

HILLINGDON LOCAL PLAN: PART 2

DRAFT DEVELOPMENT MANAGEMENT POLICIES, SITES ALLOCATION AND DESIGNATIONS AND POLICIES MAP

Cabinet Member	Councillor Keith Burrows
Cabinet Portfolio	Planning, Transportation and Recycling
Officer Contact	James Gleave: Residents Services
Papers with report	<p><u>Appendices circulated separately to main agenda, with copies for Cabinet, Executive Scrutiny Committee and reference copies available in Party Group Offices, on the Council's website and also for public inspection</u></p> <p>Appendix 1: Schedule of Representations Received and Officer Responses: Development Management Policies Document</p> <p>Appendix 2: Schedule of Representations Received and Officer Responses: Site Allocations and Designations Document</p> <p>Appendix 3: Schedule of Representations Received and Officer Responses: Policies Map</p> <p>Appendix 4: Schedule of Representations Received and Officer Responses: Non specific comments and comments relating to multiple documents</p>

1. HEADLINE INFORMATION

Purpose of report	This report provides a summary of the representations received in response to the Local Plan Part 2 which was issued for public comment for a 6 week period from 22 nd September - 04 th November 2014. It sets out officer responses to the representations, recommends the completion of new evidence base documents and seeks approval to undertake further consultation on proposed changes to the Local Plan Part 2 document, prior to the submission of the document to the Secretary of State for Examination.
Contribution to our plans and strategies	<p>Putting our Residents First: <i>Our Natural Environment; Our Built Environment; Our People</i></p> <p>Part 2 of the Hillingdon Local Plan will align closely with the Sustainable Community Strategy and its objectives. including maintaining the borough's local heritage and to ensure it and the natural environment are protected and enhanced. It will also contribute to delivering key plans and strategies, in particular the Transport Strategy, Economic Development Strategy and Housing Strategy.</p>

Financial Cost	The cost of preparing and consulting on the Hillingdon Local Plan: Part 2 can be met from the existing revenue budget for 2014/15.
Relevant Policy Overview Committee	Residents' and Environmental Services Policy Overview Committee.
Ward(s) affected	All

2. RECOMMENDATION

That the Cabinet:-

- 1. Agrees the proposed changes to the Development Management Policies document, Site Allocations and Designations document, and Policies Map, as set out in the Local Plan Part 2 Schedules of Representations Received and Officer Responses, in Appendices 1 - 4 of this report.**
- 2. Instructs officers to incorporate, by way of tracked changes, the proposed officer responses in Appendices 1 - 4 of this report, into the Development Management Policies document, Site Allocations and Designations document; and Policies Map; and to issue the revised documents for a 6 week period of public consultation.**
- 3. Instructs officers to commission the production of a Playing Pitch Study and an Assessment of Nature Conservation Sites in the borough as a further evidence base for the Local Plan Part 2, in advance of the its submission for examination.**
- 4. Notes the requirement to undertake a Sustainability Appraisal of the proposed changes resulting from the consultation process.**
- 5. Grants delegated authority to the Deputy Chief Executive and Corporate Director of Residents Services to agree, in conjunction with the Cabinet Member for Planning, Transportation and Recycling, any editing and textual changes to the Draft Development Management Policies, Sites Allocations and Designations and Policies Map, including those associated with recommendation 4.**
- 6. Instructs officers to report back to a future meeting of Cabinet the outcome of public consultation and recommendations for changes to the Development Management Policies document, Site Allocations and Designations document and the Policies Map prior to its formal submission to the Department of Communities and Local Government.**

Reasons for recommendations

At its meeting in February 2014, Cabinet agreed to the publication of the Proposed Submission Local Plan Part 2, comprising the Development Management Policies, Site Allocations and Designations and Policies Map, for public comment. Officers were also instructed to report back on the outcome of the publication process, including any recommendations for changes to the documents.

Subsequent to this in August 2014, a Cabinet level decision was delegated to the Leader of the Council, which sought to amend the Local Plan in the light of new evidence base documents. The recommended changes were approved and the Local Plan Part 2 documents were published for a 6 week period from 22nd September to 4th November 2014.

Representations received in response to the publication process have resulted in the need for further changes to the proposed submission documents. To expedite the adoption process it is recommended that the Council should undertake a further round of consultation on these proposed changes, before the Local Plan is submitted to the Secretary of State for examination.

Alternative options considered / risk management

Cabinet may decline to approve the proposed changes to the Proposed Submission documents. Officers are of the view that this would increase the length of the public hearing sessions associated with the examination process and the likelihood that the Local Plan Part 2 is found to be unsound.

A further option would be to instruct officers to submit the Local Plan for examination without undertaking further consultation on the proposed changes. In this instance it is likely that the Council would be requested to re-consult on the proposed changes, or withdraw the document from submission.

Comments of Policy Overview Committee(s)

None at this particular stage.

3. INFORMATION

Background

1. Further to the report to Cabinet in February 2014 and the Cabinet decision delegated to the Leader in August 2014, this report provides Members with:

- An analysis of the representations received as a result of the publication of the Local Plan Part 2 documents; and
- Officer responses to all of the representations received.

2. Officers are now seeking agreement to carry out further public consultation on changes to the Local Plan Part 2 documents which have resulted from the publication process.

Publication Process

3. The Proposed Submission documents were published for public comment on 22nd September 2014. Interested parties were specifically asked to provide comments on whether the documents met the tests of 'soundness' set out in the National Planning Policy Framework (NPPF).

4. At the start of the publication process, copies of the Local Plan Part 2 documents were issued to all local libraries and made available at the Civic Centre. Approximately 2,500

individuals whose details are held by the Council on its consultation database were advised that the publication period was about to commence. A notice was placed in the Uxbridge Gazette to publicise the process.

5. A number of 'drop in' sessions were held during the publication period to provide information to those who wished to make comments. Two drop in sessions were held for members on 6th and 13th October.

6. The main queries that arose during these events included:

- the amount of designated employment land that is proposed to be released for other uses;
- issues related to hot food take-aways;
- the proposed approach to care homes;
- sites identified for housing;
- the approach to the protection of shopping centres and parades; and
- the protection of nature conservation sites and Green Belt.

7. In addition, 3 'drop in' sessions for members of the public were held at Ruislip Manor, Botwell Green and Uxbridge library on 7th October, 9th October and 16th October. Approximately 20 individuals attended these events. A wide range of queries were raised, including the joint designation of Metropolitan Open Land (MOL)/Green Chain; designation of Conservation Areas; the protection of nature conservation sites; the tests of soundness and how these are applied to the plan and sites allocated for development in Hayes town centre - particularly the Nestle site.

Summary of Representations Received

8. The Council received a total of 283 representations covering a range of topic areas. Tables 1 and 2 below provide a breakdown of the representations received on each document and a summary of those who responded:

Table 1: Total comments received on each Local Plan Part 2 document

Document	Total Reprs	Support	Object
Development Management Policies (DMP)	164	21	143
Site Allocations and Designations (AD)	85	10	75
Policies Map (PM)	23	6	17
Representations relating to multiple documents and the Sustainability Appraisal (SA)	11	3	8
TOTAL	283	40	243

Table 2: Summary of representations received by representor

Representors	Number of Representations
Businesses	12
Councillors	26
Consultants	138
Landowners/Developers	10
Local Interest Groups	43
MPs	2
Statutory Consultation Bodies	33
Residents/RAs	17
Others	2
TOTAL	283

Key Issues Raised

9. The total number of representations received on the Local Plan Part 2 was relatively small in comparison with other London boroughs who have issued Development Management Policies and Site Allocations documents for public comment. It should also be noted that a significant number of representations (14% of the total) expressed support for the policies and proposals. The Mayor of London has confirmed that the documents are in general conformity with the London Plan and has also expressed support for a number of the policies, including the allocation of the Cape Boards site for mixed use development proposals.

10. A Schedule of Representations Received and Officer Responses is attached at Appendices 1 - 4 of this report. This contains all of the representations received and identifies where changes to the documents are required to address issues raised during the publication process. For ease of reference, Table 3 below highlights some of the key issues raised in the Development Management Policies document and Table 4 highlights the key issues raised in the Site Allocations and Designations document and Policies Map.

Table 3: Development Management Policies: Key Issues Raised and Officer Responses

Chapter 2: Economy		
Issues Raised	Officer Response/Key Changes	Change Required?
Policy DME1 seeks to protect designated employment areas for B1, B2 and B8 uses. The policy needs to recognise the role that other sustainable employment generating uses can play in these areas.	Whilst some ancillary uses will be allowed on allocated employment sites, the designation seeks to protect them for the specified uses, based on the conclusions of the Council's Employment Land Study.	No
Policy DME3: Office Development should recognise the significance of the Heathrow Opportunity Area for future office provision in the Borough.	The boundary of the Heathrow Opportunity Area has not yet been defined. This issue will be addressed in the forthcoming Heathrow Area Local Plan document, which will be progressed following the adoption of the	No

<p>In addition to town centres the Plan should allow the location of hotels in sustainable locations, in close proximity to Heathrow airport.</p>	<p>Local Plan Part 2.</p> <p>Subject to meeting the requirements of other policies in the Plan, Officers do not object to the location of hotels outside of Heathrow Airport. However, in order to ensure the availability of operational land, the Council will continue to resist proposals for non airport related development within the airport boundary.</p>	<p>No</p>
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Chapter 3: Town Centres

Issues Raised	Officer Response/Key Changes	Change Required?
<p>The requirement in policy DMTC 1 to retain a high percentage of retail frontages in primary shopping areas is overly prescriptive and could result in empty units remaining vacant in town centres when other 'A class' uses may be acceptable. An additional criteria should be added to Part A of the policy, stating that any change of use from A1 in a Local Centre should be subject to the additional test of "range and choice"</p> <p>The policy should also encourage the competitiveness of town centres and the creation of a sense of place.</p>	<p>Existing Council policy is consistent with the NPPF in that it promotes competitive town centres that provide customer choice and a diverse retail offer. The requirement to retain a high percentage of retail uses in primary and secondary frontages reflects the objective to improve the vitality, viability and competitiveness of town centres over the plan period. It is considered that the loss of retail will ultimately reduce the competitiveness of these areas.</p> <p>Part A of the policy is considered to be consistent with the requirements of the NPPF and should not be amended.</p>	<p>No</p>
<p>Further evidence required to justify the resistance to hot food take aways, drinking establishments and other such uses in proximity to schools and sensitive community uses.</p>	<p>Policy DMTC 4 seeks to limit the concentration of these uses where they would result in an adverse impact on the amenity of an area. In town and local centres, A5 hot food takeaways will be limited to a maximum of 15% of the total frontage.</p>	<p>Yes</p>
<p>A number of representors have proposed changes to town centre boundaries in the borough. Specific centres where changes are proposed include South Ruislip to incorporate Arla Foods site, Willow Tree Lane to include retail units on the south side of Glencoe Road and Yiewsley town centre/Padcroft works.</p>	<p>The Local Plan Part 2 does not propose significant changes to the town centre boundaries or the retail hierarchy in the borough. A full review of town centres, including the boundaries and hierarchy, will be undertaken as part of a review of Local Plan Part 1 - Strategic Policies.</p>	<p>No</p>
<p>The Plan should contain specific policies relating to advertisement control.</p>	<p>The Plan has been amended to incorporate a new policy on advertisements. The guidance on advertisements is currently spread over 2 chapters and will be brought together as one section in Chapter 5: Historic and Built Environment.</p>	<p>Yes</p>
<p>The Plan should include a definition of a local centre.</p>	<p>The definition of a local centre will be included as part of the supporting text to policy DMTC 3.</p>	<p>Yes</p>

Chapter 4: New Homes

Issues Raised	Officer Response/Key Changes	Change Required?
<p>The Housing Mix table associated with Policy DMH2, which sets out the need for the different sizes of units in the borough, shows limited need for 1 bed properties. This is unrealistic and unviable.</p>	<p>The mix of units identified in the table reflects the Council's Housing Market Assessment. Applicants proposing residential schemes will be required to show they have taken account of the HMA and provide appropriate evidence to justify any departures from the guidance on housing mix.</p>	<p>No</p>
<p>Policy DMH6: Garden and Backland Development should be amended to refer to the protection of front as well as back gardens and place greater emphasis on the protection and value of trees.</p>	<p>Policy DMH 6 will be amended to refer to the importance of front as well as back gardens.</p>	<p>Yes</p>

<p>The proposed tenure split between social/affordable rented and intermediate property in Policy DMH7 is not economically viable. In addition, the requirement for 35% of all units to be provided as affordable housing is unnecessarily restrictive.</p>	<p>The proposed tenure split results from the affordable housing viability study, prepared as part of the evidence base for the Local Plan Part 1. This study concludes that a 70/30 split is appropriate for Hillingdon and does not lead issues of economic viability when assessed at a borough-wide level.</p>	<p>No</p>
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Chapter 5: Historic and Built Environment

Issues Raised	Officer Response/Key Changes	Change Required?
<p>Policy DMHB 1 Heritage Assets offers the same level of protection to designated and non designated heritage assets. When considering the impact of a proposed development, the significance of a designated heritage asset should be identified and the degree/level of harm considered.</p> <p>Amendments are necessary to differentiate between two levels of protection.</p> <p>In addition, officers have proposed a number of changes to chapter 5 to ensure the protection of heritage assets in the borough, in accordance with national planning policy.</p>	<p>Amendments to the policy have been made to ensure consistency with the NPPF.</p>	<p>Yes</p>
<p>Content from the current Hillingdon Design and Access Statements should be included in the DMP, including height limits for two storey extensions.</p>	<p>The DMP document has been amended to contain an Appendix, incorporating the relevant sections of the HDAS, which provide a useful guide for members of the public and Development Management officers when determining planning applications.</p>	<p>Yes</p>
<p>The density standards set out in Table 2 associated with DMHB 20 are not in accordance with the London Plan.</p>	<p>Officers are of the view that the proposed standards are broadly consistent with those contained in the London Plan. Variations on the density matrix are permitted to reflect local circumstances. No objections have been received from the GLA on this matter.</p>	<p>No</p>
<p>The proposed outdoor amenity space standards set out in the supporting text to policy DMHB19 are excessive.</p>	<p>The proposed outdoor amenity space guidelines reflect those contained in the Hillingdon Design and Access Statement (HDAS). The provision of outdoor amenity space contributes to the health and well being of residents.</p>	<p>No</p>
<p>Concerns that policy DMHB16: Living Walls and Roofs is not achievable and will adversely affect the economic viability of development proposals.</p>	<p>The requirements for living walls have been incorporated in to the proposed sustainable design standards in policy DMEI 1.</p>	<p>Yes</p>

Chapter 6: Environmental Improvements

Issues Raised	Officer Response/Key Changes	Change Required?
<p>Policy DMEI 18: Air Quality should be amended to state that new development should not increase air pollution. New housing should not be allowed in areas where pollution is above safe limits.</p>	<p>Officers are content that the current policy is consistent with the NPPF.</p>	<p>No</p>
<p>DMEI 18 is too restrictive on new development Suggest rewording of the policy to require that development proposals within areas in excess of European levels should aim to achieve air quality improvements over the baseline situation or at the very least aim to be air quality neutral.</p>	<p>Officers are content that the current policy is consistent with the NPPF.</p>	<p>No</p>

Chapter 7: Community Infrastructure		
Issues Raised	Officer Response/Key Changes	Change Required?
<p>Policies in the DMP do not provide sufficient protection for community infrastructure. The Plan should ensure that sufficient community infrastructure is provided to support housing growth.</p>	<p>Policies DMCI 1 seeks to resist the loss of existing community infrastructure. The Council also supports the provision of new community infrastructure through policy DMCI 2.</p> <p>Community infrastructure associated with new development will be provided through the existing mechanisms of CIL or Section 106 contributions.</p>	No
<p>The Plan has not been accompanied by an objective assessment of needs for higher education to assess development requirements at Brunel University. Such an assessment should inform paragraphs 7.9-7.12 relating to education provision</p>	<p>The specific needs of Brunel University were assessed in the Council's Strategic Infrastructure Plan, produced as part of the Local Plan Part 1: Strategic Policies. The Local Plan Part 2 does not set further targets but instead identifies specific sites to meet the provisions contained in Part 1 document. As such, it is not considered that a higher education needs assessment is required. This work may be undertaken as part a subsequent review of the Part 1 document.</p>	No
<p>A Playing Pitch Assessment is required as a basis for identifying future sporting needs and assessing whether the loss of pitches in the context of policy DMCI 1 would lead to a shortfall in provision.</p>	<p>Officers recommend that a Playing Pitch Study should be undertaken as an evidence base to the DMP, prior to the submission of the document for public examination.</p>	Yes
<p>The need for additional school places over the Plan period has not been addressed.</p>	<p>The section of the DMP covering education and community uses will be updated to include the latest information on school place provision. Sites for additional new schools will be identified in the Site Allocations and Designations document.</p>	Yes
Chapter 8: Transport and Aviation		
Issues Raised	Officer Response/Key Changes	Change Required?
<p>The threshold for transport assessments in Table 8.1 associated with policy DMT1 is too restrictive.</p>	<p>The threshold for transport provision reflects the current UDP. No evidence has been provided to justify a change in the threshold.</p>	No
<p>The car parking standards associated with policy DMT 6 exceed those in the London Plan. Suggest adding people over 65 to the list of groups identified in paragraph 8.31 for which the Council must accommodate spaces.</p>	<p>Officers are of the view that the standards are broadly consistent with the London Plan. The Council has not received representations from the Mayor to demonstrate otherwise.</p>	No
<p>Policy DMAV 2: Heathrow Airport should be reviewed when the position on Heathrow is clear.</p>	<p>This is not a matter for the Local Plan Part 2 and will be assessed when the Local Plan Part 1 is reviewed.</p>	No
<p>Proposals that generate high levels of HGV movements should be located away from residential areas.</p>	<p>The impact of HGV movements will be taken account of in the transport assessments prepared for individual development schemes. There is no requirement for a specific policy on this matter in the Local Plan.</p>	No

Table 4: Site Allocations and Designation/Policies Map: Key Issues Raised and Officer Responses

Chapter 3: New Homes		
Issues Raised	Officer Response/Key Changes	Change Required?
Table 3.2: of the Site Allocations document should identify sites that are expected to come forward from the expected adoption date of the Local Plan rather than base date for the Local Plan of 2011.	Table 3.2 will be reordered to show sites that will be delivered from the expected adoption date of Spring 2016.	Yes
Further Alterations to the London Plan have now been agreed by the Inspector and increase Hillingdon's annual monitoring housing target from 425 units to 559 units. This increase should be incorporated into the Plan.	The Plan will be amended accordingly. Additional sites will be added to the Site Allocations and Designations document to ensure that this target can be met.	Yes
The Trout Road site allocated as SA 29 currently has planning permission for a mixed use development scheme comprising 99 units. The capacity of the site should be increased to 200 units.	No specific evidence has been provided to justify a departure from the approved scheme on this site.	No
The residential density proposed for the Nestle site allocated as SA 10 in the Site Allocations document is not high enough. In addition, a higher proportion of the site should be identified for residential use.	No specific information has been provided by the owners of the Nestle site to justify a departure from the number of units identified in policy SA10. Officers will review this should any additional evidence be provided.	No
The former Coal Yard site at Tavistock Road site should be identified for residential led mixed use development. In addition, the sites occupied by TIGI and COMAG located between Bentinck and Tavistock Road should also be allocated.	The Plan has been amended to identify this site for mixed use development.	Yes
The owner of the Cape Boards Site states that their site is not available for development and does not wish it to be included in the plan.	The identification of the Cape Boards site for housing has been assessed at a number of levels and in the long term, is considered to be suitable for residential led mixed use development.	No
Land at Mount Vernon Hospital should be removed from the Green Belt and allocated for residential use.	Large scale releases of Green Belt land are not required to meet Hillingdon's housing target. This area continues to meet the tests for including land in the Green Belt contained in the NPPF.	No
Land at Fairview Business Centre, Clayton Road, should be identified for residential led mixed use development .	This site is not identified in evidence base documents as being suitable for new housing and has not been allocated in the Plan.	No
The boundary of site SA18 (Chailey Industrial Estate) should be amended to exclude the Matalan site, which is in separate ownership and not available for development.	The boundary will be amended accordingly.	Yes
The Site Allocations and Designations document does not contain and is not supported by an assessment to determine the impact of the proposals on the Strategic Road Network.	The overall level of growth in Hillingdon is set out in the Local Plan Part 1 and assessed in the Strategic Infrastructure Plan. Following discussions with the Highways Agency the conclusion of this assessment is that the level of proposed growth will not have an adverse effect on the Strategic Road Network. The impact of proposed housing growth on the Strategic Road Network will not change as a result of the allocation of sites in the Local Plan Part 2. On this basis, it is not considered that additional	No

strategic assessment work is required.

Chapter 4: Rebalancing Employment Land

Issues Raised	Officer Response/Key Changes	Change Required?
The loss of employment land is in excess of that identified in the Mayor of London's SPD.	The amount of designated employment land identified to be released for other uses is broadly consistent with the Council's updated Employment Land Study.	No
The designation of the Hayes Industrial Area is supported but the Local Plan needs to make clear that Prologis Park is designated as SIL.	The Plan will be amended to confirm proposed areas of newly designated employment land (including Prologis), those areas that are being retained and those that are being disposed of for other uses.	Yes
A numbers of representors have objected to the retention of designated Strategic Industrial Locations, including the Argent Centre at the Pump Lane. It is argued that there is a surplus of designated employment land in the borough and these areas should be released for other forms of development.	Decisions regarding the release or retention of designated employment land are based on the Council's updated Employment Land Study, which is published on the website as an evidence base document. The Argent Centre is identified for retention in this document.	No

Chapter 5: Green Belt, Metropolitan Open Land, Green Chains, Nature Conservation

Issues Raised	Officer Response/Key Changes	Change Required?
A number of areas are proposed for removed from the Green Belt. These include land at Mount Vernon Hospital, Frogs Ditch Farm and Glebe Farm, Ickenham to accommodate residential development, land Brunel University to accommodate educational uses and land at Springfield Road and Stockley Park for employment uses.	The Local Plan Part 2 has been prepared to reflect the policies in the Local Plan Part 1, which do not identify the need to release large areas of Green Belt land to accommodate growth. Such releases would be inconsistent with policy EM2 in the Part document, which seeks to maintain the current extent of the Green Belt in the borough.	No
Ickenham Marshes complex should be recognised as Green Belt.	No evidence has been provided to justify the designation of this area as Green Belt land.	No
The Plan proposes to upgrade Pinn Meadows from Green Chain to Metropolitan Open Land. A number of representations have been received stating this area should be subject to both designations.	Officers are of the view that a dual designation will not provide additional protection for Pinn Meadows and could result in a lack of clarity regarding the status of the site.	No
Further requests for Dual Metropolitan Open Land/Green Chain designation for a number of open spaces in Ruislip, including Haydon Hall Park, Eastcote House Gardens and Cheney Street Parkway, Kings College Playing Fields, Manor Farm.	Officers are of the view that a dual designation will not provide additional protection and could result in a lack of clarity regarding the status of the site.	No
Requests for a number of sites to be designated as Green Chain, including Parkway open space linking to Columbia Avenue open space..	No evidence has been provided to justify the designation of these areas as Green Chains.	No
Charville Fields and Hayes Park should have their level of open space protection increased.	Charville Fields is already designated as Green Belt, which provides a high level of protection for the site.	No
Objections to the designation of Ruislip Manor Sports and Social Club as a Green Chain.	Ruislip Manor Sports and Social Club meets the criteria of policy DME15 as a designated Green Chain on the basis that it constitutes a valuable site for recreation. The Council is keen to protect this important site from other forms of development.	No

Concerns have been expressed regarding the allocation of and evidence base associated with proposed new Nature Conservation Sites of Metropolitan or Borough Grade 1 or 2 importance. These sites are more commonly referred to as Sites of Nature Conservation Importance, or SINCs. Specific objections have been lodged to proposed SINCs at Mount Vernon Hospital, Brunel University and Medipark.	A key recommendation of this report is for Cabinet to instruct officers to commission an ecology report to supplement the work undertaken by the GLA, as an evidence base for these sites. SINCs will be retained or deleted on the basis of this work.	Yes
Chapter 6: Key Transport Interchanges		
Issues Raised	Officer Response/Key Changes	Change Required?
Ruislip Station Approach should be included in the schedule of Key Transport interchanges.	The key transport interchanges have been carried forward from the Local Plan Part 1. It is not considered that there is scope to include further interchanges in the Local Plan Part 2. Additional interchanges may be added when the Part 1 document is reviewed.	No
Chapter 7: School Sites		
Issues Raised	Officer Response/Key Changes	Change Required?
The Plan needs to identify sufficient sites to meet pupil growth projections over the plan period.	The Plan will be updated to include sites that have been identified for new schools.	Yes
Chapter 8: Mineral Safeguarding		
Issues Raised	Officer Response/Key Changes	Change Required?
The Plan confuses the requirement to define Mineral Safeguarded Areas and new sites for extraction.	The Local Plan Part 2 is consistent with the latest evidence base for minerals contained in the up to date Local Aggregates Assessment.	No

Evidence Base Studies

11. The publication process has highlighted the need to undertake further evidence base studies prior to the hearing sessions associated with the examination of the Local Plan documents. Officers recommend that the following additional studies are undertaken:

- **Ecology Assessment:** The Nature Conservation Sites of Metropolitan or Borough Grade 1 Importance and the Nature Conservation Sites of Borough or Local Grade 2 Importance identified in the Site Allocations documents are more commonly referred to as Sites of Importance for Nature Conservation (SINCs). These sites were designated on the basis of a study undertaken by London Ecology Unit for the Mayor of London in 2005. It is recommended that the Council should undertake further work to supplement the conclusions of this study, in advance of the public hearings associated with the examination process.
- **Playing Pitch Study:** Policy DMCI 1 of the DMP sets out the criteria against which proposals for the loss of existing community, sport or educational facilities will be permitted. The policy places an onus upon the applicant to demonstrate that the loss of any existing facilities would not lead to a shortfall in provision. Representations submitted by Sport England have highlighted the need for the Council to prepare a Playing Pitch

Strategy to identify areas of shortfall and also as a basis for assessing any site specific strategies submitted by applicants.

Next Steps

12. The changes proposed in the schedules at Appendices 1 - 4 of this report will assist in minimising the number of objections when the Local Plan Part 2 is submitted for examination. In addition, they are also required to ensure that the documents meet the tests of soundness contained in the NPPF.

13. Subject to Cabinet approval, officers will incorporate, by way of tracked changes, the proposed officer responses in Appendices 1 - 4 of this report, into the Development Management Policies document, Site Allocations and Designations document; and Policies Map; and issue the revised documents for a 6 week period of public consultation.

14. The proposed changes will need to be subject to Sustainability Appraisal before they are issued for consultation. In addition and on the basis of legal advice, officers have written to the owners of a number of sites contained in the Site Allocations and Designations document to inform them that their sites have been identified for future development. This engagement process is considered essential to demonstrate that allocated sites are deliverable and that the plan is sound. In some cases, where landowners indicate that they do not wish their sites to be included, they will be removed from the Plan.

15. Officers are of the view that if the Local Plan Part 2 is submitted to the Secretary of State with the changes proposed in Appendices 1 - 4, the Council will be asked to undertake further consultation prior to commencement of the hearing sessions or withdraw the plan from examination. It is therefore recommended that a further round of consultation should be undertaken on proposed changes resulting from the publication process, prior to the submission of the Local Plan for examination.

16. Whilst this approach will delay the submission of the document, it is considered that it will ultimately result in a shorter examination process which is subject to fewer objections. The following table sets out the anticipated timescale for the Local Plan Part 2 through to the public hearing sessions associated with the examination process.

Table 5: Expected delivery timetable for the Local Plan Part 2

Stage	Timescale
Approval from Cabinet to issue proposed changes for additional consultation	19th March 2015
Commencement of consultation on the proposed changes	May 2015
Close of additional consultation period	July 2015
Formulate responses to representations on proposed changes	August 2015
Prepare the Revised Submission Local Plan Plan for Cabinet Approval	August 2015

Cabinet approval to submit the Local Plan Part 2 for public examination	September 2015
Public hearing sessions associated with the examination	December 2015/January 2016

Financial Implications

The cost of preparing and consulting on the Hillingdon Local Plan Part 2 will be contained within existing revenue budgets.

4. EFFECT ON RESIDENTS, SERVICE USERS & COMMUNITIES

What will be the effect of the recommendation?

The preparation of Part 2 of the Hillingdon Local Plan will be a key step in helping delivery of the Sustainable Community Strategy providing detailed site specific allocations, development management policies and a policies map for future development in the Borough over the next 15 years. Part 2 of the Local Plan will therefore have a significant impact, both short-term and long-term, upon residents, businesses, service users and all members of Hillingdon's communities.

Consultation Carried Out or Required

Cabinet approval was given in March 2013 to undertake an initial consultation required for the preparation of Part 2 of the Local Plan, under Regulation 18 of the 2012 Local Plan Regulations. This involved sending out approximately 3,000 letters and emails together with a résumé of what the Council intends including in Part 2 and inviting comments from Borough residents, local businesses and other stakeholders on what they think should be included in the Plan. The consultation was held between 19 April and 31 May, 2013.

Subsequent to this process, the Local Plan Part 2 documents were published under Regulation 19 of the 2012 Local Plan Regulations, from 22nd September to 4th November 2014. Further consultation is proposed in accordance with the recommendations of this report.

CORPORATE IMPLICATIONS

Corporate Finance

Corporate Finance has reviewed this report and confirms that there are no direct financial implications associated with the recommendations outlined above. The Medium Term Financial Forecast remains closely aligned with future development projections contained within the Local Plan.

Legal

Section 17 of the Planning and Compulsory Purchase Act 2004 requires the Council to prepare development plan documents that will form part of the Council's Local Plan. The Council has adopted its Local Plan Part 1, Strategic Policies. The Local Plan Part 2, which is the subject of this report, will contain the Site Allocations Policy, the Site Designations Policy and also more detailed Development Management Policies that will guide decision making on applications for planning permission.

In accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (SI 2012/767), the Council has carried out a consultation exercise with stakeholders as to what the Part 2 Policies should contain. Following that consultation exercise, the Development Management Policies, Site Allocations and Designations and Policies Map has been drafted and consultation was undertaken on those documents under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012(SI 2012/767). Following consultation the Council intends to make proposed changes to the Development Management Policies, Site Allocations and Designations and Policies Map, as set out in the Local Plan Part 2 Schedule of Representations and Officer Recommendations for a 6 week period of public consultation.

The results of the consultation will then be reported back to Cabinet and approval will be sought from Cabinet on the final draft that will then be submitted to the Secretary of State. The Secretary of State will then conduct an examination in public of the proposed policies, and subject to any directions by the Secretary of State or Mayor of London, the policies will be presented to Full Council who is responsible for adopting development plan documents.

Property and Construction

There are no Corporate Property and Construction implications arising from the recommendations in this report.

BACKGROUND PAPERS

- Reports to Cabinet - Local Plan Part 2: Draft Development Management Policies, February 2014
- Cabinet Decision delegated to the Leader: Proposed Amendments to the Local Plan Part 2: August 2014