

1 Introduction and summary

1.1 The following document sets out the London Borough of Hillingdon's comments on the draft London Plan, which was published for public comment on 1st December 2017. The Council welcomes the opportunity to comment on the draft plan, but is extremely concerned about the Mayor's growth aspirations, which are not considered to be deliverable over the plan period.

1.2 Notwithstanding the highly prescriptive nature of the policies within the document, the Council does not consider that the plan encourages good growth or sustainable development. Overall, the proposed level of growth will have an adverse impact, particularly in outer London boroughs like Hillingdon and result in adverse outcomes such as the loss of Green Belt land, which is the polar opposite of what the Mayor is seeking to achieve.

1.3 The Council's comments on each of the chapters in the draft document are set out in the following paragraphs. The key points contained within Hillingdon's response are as follows:

- The highly prescriptive nature of the draft plan limits the flexibility for boroughs to develop their own policies to address locally specific circumstances. In this sense, the document goes far beyond the remit of the Greater London Authority Act, which states that the Mayor's Spatial Strategy should only deal with matters that are of strategic importance to London.
- The Council is concerned that the draft plan fails to provide sufficient differentiation between the development needs of inner and outer London. The work undertaken by the Outer London Commission to support the current version of the plan should continue to be recognised.
- The Council disputes the statement that in outer London, the suburban pattern of development has significant potential for intensification. Suburban development is a fundamental and long-standing component of London's urban character. It is one of the factors that defines London and makes it a unique city.
- The Mayor's approach to small site development has the potential to destroy much of the suburban character in outer London through inappropriate development. This is an unacceptable outcome of a policy that will fail to deliver growth in a sustainable manner.
- The proposed housing target for Hillingdon of 1,553 units per annum will not be delivered.
- The Council is concerned that the Mayor's proposed standards for car parking are inappropriate for Hillingdon, where residents rely heavily on the use of a car to go about their daily lives.

- The Mayor's continued opposition to the expansion of Heathrow Airport is supported. However, the Council is disappointed that there is no strategic policy to promote the expansion of Gatwick.

2. The overly prescriptive nature of the plan

2.1 The Greater London Authority Act 1999 sets out the scope for the preparation of the Mayor's Spatial Development Strategy, the London Plan. Part VIII, para 334[5] states:

'The spatial development strategy must deal only with matters which are of strategic importance to Greater London.'

2.2 The draft plan contains over 100 policies and is over 500 pages in length. The plan fails to provide policies relevant to key strategic issues, whilst being overly prescriptive for non strategic matters. Many strategic issues have been further complicated through generic policies that simply pass the problem to boroughs. Ultimately, the plan introduces countless more policies and rhetoric to be considered when fulfilling local planning obligations of little strategic relevance, requires further assessments to be submitted and considered and blurs the line with local issues and other forms of planning control.

2.3 For example, as currently worded, the proposed policy for Noise adds little to existing policies and guidance and fails entirely to address the noise implications from Heathrow airport, despite this being of clear strategic importance for hundreds of thousands of people. This is a clear example of the plan tackling the wrong remit.

Air Quality

2.4 The issue of air quality is clearly a strategic matter that affects all Londoners, yet the air quality policy is vague, lacks clarity and requires boroughs to find ways to interpret the policy and then implement. The only additions to the general policy approach of the National Planning Policy Framework are not workable in planning terms. Policy SI1 states:

Development proposals should not: a) lead to further deterioration of existing poor air quality.

2.5 Most development is likely to result in additional traffic movements, which inherently will add to existing pollution levels. Whilst the aim of the policy is welcomed, it should provide boroughs with effective, practical and workable planning criteria. This policy will result in a range of different approaches being taken across London and may not achieve the aims of improving air quality.

2.6 In general, it appears that the desire to provide a London Plan that covers every single planning matter is at the expense of targeting policies to only the

strategic topics. It is also concerning that the Mayor has effectively passed the responsibility of finding solutions to significant issues to boroughs, which is not the intention of the Greater London Act 1999.

Aviation

2.7 The Council supports the Mayor's position that Heathrow should not be expanded and that instead the existing environmental conditions improved dramatically. However, the Council is disappointed that there is no strategic policy to promote the expansion of Gatwick. Clearly this is a matter of strategic importance for the GLA and therefore should warrant coverage somewhere in plan.

3. Chapter 1: Good Growth

3.1 Whilst the general intention to deliver 'good growth' is supported, it is not considered that it is possible to bring forward the proposed level of housing development in a sustainable manner. The proposed housing delivery targets will have significant and adverse social, economic and environmental consequences. The Council's detailed comments on these policies are set out below.

Policy GG1: Building Strong and inclusive communities:

3.2 The Council supports the general notion that spatial planning can have significant impacts on social outcomes. However, this section of the plan should refer to the importance of open space and green Infrastructure in achieving positive health outcomes. Specific comments on this policy are as follows:

Criterion C should read:

'Ensure that streets, public and private open and green spaces are planned for people...'

Criterion D should read:

'Promote the crucial role town centres have in social, civic, cultural, historic and economic lives...'

Criterion E should specifically refer to the 'local distinctiveness' of an area and read:

'Ensure new buildings and the spaces they create are sensitively designed to reinforce and enhance the accessibility, legibility, permeability, and inclusivity of new and historic neighbourhoods, and are appropriately resilient and adaptable...'

Policy GG2: Making the best use of land

3.3 The Council does not consider that the creation of high density, mixed use places should be a specific outcome for this policy. This approach is a backward step to the 'town cramming' policies proposed in previous versions of the London Plan, which failed to meet housing needs or deliver a high quality environment. Instead, the policy should focus on striking a balance which reflects the character of surrounding land uses and meets locally identified needs.

3.4 The reference to the development of small sites should be removed from the policy. The proposed approach cannot be controlled through the development plan process and does not represent a strategic or sustainable means of meeting London's housing needs. Housing targets containing an unrealistic proportion of small site provision will not be met. This may well result in the development of sites that would not normally be granted planning consent and the loss of Green Belt land on appeal.

3.5 Criterion E of the policy sets a strategic target for 80% of all journeys using sustainable transport and refers to a car free lifestyle. This target is unrealistic for Hillingdon, where public transports links do not serve many of the destinations that many residents need to travel to. Residents therefore rely heavily on the private car to travel north to south in the Borough and outside of London. The target will not be achieved without significant investment in public transport provision, which is co-ordinated with local authorities outside of the capital.

3.6 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.

3.7 Specific comments on the policy are as follows:

Criterion C should read:

'Understand what is valued about individual existing places...'

Criterion D should read:

'Protect London's Open Land, designated nature conservation sites, other designated sites and local green spaces, and promote the creation of new and enhancement of existing green infrastructure and urban greening.'

Policy GG3: Creating a healthy city

3.8 The policy should specifically refer to enhancing and improving the provision of health services and infrastructure and ensuring it is designed and considered as part of the planning and development process.

Policy GG4: Delivering the homes Londoners need

3.9 The proposed strategic target to deliver 50% of all new homes as affordable housing is not considered to be achievable. The Council is aware that the 2004 version of the London Plan included a 50% target for affordable housing provision and that this was not delivered. The draft plan contains no additional incentives to ensure the target is delivered and does not explain its economic viability.

3.10 The strategic target for affordable housing provision should be 35% to reflect the Mayor's Affordable Housing and Viability SPG.

Policy GG5: Growing a good economy

3.11 The Council's comments on this policy are as follows:

Criterion F should read:

'Promote, enhance and support London's rich heritage and cultural assets...'

Criterion G should read:

'Maximise London's existing and future public transport, walking, cycling and waterways network...'

Policy GG6: Increasing efficiency and resilience

3.12 Criterion B should be amended to incorporate the following wording:

'Ensure new buildings and infrastructure...'

4. Chapter 2: Spatial Development Patterns

4.1 The Council strongly objects to the provisions of paragraph 2.0.3, which states that the suburban pattern of development in outer London has significant potential for appropriate intensification. The phrase 'appropriate intensification' is not explained, however it is assumed that this refers to the Mayor's policy on the development of small sites.

4.2 As noted elsewhere in this response, the Council is extremely concerned that the Mayor's policy on small sites will lead to irreparable harm to the character of suburban areas in outer London boroughs like Hillingdon. A vague statement of this

nature will do little to address housing needs in a managed way and only serves to support inappropriate windfall development in suburban areas.

4.3 By its nature, windfall development cannot be managed through the allocation of sites. Whilst there may be limited scope for residential development on vacant sites, this paragraph should be balanced against the need to preserve the character of suburban areas in outer London. These areas are as much a part of London's urban grain as the intensely developed central areas and form an important buffer between rural areas outside of London.

Policy SD1: Opportunity Areas

4.4 The proposed new Opportunity Area for Hayes broadly reflects the level of growth proposed in the Hayes Housing Zone. The Council has not requested an Opportunity Area designation for Hayes and requests further discussions with the Mayor to agree the rationale and potential impact of this proposal.

Policies SD2: Collaboration with the wider south East and SD3: Growth locations in the Wider south East and beyond

4.5 The Council supports the Mayor's objections to Heathrow expansion. The Council, like the Mayor, supports the expansion of Gatwick in preference to Heathrow. It is therefore surprising to see that the policies in relation to the south east in SD2 and SD3 do not refer to Gatwick, which should be a principle strategic matter given the stance on Heathrow. Without policy support, or a clear vision of how an expanded Gatwick would be supported by London, the arguments for not supporting Heathrow are weakened.

4.6 The Council would expect the London Plan to reflect the aspirations of the Mayor, and lay the foundations for an expanded Gatwick that serves and benefits London as a whole.

Policy SD6: Town Centres

4.7 The Council places significant importance on the role that Hillingdon's town centres have in supporting the character of the borough and meeting the needs of residents', businesses and visitors. The priority given to town centres is therefore supported.

4.8 The reference to 'higher-density' in criterion C raises a particular concern. It begs the question of what constitutes higher density and often encourages tall buildings in locations that are out of context with the existing character of the area. High density residential development within town centres must only be allowed if it complements the character, role and function of the local centre.

4.9 The Council would prefer reference to making best use of land, taking account of the factors identified in the rest of the policy and policy D1 relating to properly understanding and responding to existing character and context.

Policy SD7: Town centre networks

Policy SD8: Town Centres Development principles and Development Plan Documents

Policy SD9: Town Centres: Local Partnership and implementation

Policy SD10: Strategic and local regeneration

4.10 As noted above, the Council welcomes policies that support the role and function of strong town centres, however these policies are too prescriptive and cannot be practically applied in decision taking. As such, they should be removed from the plan.

5. Chapter 3: Design

5.1 Whilst the Council welcomes the Mayor's focus on good design, the policies are overly prescriptive on design detail and do not provide a strategic focus. As such, they are inconsistent with the purpose of the London Plan, as outlined in paragraph 2.2 of this response. The draft plan should provide general design guidance, as a framework for Boroughs to develop their own locally specific design policies.

5.2 The Council is particularly concerned that pressure to meet increased housing delivery targets, outlined in chapter 4 of the draft plan, will result in a profusion of poor design. The draft plan should provide a policy statement to confirm that this will not be supported and confirm that good design is a key aspect of sustainable development.

Policy D1: London's form and characteristics

5.3 The policy outlines a series of largely agreeable design concepts, which are already considered to be established as best design principles in placemaking. The policy is not of strategic value, nor is it prescriptive enough to be implemented in planning decisions or plan making. On this basis, it is considered that Policy D1 should be removed.

5.4 Notwithstanding the above, there is a contradiction between the requirement to optimise density in Criterion A 1), with Criterion B 1) of the policy, namely to respond to the local context of the 'existing and emerging street hierarchy, building types, forms and proportions'. It will be very difficult to mitigate for the scale of the difference being proposed through new developments, with that of low-rise suburban development or the setting of heritage buildings. Furthermore, the requirements

attached to these high rise developments, namely on-site amenity, community infrastructure and car parking will pressurise the site coverage and the boundaries of the existing local environment.

5.5 An example should be provided in part 6 of Criterion A, to demonstrate what is meant by a positive reciprocal relationship between what happens inside the buildings and outside in the public realm.

5.6 In the event that the policy is retained, the Council's specific comments are as follows:

Criterion B, part 4 should be amended to:

'...respect and enhance heritage assets and their wider settings and utilise other architectural features that contribute to local character'

Paragraph 3.1.2 should be amended to:

'Their height, massing, footprint and site layout should help make public spaces coherent and reflect the existing townscape characteristics of the surrounding area.'

Paragraph 3.1.3 should include a reference to the quantitative air quality requirements.

Paragraph 3.1.4 should include a reference to site coverage and larger sites being able to contribute further to urban greening in terms of accessible green space.

Paragraph 3.1.9 should be removed.

Paragraph 3.1.10-11 should include reference to the use of sustainable transport to development sites, e.g. using canals where they abut development sites.

Policy D2: Delivering good design

5.7 Criterion A of this policy relates to the mechanisms used to identify areas with growth potential. As currently worded, the policy conflicts with Annex A1.2 and A1.3, which identify areas of growth potential without seeming to apply the criteria in this policy.

5.8 The policy is also an example of the London Plan operating beyond its remit of dealing with matters of strategic importance. Evidently, if the plan doesn't identify the areas of growth, then they are not matters of strategic importance. Therefore, having a generic policy of this nature is of little purpose.

5.9 Furthermore, these requirements will put more pressure on limited planning resources for additional framework plans and design review panels. These

requirements could also delay the planning process, if multiple plans are being produced to support the future strategic planning of one place.

5.10 A clear definition of 'optimised' should be included within the plan, to determine whether this means over and above the existing use and character of the area.

5.11 In relation to Criterion F, design review panels have a huge resource implication for individual boroughs and one would question if this was realistic. There is also no indication of how these standards would be monitored and maintained across London.

5.12 Specific comments on this policy are as follows:

Criterion A should include the requirement:

'Identify the current provisions of accessibility and inclusive design, and analyse all options to deliver high quality inclusive development.'

Criterion A, part 3 should include:

'Building form'

Criterion A, part 6 should be amended to:

'accessible open space networks, green infrastructure and water bodies'

Criterion A, part 7 should be amended to:

'to archaeology, historic development and the contribution made to local character by heritage assets (including an assessment of their significance and contribution to local character).'

Criterion A, part 8 should separate topography and hydrology.

Policy D3: Inclusive design

5.13 The principle of inclusive design is supported, however the policy requires the following amendments:

Criterion A, part 3 should be amended to:

'In developments where lifts are installed, including within blocks of flats, as a minimum at least one lift per core (or more subject to capacity assessments) should be a fire evacuation lift suitable to be used to evacuate people who require level step free emergency egress from the building. Carry-down

mechanical or similar interventions that rely on manual handling are not acceptable'

Policy D4: Housing quality and standards and S4 - Play and Informal Recreation

5.14 The intensive densification of development in London is putting increasing stress on existing open space. Many developments now place multi-storey buildings overlooking the amenity space in a courtyard areas, leading to significant areas of shadowing and a 'wind tunnelling' effect. These open spaces are often relied upon as the sole areas of recreation and enjoyment for new residents.

5.15 Neither Policy D4 or S4 makes any reference to the usability of the play and informal recreation. The quality of the play space is just as important, if not more so, than the quantity.

5.16 The policy also fails to set out adequate minimum private amenity space standards, which are necessary if high density housing is to realise the vision to become 'comfortable places of retreat'. The 5 sqm, with an extra 1 sqm, is seen as inadequate. The policy also fails to outline alternative locations for private amenity space, if the minimum size cannot be achieved within the dwelling layout, such as through the use of podium decks.

5.17 There is also no recognition of the hierarchy of spaces, which are required to provide a range of different amenity spaces, in order to encourage residents to participate in communal activities within the development. Defensible space and buffer zones, between the private dwellings and public domain, do not feature as part of the design standard.

5.18 Rooftop amenity space is also a restricted solution with regards to access and appropriateness for certain uses, as well as being restrictive for certain users such as young children, the elderly and people with certain disabilities. It should not be the primary space in a development and should only be viewed as windfall for central locations like town centres, where sites are substantially constrained. Urban and suburban locations should be able to provide adequate amenity at the lower levels of the building, if designed and approached correctly.

5.19 Paragraph 3.4.10 does not set out minimum overlooking/privacy distances, yet conversely promotes habitable rooms placed closer together, if greater ceiling heights are achieved. Whilst sunlight/daylight is an important aspect, so is a resident's right to a sense of privacy.

Policy D6: Optimising housing density

5.20 The approach fails to set out a range of appropriate density standards, which respond to a variety of characteristics and settings that reflect the diversification and different urban morphologies of London. A universal approach to density is inappropriate, particularly in light of the policies relating to context that are provided before this policy.

5.21 Criterion C of the policy contradicts the previously well established Sustainable Residential Quality standard to density, without providing any new evidence to suggest why the thresholds need to be this high to trigger good design.

5.22 Paragraph 3.6.1 of this policy overlooks the need to consider the existing character and context of the site, setting out a presumption in favour of high density development, regardless of site constraints.

5.23 Paragraph 3.6.4 fails to understand that strategic transport interventions will not always significantly improve the PTAL of an area, particularly where associated increases in local transport provision do not come forward. As currently worded, the delivery of major developments could be delayed whilst local transport improvements are negotiated, rather than using alternate mitigations.

5.24 Specific comments on this policy are as follows:

Criterion A, part 1 should include the addition of:

'And character'

Paragraph 3.6.1 should be amended to read:

'This will may mean developing at densities above those of the surrounding area on most sites. The design of the development must optimise housing density within the restraints of the site's context. A design-led approach to optimising density should be based on an evaluation of the site's attributes, its surrounding context and capacity for growth and the most appropriate development form...Historic areas will need special consideration and it may not be possible to apply this approach in these locations'

Policy D7: Public realm

5.25 The policy should include a reference to ensure that public realm includes green infrastructure to support rainwater management through sustainable drainage.

Policy D8: Tall buildings

5.26 Criterion B of the Policy indicates that tall buildings will affect the dispersal of pollutants. This suggests that all tall building applications should be accompanied by an air pollution dispersal model. The draft plan should clarify this point, as it would be an additional piece of work required from the applicant. As written, the policy becomes inconsistent and may result in different information being assessed by schemes referred to the Mayor.

5.27 There should also be reference to large/bulky buildings, as the use of a large footprint combined with even moderate height can be destructive in a townscape, if not given proper consideration. Overall, tall buildings should not change the overall character and appearance of the place.

5.28 Specific comments on this policy are as follows:

Criterion C, part 1d) should include reference to strategic views and their tests, as required in the NPPF.

Criterion C, part 1d) should make reference to the wider setting of the WHS and refer to views and the management plan policies for each area.

Policy D9: Basement Development

5.29 This policy is not a strategic issue, nor is it prescriptive enough to be of any value to local authorities. There is no definition of negative impacts and the supporting text introduces several gray areas which local authorities would have to navigate. This is not an issue that is refined to inner London or large scale basement development. The policy should be deleted and the issue of basement development left to individual Boroughs to address.

Policy D11: Fire safety

5.30 Whilst the Council recognises the need to improve fire safety, the policy itself addresses issues that are currently dealt with through building control.

5.31 The requirement for all major development proposals to submit a fire statement to the local planning authority is of most concern, as any information submitted to the local planning authority requires consideration and effective sign off from a qualified officer. The expertise in fire safety required to sign off these third person fire statements is unlikely to exist within a planning department and will ultimately lead to building control officers having to participate in the planning process, creating duplication of a role that already exists.

5.32 If the policy is to be retained, then Criterion B 2) should be expanded from the disabled to those who also 'require step free emergency egress'.

Policy D12: Agent of Change

5.33 The principle of the policy is supported, as it takes a more logical approach to moving the responsibility of mitigating noise impacts onto the new development, when mitigations can be more easily built in or funded.

5.34 The concern however is that in some scenarios, such as in Conservation Areas or on Listed Buildings, it will not be appropriate to introduce unsightly mitigation measures, such as acoustic fencing.

5.35 Furthermore, there needs to be more clarity on the engagement process between new and existing uses, to ensure that existing occupiers are consulted from the beginning and are not forced into making alterations that could negatively impact their viability.

5.36 Additional clarity would also be welcomed on the requirements of new uses being established adjacent to Strategic Industrial Land (SIL), where the current SIL use does not generate any noise.

Policy D13: Noise

5.37 The policy adds nothing to the existing framework around noise management and planning. Heathrow airport is a major source of noise that impacts hundreds of thousands of people across London and therefore should be considered a strategic and spatial issue that warrants prescriptive attention in the London Plan.

5.38 The Council would request that the noise issues around Heathrow are treated with specific attention, with a policy that clearly sets out the Mayor's intentions for any new or changes to existing airport activity. This should relate to the assessment methodology, as well as the triggers for mitigation.

6. Chapter 4: Housing

6.1 The Council strongly objects to the proposed housing target as set out in Chapter 4 of the draft plan. The Mayor has not provided any evidence to demonstrate that the proposed target can be delivered and the Council is concerned at the lack of engagement, particularly in relation to the approach on small sites, which was not communicated until a late stage in the process.

6.2 Fundamentally, the imposition of unachievable targets will encourage developers to bring forward proposals on sites that would not normally be granted planning consent and the significant erosion of the character of suburban areas. Experience tells us that a failure to demonstrate housing delivery results in the loss of planning appeals on Green Belt sites. These outcomes are completely unacceptable in Hillingdon.

Policy H1: Increasing London's Housing Supply

6.3 The proposed housing target for Hillingdon of 15,530 completions over a 10 year period, or 1,553 units each year, represents a three-fold increase over and above the current London Plan target of 559 units per annum. This level of housebuilding will not be achieved.

6.4 Over the last 4 years, an average of 749 units per year have been completed in Hillingdon. This average is expected to rise as a result of development coming forwards in the Hayes Housing Zone in the south of the borough, which is expected to deliver in the region of 4,000 - 5,000 units up to 2026 and beyond.

6.5 However, the draft plan provides no evidence or policies to demonstrate that such a substantial uplift can be delivered in a sustainable manner. Hillingdon has no means of accommodating the proposed level of new housing and the Council is concerned that policy H1 will result in uncontrolled housing development that is not supported by local infrastructure, has an adverse environmental impact and is detrimental to local residents.

6.6 The draft plan should acknowledge that housing delivery relies on the implementation of planning consents. Large sites in Hillingdon are currently being developed at a rate approximately 200 homes per annum. Whilst boroughs are able to grant planning consents and allocate sites for residential use, this is not sufficient to meet the proposed housing targets.

London's Housing need

6.7 The Council disputes the Mayor's assumptions regarding population growth and household size, which have resulted in a need to build 66,000 additional homes in London per annum. The Council is currently participating in a Strategic Housing Market Assessment for West London and will submit additional evidence on this point in advance of the examination process.

6.8 Borough delivery targets are informed by estimates of London's current and future housing requirements set out in the 2017 London Strategic Housing Market Assessment (SHMA). The SHMA provides estimates at the Greater London level only and considers London as a single housing market area.

6.9 The main results set out in the London SHMA are based on the 'central' scenario of the GLA's demographic projections, according to which, there is projected to be an annualised growth rate of 55,540 households a year. When backlog need, affordability and the likely rate of second and vacant homes are taken into account, the net requirement for new homes in London between 2016 and 2041 is estimated to be around 65,900 a year.

Household size

6.10 The Council is of the view that the household projections used in the London SHMA, for both Hillingdon and other London boroughs, are unrealistic. Household size was considerably larger in 2011 than it had been 1991, but despite this the modelled household size from 2011 onwards shows a fall. This does not seem

credible. To inform estimates of housing requirements in London, the GLA produces household projections using a model that replicates, as closely as possible, the operation of the most recent CLG model. A fall in household size is projected by both the GLA and CLG outputs, and this translates to a higher projected rate of growth in the number of households than the projected rate of growth of the population.

6.11 Population and household projections are intended to project forward past trends, and it is unlikely that 20 years' worth of increasing household sizes should yield a projection where household sizes now reduce. It is possible that the effect of an ageing population will lead to a greater number of older single persons or couples with no children and this would have an impact on average household sizes; but changes to household mix seem unlikely to lead to household sizes reducing to the extent currently projected by the GLA.

6.12 Average household sizes did reduce over the period 1971 to 1991, and these historic trends continue to have a significant influence on the rates of household growth currently published by CLG and used by the GLA projections. The Office for National Statistics (ONS) will be taking over responsibility for producing future household projections and aim to publish their 2016-based subnational household projections in summer 2018. The ONS has confirmed that they intend to discontinue the use of historic data from 1971 and 1981 and the trend will be taken from 1991. This is likely to mean that the trend in household size in Hillingdon and other parts of London will no longer be downward. The Objectively Assessed Need (OAN) calculation is sensitive to household size and consequently the publication of revised projections in the summer may well raise questions regarding the proposed housing targets.

Household type

6.13 The likelihood that household size is larger than modelled is supported by household type projections. The GLA 2016-based projections identify the overall number of households and also the types of households in each area. While, the overall household size is projected to fall, there is no evidence in the projected mix of household types that this is driven by smaller households such as single persons or childless couples. Neither of these groups is increasing sufficiently to explain a reduction in household sizes, and the proportion of single persons is actually projected to fall in many areas of London.

6.14 None of the larger household types (such as "households with two or more children" or "other - predominantly multi-adult - households") have seen a reduction in their average household size. The average size of each household type has remained relatively consistent for the last 20 years. Therefore trends in average household size are due to the overall mix of households in the area. The mix of households in Hillingdon and other boroughs is expected to include a higher proportion of households with children and 'other households'. This suggests that

household sizes are likely to increase and contradicts the GLA 2016-based projections showing falling household sizes.

6.15 If the household types set out in the GLA 2016-based projections are correct, the total number of households are likely to be overstated. Alternatively, if the total number of households is correct the household types are likely to be incorrect. Either way there appears to be a fundamental inconsistency between the average size of households projected and the types of households projected.

6.16 This inconsistency is fundamentally important, as the different approaches will amount to a considerable difference in household growth projected over the plan period. In establishing the London-wide OAN, the GLA has relied exclusively on the average size of households.

Policy H2: Small sites

6.17 The small sites target for Hillingdon is proposed to increase from an assumed rate of 178 units in the current plan to 735 units per annum. This represents 49% of the overall housing target of 1,530 units per annum and in simple terms is not considered to be achievable.

6.18 This aspect of the housing target was not consulted on as part of proposed methodology for the Mayoral SHLAA and Hillingdon was not briefed on the proposed approach in its subsequent discussions with the GLA. This represents a basic failure in the procedural aspects of undertaking the SHLAA. The proposed approach appears to have been introduced following an analysis of the results that were consulted on and a realisation that London's housing needs were unlikely to be met.

6.19 The starting point for the small sites target is an assumption that 1% of residential units within 800 metres of a railway station, town centre boundary or high PTAL level will deliver additional residential units in the form of residential conversions or intensification. The Council believes that the Mayor's assumptions regarding the number of units within these contours is incorrect, whilst the 1% per year assumption is not based on any sound evidence. This undermines the entire calculation for small sites in Hillingdon.

6.20 The Council is concerned that small site windfall development forms such a high percentage of Hillingdon's overall housing target as this cannot be controlled or managed through the allocation of specific deliverable sites.

6.21 The Mayor has not demonstrated that the proposed target for small sites can actually be delivered. Based on current delivery, which averages 178 units from small sites in Hillingdon, the Council believes that the proposed target will be missed

by a significant margin. Policy H2 is therefore little more than an unachievable aspiration.

6.22 Hillingdon is concerned that these circumstances will result in a failure to demonstrate a five year land supply and that this will be used by developers to support development on sites that would not normally be granted planning consent. The Council expects that the target will significantly increase the pressure on Green Belt land.

6.23 The Mayor's policy has been prepared to increase the number of residential conversions and infill development across London. These proposals often result in substandard, unsightly accommodation with inadequate levels of parking provision. In Hillingdon, the impact of the policy will be felt most strongly in suburban areas.

Impact on the suburbs

6.24 The Plan has neither appraised nor understood the 'suburban pattern of development' in London. Where the Mayor's approach has the desired effects it will 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.

6.25 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. It has also led to 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.

6.26 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.

6.27 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.

6.28 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.

6.29 The Council is disappointed that the draft plan does not include a policy provision which allows Boroughs to introduce a presumption against development on back gardens. The protection of front and back gardens will help to protect and enhance the environment of London as a whole. As such, the provisions of policy 3.5 in the current plan, which supports this position should be carried forward.

Flood Risk

6.30 The Council is concerned that the flood risk implications of the small sites policy have not been fully assessed. Sites of this size are not sequentially tested in terms of flood risk and would have to be dealt with as part of the windfall sites process, which does not allow the LPA to plan for an appropriate level of mitigation.

6.31 Proposals for sites which are not classed as major development are not required to provide sustainable drainage information as part of their applications. In addition, sites under 1 hectare do not require Flood Risk Assessments and proposals for the extension or conversion of existing properties have limited requirements. Given these limited requirements and the scale of development expected to come forward from small sites, the cumulative impact of the proposed approach has the potential to significantly increase flood risk across the borough. In addition, the policy does not comply with the requirements of policy SI12 to manage current and expected flood risk in cost effective way and well as supply appropriate infrastructure and mitigation

Proposed approach to housing delivery

6.32 Unlike other aspects of the SHLAA, boroughs were not been given the opportunity to express their views on the Mayor's policy on small site delivery prior to the publication of the draft plan. Given the extent to which it is expected to contribute housing delivery, the approach needs to be subject to significant further scrutiny. Further discussions should take place with boroughs on the extent to which the small sites targets can be supported, before the draft plan progresses to the examination stage.

Policy H5: Delivering Affordable Housing

6.33 The Council does not support the Mayor's strategic target to deliver 50% of all new units across London as affordable housing. This target was included in the 2004 version of the London Plan and removed on the basis that it was not being achieved. The Council is unclear how this will be delivered, given the 35 % threshold set out in the Mayor's Affordable Housing and Viability SPD and Policy H6: Threshold Approach to applications.

6.34 The strategic target should reflect the 35% threshold contained in policy H6.

Policy H7: Affordable housing tenure

6.35 The Council does not agree with the provisions of Table 4.3, which identifies a requirement to deliver 55% of all new units as 1 bed properties. This does not reflect the needs in Hillingdon which are overwhelmingly for 3 and 4 bed family units. The supporting text should recognise the variation of need that exists across London, particularly the requirement for family accommodation.

Policy H12: Housing size mix

6.36 In relation to paragraph 4.12.3, 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, the Council does not consider that those wishing to downsize from larger properties should be encouraged as a means of meeting London's housing need.

Policy H13: Build to rent

6.37 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.

Policy H15: Specialist old persons housing

6.38 The recognition of housing needs for older persons is broadly supported. However, Criterion C of the policy should set out standard(s) to which Use Class C2 and C3 housing should be designed and specified, e.g. Design Principles for Extra Care Housing, published by Housing LIN.

Policy H16: Gypsy and Traveller Accommodation

6.39 The proposed change in the definition of Gypsy and Traveller Groups, as set out in draft policy H16 differs significantly from that contained in the DCLG Guidance

document: Planning policy for traveller sites. There is no justification for a departure from national planning guidance on this matter and the DCLG definition should be retained in the policy.

Policy H18: Large-scale purpose built shared living

6.40 Shared living schemes, which are excluded from the minimum floorspace standards for residential accommodation, should not be regarded as a sustainable solution to addressing housing need.

6.41 The suggested minimum tenancy length of only 3 months is considered inadequate, with the standard assured shorthold tenancy requirement set at a minimum of 6 months, which itself is criticised as being too short to provide a stable living environment.

6.42 Whilst the difficulties providing affordable accommodation for individuals is acknowledged, there is concern that this type of housing, which does not meet current minimum standards, becomes normalised in the place of long-term sustainable solutions to housing shortages.

7. Chapter 5: Social Infrastructure

7.1 The delivery of social infrastructure is essential to support the ambitious housing targets that are put forward in the draft plan. The policies which support the retention of existing social infrastructure and the provision of new facilities are broadly supported. However, if boroughs are expected to deliver such high levels of growth, the Mayor should provide direct funding to ensure the delivery of essential health and education facilities.

Policy S3: Education and childcare facilities

7.2 The policy is supportive of new educational facilities which will assist in meeting the Borough's needs, but some requirements will not be practical on all sites and may conflict with other policies.

7.3 Criterion B, part 3 seeks to locate entrances and playgrounds away from busy roads. The policy should seek to achieve this where possible. Where no insurmountable highway objections exist, a balance needs to be struck between this and other site constraints (which often dictate layout, access, etc, particularly where expanding existing schools) and ensuring this does not encourage car use by locating entrances too far from public transport links, contrary to Criterion 2.

7.4 Parts 5 and 6 of criterion B encourage greater community use and sharing of facilities. Again, the policy should seek to achieve this where it is feasible and practicable to do so, in compliance with other policies of this plan.

7.5 Although desirable, this continues to present challenges with Sport England (SE). The extent to which this can be delivered varies significantly across sites. SE takes an uncompromising view to delivery of community use and associated facilities (eg, floodlighting, hours of use, etc). Their unsympathetic approach to site constraints and other policy requirements has proven problematic, increasing risk and delay (and costs) to the delivery of pupil places. A policy which is weighted too much in favour of community use over other policy considerations gives greater weight to SE's objections and could increase risk to future school developments.

7.6 Paragraph 5.3.12 seeks the co-location of education and housing facilities. Consideration has historically been given to the provision of housing above some of LBH's primary schools. This has been strongly resisted in the past due to child safeguarding concerns. For smaller facilities such as crèches and nurseries this may be more feasible but for schools the practicality of this would need to be very carefully considered. Furthermore, within Hillingdon at least, options for expansion and/or new schools are extremely limited. Therefore, notwithstanding housing need, it is important the educational use of sites is maximised to meet the need for pupil places. The provision of housing or other uses could restrict future expansion of schools.

Policy S4: Play and Informal recreation

7.7 Major development proposals should provide details of the daylight and overshadowing of amenity space and should be refused if there is excessive overshadowing. Major developments incorporating courtyards that are relied upon for amenity space should be able to demonstrate suitable comfort levels in windy conditions.

Policy S6: Public toilets

7.8 The term "Larger developments" used in criterion B of the policy is subjective. The policy should, instead, define the minimum floor area over which a 'Changing Places' cubicle must be provided.

8. Chapter 6: Economy

8.1 The Council would like to see a greater recognition of outer London's economy in the prosperity of London. Specifically, the plan should recognise the different factors that are necessary for economic growth in outer London, particularly the need for improved transport connections and car parking.

8.2 A key factor in the success of the logistics sector in Hillingdon and of Uxbridge as an outer London town centre with a significant amount of office space, is the proximity to other parts of London via the motorway network. The draft plan should recognise the essential nature of transport to the success of outer London's economy, both in terms of providing sufficient public transport links from inner

London and acknowledging that many residents travel to work in outer London centres by car.

8.3 It is important to note that many travel to work in Hillingdon from areas outside of London. Public transport options from these areas are limited and an appropriate level of car parking should therefore be provided.

Policy E1: Offices

8.4 The Mayor's support for the retention of office space and the specific support for existing office parks, including Stockley Park, is particularly supported. However the Council is of the view that significant investment in sustainable transport is required to maintain both Stockley Park and Uxbridge as successful outer London office locations.

8.5 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.

Policy E2: Low cost business space

8.6 The provision of low cost business space in town centres is generally supported. However, the reality is that the delivery of these low value units is likely to be difficult to achieve. The policy should support the delivery of low cost units wherever possible, as part of the development of high value mixed use schemes.

8.7 Criterion B states that proposals that involve the loss of existing B1 floorspace should demonstrate that there is no reasonable prospect of the site being used for business purposes. A stronger line is required from the Mayor on this point. Instead the policy should state that the loss of B1 floorspace will not be supported where there is a demand for low cost business space. The loss of such space should only be supported in exceptional circumstances.

Policy E3: Affordable workspace

8.8 The provision of affordable workspace is generally welcomed and the Mayor should strongly support boroughs who are seeking to bring forward this scarce resource, where local evidence demonstrates that it is required. The policy should highlight the challenge of delivering affordable workspace at a scale that is attractive to investors. Delivery is most likely to take place as part of mixed use development schemes.

Policy E4: Land for industry, logistics and services to support London's economic function

8.9 As currently worded, the policy is rather muddled and overly prescriptive. Whilst the supply of the uses listed in the policy is a London-wide concern, they will not be relevant to many boroughs.

8.10 The wording should simply state that boroughs should make sufficient provision to meet the demand for floorspace, in accordance with locally identified needs. Boroughs should be encouraged to update employment land requirements on a regular basis.

Policy E5: Strategic Industrial Locations

8.11 The protection of Strategic Industrial Land (SIL) is broadly supported.

Policy E7: Co-location and substitution of land for industry, logistics and services to support London's economic function

8.12 The policy seeks to encourage the intensification of industrial activities and the co-location of residential and industrial uses. Whilst the proposed approach may be successful in some instances, industrial uses are rarely compatible with residential development.

8.13 The Council is concerned that the proposed approach could lead to highly complex, customised development schemes that do not have in-built flexibility to meet the needs of future occupiers. Once the applicant vacates the site, the vacant space must be able to meet the needs of the wider market. The Council is of the view that the policy as currently worded is far too complex and provides limited scope for boroughs to develop their own guidance. A two page policy does not provide a strategic framework on this matter.

Policy E9: Retail markets and hot food takeaways

8.14 The Council welcomes the Mayor's continued support for town centres as locations for retail and other uses that are likely to promote vitality and viability. Given the transformation that is currently taking place in the retail sector, policy criterion B, part 3 which seeks to bring forward additional comparison goods retail in metropolitan and major town centres, may be difficult to achieve.

8.15 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.

Policy E11: Skill and opportunities for all

8.16 The issue of low pay is not a planning matter and should not be included in the draft plan.

9. Chapter 7: Heritage and Culture

9.1 The Council welcomes the Mayor's focus on heritage and conservation. However, there are serious concerns that the heritage related objectives will be undermined by the housing growth policies contained in other chapters of the draft plan.

9.2 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 Hillingdon.

Policy HC1: Heritage conservation and growth

9.3 Specific comments on this policy are as follows

9.4 Criterion A should read:

'...This evidence should be used for identifying, understanding, conserving and enhancing the significance of the historic environment and heritage assets...'

9.5 Criterion B, part 2 of the policy should refer to:

'.....structure, site or area....'

9.6 Criterion C should read:

'Development proposals affecting heritage assets and their wider settings should seek to conserve and enhance the historic environment and be sympathetic to the asset's significance. Development proposals should avoid harm to assets and make a positive contribution to local distinctiveness and character. Opportunities to enhance heritage assets and better reveal their significance should be considered at the commencement of the design process.'

9.7 Paragraph 7.1.4, should be amended as follows:

'..In addition to utilising this record, borough townscape and character appraisals, conservation area appraisals and management plans, Local Lists and gazetteers, local heritage guidance and heritage agreements should be used...'

9.8 Paragraph 7.1.7, heritage significance and setting should be defined as per the NPPF and this should be included in the glossary of the London Plan.

Policy HC7: Protecting public houses

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

10. Chapter 8: Green Infrastructure and Natural Environment

10.1 The policies in Chapter 8 seek to protect and retain Green Infrastructure and the natural environment and are generally support. The Council is, however, concerned that the proposed housing target for Hillingdon will result in the development of greenfield sites and the loss of green infrastructure. It is unclear how additional green infrastructure required to support housing growth will be delivered. Specific comments on individual policies are as follows:

Policy G1: Green Infrastructure

10.2 The Council welcomes the Mayor's support for the value of Green Infrastructure, but has limited resources to prepare a Green Infrastructure Strategy, which is set as a requirement in Criterion B of the policy. The policy should provide more flexibility for boroughs to decide if the production of a specific Green Infrastructure Strategy is necessary or appropriate.

10.3 Criterion B of the policy should be amended to simply state that Green Infrastructure Strategies should form part of borough-wide Local Plans. Criterion C should refer specifically to the all London Green Grid and the London-wide assets, deficiencies and key priorities for London's Green Infrastructure.

10.4 The Green Infrastructure policy should also recognise the links with other policies in the draft plan, particularly those related to waterways and flood risk.

Policy G2: London's Green Belt

10.5 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.

10.6 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. The Council therefore strongly objects 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.

10.7 Policy G2 is vague and lacks precision. It makes reference to 'enhancement', but does not define what this term means. Equally the policy makes reference to 'appropriate multifunctional uses', but does not define what these uses should be.

10.8 This part of the policy could therefore be open to interpretation by developers seeking to develop Green Belt sites and make the Council's position more difficult in resisting inappropriate development.

Policies G3 and G4: Metropolitan Open Land and Local green and open spaces

10.9 Policies G3 and G4 contain no strategic aspiration for the increase and provision of metropolitan open land (MOL). By its definition, MOL is a matter of strategic importance, and this is reflected in the text. Any changes to its boundary should be presented by the Mayor, either through a separate strategy or as part of the London Plan. However, Policy G3 [D] sets the criteria for which the boroughs are expected to designate MOL.

10.10 Policy G4 then sets the criteria for boroughs to consider 'local green and open space'. The Council is concerned that the draft plan does not take responsibility for the strategic matters and is effectively making all open space matters a local issue, despite acknowledging MOL is clearly a strategic matter.

10.11 Taking account of the above comments, policy G3 should be revised to clearly detail what the GLA will do to designate and safeguard MOL and how boroughs can support that process. In addition, reference should be made to the protection of Green Chains, which provide a natural resource across London.

Policy G5: Urban Greening

10.12 The Council supports the policy on Urban Greening and welcomes the direction provided. The erosion of urban greening has significant impacts for Hillingdon and the Council welcomes the direction taken. It is particularly important given that the intensification of development places extreme stress on existing urban green cover.

10.13 Table 8.2: Urban Greening Factors could be clearer in the explanation of the different 'Surface Cover Types'. These could be colour coded into groups to highlight the variation in factors.

Policy G6: Biodiversity and Access to Nature

10.14 The policy transfers a number of key responsibilities for strategic nature conservation from the GLA to boroughs.

10.15 Criterion A of the Policy states:

'Sites of Importance for Nature Conservation (SINC) should be protected. The greatest protection should be given to the most significant sites.'

10.16 It is not appropriate for the London Plan to pass on responsibility to boroughs to determine the scope of this part of the policy. If there are significant strategic sites, then the draft plan should identify them and then define what is meant by 'greatest protection'.

10.17 Criterion B sets the criteria for boroughs to review Metropolitan grade SINCS. These are determined because of their strategic importance for London and therefore it is entirely the responsibility of the GLA to identify, amend or remove Metropolitan grade SINCS.

10.18 Specific comments on this policy are as follows:

Criterion C should be amended to:

*'Where harm to a SINC (other than a European (International) designated site) is unavoidable, the following *hierarchical* approach should be applied to minimise development impacts.'*

Criterion C, part 1 should delete reference to '*special*'.

Criterion C, part 2 should be amended to:

'Minimise the impact and mitigate it by improving the quality or management of the rest of the site to achieve a net improvement in biodiversity.'

Criterion C, part 3 should be removed and replaced with:

'Achieve a net improvement in biodiversity off site through an appropriate compensation in exceptional cases where the benefits of the development proposal clearly outweigh the biodiversity impacts.'

10.19 Criterion D should be replaced with the following:

'All developments should achieve a net improvement in biodiversity with major development proposals accompanied by a statement of how biodiversity enhancements have been included within the development.'

Policy G9: Geodiversity

10.20 The policy adds little to existing framework on protecting geodiversity and should be deleted.

Chapter 9: Sustainable Infrastructure

11.1 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.

Policy SI1: Improving air quality

11.2 Whilst the Council is in general agreement with the intentions of the policy, it has so little substance that it is difficult to see how practical implementation would occur and therefore how the Plan would secure the necessary air quality improvements. Other than providing a statement of intent, the Mayor has little responsibility for implementation and passes a sizeable amount of work to boroughs.

11.3 The policy needs to be far more robust with clear targets and triggers for mitigation. The Council recommends an approach adopted by the previous Mayor with respect to achieving carbon reduction emissions. Development proposals should be able to demonstrate the baseline emissions and the necessary reductions.

11.4 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.

11.5 The policy introduces an ambiguous approach that complicates implementation significantly. Ultimately, it will be left to boroughs 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.

11.6 The principle of improving air quality and reducing exposure in criteria A, part 1 and 2 are supported, although it is unclear how this will be achieved in practice. For example, the current air quality neutral guidance still allows for a degree of uplift in pollution. It is also unacceptable to believe that a large scale residential development (or any traffic generating proposal) would not lead to a further deterioration in existing poor air quality.

11.7 There is also a lack of clarity around the terminology of 'unacceptable risk', 'existing poor air quality' in criterion A1 and what constitutes 'high levels of exposure'.

11.8 Furthermore, part A1 does not contain any criteria to reflect the text in para 9.1.2, which states:

'...new developments must endeavour to maintain the best ambient AQ compatible with sustainable development'

11.9 Criterion A1 is entirely well intended but also virtually impossible to implement consistently and efficiently.

11.10 Criterion A2 is equally generic and lacking any substance. The current air quality neutral guidance allows for a degree of uplift in pollution which is not appropriate in Focus Areas which are identified as exceeding the EU limit values. Therefore, criterion A3 should contain a requirement for an Air Quality positive approach to apply to Air Quality Focus Areas as well as Opportunity Areas. The importance of improving air quality in AQ Focus Areas is supported in the text (para 9.18).

11.11 In addition, criterion A3 contains reference to Environmental Impact Assessment (EIA) development. There is a distinct lack of understanding as to what EIA development is in this context. EIA can be triggered by a range of matters, for various sized developments. Small, non traffic generating development could be EIA, whereas larger development with likely large amounts of traffic movement may not trigger EIA. the reference to EIA is therefore out of context.

11.12 Air quality assessments should be submitted with all major developments and not caveated as set out in criterion A5. All major development proposals should demonstrate sound approaches to air quality. Furthermore, mothballed sites that have been inactive and without traffic generation for many years could suddenly become active in areas of concern, without any consideration to traffic impacts. Finally, an air quality assessment should demonstrate an understanding of the impacts of transport emissions comparison between proposed and previous developments.

11.13 Specific amendments to this policy are as follows:

Criterion A, part 1 should provide clarification and include targets and triggers for mitigation.

Criterion A, part 3 should delete reference to environmental impact assessments and define 'large scale redevelopment areas'. The criterion should also define air quality positive and how air quality neutral relates to Criterion A, part 1.

Criterion A, part 5 should omit 'unless they can demonstrate that transport and building emissions will be less than the previous or existing use.'

Criterion A, part 6 should include the formula for seeking offsite solutions.

Policy SI2: Minimising Greenhouse Gas Emissions

11.14 The current London Plan policy on carbon emissions represents a clear and efficient approach. Implementation has been effective and in general, most developers and boroughs understand the requirements. There is no need to amend the approach.

11.15 Criterion A1 introduces zero carbon reduction in construction phases. Whilst well intended, it has no material or practical relevance to the planning stages of development. This is evidenced by the lack of explanation in the supporting text.

11.16 Criterion C2 introduces the possibility of a developer providing an offsite contribution, subject to an identified proposal with certain delivery. This aspect of the policy is fraught with implementation uncertainties. For example, developers have raised the possibility of funding global carbon schemes in lieu of a contribution to Hillingdon. This addition allows for a range of funding scenarios, for example global schemes, Carbon Trust schemes and GLA schemes.

11.17 If the developer is unable to find an on-site solution, they should not be able to manipulate the system and put pressure on Council resources to accept the identification of solutions that have far less control.

11.18 Specific amendments to this policy are as follows:

Criterion A, part 1 should delete reference to construction.

Criterion C, part 1 should be deleted.

Policy S13: Energy Infrastructure

11.19 Policy S13 places no responsibility on the Mayor to identify and assist in the delivery of new and improved energy infrastructure, particularly relating to low or zero carbon networks. There is a significant shift towards a position where individual boroughs are required to identify appropriate solutions.

11.20 As an example, Hillingdon has three heat map opportunity areas, but to date, no assistance has been provided by the GLA to unlock their potential. They remain strategic opportunity areas, yet have no strategic policy protection or incentives in this Plan.

11.21 If energy infrastructure is considered to be a strategic matter, criterion A of the policy should be far more robust with the plans the Mayor will put in place to deliver the necessary solutions.

11.22 Notwithstanding the above, criterion A introduces specific requirements for 'large scale development', which is an imprecise term and open to interpretation. In

any event, energy capacity within an area is not a material planning consideration and it is not appropriate for a development plan to make it so.

11.23 Criterion B of the policy requires the production of energy masterplans for 'large-scale development locations to establish the most effective energy supply solutions'. As above, 'large-scale' is not a defined term and therefore renders this part of the policy impractical. Additionally, there is no clarity as to who is expected to produce an energy masterplan or why.

11.24 Criterion D is unnecessary and is further evidence of a lack of strategic planning. Each major development is required to achieve zero carbon. Achieving this should be fully within the auspices of the applicant. It is entirely inappropriate to expect all major developments to have a communal heating system, particularly in opportunity areas where the lack of GLA policy assistance renders it unlikely that any connection infrastructure will come forward.

11.25 The Council is concerned that as a whole, policy SI3 has questionable aims and places too much emphasis on boroughs. Practical implementation also appears questionable in any event and there are overlaps with other energy policies.

11.26 Taking account of the above, the Council considers that the policy should be deleted.

Policy SI5: Water Infrastructure

11.27 The Council supports the inclusion of this policy and the principle that new development should seek to reduce water consumption. The Council already has policies in place to secure these reductions. The consideration of Integrated Water Management strategies proposed in paragraph 9.5.12 is supported. In relation to paragraph 9.5.13, there is a need for more transparency on who participates in the Mayor's Water Advisory Panel.

Policy SI6: Digital connectivity infrastructure

11.28 The Council does not consider that criteria A1, A2 and A3 are material planning considerations and it is entirely unclear who would discharge the responsibility imposed by this policy. These criteria should therefore be deleted from the policy.

Policy SI7: Reducing waste and supporting the circular economy

11.29 Criterion B of the policy introduces a requirement for the submission of further statements, but only on referable applications. It lists what is required in the statement, but gives no clarity as to how a decision maker will respond.

11.30 It is assumed that if the statement was not satisfactory then the scheme would be refused, but it is not clear what would make it satisfactory (no targets) or

how a decision would be made. Taking account of the above, criterion B of the policy should be deleted.

Policy SI8: Waste capacity and net waste self-sufficiency

11.31 As a result of the new apportionment methodology being proposed, Hillingdon has been allocated a significantly increased apportionment to manage from the current plan, both in terms of overall tonnes per annum (tpa) and as a proportion of all the waste proposed to be managed in London. Figure 1 outlines the changes being proposed:

Figure 1: London Borough of Hillingdon Apportionment Figures

	2021	2041
London Plan	245	-
Draft London Plan	423	450
% Change	↑ 72.6%	-

11.32 This significant apportionment increase is chiefly down to the amendments made to the waste apportionment methodology and not with the Borough's ability to manage waste, with no new committed capacity having been developed and a net loss of industrial land occurring since the last London Plan.

11.33 Whilst the Borough's projected waste arisings have increased marginally, when viewed against the overall increase in London's arisings as a whole (Figure 2), this actually represents a smaller increase than the London average and means Hillingdon is now proportionally forecast to produce less of London's waste.

Figure 2: London Borough of Hillingdon Arisings vs. London

	Hillingdon (2021)	London (2021)
London Plan	343	7,863
Draft London Plan	347	8,216
% Change	↑ 1.2%	↑ 4.5%

11.34 It is evident therefore that the apportionment increase has occurred artificially, through an alteration to the methodology, rather than any natural shifts in the indicators themselves.

11.35 Under the newly selected seven criteria, the focus of the methodology has shifted substantially to resemble a basic evaluation of how much industrial land there is in a given borough. Three of the seven criteria within the new methodology (Criteria 1, 5, 6) relate directly to the amount of industrial land within a borough, which represents 43% of the assessment.

11.36 Furthermore, there is also a positive correlation between the amount of industrial land within a borough and some of the remaining criteria used, such as Criterion 4 Road Network Capacity, with London's remaining industrial land tending to locate near the strategic road network for example.

11.37 Criterion 5 of the methodology as currently constructed is simply double counting the amount of industrial land within a borough, with the base number being the same total suitable industrial area used in Criterion 1. If the calculated constrained area of Criterion 5 is viewed to represent an area that is not suitable for waste facilities, then this figure should be used within Criterion 1 and Criterion 5 deleted. This would provide a more accurate reflection of how appropriate the industrial land being cited in Criterion 1 is for waste management facilities and prevent the double counting that is currently occurring.

11.38 Criterion 6 of the methodology is also a double count of the amount of industrial land within a borough, with the base number being the same total suitable industrial area used in Criterion 1.

11.39 Whilst the fundamental concept of locating development away from flood zones 2 and 3 is acknowledged, this same concept has historically led to less demand for these areas from high intensity uses and greater viability for lower value industrial uses, including waste facilities. A brief assessment of the Mayor's London Waste Map will highlight the large proportion of existing waste sites that exist within flood zones 2 and 3, namely within the industrial market areas of Lee Valley and Thames Gateway. In light of the existing land pressures and historical evidence to suggest that it is common to locate these uses in such areas, one would question whether it should be an apportionment restriction.

11.40 Furthermore, the substantial housing target increases for west London boroughs in Policy H1 have not been taken into account within the new apportionments. The requirements to both substantially increase housing supply and find new sites for waste management in west London are ultimately contrasting aims, with the conflict between residential uses and waste management facilities well documented.

11.41 In addition to the above, the absence of an apportionment figure for the Mayoral Development Corporations is a concern. Whilst the continued inclusion of the text within paragraph 9.8.7 is noted, without a fixed apportionment to be held to, there is little requirement for an MDC to do more than just safeguard existing sites. Noting the substantial increase in waste capacity that is required to meet the Mayor's own net self-sufficiency policy, MDCs should be proactively aiming to accommodate new waste capacity as part of the entire waste disposal authority.

Policy SI12: Flood Risk Management

11.42 The policy should cover the need for an upper catchment approach in areas not at risk, providing more benefit than focusing on just the receptors. The Regional Flood Risk Assessment supports and refers to this method.

11.43 There is no reference to the need for natural flood risk management and small scale interventions linked with Green Infrastructure, which will slow the flow to the major tributaries. In addition, the standards for managing flood risk where the receptor is more vulnerable should be higher.

11.44 Criterion C should reflect that there is still a hierarchy in approaches to mitigating residual risk. It could define and encourage that resistance is preferable, and those defenses which do not require human intervention, such as flood doors rather than barriers, and only then to any resilience methods i.e. recovery after the site is flooded.

11.45 Whilst the proposed Riverside Strategies referred to in paragraph 9.12.4 are broadly supported, the approach is too focused on those areas in the centre of London along the River Thames corridor. It is critical that the upper Thames catchment areas contribute to reducing flood risk to the lower catchment by "slowing the flow" of water, through natural flood management and addressing a number of the Water Framework Directive recommendations and the Thames River Basin Management Plan. These principles should be a critical element within this policy and linked with the provision of green infrastructure.

11.46 Paragraph 9.12.2 does not refer to the assessment of flood risk issues associated with policy H2. In addition, the RFRA does not assess the impact that small site development may have on the flood risk or other environmental factors, as they are not subject to such significant constraints. The RFRA should recommend appropriate constraints within those focus areas to mitigate any potential impact.

11.47 The Impact Assessment for Policy H2 does not recognise that there is an impact in flood risk terms and marks it as not applicable. However if a significant driver within the London Plan is to secure long term sustainable and appropriately designed housing, which encourages future green infrastructure to mitigate impacts,

encouraging smaller sites will not achieve this as these are below thresholds for current constraints on development to be considered.

Policy SI13: Sustainable drainage

11.48 The policy on sustainable drainage is generally supported. The Council particularly welcomes the improvements to drainage hierarchy, references to the Local Flood Risk Management Strategies, Surface Water Management Plans and the need to include green and blue living roofs.

11.49 The Council also welcomes the reference to refusing proposals that incorporate impermeable surfaces, although the phrase 'where appropriate' should be removed and replaced with 'unless they can be shown to be unavoidable'. In addition, the wording of paragraph 9.13.2 which states that 'developments should aim to achieve greenfield run-off' is disappointing. Lower rates of runoff are often achievable, but will not be offered by developers because of this statement. The policy should state that if greenfield rates are not achievable on site, then off site contributions should be considered, as outlined in the Plan's current approach to air quality.

11.50 In relation to paragraph 9.13.1, whilst the Local Lead Flood Authority (LLFA) leads on the issue of surface water management, there are also a number of other Risk Management Authorities that may have to contribute to resolving the issue. Flooding from sewers is not the responsibility of the LLFA but water utilities, who are also defined as Risk Management Authorities. These definitions should be amended.

11.51 Water quality should also be linked to the water body status of a particular watercourse, however to do this would require a clear understanding of the catchment and sub catchment areas, provided by the water company.

Policy SI14: Waterways-strategic role

11.52 The policy appears to have replaced the 'Blue Ribbon network' policy in the current version of the plan. The Blue Ribbon concept is widely understood and associated with the protection of waterways in London. As such, it should be retained throughout the plan.

11.53 The Council is of the view that the draft plan should contain a general policy for all the upper catchment areas, which seeks to slow the flow of water into the lower catchment area and also to maximise access to Green Infrastructure.

11.54 As currently worded, policy SI14 is contradictory with other parts of the text as it only refers to the River Thames and Marine Spatial Plans. However, paragraph 9.14.1 notes that the "term waterways does not only refer to the River Thames". Figure 9.6 shows numerous waterways. It would be helpful to show canals in a different colour.

11.55 The waterways are multifunctional assets however the Thames and London Waterways Forum does not appear to have a remit to discuss green infrastructure and environmental, cultural and community and drainage/ flood risk functions. The Council is of the view that there should be a Thames Policy Area to address the waterways not shown in Figure 9.7.

Policy SI5 Water Infrastructure

11.56 Criterion B of the policy states that Development Plans should promote improvements to water supply infrastructure. This may be difficult to achieve given the difficulties in obtaining long term demand and supply information for water use.

11.57 It is unclear how criterion D of the policy will be implemented. The Council already references the Thames River Basin Management Plan within its policies. The document is non specific in its recommendations and the draft plan sets a clear focus on the River Thames through the centre of London and not outer London boroughs. The expectations for outer London should be clearly defined as part of the policy.

11.58 Development Plans cannot provide an appropriate mechanism to support strategic waste water treatment infrastructure investment, without clear specific information from Thames Water over a long enough time frame. Feedback from water companies on this point is generally poor.

11.59 Criterion E of the policy should be refined to specifically state how key requirements 1 and 2 will be implemented, as boroughs have limited information on waste water capacity. This is partly due to the limitations of Thames Water modelling in outer London. The terminology in this section of the policy is also vague, for example it is unclear what constitutes adequate wastewater infrastructure capacity.

11.60 Although the general aim of this part of the policy is supported, the Local Flooding Authority is the only organisation reviewing drainage design currently and only on major developments, as required by government. To do more than this and require a review of all development drainage plans will require significant additional resource which may not be forthcoming.

Chapter 10: Transport

Policy T1: Strategic approach to transport

12.1 The Council was encouraged that the draft Mayor's Transport Strategy recognised that achieving an 80% modal shift from the private car to trips on foot, by cycle and public transport would be difficult to achieve in boroughs like Hillingdon. This should also be recognised in policy T1, as part of the Mayor's strategic approach to transport.

Policy T2: Healthy Streets

12.2 The Council supports mode shift initiatives towards active and public transport travel. It needs to be recognised, however, that the PTAL within the majority of the borough is generally very low, with 86% of the population situated within a PTAL of 2 or below.

12.3 A recent consultant's study advised that the majority of points of interest within LBH are located in areas which have limited access to public transport and therefore, in the absence of further investment, reliance on the private car is inevitable.

12.4 Hillingdon has satisfactory radial routes into Central London. However the study also identified that a proportion of Hillingdon residents work in places other than Central London, resulting in a greater need for a car given the poor north south public transport connections within Hillingdon and orbital routes to the surrounding boroughs. It also has to be borne in mind that 33% of employees within LBH come from outside of London, where the drive to work mode share is 87%.

12.5 Hillingdon Council particularly supports the Mayor's long-term 'Zero Vision' to reduce danger on the streets so that no deaths or serious injuries occur on London's streets

Specific comments on this policy are as follows:

Include a commitment to developing a more comprehensive, interactive and up to date database to inform the design and management of an increasingly safe street system. This information is essential to delivering the Mayor 'Zero Vision' target.

The policy should link back to Green Infrastructure strategies in policy G1. Healthy streets should incorporate elements of Green Infrastructure.

Policy T3: Transport capacity

12.6 The MTS expresses concern that a three-runway Heathrow would have severe noise and air quality impacts and put undue strain on the local public transport and road networks. It is noted that the MTS makes it clear that 'The Mayor will continue to oppose expansion of Heathrow airport unless it can be shown that no new noise or air quality harm would result'.

12.7 The MTS goes on to state that any expansion 'must also demonstrate how the surface access networks will be invested in to accommodate the resultant additional

demand alongside background growth". On this point, the London Plan could be cross-referred to the MTS as it is broadly aligned with the Council's own views.

12.8 The MTS also mentions that new Tube trains will be introduced from the mid-2020s on the Piccadilly Line serving Eastcote, Ruislip Manor, Ruislip, Ickenham, Hillingdon and Uxbridge and these new trains will be complemented by signalling and track improvements to enable faster and more frequent services. Whilst this investment is welcomed it is considered long overdue, taking into account the growth that is taking place in Hillingdon and the contribution this makes to the London economy it is considered that this investment should be prioritised and accelerated to support the London Plan aspiration.

Specific comments on this policy are as follows:

The London Plan should acknowledge and build upon the benefits of extending the Central Line to Uxbridge.

MTS also makes no mention of plans for new night buses in Hillingdon.

Policy T4: Assessing and mitigating transport impacts

The provisions of this policy are broadly supported.

Policy T5: Cycling

12.9 Consultants have carried out an assessment of cycling trips in Hillingdon to understand whether cycling is a genuine alternative to making the same trip by private car. The consultants found that cycling does not provide a viable alternative for a large proportion of trips within Hillingdon given that the overwhelming majority of journeys are quicker by car than cycling. The consultants found that only 1.4% of Hillingdon car driver commuter trips are cyclable. This information needs to be considered when finalising the London Plan Cycling Policy.

12.10 The Council considers that cycle parking standards should be amply provided and tailored to land use and location. It is agreed that the facilities should be located in close proximity to the entrances of buildings to provide convenience and choice for users. Cyclists should be certain that they always have a space for parking their bicycle but what the Council wants to avoid is "white elephants", where numerous unused parking stands result in adverse public reaction.

12.11 The policy could be amended so that it provides cyclists with the certainty that they have always have a space, whilst allowing the Council to be flexible in providing facilities in response to (anticipated) demand. The plan needs to recognise that only 1.4% of Hillingdon car driver commuter trips are cyclable.

Policy T6: Car parking

12.12 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 that 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 car ownership and in LBH when compared to other boroughs;
- LBH 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.

12.13 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 for 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.

12.14 Criterion B of the policy appears to contradict policies D3 and D5. A privately owned accessible vehicle for many disabled people is their only means of getting out and about. Within 'car-free developments', the M4(3) Wheelchair Accessible and Wheelchair Adaptable units should have provision for accessible parking.

Policy T6.1: Residential Parking

12.15 In regards to criteria G1 and G2, on the basis that only 3% of parking bays would need to be accessible at the outset, the mechanism by which an accessible bay could be requested by a future occupier, once the development is occupied, should be set out. Unless an arrangement of this type is made legally binding, it would likely get lost in the mists of time.

12.16 In regards to criterion H2, there are significant numbers of disabled people who rely on their own car or similar accessible vehicle as the sole mode of transport. If parking bays are not allocated to specific dwellings, then there would be no guarantee of a parking space upon their return home. Parking bays should be allocated to specific dwellings.

Policy T8: Aviation

12.17 The Council broadly supports criteria C and D of the Policy, although there is a need for much greater clarification and a more robust position. For example, Heathrow Airport Ltd has already formulated an argument that the generic targets set out in the Policy, i.e. no additional noise, will be met for Heathrow expansion. Criterion D should therefore contain the minimum specific parameters which would need to be met to allow for expansion.

12.18 The Council strongly opposes HAL's position, but it does highlight the uncertainty of a highly complex and technical matter within a highly ambiguous policy framework.

12.19 Furthermore, the Council is surprised to see no reference to the Mayor's support for Gatwick in criterion D, which would reflect the views expressed in the text in 10.8.7.

12.20 There could be confusion over criteria F and G. For example, F refers to changes in airport operations and aircraft movements which must take account of their environmental impacts, G refers to making better use of existing airport capacity. As an example, G could be interpreted as an extension of the current operating measures at Heathrow, in the early mornings, or the introduction of mixed mode, even partial, or the landing of certain types of aircraft on one particular runway as making better use. There needs to be more clarity on what G is intended to cover.

12.21 The Council would welcome an express commitment from the Mayor that there would be no support in the air traffic numbers at Heathrow Airport.

13. Conclusion

13.1 In conclusion, the London Borough of Hillingdon strongly objects to many of the key policies put forward in the draft London Plan, particularly the proposed housing targets and the policy relating to small sites. The Council would welcome the opportunity to discuss the points raised in this response with representatives from the Greater London Authority and can confirm that it would like to participate in the examination hearing sessions.