

# HILLINGDON LOCAL PLAN: PART 2

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

<b>Cabinet Member</b>	Councillor Keith Burrows
<b>Cabinet Portfolio</b>	Planning, Transportation and Recycling
<b>Officer Contact</b>	James Gleave: Residents Services
<b>Papers with report</b>  <b>CIRCULATED SEPARATELY</b>	<p>The following appendices are circulated separately to Cabinet Members and Executive Scrutiny Committee, with reference copies available in Group Offices:</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, Sustainability Appraisal, Appropriate Assessment and Flood Risk Assessment.</p>

### 1. HEADLINE INFORMATION

<b>Purpose of report</b>	This report provides a summary of the representations received in response to the Revised Proposed Submission Version of the Local Plan Part 2, which was issued for public comment for a 6 week period from 26 <sup>th</sup> October - 08 <sup>th</sup> December 2015. It sets out officer responses to the representations, recommends an approach to addressing outstanding objections and seeks approval to submit the documents for public examination.
<b>Putting our Residents First</b>	<p>This report supports the following Council objective of: <i>Our People; Our Built Environment; Our Natural Environment; Our Heritage and Civic Pride;</i></p> <p>Part 2 of the Hillingdon Local Plan will also 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, Economic Development and Housing Strategies.</p>
<b>Financial Cost</b>	The cost of preparing and consulting on the Hillingdon Local Plan: Part 2 can be met from the existing revenue budget for 2015/16 and 2016/17. The costs of the public examination will be met from the relevant earmarked reserve.

<b>Relevant Policy Overview Committee</b>	Residents' and Environmental Services Policy Overview Committee.
<b>Ward(s) affected</b>	All

## **2. RECOMMENDATION**

**That the Cabinet:**

- 1. Agrees to the Submission of the Development Management Policies, Site Allocations and Designations, Policies Map and all supporting studies and documentation for public examination.**
- 2. Approves the preparation of a Schedule of Proposed Modifications setting out proposed changes to the Development Management Policies, Site Allocations and Designations and Policies Map, based on the Schedules of Representations and Officer Responses in Appendices 1- 3 of this report and officer discussions with the organisations and individuals that have submitted comments on these documents.**
- 3. 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 and the Leader of the Council, that the Schedule of Proposed Modifications is submitted with the Development Management Policies, Site Allocations and Designations and Policies Map for public examination.**
- 4. Instructs officers to commission the production of a study to assess the impact of the Site Allocations and Designation on the Strategic Road Network, in advance of the submission of the Local Plan Part 2 documents for public examination.**
- 5. Agrees to the recruitment of a Programme Officer to undertake all administration associated with the public examination process**
- 6. Instructs officers to report back to a future meeting of Cabinet on the outcome of the public examination process.**

### **Reasons for recommendations**

At its meeting in September 2015, Cabinet agreed to the publication of the Revised Proposed Submission Version of the 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, prior to the submission of the documents to the Secretary of State for public examination.

Following the publication of the Local Plan Part 2 documents from 26<sup>th</sup> October 2015 - 8<sup>th</sup> December 2015, officers are now keen to submit the Local Plan Part 2 for public examination. However, representations received in response to the publication process have resulted in the

need for further changes to these documents. In addition, it is recommended that discussions should proceed with a number of representors, with a view to resolving outstanding comments and objections prior to the commencement of the examination hearing sessions. The proposed changes and the outcome of the discussions with representors will be reflected in a Schedule of Proposed Modifications, to be prepared and submitted for examination with the Local Plan Part 2 documents.

### **Alternative options considered / risk management**

Cabinet may decline to approve the proposed changes to the Local Plan Part 2 documents, or the approach to resolving outstanding objections. 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.

Cabinet may also decline the recommendation which seeks the delegation of agreement for the Schedule of Proposed Modifications to the Corporate Director of Residents Services, in conjunction with the Cabinet Member for Planning, Transportation and Recycling and the Leader of the Council. Further Cabinet approval would therefore be required to agree any proposed changes to the Local Plan Part 2 documents, in advance of their submission for public examination. Such an approach could delay the submission of the Local Plan Part 2 documents and the examination process.

### **Comments of Policy Overview Committee(s)**

The Residents' and Environmental Services Policy Overview Committee were briefed on the production of the Local Plan Part 2 on 19<sup>th</sup> January 2016.

## **3. INFORMATION**

### **Background**

1. In September 2015 Cabinet approved a recommendation to undertake further consultation on the Revised Proposed Submission Local Plan Part 2 documents, comprising the Development Management Policies, Site Allocations and Designations and Policies Map. This report provides Members with:

- An analysis of the representations received as a result of the publication of the Local Plan Part 2 documents; officer responses to all of the representations received; and
- A proposed strategy to progress the Local Plan Part 2 documents towards submission to the Secretary of State for public examination.

### **Background to the Publication Process**

2. The Revised Proposed Submission versions of the Local Plan Part 2 documents were published for public comment on 26<sup>th</sup> October 2015. The documents identified proposed changes to those published in September 2014 as either red text for proposed additions or red strikethrough text for proposed deletions. Interested parties were specifically asked to comment on whether the proposed changes met the tests of 'soundness' set out in the National Planning Policy Framework (NPPF).

3. 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.

4. Two drop-in sessions for Councillors were held at the Civic Centre on 4<sup>th</sup> and 18<sup>th</sup> November 2015.

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

- The need for additional community infrastructure to support growth, including education and healthcare facilities;
- Issues related to hot food take-aways and other uses that can result in antisocial behaviour;
- Support for the allocation of the Old Coal Yard site at Tavistock Road for residential-led mixed use development;
- The approach to the protection of shopping centres and parades and whether seeking to retain a high proportion of A1 retail uses in local parades was most appropriate for the Borough; and
- The protection of nature conservation sites and Green Belt.

6. In addition, 4 'drop in' sessions for members of the public were held at Botwell Green, Ruislip Manor, West Drayton and Uxbridge libraries on 11<sup>th</sup> November, 12<sup>th</sup> November, 17<sup>th</sup> November and 19<sup>th</sup> November 2015. Whilst public attendance at the majority of these events was relatively low, approximately 30 individuals attended the West Drayton session, the majority of which were keen to support the allocation of the Old Coal Yard site for mixed use development. A further area of concern was the need to ensure the provision of sufficient community infrastructure to support growth.

### **Summary of Representations Received**

7. The Council received a total of 325 representations in response to the publications process covering a range of topic areas. The total number of representations 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 have 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 and allocations.

8. Notwithstanding the above, there are a number of representations which require further action before the documents are submitted for public examination. The process of resolving these points is set out in the Key Actions Prior to Submission in paragraphs 12 - 14 below.

9. Schedules of Representations Received and Officer Responses are included in Appendices 1 - 3 of this report. These contain all of the representations received and identify 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

relation to the Development Management Policies document, Table 4 relates to the Site Allocations and Designations, Table 5 deals with the Policies Map and Table 6 identifies issues raised in relation to the Sustainability Appraisal.

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

<b>Chapter 2: Economy</b>	
<b>Issues Raised</b>	<b>Officer Response/Key Changes</b>
Policy DME 1 seeks to protect designated employment areas for B1, B2 and B8 uses. The policy should include more flexibility to allow other uses on designated employment sites, in response to changing economic circumstances.	The policy is broadly in line with the provisions of the London Plan, which seek to protect designated employment sites for these uses.
Criteria contained in policy DME 1 state that proposals for non B1, B2 and B8 uses will be acceptable in designated employment areas, where sites have been consistently marketed for a period of 2 years. This requirement should be removed.	The requirement for vacant designated sites or buildings located within these sites to be marketed for a specified period of 2 years before they are released for other non employment uses reflects the provisions of the Mayor of London's Land for Industry and Transport SPD.
Policy DME 3 identifies suitable locations for office development. More flexibility needed to allow office development outside of preferred locations.	The Council will seek to accommodate the majority of office development in office growth locations and town centres. Officers consider that policy DME3 could be amended to note the proposals for offices in other locations will be required to demonstrate that no other sequentially preferable locations are available.
Policy DME 3 should recognise the significance of the Heathrow Opportunity Area for future office provision in the borough.	The policy already refers to office growth locations, including the Heathrow Perimeter, which were identified as part of the Mayor of London's London Office policy review. The Heathrow Perimeter will form the main growth point for office development within the Opportunity Area. As such, no further references to office growth are required.
Policy DME5 is supported.	Support for this policy is noted and welcomed
<b>Chapter 3: Town Centres</b>	
<b>Issues Raised</b>	<b>Officer Response/Key Changes</b>
Policy DMTC 1: specifies that the Council will support main town centre uses where the development proposal is consistent with the scale and function of the centre, subject to adequate width and depth of floorspace being provided. This criterion should be removed.	The criterion seeks to resist a provision of inappropriately sized retail units, which could lead to the fragmentation of the town centre.
Retention of A1 retail uses in primary and secondary frontages is not supported.	The policy seeks to promote and protect the provision of A1 retail uses in town centres, in accordance with national policy guidance and the provisions of the London Plan.
Policy DMTC 3: Objections to the absence of Sovereign Court, Sipson Road in the list of local parades.	Sovereign Court only contains one single A1 retail unit. This is not considered sufficient to justify a local parade designation.
Concerns regarding limiting hot food takeaways (A5 uses) to 15% of the frontage in local centres. No explanation of how this has been arrived at. No justification for grouping together betting shops, restaurants and takeaways and minicab offices in the policy.	Guidance in the NPPF and policies in the London Plan directs local authorities to promote the health and wellbeing of their communities through local policies and approaches. The policy seeks to avoid an overconcentration of uses that can cause detrimental cumulative impacts. The issues associated with each of the specified uses, including Betting Shops, Restaurants and Takeaways, Night Time

	Economy and Minicab offices are specified in the supporting text to policy DMTC 4. Officers will continue to review the policy to ensure it is in accordance with the NPPF and the provisions of the London Plan.
<b>Chapter 4: New Homes</b>	
<b>Issues Raised</b>	<b>Officer Response/Key Changes</b>
Policy DMH 2: Concerns that the proposed housing mix will result in the delivery of low density development across the Borough. Further clarity is needed to ensure the policy continues to promote housing delivery. Policy should confirm that the housing mix will be applied on a site by site basis, dependent on the location.	The supporting text to policy DMH 2, including Table 4.1, provides background on the latest census data for Hillingdon and the conclusions of the latest Housing Market Assessment (HMA). The information contained in the HMA is a material consideration in the assessment of planning applications for residential development. The Council will therefore require applicants bringing forward schemes for residential development to take this into account
Policy DMH 6: Policy against loss of back gardens is unreasonable.	Policy DMH 6 notes the contribution that back gardens make to local character. This reflects the conclusions of the Council's townscape character study.
Policy DMH 7: All residential schemes of 10 units should meet the Council's 35% affordable housing target.	The Council will seek the provision of 35% affordable housing, subject to viability and if appropriate in all other circumstances.
Policy DMH 7: Flexibility to adjust the quantum and tenure of affordable housing to reflect site specific circumstances is essential.	Officers consider that the policy provides sufficient flexibility regarding the quantum and tenure of affordable housing.
<b>Chapter 5: Historic and Built Environment</b>	
<b>Issues Raised</b>	<b>Officer Response/Key Changes</b>
DMHB 1: Recommend the inclusion of an overarching sentence stating that the Council will expect development proposals to avoid harm to the historic environment.	Supporting text to Policy DMHB 1 states that proposals affecting heritage assets will be determined in accordance with the NPPF. No further policy guidance is required.
DMHB 3: Policy should note that locally listed buildings can be demolished subject to the provisions of policy being met.	The demolition of locally listed buildings will be discouraged. The policy notes that replacement will only be considered where it can be demonstrated that the community benefits of such proposals outweigh those of retaining the Locally Listed building.
Policy DMHB 13: Advice on shopfronts should be contained in a single section or in two totally separate sections.  Policies are too restrictive and are not based on locally specific evidence. Signage should not need to be restricted to certain areas of the shopfront - each proposal must be considered on its merits. Ban on flashing box signage is not justified.  No need to make special mention of particular types of advertisement as all are covered by the statutory definition.  A number of provisions are contrary to national policy and guidance. Proposals should be acceptable provided they do not detract from amenity.	The Council's policies have been drafted to protect the particular character of town centres and Conservation Areas in the Borough.  The issue of advertisements cuts across a number of policy areas including the public realm, heritage and shopfronts. The Council's general policy on advertisements has been prepared to protect visual amenity and to maintain the quality of the public realm. Policy requirements and guidance are geared towards meeting this objective.  Officers will undertake a further review of the advice and guidance provided on advertisements and other detailed design matters, prior to the submission of the Local Plan documents for public examination.
Concerns regarding the approach to moorings, which should be promoted throughout the plan. No specific reasons why moorings cannot be located on rural stretches of the canal. Moorings should be	The Council supports the general provisions of the Blue Ribbon network, however, Policy DMHB 20 reflects the need to assess the visual impact of moorings.

an integral part of the Blue Ribbon network, including the Grand Union Canal. Development should take account of the Canal & River Trust's 'Hillingdon Towpaths' document.	
Policy DMHB 16: The policy should incorporate the recently introduced national housing standards.	Officers are of the view that policies should be amended to reflect the need to comply with recent revisions to national housing standards. Appropriate revisions will be put forward in the Schedule of Modifications, to be submitted with the Local Plan documents.
DMHB 17: Density guidelines in table 5.3 are not justified by evidence base and should be removed.	The proposed density guidelines in Table 5.3 (Residential Density Matrix) are broadly consistent with those contained in the London Plan.
<b>Chapter 6: Environmental Protection and Enhancement</b>	
<b>Issues Raised</b>	<b>Officer Response/Key Changes</b>
Policy DMEI 1: The proposed deletion of Sustainable Design Standards will not fulfil the requirements of policy BE 1 in the Local Plan Part 1.	The Sustainable Design policy has been amended to reflect the removal of the Government's Code for Sustainable Homes. The policy will be amended to reflect the fact that many of the sustainable design requirements have been carried forward into Building Regulations.
DMEI 4: Disappointed that Warrender Park/ Highgrove Woods/ Bessingby/ Cavendish/ Pine Gardens Parks have not been upgraded to MOL.	These parks were not identified in the Council's evidence base documents relating to Metropolitan Open Land.
Policy DMEI 5: The policy weakens the protection of Green Chains in the Borough. UDP policy EM2 should remain.	Policy DME 15 reflects the provisions of policy OL11 in the Unitary Development Plan Saved Policies document.
Policy DMEI 7: The impact of renewable energy installations on biodiversity and heritage should be referred to in the policy.	The Council will be undertaking discussions with Historic England, with a view to addressing their comments prior to the commencement of the examination process.
Policy DMEI 8: The policy should note that there are circumstances when it is appropriate for developments to be built up to the canal edge. Proposed 5 metre set back could create unsightly 'dead space'.	Five metre set back is proposed to allow the protection of an existing canal tow path or the creation of a new tow path. The policy provides flexibility to adjust these widths, subject to agreement from the Council.
Policy DMEI 9: It is important that development proposals pass sequential test before a flood risk assessment is undertaken. For development sites in Flood Zones 2, 3 and 3b that pass sequential test, a sequential approach should be used so that the most vulnerable uses are placed at lowest risk of flooding.  The policy contains no specific references to climate change. Flood defences should be commensurate with the lifetime of the development.. New development should not prevent upgrading of flood defences.	The Council will be undertaking discussions with the Environment Agency, with a view to addressing their concerns prior to the commencement of the examination process.
Policy DMEI 10: Policy should include text to address misconnections in the sewer network.	The Council will be undertaking discussions with the Environment Agency, with a view to addressing their concerns prior to the commencement of the examination process.
Policy DMEI 10: Sentence stating that 'the Site Allocations document identifies sites that might have capacity issues and notes this as a constraint' should be deleted, as it infers all other sites in the document do not have capacity constraints, which could change if the scale and phasing of a site changes.	Officers do not agree that the deletion of this sentence is necessary. It is acknowledged that changes in the scale of development may result in further infrastructure capacity issues. These matters will be addressed on a site by site basis.

Proposed deletion of Policy DMEI 12 in the 2014 Proposed Submission Document has not been remedied by the proposed new Policy DMEI 10 in addressing water quality.	Officers are content the reworded policy DMEI10 addresses key provisions regarding water quality.
Policy DMEI 3: Developments located in areas of decentralised energy should be future proofed for connection to the London Heat Network.	The Council will be undertaking further discussions with the Greater London Authority, with a view to addressing their concerns prior to the commencement of the examination process.
Policy MIN 1: Policy confuses requirement to identify new sites for Mineral extraction with Mineral Safeguarding Areas. Land south of Harmondsworth Quarry and North of the A4; Land at Bedfont Court should be identified as specific sites.	Officers will continue to review the policy to ensure it is in accordance with the NPPF and the provisions of the London Plan.
Policy MIN 4: Basis for policy is unclear, not consistent with national planning policy guidance.	Officers will continue to review the policy to ensure it is in accordance with the NPPF and the provisions of the London Plan.

## Chapter 7: Community Infrastructure

Issues Raised	Officer Response/Key Changes
DMCI1: Policies in the Plan not sufficient to meet the requirements of the NPPF relating to open space and sports provision.	The Council has recently commenced a Recreational Needs Assessment in accordance with advice from Sport England. The Council will be undertaking discussions with Sport England, with a view to addressing their concerns prior to the commencement of the Examination process.
DMCI 1: There should be no loss of community facilities in areas of significant housing development.	The Council has included policies in the plan which seek to protect existing community infrastructure facilities and support the provision of new facilities.
DMCI 5: Requirements for play areas should be based on London Plan child yield figures.	The policy already refers to the London Plan SPG: Providing for Childrens and Young Persons Play Space. This issue of yield figures will be discussed further with the GLA.
DMCI 6: Policy should refer to outdoor sports facilities.	As noted above, the Council has recently commissioned a Recreational Needs Assessment. This document will set standards for accessibility to sports facilities, which can be incorporated into the policy.
Policy DMCI 3: Policy should refer specifically to Ruislip Woods SSSI.	Paragraphs 7.26-7.28 of the Development Management Policies have been deleted as they provide unnecessary contextual information that adds little to the policy. SSSIs are already protected by national planning policy and policies in the London Plan. However, it is agreed that specific reference to Ruislip Woods SSSI should be included.
DMCI7: References to the Council's Community Infrastructure Levy should be used with caution as this will not be sufficient to meet the Council's infrastructure requirements over the plan period.	It is recognised that the CIL will not address all of the identified infrastructure requirements in the Borough. However, this funding route will contribute towards some transportation improvements over the period of the Plan.

## Chapter 8: Transport and Aviation

Issues Raised	Officer Response/Key Changes
DMT 1: Threshold for travel plans should be updated to reflect TfL guidance.	The Council will be undertaking discussions with TfL, with a view to addressing their concerns prior to the commencement of the examination process.
DMT5: Cycle Parking standards should be minimum rather than maximum, to ensure compliance with London Plan.	The Council will be undertaking discussions with TfL, with a view to addressing their concerns prior to the commencement of the examination process.

Policy DMT 5: This policy should refer to the legible London walking scheme.	The Council will be undertaking discussions with TfL, with a view to addressing their concerns prior to the commencement of the examination process.
Policy DMT 6 and Appendix A, Table 1: Whilst the London Plan provides for flexibility in parking standards, they should reflect those in the London Plan. It should be noted that other representors supported higher parking standards for office uses.	The Council will be undertaking discussions with TfL, with a view to addressing their concerns prior to the commencement of the examination process.

### Appendix A: Householder Development Policies

Issues Raised	Officer Response/Key Changes
Policy DMHD 3: Policy is supported but basements should be fitted with a pumping device to ensure they are protected from sewer flooding.	Officers are happy for specific references to the inclusion of a pumping device to be added to the supporting text for policy DMHD 3 .

### Appendix B: Design Guidance for Shopfronts

Issues Raised	Officer Response/Key Changes
Much of the advice relating to signage is unnecessary and overly restrictive	Officers will undertake a further review of the advice and guidance provided on advertisements and other detailed design matters prior to the submission of the Local Plan documents for public examination.

**Table 4: Site Allocations and Designations: Key Issues Raised and Officer Responses**

General comments on the Site Allocations and Designations document	
Issues Raised	Officer Response/Key Changes
SA1 - SA41: Local Plan should not rely on future transport assessments. Further evidence is required to assess the cumulative impacts of all allocated sites on the SRN.	Officers are seeking agreement to commission a study to assess the impact of planned growth on the Strategic Road Network. The Council will be undertaking discussions with Highways England, with a view to addressing their concerns prior to the commencement of the examination process.
Need to review the Site Allocations and Designations document in advance of 2021.	It is likely that a full review of the Local Plan Part 2 documents will commence prior to 2021.
Chapter 3: New Homes	
Issues Raised	Officer Response/Key Changes
Failure to consult with Gypsies and Travellers during the production of the Gypsy and Traveller Assessment. The Council's approach does not reflect the needs of Gypsies and Travellers in Borough. Further assessment of need is required.	The Council's Gypsy and Traveller Accommodation Assessment was undertaken in September 2014. Since this time, Government guidance relating to pitch provision has been updated. The revised guidance contains a new definition of gypsies and travellers for the purposes of planning policy. Officers will assess the implications of these changes for pitch provision targets identified in the Local Plan Part 2, in advance of the examination process.
The document does not provide sufficient information on how the London Plan housing targets will be exceeded, in accordance with the London Plan policy 3.3	The Council regularly exceeds its London Plan Housing target of 559 units per annum. The Council will be undertaking further discussions with the Greater London Authority, with a view to addressing their concerns prior to the commencement of the examination process.

SA 2: Should refer to amended outline permission. Based on this permission it would be appropriate to increase the delivery of the site by 15%.	Officers are happy to include references relating to any updated planning history associated with specific sites.
SA 4: Boundary of policy designation SA4 should be amended to include the Crown Trading Estate.	The release of this site is broadly consistent with the provisions of Local Plan Part 1 which seek to maximise the potential of the Grand Union Canal in Hayes. Further discussions are required to assess the impact of the loss of the SIL designation and the redevelopment potential of this site.
SA 5: More flexibility needed to increase the residential capacity across the Nestle site. The proposed division between parts A, B and C is inaccurate. The requirement for comprehensive development should be removed. The need for sports pitch provision is questioned.	Discussions are progressing with the owners of the Nestle site to agree an appropriate scheme. The latest position will be reflected when the Local Plan Part 2 is submitted to the Secretary of State for public examination.
SA5: The balance of the loss of employment land and delivery of residential units has not been fully considered.	The Council is keen to ensure the delivery of a significant proportion of employment generating uses as part of the proposed scheme for this key site. Discussions are progressing with the site owners to agree the overall quantum of uses. The latest position with be reflected when the Local Plan Part 2 is submitted to the Secretary of State for public examination.
SA 5: Network Rail land should be included in the allocation of this site. Residential capacity on site C should be increased.	Discussions are progressing with key stakeholders to agree a development scheme for the Nestle site. The latest position will be reflected when the Local Plan Part 2 is submitted to the Secretary of State for public examination.
SA 12: Council should bring allotments back into use.	The allotments site has been vacant for a number of years and the principle of residential development was established in 2011, when planning permission was granted for 79 units.
SA 22: Object to the exclusion of the Matalan element of the site.	<p>The Local Plan Part 2 Site Allocations and Designations Proposed Submission Version September 2014 identified the Matalan site as part of site allocation SA22. This portion of the site was removed following representations from the site owners, which indicated that it was unlikely to come forward for development.</p> <p>The site is now in the ownership of the London Diocesan Fund, who have requested that it is added back into the Site Allocations and Designations document and allocated for a mixed use residential and retail scheme. Officers are content to support the proposed allocation, subject to the agreement of a suitable quantum of development on the site.</p>
SA 24: The proposal to allocate Benlow Works in isolation is not supported. The wider Silverdale Road site should be allocated for residential-led mixed use development.	Benlow Works is a largely vacant building that is suitable for mixed use development. The specific circumstances and heritage value of the site are such that it is considered suitable for allocation in the Local Plan. The release of the wider Silverdale Road area has not been justified.
SA 37: The proposed allocation of the Old Coal Yard site for mixed-use development is widely supported, but has attracted objections from Powerday and Network Rail.	Support for this site is noted. Officers maintain the view that it should be allocated for mixed use residential development to come forward in the latter stages of the plan period.
Proposed allocations adjacent to the canal are generally supported, subject to access to the canal being improved and the provision of residential moorings.	Officers are generally supportive of the proposals to improve access to the Grand Union Canal. Specific references to meet this objective should be added to the opening paragraphs of Chapter 3: New Homes.
Western Core Allocation should be re-introduced.	The Local Plan Part 2 Proposed Submission Version September 2014 document sought to carry forward from the saved UDP policies the Western Core site allocation for mixed use development, including 60 units. The site is proposed to be

	deleted on the basis that multiple landownership may compromise delivery. No further evidence has been put forward that would support the re-introduction of the site.
SA 39: Onslow Mills should continue to be included in the allocation.	Officers support the re-introduction of this portion of the site.

#### Chapter 4: Rebalancing Employment Land

Issues Raised	Officer Response/Key Changes
Continued consolidation and designation of SILs and LSIS is supported. However, paragraph 4.14 relating to mixed use development along the canal frontage creates ambiguity. These sites should either be designated as SILs or released for mixed use development.	It is agreed that the supporting text in 4.14 should be amended to omit any reference to mixed -use development, given that the Blyth Road, Clayton Road and Printinghouse Lane sites are proposed as SIL.
No evidence to support the allocation of Odyssey Business Park as an LSEL.	The proposed allocated is based on recommendation 7 of the Council's Employment Land Study update 2014 and corresponds to the strategic direction provided in the Local Plan Part 1.
Stockley Farm should be designated as a Locally Significant Employment Location (LSEL)	No specific evidence is available to support the proposed LSEL designation.

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

Issues Raised	Officer Response/Key Changes
Site specific support and objections for proposed site specific additions and deletions from the Green Belt.	Proposed additions and deletions of Green Belt land are based on the conclusions of the Council's Green Belt study.
Seeking joint designation of MOL/Green Chain sites identified in the Plan.	Officers are of the view that a dual designation will not provide additional protection and could result in a lack of clarity regarding the designation that applies to these sites.
Site specific support for and objections to proposals relating to SINCs.	Support noted and welcomed. Changes to identified SINCs are based on the conclusions of the Review of the Sites of Importance for Nature Conservation, undertaken in 2015.

#### Chapter 6: Key Transport Interchanges

Issues Raised	Officer Response/Key Changes
Safeguarding of Transport Interchanges is supported.	Support is noted and welcomed

#### Chapter 7: Community Infrastructure

Issues Raised	Officer Response/Key Changes
Concerns expressed that the plan fails to make provision of sufficient infrastructure provision in the Borough, particularly community infrastructure provision.	<p>Policies in the plan relating to community infrastructure seek to resist the loss of existing facilities and encourage new provision, subject to a number of criteria. The Council's Strategic Infrastructure Plan (SIP) provides an overview of the main areas of infrastructure that are required to support planned growth in the Borough.</p> <p>The SIP notes that additional school places will be required over the Plan period. The plan will be updated to reflect the latest position with school place planning, as it progresses through the examination process. In addition, the Council is working with the CCG to ensure that the latest position with regard to new</p>

	healthcare facilities is reflected in the Plan.
The Plan has not been informed by an objective assessment of development needs for higher education. This study should be undertaken and policies should be added to address these needs in full. This should include the allocation of Brunel University Campus for higher education uses and a Green Belt review that removes the Green Belt designation from sites 1,2,3 and 4.	Officers are undertaking a full review of the evidence provided by the University to support this position.

**Table 5: Policies Map: Key Issues Raised and Officer Responses**

Issues Raised	Officer Response/Key Changes
Gravel Pits should be identified Regional Significant Geological Sites should be identified.	Officers support the proposals to identify the RIGs on the Policies Map.
Route of access to Southall Gas Works development site is not adequately illustrated.	The route of the access to this site has been amended in the light of the outline consent. Officers will investigate whether this has subsequently been revised.
Full extent of Frays Island nature reserve, Frays Farm Meadows and Crane Meadows are not correctly shown on the Policies Map.	Extent of existing nature reserves is shown on the maps. The Council will be undertaking further discussions with the London Wildlife Trust to confirm the full extent of these sites, prior to the commencement of the examination process.

**Table 6: Sustainability Appraisal: Key Issues Raised and Officer Responses**

Issues Raised	Officer Response/Key Changes
Northwood Futures site SA16 should be removed from the Plan. The over-arching sustainability impacts of the allocation are negative.	Officers do not object to the principle of the allocation of this site for residential-led mixed use development. The overall quantum of units will be determined through a design-led process.

### The Submission Process

10 The Local Plan Part 2 documents, including the associated evidence base documents and the Sustainability Appraisal Reports, will be submitted to the Secretary of Statement for examination under the provisions of Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012. In addition to the documents themselves, the Regulations require the submission of a statement setting out:

- The organisations and individuals that were consulted at each stage of the production of the Local Plan Part 2;
- How these organisations were invited to comment on the draft documents;
- A summary of the main issues raised and how these have been taken into account; and
- Copies of all representations made in response to the pre-submission consultations.

11. The Regulations require that the submission documents are made available for public inspection at the Civic Centre and on the Council's website. The provisions of the Council's Statement of Community Involvement will also need to be taken to account, which require the documents to be made available at all local libraries. The Council will also be required to notify the specific bodies that are listed in the Regulations and all those that have requested to be notified of the submission process.

## **Key Actions Prior to Submission**

12 Officers propose to undertake discussions with a number of the individuals and organisations identified in Tables 3 - 9 to resolve outstanding issues and concerns prior to the submission of the Local Plan for public examination. The aim of these meetings will be to agree the Schedule of Proposed Modifications in relation to objector concerns and those matters that require further discussion at the examination hearing sessions. In addition, officers will seek to meet with the Planning Inspectorate for an informal review of the Local Plan documents and the associated evidence base prior to submission. Such a meeting will allow any potential issues of soundness to be identified and addressed prior to the commencement of the examination process.

13. The Council has been advised that there is not an opportunity to make further substantial changes to the Local Plan Part 2 documents prior to the submission process, without undertaking further consultation. Officers therefore propose to prepare a Schedule of Proposed Modifications to the Local Plan Part 2 documents, setting out proposed further changes that:

- Are identified in Appendices 1-4 of this report; or
- Have been agreed following discussions with organisations or individuals who made comments on the Local Plan Part 2 documents.

14. The Schedule of Proposed Modifications will be submitted with the Local Plan Part 2 documents for public examination. The proposed changes within the schedule will be considered by the Inspector as part of the examination process and will be the subject of discussions during the hearing sessions. To expedite the submission of the Local Plan Part 2 documents it is considered that the approval of the Schedule of Proposed Modifications should be delegated as set out in this report's recommendations.

## **Weight to be attached to the Local Plan Part 2 documents**

15. Planning legislation indicates that policies in the development plan, which includes the Council's Local Plan, should be the primary consideration in the determination of planning applications, unless material considerations indicate otherwise. Emerging policies are given more weight, as they progress towards adoption.

## **Next Steps**

16. Prior to the submission of the Local Plan Part 2 documents to the Secretary of State for Examination, officers propose to:

- i) Continue discussions to resolve the issues with specific representors' as identified in Tables 3-6 above. The outcome of these discussions is expected to feed into the Schedule of Proposed Modifications to be submitted alongside the Local Plan Part 2 documents for public examination.
- ii) Arrange a further meeting with the Planning Inspectorate in accordance with paragraph 13 above.
- iii) Progress the additional work requested by Highways England, to assess the impact of the proposed housing growth on the strategic road network.
- iv) Prepare a Schedule of Proposed Modifications, setting out further changes to the Local Plan Part 2 for inclusion when the documents are submitted for public examination.

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

<b>Stage</b>	<b>Timescale</b>
Submission of the Local Plan Part 2 documents for Public Examination	May/June 2016
Hearing sessions associated with the public examination	September/October 2016
Consultation on major modifications arising from the public examination process.	January/February 2017
Receipt of Inspectors report	March 2017
Target date for the adoption of the Local Plan Part 2	June/July 2017

### **Financial Implications**

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

The current best estimate for the cost of the public examination is £110k. This is comprised of two elements:

- 1) The Programme Officer (recommendation 5 of the report); Based on previous experience, this will be in the order of 10k, payments for this resource will need to commence in 2016/17, but may not conclude until 2017/18.
- 2) Inspector's fees from the Planning Inspectorate (PINS): PINS invoice will be received after their report is issued - this is estimated for March 2017, however it is possible this could slip into the following financial year 2017/18.

18. The cost of the public examination is expected to be fully resourced from the earmarked reserve ("Hillingdon Local Plan") specifically set aside for the public examination.

### **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 22<sup>nd</sup> September to 4<sup>th</sup> November 2014. Following Cabinet Approval in September 2015, a second round of Regulation 19 consultation was undertaken during the period 26<sup>th</sup> October 2015 - 8<sup>th</sup> December 2015.

## **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 have 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 a six week consultation in October 2015 the Council intends to make proposed changes to the Development Management Policies, Site Allocations and Designations and Policies Map by way of Schedule of Proposed Modification, which shall be submitted with the Development Management Policies, Site Allocations and Designations and Policies Map for examination under Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (SI 2012/767). Once the Council has formally submitted the Local Plan Part 2 the Secretary of State shall 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 specific 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
- Reports to Cabinet - Local Plan Part 2: Draft Development Management Policies, Site Allocations and Policies Map, September 2015