

HILLINGDON'S RESPONSE TO THE DRAFT LONDON PLAN

Cabinet Member	Councillor Keith Burrows
Cabinet Portfolio	Cabinet Member for Planning, Transportation and Recycling
Officer Contact	James Gleave: Residents Services
Papers with report	Appendix A: Proposed response to the Draft London Plan

HEADLINES

Summary	<p>The London Plan provides a blueprint for spatial planning in London. The document contains borough specific targets on matters such as house building, climate change and employment land retention and a series of policies to guide the determination of planning applications across the capital. A new version of the London Plan was published for public comment on 1st December 2017.</p> <p>The consultation period runs until 2nd March 2018. This report explains the key content of the new plan, the adoption process and sets out the key points of a proposed response for Cabinet approval. The report concludes that there are a number of policy changes proposed that will have significant adverse impacts on the Borough, its people, its built environment; its natural environment; its heritage and wider policy objectives. The Council's consultation response should reflect these "significant" concerns.</p>
Putting our Residents First	<p>This report supports the Council's objectives of: Our People; Our Built Environment; Our Natural Environment; Our Heritage and Civic Pride by considering how these are impacted upon by policies proposed in the new London Plan.</p> <p>The report also considers how the new plan will affect the delivery of key plans and strategies, in particular the Transport, Economic Development and Housing Strategies.</p>
Financial Cost	<p>The cost of preparing the proposed response and attending the public examination can be met from existing revenue budgets.</p>
Relevant Policy Overview Committee	Residents' & Environmental Services
Relevant Ward(s)	All Wards

RECOMMENDATIONS

That the Cabinet:

1. **Notes the content of the draft London Plan and endorses, in principle, the Council's proposed response attached at Appendix A of this report.**
2. **Grants delegated authority to the Deputy Chief Executive and Corporate Director of Residents Services to make any final changes to the response before submission, in conjunction with the Cabinet Member for Planning, Transportation and Recycling and the Leader of the Council.**
3. **Agrees that officers should meet with representatives from the GLA to discuss the concerns raised and actively participate in the examination process to progress the Council's case.**

Reasons for recommendation

The current version of the London Plan was first published in 2011 and is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for development over the next 20–25 years. The document brings together the geographic and locational (although not site specific) aspects of the Mayor's other strategies, including those dealing with Transport; Economic Development; Housing; Culture; a range of social issues such as children and young people, health inequalities and food; and environmental issues such as climate change (adaptation and mitigation), air quality, noise and waste.

The plan should conform to the NPPF which sets out national planning policies, such as Green Belt protection.

The plan forms part of the Development Plan for Hillingdon and provides the strategic, London-wide policy context within which the Council should set its detailed local planning policies. It is very difficult to under-estimate the importance of the new London Plan, for planning in Hillingdon and London as a whole. It is critical that the Council provides a detailed response to the draft plan, to ensure the interests of residents are fully represented.

Alternative options considered / risk management

To not submit a response to the draft London Plan. In this instance, the Council's views would not be reflected in the final version of the plan, which is expected to be adopted by the Mayor of London in 2019.

Democratic compliance / previous authority

Responses to Greater London Authority consultations ordinarily require Cabinet approval, as set out in the Cabinet Scheme of Delegations.

Policy Overview Committee comments

None at this stage.

SUPPORTING INFORMATION

Background

1. The draft London Plan was published for public comment on 1st December 2017, for a 16 week period. The consultation runs until 2nd March 2018 and the public hearing sessions associated with the examination are expected to take place in the Autumn of this year. These sessions will provide an opportunity to any organisation or individual who has made comments on the draft plan to express these in person to the inspector appointed to conduct the examination proceedings.
2. The new London Plan will run from 2019-2041 and is the third brand new version since the Greater London Authority (GLA) was established in 2000. Previous versions were published in 2004 and 2011 and a number of what are referred to as 'consolidated versions', incorporating modifications and changes, were published in the intervening periods.
3. The draft plan looks very different to the 2011 version and promises a 'step change' from previous approaches, to meet the particular challenges of population growth and housing need. London's population is expected to increase by 70,000 every year and 66,000 new homes are required each year to meet this demand. The Mayor of London's strategy to address these issues is referred to as 'good growth'. In essence, this approach seeks to deliver more affordable homes and economic prosperity, whilst creating a safer, greener city that supports the health and well-being of all Londoners.
4. In many cases, the policies in the new plan have been drafted with specific criteria to be applied directly in the assessment of planning applications. At 528 pages, the new plan is longer than previous versions and more prescriptive on matters such as design, conservation and heritage. GLA officers have stated there is no need for boroughs to duplicate the policies in their Local Plans, unless there are locally specific reasons for doing so. As such, policies can be applied directly in the determination of planning applications.
5. This report highlights key points emerging from each of the chapters in the new plan and summarises the Council's proposed response. The Mayor of London continues to oppose the development of a third runway at Heathrow, but significant issues for Hillingdon are:
 - Hillingdon's housing delivery target is increasing from 559 units to 1,553 units per annum.
 - 765 units per year are expected to be delivered from 'small sites', including a presumption in favour of extensions, conversions, redevelopment and infill development within 800 metres of a tube station or town centre. There is also no longer a presumption against back-land development (so called garden grabbing).
 - There is a clear policy of shifting housing growth to outer London Boroughs and that more housing should occur in the suburbs.
 - The protection of the Green Belt is potentially undermined.
 - Car parking standards have been significantly reduced. Areas with a PTAL of 5-6 have a nil parking standard.

6. The following sections of the report summarise the key content of the draft plan and the Council's proposed response to each of the chapters, which is attached in full at Appendix A.

The Concept of Good Growth

7. The Mayor of London's concept of good growth sits at the heart of the new plan. In essence, this means addressing London's significant housing and economic growth requirements in a sustainable manner. The concept includes:

- Building strong and inclusive communities through the generation of economic growth, the promotion of town centres as social and economic hubs and good design.
- Making the best use of land to create high-density, mixed-use places, through the prioritisation of Opportunity Areas and intensification of land use.
- Improving Londoners' health and reducing health inequalities; the promotion of healthy lifestyles, assessing the impact of development on health and well-being and adopting the 'healthy streets' approach.
- Creating a housing market that works better for all Londoners through the delivery of more homes, a strategic target of 50% affordable housing and homes that meet high standards of design.
- Growing a good economy, seeking to diversify London's economy and sharing the benefits in a more equitable manner, planning for sufficient employment and industrial floorspace in the right locations and maximising London's existing and future public transport.
- Helping London to become more efficient by supporting the Mayor of London's objective to become a 'zero carbon' city by 2050, ensuring that buildings are designed to adapt to a changing climate and creating a safe and secure environment that is resilient against emergencies, such as fire and terrorism.

Chapter 2: Strategic Growth

8. The primary purpose of the plan is to deliver housing and employment growth across London, to address projected population growth and housing needs. Specific reference is made to outer London in this context, where the suburban pattern of development is described as having significant potential for intensification to deliver more homes.

9. The current London Plan identifies a number of 'Opportunity Areas', for housing and employment growth, including the Heathrow Opportunity Area, which relates to the southern part of Hillingdon and the northern part of Hounslow. This area is currently identified as having an indicative employment capacity of 12,000 new jobs and a minimum of 9,000 new homes.

10. In addition to those identified in the existing plan, six new Opportunity Areas are proposed within a series of 'growth corridors', which are identified to bring forward housing and employment growth in a co-ordinated manner. The proposed new Heathrow/Elizabeth Line West growth corridor incorporates part of Hammersmith and Fulham, Ealing, Hounslow and Hillingdon. It includes the existing Heathrow Opportunity Area where growth targets have increased to 13,000 new homes and 11,000 new jobs and a new Opportunity Area for Hayes, to

deliver 4,000 new homes and 1,000 jobs. The level of growth in the Hayes Opportunity Area broadly reflects the proposals for the Hayes Housing Zone.

11. At a strategic level, the Mayor of London proposes a 'town centre first' policy, which seeks to protect town centres for retail, commercial, offices, leisure entertainment, cultural and tourism and hotel uses. High density residential development, which capitalises on the availability of services within walking distance, is also encouraged.

Summary of the proposed response to Chapter 2

12. The key issues of concern for Hillingdon relate to the proposed increase in the Council's housing target and also the significant reduction in car parking standards, which is not considered to be sustainable for residents in outer London. The proposed response is set out in full at **Appendix A** of this report. The comments regarding the potential for the intensification of the suburban pattern of development would herald very damaging and irreversible change to the character of Hillingdon's towns and village centres.

13. The purpose of the London Plan is to provide a strategic spatial planning framework for London, rather than detailed planning policies to be used in the determination of planning applications. As it stands, the document is far too prescriptive. A number of policies are not of strategic importance to Greater London and should be deleted.

14. The specific policies relating to outer London's vision and strategy, economy and transport contained in the current London Plan are proposed to be removed. These policies are essential in recognising the specific differences in the development needs of inner and outer London. The conclusions of the work undertaken by the Outer London Commission on car parking provision, economic and housing growth should continue to be reflected in the new plan and these specific policies, or something similar, should be reinstated.

15. There is a concern that the Council was not consulted on the proposed new Opportunity Area (OA) for Hayes, in advance of the draft plan being published. Whilst the Hayes OA broadly reflects the provisions of the Housing Zone, the proposals should be developed alongside and in consultation with boroughs, rather than imposed on them.

16. There needs to be greater recognition of the differences between and development needs of inner and outer London centres. For example, outer London centres often serve as shopping destinations for those living outside of London, where public transport is poor. These transport connections should not be ignored.

Chapter 3: Design

17. The draft plan notes that the form and character of London's buildings and spaces must be appropriate for their location, fit for purpose and make the best use of a finite supply of land. The document contains specific policies on London's Form and Characteristics and Delivering Good Design and is far more prescriptive on these matters than previous versions of the plan. This reflects the intention that policies can be used in the determination of planning applications, in the absence of suitable Local Plan policies.

18. Of particular note is policy D3 on inclusive design. In addition to ensuring the highest standards of access, the policy seeks to ensure safe and dignified emergency evacuation for all building users. It notes that in developments where lifts are installed, at least one lift per core should be a fire evacuation lift. This is consistent with the provisions of policy D11 on Fire Safety, which requires all major development proposals to be submitted with a fire safety statement, produced by a third party suitably qualified assessor. Whilst these matters are currently covered by Building Regulations, the supporting text to the policy notes that applicants should consider matters of fire safety in advance of the Building Regulations stage.

19. One of the most significant changes to the current version of the plan is the proposed removal of the 'Sustainable Residential Quality' density matrix, which provides density guidelines for new housing development. The proposed 'optimum density' approach is based on an evaluation of the surrounding characteristics, context and capacity for growth. Management Plans should be submitted with higher density developments to demonstrate how day to day servicing and delivery will be achieved.

20. Improving the public realm across London is seen as being central to achieving the Mayor's objective of 'good growth'. Policy D7 proposes a range of measures to achieve this including the adoption of a healthy streets approach, legible signposting across the street scene, careful consideration of street lighting and the provision of free drinking fountains to improve public health and reduce waste from single use plastic bottles.

21. Policy D12: Agent of Change is a proposed new addition to the London Plan, which places the primary responsibility for mitigating the impacts from noise generating activities on the proposed new noise sensitive development. This means that where new development is proposed close to existing noise generating uses, applicants will need to design them in a way which protects the new occupiers. The Agent of Change principle works both ways. If a noise generating use is proposed close to existing noise sensitive uses, the onus is on the new use to ensure its building or activity is designed to protect existing users from noise impacts.

Summary of the proposed response to Chapter 3

22. Whilst the focus on good design is supported, it is unclear how some of the proposed measures can be implemented. Furthermore, many of the proposed provisions are not of strategic importance to Greater London and should not be included in the London Plan. The increased emphasis on design review and the consideration of fire safety assessments, to be submitted with all major development proposals will place additional burdens on boroughs. It is unclear how these measures will be delivered or funded.

23. Policies relating to noise add nothing to the existing policy framework that covers noise management and planning. Heathrow airport is a major source of noise that must be considered a strategic and spatial issue that warrants prescriptive attention in the London Plan. Hundreds of thousands of people suffer from health impacts caused by noise nuisance and the London Plan remains silent on the issue, whilst providing a generic noise policy that adds nothing new. Officers are of the view that noise issues around Heathrow should be given specific attention with a bespoke policy. This should relate to the assessment methodology as well as the triggers for mitigation.

24. It is also unclear how the significant focus on good design squares with the proposed delivery of such a large number of new homes and the development of small sites. The pressure to deliver small sites in such large numbers will undoubtedly result in poorly designed conversions, development that is out of character with surrounding land uses and the approval of sites that would not normally be granted planning consent.

Chapter 4: Housing

25. The draft plan proposes to increase Hillingdon's 10 year target for net residential completions from 5,590 to 15,530 units; an annualised average of 1,553 units. This total includes a 10 year target for small sites under 0.25 hectares of 7,650 units, annualised as 765.

26. Small sites under 0.25 ha are required to play a much greater role in the delivery of new homes. In this regard, boroughs are expected to recognise that local character evolves over time and will need to change in appropriate locations, to accommodate additional housing provision. Boroughs are also expected to prepare area-wide design codes to encourage good design and to encourage higher residential densities on small sites.

27. Boroughs are expected to apply a presumption in favour of the following types of small site development, which provide between 1 and 25 homes:

- Infill development on vacant or underused sites
- Proposals to increase density on underused sites within PTALs 3-6 or within 800 metres of a tube or rail station through: Residential conversions and extensions, the demolition and redevelopment of existing buildings and infill development within the curtilage of an existing house
- The redevelopment or upward extension of flats and non-residential buildings.

28. The presumption means approving small site housing development, unless it can be demonstrated that the proposal would give rise to an unacceptable level of harm. To further compound the harm this will cause, the policy protection which exists in the current London Plan to prevent back-land development (re: garden grabbing) has been removed.

29. A strategic target is set for 50% of all new homes to be delivered as affordable housing. A threshold for affordable housing provision is set for proposals which are capable of delivering more than 10 units, or those with a combined floorspace greater than 1,000 sqm. The threshold level for affordable housing is initially set at 35% and 50% on public sector land and designated employment land.

30. Tenure split for affordable products is set at 30% low cost rented homes, 30% intermediate products and 40% to be determined by individual boroughs, based on identified need. In addition, a new policy states that large scale purpose-built shared living developments may have a role to play in meeting housing need in London.

31. Policy H12 relates to unit size, noting that boroughs should not be prescriptive on the type of units required. Whilst family units have historically been considered as those with 3 or more bedrooms, many families live in two bedroom units. The draft plan states that this should be considered when assessing the need for different sized units.

32. The draft plan provides general support for build to rent schemes. This form of tenure is not subject to the same affordable housing requirements as owner occupation and could be seen by developers as financially preferable.

33. Finally, the draft plan includes policies to deliver housing for specialist groups. Specific borough benchmarks are provided for older persons' housing and a definition is provided for Gypsy and Traveller Groups for planning purposes, which differs from that contained in the Government's Planning policy for traveller sites.

Summary of the proposed response to Chapter 4

34. Hillingdon's housing target of 1,553 homes per year is not considered to be achievable. On average, 749 homes have been built in the Borough each year over the last 4 years. Whilst the Hayes Housing Zone will increase housing delivery to a degree, such a significant increase in the target will not be delivered, unless significant harm is caused to the existing built environment.

35. The Plan has neither appraised nor understood the 'suburban pattern of development' in London, for its intensification policy would have far reaching and very damaging consequences for outer London boroughs. This is particularly true of Hillingdon, which is one of the least developed. Hillingdon comprises a number of former mediaeval and post-mediaeval villages and small towns which grew up along the roads leading out of London: Each has its own historic character and the sense of place and identity which their residents experience is very strong. Moreover, each historic core has been designated a Conservation Area, with other Conservation Areas capturing the quality of their Victorian, or interwar, residential or canalside industrial suburbs.

36. There is already pressure to 'extend to convert', redevelop or infill in the back gardens of larger houses and this has often led to compromised designs, a loss of well detailed Victorian and 1920's houses and a creeping reduction in, or loss of, gardens with their amenity, biodiversity and flood mitigation value, an increase in hard standings, and a relentless incremental erosion of the cherished streetscene. With a strong presumption in favour of intensifying development of this type, within 800m of underground stations or town centres, in this ad hoc, incremental way, the pressures would be greatly increased and large swathes of the Borough would be hugely compromised in their character and amenity, with their history illegible to visitors and their green settings lost.

37. There is no clear protection for Conservation Areas or local heritage designations in these policies, nor for the settings of listed buildings, which should be taken into account when considering proposals for new development. 'Underused sites' could be interpreted as large family houses with gardens whilst 'unacceptable levels of harm to designated assets' would be difficult to determine and even more difficult to agree. There are at least 17 Conservation Areas and numerous Areas of Special Local Character in this Borough which would be directly affected by the Policy to target sites within a set radius of the Borough's seven town centres and fifteen stations. A catch all GLA Design Guide could never provide the subtlety necessary for preserving the character of the many towns and villages which make up Outer London, whilst the specialist resource required by each Borough to write individual design codes for all of these areas would be unrealistic and the task unattainable.

38. Furthermore, the small sites component of the target of 765 units per annum bears no resemblance to what has been delivered in recent years. Hillingdon has delivered an average of 176 units per annum on small sites over the last 8 years. Such a reliance on small sites does not constitute a strategic approach to housing delivery which should be progressed through the London Plan. It is not considered that policy H2 will accelerate delivery to such a significant degree and will, in fact, lead to inappropriate development.

39. Boroughs have no specific means of allocating or controlling the delivery of residential units from small sites. This will lead to housing targets being missed and the loss of planning appeals on sites that would not normally be granted planning consent - for example, the development of Green Belt land, which is strongly opposed by the Mayor.

40. The target to deliver 35% of all new units as affordable housing is consistent with the Council's current threshold. However, the proposed strategic target of 50% affordable housing provision is not supported. This target was included in the 2004 version of the London Plan and was never achieved. There is no clear justification why the 50% target has been re-introduced or how it will be achieved under the proposed new policy framework.

41. Two bed units should not be regarded as family housing. This will restrict the delivery of larger three and four bed units, exacerbate problems of overcrowding and ultimately force families to move outside of London. Furthermore, shared living schemes, which are excluded from the minimum floorspace standards for residential accommodation, should not be regarded as a solution to address housing needs.

42. Whilst it is acknowledged that Build for Rent has a role to play in housing delivery, this should not be at the expense of developing new homes for sale. Owner occupation is still the tenure that many aspire to and although it requires greater up-front expenditure, the ongoing housing costs are comparable and in some instances less than housing for rent.

43. In relation to specialist housing, the acknowledgement of the needs of older persons in London is supported. However, proposed change in the definition of Gypsy and Traveller Groups set out in draft policy H16 differs significantly from that contained in the DCLG Guidance document, which was used in the recently completed Gypsy and Traveller Assessment for Hillingdon. There is no justification for a departure from national planning guidance on this matter and the DCLG definition should be retained in the policy.

Chapter 5: Social Infrastructure

44. Chapter 5 of the plan contains policies which seek to ensure an appropriate level of social infrastructure is delivered to support planned growth. Specific policies are included to address health and social care, education and childcare, play and informal recreation, sports and recreation facilities and burial space. Large scale commercial developments that are open to the public should provide and secure the management of free publicly accessible toilets, which are suitable for a range of users including disabled people and families with young children.

Summary of the Council's proposed response to Chapter 5

45. The delivery of social infrastructure is essential to support the ambitious housing targets that are put forward in the plan. If boroughs are expected to deliver such high levels of growth, the Mayor of London should provide direct funding to ensure the delivery of essential health and education facilities.

Chapter 6: Economy

46. Boroughs are encouraged to introduce Article 4 Directions to protect strategically important office space to ensure these areas are not undermined by office to residential permitted development rights. The Council has already implemented this approach through the Article 4 direction that restricts office to residential permitted development rights in Uxbridge, Stockley Park and the Heathrow Perimeter.

47. The draft plan notes that the release of land for industrial land uses, including the designated Strategic Industrial Locations, has far exceeded release benchmarks set in previous London-wide guidance. Overall, the plan seeks to achieve no net loss of industrial floorspace capacity across London.

48. Each borough is categorised according to whether designated industrial land should be retained or released for other uses. Hillingdon is categorised to retain capacity, which means there should be no net loss of industrial floorspace across the Borough. Strategic Industrial Locations continue to be protected for industrial, storage/distribution and logistics uses.

49. Policy E7 encourages boroughs to explore the potential to intensify industrial activities on industrial land and consider whether some types of industrial activity could be co-located or mixed with residential development. The policy states that boroughs should work with the Mayor of London and be pro-active in encouraging this approach. A number of worked examples are set out in the plan to show how the co-location of industrial/storage and residential uses could work.

50. The draft plan seeks to encourage a diverse and vibrant retail sector and specific reference is made to development proposals containing A5 hot food takeaways. Policy E9 notes that these should not be permitted where they are within 400 metres of an existing or proposed school.

Summary of the Council's proposed response to Chapter 6

51. The principle to retaining the Borough's supply of designated employment land is broadly supported. However, given the significant pressure from owners/occupiers for residential/mixed use development and the flexibility that the draft plan provides to release business space, this objective may be difficult to achieve.

52. Officers are of the view that there is not enough policy support to retain economic activity in outer London centres like Uxbridge, or to deliver the infrastructure that is necessary to achieve this objective. Specific reference should therefore be made in the plan to the extension of the Central Line from West Ruislip to Uxbridge. Officers note the priority given to the delivery of Old Oak Common, however direct support should also be provided to secure the long-term

prosperity of both Uxbridge town centre and Stockley Park, to prevent this expansion being to the detriment of other outer London employment areas.

53. Officers broadly support the proposal to support retail development in town centres. Whilst concerns regarding the proliferation of hot food takeaways are understood, these uses are preferred to vacant shop units, which become magnets for anti-social behaviour. In this regard, the moratorium on A5 uses within 400 metres of a school is not supported.

Chapter 7: Heritage and Culture

54. The draft plan contains a series of highly prescriptive policies to protect and promote heritage across the capital. Boroughs are encouraged to develop evidence that demonstrates a clear understanding of the historic environment.

55. A new policy is included to protect public houses that have heritage, economic, social or cultural value and supports proposals for new public houses to stimulate town centre regeneration.

Summary of the Council's proposed response to Chapter 7

56. There are serious concerns that the heritage related policies will be undermined by the housing growth policies contained in other chapters of the plan. It is imperative the heritage based planning policies seek to protect the wider settings of heritage assets; otherwise such assets will have their value eroded by nearby developments which adversely impact on their settings and wider significance. This is of particular concern with regard to Conservation Areas and Areas of Special Local Character, which cumulatively cover large parts of the Borough.

57. The protection of public houses is supported, but changes are required to policies that seek to protect heritage assets.

Chapter 8: Green Infrastructure and the Environment

58. Chapter 8 seeks to protect London's open and green spaces and biodiversity. Policy G1 relating to green Infrastructure notes that Boroughs should prepare green infrastructure strategies to integrate the objectives relating to open space provision, biodiversity, conservation, flood management, health and well-being and sport and recreation.

59. Whilst policy G2: London's Green Belt states that the protection of the Green Belt is maintained, it also states that *'the enhancement of the Green Belt to provide appropriate multi-functional uses should be supported'*. This is considered to be a departure from the wording used in the National Planning Policy Framework.

Summary of the Council's proposed response to Chapter 8

60. The proposed wording of draft policy G2 is a matter of serious concern. The existing London Plan Green Belt policy mirrors the National Planning Policy Framework (NPPF) text; and the current NPPF/London Plan policy wording has been very effective in preventing inappropriate development in the Green Belt.

61. Any weakening of current Green Belt policy will not, in reality, result in more efficient use of Green Belt land for uses of community benefit (if this is the intention) but instead be the subject of speculative development proposals by the development industry. Therefore, it is considered that the Council should strongly object 'in principle' to the change in wording of the policy. The above issue will be compounded if (as expected) increased unachievable housing numbers place further pressure on Green Belt land to be released.

62. Whilst the protection of Metropolitan Open Land is supported, the draft plan should also refer to the protection of Green Chains, which provide a natural resource across London.

Chapter 9: Sustainable Infrastructure

63. This chapter relates primarily to air quality, climate change, water supply matters and waste management. Policy SI1 states that London's air quality should be significantly improved. Development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality. Air quality focus areas are broadly identified in the plan for each borough.

64. To minimise greenhouse gas emissions, major development schemes are expected to be zero carbon. In meeting this target, a minimum on site reduction of at least 35% beyond building regulations is expected. Residential development should aim to achieve 10% and non residential development should achieve 15% reductions, through energy efficiency measures. Boroughs should establish a carbon offset fund, which should be ring-fenced and used to deliver greenhouse gas reductions.

65. The draft plan notes that London is already experiencing higher than average temperatures due to climate change and emphasis is placed on seeking to ensure that development proposals minimise internal heat gain and the impacts of the urban heat island through design, layout, orientation and materials. Specific building design measures are proposed to address this issue and major development proposals should demonstrate through an energy strategy how they will reduce the potential for overheating and reliance on air conditioning systems.

66. Whilst the overall waste management target for London has reduced, the share of waste (referred to as the apportionment) that Hillingdon is required to manage over the period of the plan has increased significantly. The proposed apportionment figure has risen back to similar levels contained in the version of the London Plan published by Boris Johnson in July 2011.

67. Flood risk is expected to be managed in a sustainable and cost effective way, in collaboration with key stakeholders. Development Plans should use the Mayor's Regional Flood Risk Appraisal, Strategic Flood Risk Assessment and Surface Water Management Plans to identify areas of particular flood risk.

Summary of the Council's proposed response to Chapter 9

68. Whilst many of the principles set out in this chapter are supported, additional burdens have been placed on boroughs and it is difficult to envisage how the practical implementation of policies could occur. As an example, policy SI1 relating to Improving air quality needs to be far more robust with clear targets and triggers for mitigation.

69. The Council recommends the approach adopted by the previous Mayor with respect to achieving carbon reduction emissions. Development, where required, should be able to demonstrate the baseline emissions and the necessary reductions. If the solutions cannot be found onsite, then the Policy should contain clear support for finding offsite solutions through an Air Quality improvement fund. The Mayor should invest time and resource in developing and implementing an appropriate mechanism, including formula for assessing contributions.

70. The Policy as written introduces an ambiguous approach that complicates implementation significantly. Ultimately, it will be left to the Borough to provide the detailed interpretation. Evidence from the Carbon Reduction policies shows how a well articulated and clearly defined policy can be implemented in practice. The air quality policy should follow that successful approach. Officers have provided a number of detailed comments on the flood risk and water management policies. These are contained in the Council's draft response at Appendix A.

Chapter 10: Transport

71. The key themes of the chapter relate to transport matters, car parking provision and aviation policy. Development proposals should facilitate residents making shorter, regular trips by walking or cycling and support the ten 'healthy streets' indicators. Cycle parking standards remain largely unchanged from the current version of the Plan, however car parking standards have been reduced and reformatted. The proposed car parking standards, as set out in the draft plan, are as follows:

Location	Maximum Parking Provision
Central Activities Zone Inner London Opportunity Areas All areas of PTAL 5-6 Inner London PTAL 4	Car free
Inner London PTAL 3	Up to 0.25 spaces per unit
Inner London PTAL 2 Outer London PTAL 4 Outer London Opportunity Areas	Up to 0.5 spaces per unit
Inner London PTAL 0-1 Outer London PTAL 3	Up to 0.75 spaces per unit
Outer London PTAL 2	Up to 1 space per unit
Outer London PTAL 0-1	Up to 1.5 spaces per unit*
*Where small units generally make up a proportion of a development, parking provision should reflect the resultant reduction in demand so that provision across the site is less than 1.5 spaces per unit.	

72. In relation to Aviation, Heathrow airport expansion is opposed, unless it can be shown that no additional noise or air quality harm would result. The Mayor's support for the expansion of Gatwick airport is not reflected at all within the document.

Summary of the Council's proposed response to Chapter 10

73. Officers are concerned that the proposed car parking standards do not relate to the travel patterns of residents in the Borough for the following reasons:

- LBH has extremely poor public transport accessibility (percentage of PTAL by area) in comparison to all other London Boroughs, typified by:
 - 86% of the residential population living within an area of PTAL less than 2 (defined as 'poor' by TfL); and
 - 51% of the residential population living within an area of PTAL between 1 and 1b (defined as 'very poor' by TfL);
- An assessment of journeys between key destinations has determined that public transport does not provide a viable alternative for the vast majority of trips. Analysis shows 89% of trips being quicker by car than public transport;
- An assessment of 2,506 'points of interest' within the Borough (shops, doctors' surgeries etc.) concludes that 46% are located in areas with low public transport access.
- In comparison with other parts of London, Hillingdon has a significantly higher number of points of Interest in PTAL 3 areas or below and the lowest number of points of interest in areas of PTAL 4 or above.
- Car ownership in Hillingdon is higher than in any other London borough, correlating with the lowest average PTAL;
- An assessment of cars owned vs mode of travel to work indicates that higher parking standards do not necessarily translate to lower car use for work and therefore congestions during peak periods;
- Amongst all other London boroughs, Hillingdon has a significantly higher number of residents working outside of Central London. This explains the need for higher car ownership in Hillingdon when compared to other boroughs;
- Hillingdon is the London borough with the highest amount of residents travelling to work by car, reflecting the number of residents that work outside of London and the limited availability of public transport.

74. Without a step change in public transport availability there will always be a greater need for residents to travel by car when undertaking trips both in and around the borough, in comparison to many other London Boroughs. An appropriate level of employment generating uses is essential to maintain economic prosperity, particularly in outer London. As a result and taking account of the above points, the Mayor of London's proposed car parking standards are not considered to be appropriate for Hillingdon.

75. The Mayor's position that Heathrow should not be expanded is supported. However, there is no strategic policy to promote expansion of Gatwick. Clearly this is a matter of strategic importance for the GLA and therefore should warrant coverage somewhere in the plan.

Next Steps

76. The consultation period for the new plan runs until 2nd March 2018. Going forwards, the key dates for the draft plan are as follows:

Action	Date
Cabinet/Cabinet Member approval of the draft proposed response	15 th February 2018
Sign off final draft response by the Leader of the Council, Cabinet Member for Planning, Transportation and Recycling and the Deputy Chief Executive and Corporate Director of Residents Services.	End of February 2018
Submit response	Beginning of March 2018
Public examination	Autumn 2018
Adoption of the new London Plan	Autumn 2019

Financial Implications

The cost of preparing the proposed response and attending the public examination can be met from existing revenue budgets.

RESIDENT BENEFIT & CONSULTATION

The benefit or impact upon Hillingdon residents, service users and communities?

Policies in the London Plan have a direct impact on all aspects of the natural and built environment in Hillingdon. The new London 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

This is the first and only round of consultation which commenced on 1st December 2017 and is due to run through until 2nd March 2018. The Council's response will be forwarded on to the Planning Inspector appointed to undertake the examination.

CORPORATE CONSIDERATIONS

Corporate Finance

Corporate Finance has reviewed this report, confirming that the direct costs associated with the recommendations above will be managed within existing service budget. Notwithstanding the practical challenges associated with achieving the proposed substantial increase in Hillingdon's housing delivery target from 559 units to 1,553 units per annum from 2019/20, such a marked increase in population would likely lead to equivalent growth in demand-led services and associated costs which will be incorporated into future iterations of the Council's Medium Term Financial Forecast as appropriate.

Legal

The Mayor of London is required pursuant to the Greater London Authority Act 1999 to consult all London boroughs on the draft London Plan and to take into account all consultation responses. At the end of the consultation period the consultation responses will be reviewed by an independent Planning Inspector appointed by the Secretary of State to carry out the Examination in Public (EIP) for the draft London Plan.

Following adoption of the draft London Plan (which may incorporate alterations following the consultation process and recommendations put forward by the Planning Inspector following the EIP), the London Plan will form part of the Council's Development Plan (the statutory basis for planning decisions).

In accordance with Section 24(1)(b) of the Planning and Compulsory Purchase Act 2004, the Council's Local Plan must also be in general conformity with the London Plan.

Therefore, once the draft London Plan is adopted, the Council will need to determine whether its own Local Plan policies continue to be in general conformity. Should this not be the case, the Council will need to bring forward its own set of alterations to the Local Plan to bring this into general conformity.

Infrastructure / Asset Management

There are no specific Property and Construction implications arising from the recommendations in this report at this stage. However in general terms the target of 50% affordable housing will reduce values of council owned sites identified for disposal, although other policies which may lead to increased densities may mitigate this effect to some extent.

BACKGROUND PAPERS

NIL