

## TWO PETITIONS RELATING TO THE CORE STRATEGY CONSULTATION

<b>Cabinet Member</b>	Councillor Keith Burrows
<b>Cabinet Portfolio</b>	Cabinet Member for Planning and Transportation
<b>Officer Contact</b>	Jales Tippell (tel. 01895 556763)
<b>Papers with report</b>	Two petitions received in July 2010

### HEADLINE INFORMATION

<b>Purpose of report</b>	To inform the Cabinet Member that two petitions have been received in response to the Core Strategy public consultation which took place between June - July 2010.
<b>Contribution to our plans and strategies</b>	The request will be considered as part of the Core Strategy consultation responses.
<b>Financial Cost</b>	There are none associated with the recommendation to this report.
<b>Relevant Policy Overview Committee</b>	Residents' and Environmental Services
<b>Ward(s) affected</b>	Yiewsley and West Drayton

### RECOMMENDATION

It is recommended that the Cabinet Member for Planning and Transportation notes the petition and:

1. instructs officers to make changes to the Core Strategy Key Diagram and Map 5.1 to clarify the areas for growth, and to add text to Table 5.3 which makes clear that growth in the Heathrow Opportunity Area will be focused on sustainable locations. These changes will form part of the revisions to the draft Core Strategy which are due to be considered by Cabinet at its meeting in November.
2. instructs officers to update the High Speed Two sections in the Core Strategy. This change will form part of the revisions to the draft Core Strategy which are due to be considered by Cabinet at its meeting in November.

### INFORMATION

#### Reasons for recommendation

To ensure the Core Strategy consultation process helps to shape the content of the document, and that comments and recommendations by interested parties are accommodated where appropriate.

## Alternative options considered / risk management

The Cabinet Member may decide not to instruct officers to make any further changes to the Core Strategy as a result of the petitions.

## Comments of Policy Overview Committee(s)

None at this stage.

## Supporting Information

1. Two petitions were received as part of the Core Strategy consultation process.
2. A petition of 194 signatures was submitted under the following terms:

We the undersigned object strongly to the widespread extension of the Heathrow Opportunity Area over the residential areas of West Drayton and much of Yiewsley and within this the designation of most of this area as being suitable for office and hotel development. We ask that:-

- (i) all commercial development and non-residential development be restricted to existing commercial areas
- (ii) all existing residential areas and estates in West Drayton be fully protected from any commercial development, transport hubs and infrastructure
- (iii) the plans and text of Hillingdon's Core Strategy be amended accordingly

The petition is from 'West Drayton and Yiewsley Residents' and was organised by Ms Janet Sweeting and Mr Ralph Dolbear.

3. 32 standard letters signed by individuals were also sent in response to the consultation and are being treated as a petition. The letters were submitted under the following terms:
  - i). The consultation period is too short; it does not allow local residents the time to adequately study the document and make informal comments.
  - ii). There has been very little publicity about the document in order to inform residents, and especially those in West Drayton what changes would take place to their communities if the Council approves the document.
  - iii). That designating the whole of West Drayton and much of Yiewsley as a Heathrow Opportunity Area must be revised as the majority of West Drayton and Yiewsley is currently residential with areas of Special Local Character and Conservation Areas included. Any Heathrow Opportunity Area must not be to the detriment of the local population and its way of life and environment. We ask that the Heathrow Opportunity Area be confined to those areas, which already have or have had business and/or industrial use.
  - iv). The plan states that the Council is not seeking views on HS2 as the proposed scheme, by the previous Labour Government, would come forward in phases from 2026, i.e. out of the scope of the current plan. However, this is now not the case as the present coalition government has plans to build HS2 to a much tighter timescale. Moreover, it is likely that the first phase will include the proposal to build a Heathrow Hub within the borough of West Drayton, possibly to be

completed by 2017. Therefore it is imperative that this section is rewritten in order that the residents in the areas most affected, and particularly West Drayton are given a chance to comment on this change of policy.

Given the poor publicity on issues such as the Heathrow Hub and The Heathrow Opportunity Area, the majority of the people in West Drayton and Yiewsley are currently totally unaware of the impact that these two issues will have to their quality of life and their environment. In order to ensure that proper and informed consultation is possible, we ask that the consultation document be revised to reflect the change of circumstance that the new government has brought. In addition, the Council should organise a series of meetings so that local residents can have their say, as well as producing a simple information leaflet for local residents in which the proposals are clearly spelt out. Without these steps the consultation must be viewed as significantly flawed.

The letters were also organised by Ms Janet Sweeting and Mr Ralph Dolbear.

4. Both petitions express concern about the 'Heathrow Opportunity Area' designation and the impact of this on Yiewsley and West Drayton.
5. The second petition additionally submits that the consultation period was too short and that the section on High Speed 2 (HS2) should be rewritten to reflect recent changes to the construction timetable.

#### Heathrow Opportunity Area

7. Opportunity Areas are a London Plan designation which boroughs are required to include in their Development Plan Documents (DPDs). Opportunity Areas (OA) are the capital's major reservoir of Brownfield land and a key spatial priority of the London Plan. They have been identified on the basis that they are capable of accommodating substantial new jobs and homes. Hillingdon is required to accommodate a proportion of 9,000 new jobs and 6750 new homes in the Heathrow OA to 2026; the period of Hillingdon's Core Strategy. The label of 'Heathrow' refers to the area (which extends outside Hillingdon's borough boundary) rather than the Airport. However the Airport is obviously a major economic factor and a source of many local jobs.
8. The Core Strategy covers broad issues including where and how the borough will accommodate new jobs and homes. It therefore indicates the general area of Hillingdon which falls within the OA designation, but does not suggest a defined boundary. This is because it is a high-level strategic document and detailed proposals will be brought forward through the Heathrow Area DPD, cross-boundary working with Hounslow and partnership working with the Greater London Authority and other interested parties. It will be subject to public consultation.
9. Yiewsley & West Drayton forms part of the Heathrow Opportunity Area. Table 5.3 of the Core Strategy sets out future growth for the Heathrow OA and identifies Yiewsley & West Drayton as suitable for regeneration opportunities through the new Crossrail station at West Drayton, the Grand Union Canal, mixed use development schemes, modern business accommodation, and improved public transport. It is important to include Yiewsley & West Drayton in the Heathrow OA so it can benefit from the inter-relationship of the area, for example access to new jobs, affordable homes, and better public transport links.

10. Detailed proposals for the area will be set out in a future Heathrow Area DPD; however there are no plans to intensify industrial or hotel uses in Yiewsley and West Drayton. The Council does not want industrial uses in residential areas and Policy E1 of the Core Strategy protects existing employment land for employment uses for this reason. In addition, development management policies control inappropriate development.
11. Policy E1 of the Core Strategy also manages the release of surplus industrial land. As part of the regeneration plan set out above (and in Table 5.3 of the Core Strategy), part of the Trout Road industrial site is identified as having potential for release for other uses. This could include mixed use schemes with modern business accommodation. Policy E2 of the Core Strategy proposes hotel growth for Uxbridge, Hayes and sites on the Heathrow perimeter. No hotel growth is planned for Yiewsley & West Drayton.
12. Areas of Special Local Character and Conservation Areas in Yiewsley & West Drayton are identified and protected in the Core Strategy through Map 7.1 and Policy HE1.
13. The Heathrow Opportunity Area covers an area of around 700ha. While neither the London Plan nor draft replacement London Plan shows the physical extent of the Opportunity Areas, some indicative working boundaries have been mapped in the London Plan Sub-Regional Development Framework West London 2006. The boundary will be refined through the Heathrow Area DPD and both the key diagram and Map 5.1 in the Core Strategy are intended to show the general areas for growth.
14. Yiewsley & West Drayton has been included in the area identified for office and hotel growth. This is misleading as it is meant to indicate the capacity of the existing employment areas within the Hayes-West Drayton corridor to accommodate new jobs, supported for example by new Crossrail stations. It is the likely source of concern surrounding the impact on Yiewsley & West Drayton of the Heathrow OA. Changes to the Key Diagram and Map 5.1 will therefore be made to clarify the areas for growth. An overarching sentence will be added to the beginning of Table 5.3 which makes clear that growth in the Heathrow OA will be focused on sustainable locations such as town centres, existing employment areas and sites with good access to public transport.

#### Consultation period

- The consultation period is too short, it does not allow local residents the time to adequately study the document and make informal comments.
15. The minimum requirements for community involvement in the plan making process are set out in the Town and Country Planning (Local Development) Regulations 2004 (as amended). The current stage is Regulation 25: Public Participation in the preparation of a development plan document (DPD). Whilst Regulation 25 does not specify a particular time period for representations, Hillingdon's Statement of Community Involvement (SCI) adopted in November 2006 sets out a minimum of six weeks for public consultations for each of the stages in the plan making process. In line with previous consultations on the Core Strategy, a six week consultation period was carried out for the draft Core Strategy to be consistent with Hillingdon's SCI.
    - There has been very little publicity about the document in order to inform residents, and especially those in West Drayton what changes would take place to their communities if the Council approves the document.

16. Involvement of the public and key stakeholders in preparing the Core Strategy Consultation Draft has followed the approach set out in the Council's Statement of Community Involvement (SCI). Various publicity methods were used with the aim of raising awareness of the LDF and informing as many people as possible. These are summarised below:
17. Consultation on the draft Core Strategy was publicised on a number of different pages on the Council website; on Horizon; in press notices in Hillingdon Leader, Gazette series and London Gazette; by audio advertisement in Hillingdon Talking Newspaper for the visually impaired, through an article in Hillingdon People; and at the libraries, One-stop-shop, schools and GP surgeries which were provided with a poster to further publicise the consultation and public drop-in sessions.
18. The consultation documents were available for viewing and comment at all borough public libraries, Hayes One Stop Shop and Planning Information Services at the Civic Centre. Public exhibitions were also set up at Uxbridge Library and Planning Information Services at the Civic Centre.
19. A number of drop in sessions for the general public were held at Ruislip Manor Library, Hayes Library and Planning Information Services. Drop in sessions were also held for Council Members and residents' associations/community groups.
20. A number of events and meetings were attended by officers to raise awareness and encourage discussion about the consultation documents, including the:
  - Mobility Forum
  - Hayes Partnership
  - Youth Council
  - Disabilities Assembly
  - Local Strategic Partnership Executive
  - Equalities and Diversity Forum
  - Residents Planning Forum
  - Older Peoples Assembly
  - Member Briefing
  - Hillingdon Chamber of Commerce
  - Residents' Environmental Services Policy Overview Committee (RESPOC)
  - The council's Organisational Management Group (OMG)
21. 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 documents, where to view the documents and how to provide comments. Relevant groups were also invited to a meeting and provided with a CD Rom.
22. People were invited to comment online, by email, by completing a Consultation Response Form, by letter or fax.

## High Speed 2

- The plan states that the Council is not seeking views on HS2 as the proposed scheme, by the previous Labour Government, would come forward in phases from 2026, i.e. out of the scope of the current plan. However, this is now not the case as the present coalition government has plans to build HS2 to a much tighter timescale. Moreover, it is likely that the first phase will include the proposal to build a Heathrow Hub within the borough of West Drayton, possibly to be completed by 2017. Therefore it is imperative that this section is rewritten in order that the residents in the areas most affected, and particularly West Drayton are given a chance to comment on this change of policy
23. Currently the High Speed Rail 2 (HS2) route is only indicative. The coalition government has put back the public consultation on HS2 until early 2011 in order to do further work on the Heathrow connection. The Mawhinney Review, published in July 2010, investigated potential HS2 connections to Heathrow Airport. It concluded that a 'Heathrow Hub' would be too costly for the government to pursue. Until the outcome of the Government's consultation is available, issues like the final route, phasing and connections will remain uncertain.
24. The public consultation will be an opportunity for everyone with an interest to find out more about the proposals and to put forward their views. The London Borough of Hillingdon will assess the impacts on the borough and local residents and will look closely at mitigation of local impacts. The Council will work with local residents and in partnership with other organizations as part of the consultation process.
25. The Core Strategy consultation says: "In principle, the Council is supportive of high speed rail. However, this support will be very much conditional upon climate change objectives and local community aspirations being met. The Council will not support any proposals that could lead to an increase in demand for flights from Heathrow, an increase in road congestion or significant adverse local environmental impacts." This remains the Council's position.
26. It is proposed to update the HS2 section in the Core Strategy to reflect the direction taken by the coalition government, and to strengthen the wording to reflect the Council's intention to mitigate local impacts and expectation of an integrated approach to public transport. It is also proposed to similarly update paragraph 9.27 in the Transport chapter. However, it would be pre-emptive to include any details of the route or phasing at this stage.

### **Financial Implications**

There are none associated with the recommendations in this report.

### **EFFECT ON RESIDENTS, SERVICE USERS & COMMUNITIES**

#### **What will be the effect of the recommendation?**

Greater clarity in the Core Strategy and for local residents on issues of growth affecting their local area.

## **Consultation Carried Out or Required**

Public consultation will be carried out, in line with the Council's Statement of Community Involvement, on the changes to the Core Strategy early in 2011.

## **CORPORATE IMPLICATIONS**

### **Corporate Finance**

Corporate Finance has reviewed this report and is satisfied that there are no financial implications associated with the recommendations in this report.

### **Legal**

Section 15 of the Planning and Compulsory Purchase Act 2004 places a statutory duty on a Council to prepare and maintain a Local Development Scheme ("the Scheme"). The Scheme will specify those documents which are Development Plan Document ("DPD"). Regulation 7 of the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended) ("the 2008 Regulations) states that the Core Strategy will be a DPD.

When preparing the Core Strategy, the Local Planning Authority must comply with the consultation requirements found in the 2008 Regulations, specifically Regulation 25 relating to the Public participation in the preparation of the DPD and also the revised PPS 12 (Local Spatial Planning) which sets out government policy on Local Development Frameworks, of which the Core Strategy is a fundamental document. The UK government has signed up to the UNECE Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the Århus Convention). Article 7 states:

"Each Party shall make appropriate practical and/or other provisions for the public to participate during the preparation of plans and programmes relating to the environment, within a transparent and fair framework, having provided the necessary information to the public."

In compliance with UNECE Convention, PPS 12 states that the Council must produce a Statement of Community Involvement ("SCI") which should follow these principles. The involvement of the public in preparing the Core Strategy must follow the approach set out in the SCI, which the Council adopted in November 2006.

This includes the duty to consult with specific and general consultation bodies, the requirement to place an advertisement in the newspaper and the general duty to comply with the Council's SCI.

The 2008 Regulations require that any representation received must be fully considered by the decision maker, including those which do not accord with the proposals.

## **BACKGROUND PAPERS**

Petitions received in July 2010.