Root Damage by Trees – Siting of Dwellings and Special Precautions”, Building Research Establishment. “Site Layout Planning for Daylight and Sunlight”, 1991;BRECSU, guide 73, “Energy Efficient House Design Exploiting Solar Energy”. P.8 - Fig 4.1 The sketch plan (about sunlight, daylight etc) should include a North point, trees and should be clearer.	Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly.
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		P.9 - Fig 4.2 Insert a north point. P.12 - Fig 4.4 Add trees to this frontage. P.14 - Fig 4.5 Large, treeless parking courts are unlikely to be acceptable, the rear gardens back onto the parking area resulting in little surveillance. Consider altering diagram. P.15 - Para 4.41 Delete "Wheelie bins and other". P.15 - Para 4.41 Unhelpful description of bin stores. Please insert after "areas for the residents, "The best bin stores are solid (but well-ventilated) with walls/doors/roof (to prevent wind blown litter, over flow, accommodate bulky items, prevent vermin etc). If well designed, they can be accommodated within the landscape and screened by planting." P.16 - Table 3 Add: Tree Preservation Orders and Conservation Areas. Accessible Hillingdon Para 5.5 - Is the 3.3m dimension correct? Standard disabled bays are 3.6m x 2.4m.	Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted, this point is, however, more relevant to the LDF Core Strategy. Comments will be included as part of the Core Strategy Consultation. Comment noted. Annotated accordingly.
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		See also 5.11 general - no specific mention of lifts from parking areas Table 3 will contradict the parking standard's minimum 10% disabled provision <u>Development at Transport Interchanges</u> Table 1 – Suggestion that the Council set a lower limit on the parking provision for flatted development. Useful to include in the aims the desire to improve the hub environment in itself to ensure levels of pollutants are minimised. <u>Shopfronts</u> It could be mentioned that projects over the public highway may require a separate licence from Highways or that ramps are unlikely to be authorised within the public highway. Pollution concern with pavement cafes close to heavily trafficked roads. Important to mention - Undercroft & basement parking not mentioned - are they relevant	Comment noted. Annotated accordingly. Comment noted. Annotated accordingly. Comment noted. Annotated accordingly.
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