Hillingdon Local Plan

Regulation 18 Call for Views Consultation

March 2024



www.hillingdon.gov.uk

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Note not for publication:

Information for Cabinet

This document sets out the draft material which the Council proposes to consult residents and stakeholders on for the Local Plan Regulation 18 consultation. The content will be published on the Council's website along with details on how to respond and deadlines for representations.

As set out in the Cabinet report the Director of Planning, Regeneration and Environment, in consultation with the Cabinet Member for Residents' Services, has delegated authority to make any necessary editorial amendments and minor changes to the document and the supporting evidence base prior to consultation.

Foreword

As the portfolio holder and a long term resident, I have seen how proactive planning is essential for tacking the challenges that Hillingdon faces – growing a strong economy, building good homes, creating great places and protecting the environment. Some of these issues are more pressing than ever – with economic headwinds, housing affordability and the climate crisis requiring strategic action.

I am proud to launch this Local Plan consultation, which allows you to shape development over the next 15 years. Many may not have heard of the Local Plan, but it affects our lives on a daily basis. The Local Plan is prepared by the Council, in consultation with the community, and sets the vision and a framework for the future development of the borough. It sets a spatial strategy for Hillingdon and a suite of planning policies including for housing, economic development, sustainability, infrastructure and transport.

This is the first stage of consultation and we are asking you what the Local Plan should contain. This is your opportunity to make your voice heard. I hope you will join us in this consultation and help create a shared vision for Hillingdon.

Cllr Eddie Lavery

Cabinet Member for Residents' Services

Background

The Council is updating and replacing its Local Plan.

What is a Local Plan?

National policy sets out that Local Planning Authorities should prepare Local Plans to provide a positive vision for the future of each area, meet housing needs, address economic, social and environmental priorities, and provide a platform for local people to shape their surroundings.

The Local Plan guides decisions on future development proposals and addresses the needs and opportunities of the area as part of the borough's statutory development plan. Topics that Local Plans usually cover include housing, employment and shops and they also identify where development should take place and areas where development should be restricted. The Local Plan must be prepared with the objective of contributing to the achievement of sustainable development (Planning and Compulsory Purchase Act 2004, Section 39(2)).

What is the current Development Plan?

The adopted Development Plan for Hillingdon consists of the following documents:

- The Local Plan Part 1: Strategic Policies (November 2012)
- The Local Plan Part 2: Development Management Policies (January 2020)
- The Local Plan Part 2: Site Allocations (January 2020)
- The West London Waste Plan (July 2015)
- The London Plan (March 2021)

Neighbourhood Plans also form part of a local planning authority's Development plan, however there are no Neighbourhood Plans in Hillingdon.

The Council is proposing to update and replace the Local Plan. The strategic and development management policies will be combined into a single document alongside the site allocations, in line with Government guidance. The West London Waste Plan will remain as a separate document.

How does this fit in with the London Plan?

The Mayor of London adopted a new London Plan in 2021, introducing new policy requirements for development in London and evidence requirements for Local Plans. Hillingdon's Local Plan must be in general conformity with the London Plan.

How does this fit in with the National Planning Policy Framework?

The Local Plan must be consistent with the National Planning Policy Framework (NPPF). This sets out the government's planning policies for England and how they should be applied. It must be considered in the preparation of the Local Plan and is a material consideration when making planning decisions. Separate policy documents deal with other topics that are material to planning, such as waste and traveller sites.

The National Planning Policy Guidance (NPPG) supports the NPPF and is amended frequently. It provides specific guidance on how parts of the Local Plan should be undertaken and is material to the plan-making process.

Why are we reviewing the Local Plan?

In line with the National Planning Policy Framework, Local Plans should be kept up to date. The Local Plan needs to be updated to respond to changes affecting Hillingdon including in the economy, the population, housing market, environment and to reflect a new London Plan and revisions to national policies.

Without an up-to-date Local Plan, Hillingdon's local planning policies could be considered out of date. In decision making, the Council would not be able to place appropriate weight on policies which are out of date, leading to inappropriate development that does not meet the needs of people living, working, and visiting Hillingdon. There is also a risk of intervention by the Government, where plan-making would be taken out of the hands of the local authority and stakeholders.

A full review of the Local Plan allows the Council to add, remove and improve planning policies.

What is a Regulation 18 consultation?

A 'Regulation 18' consultation is the first formal stage of consultation required for preparation of a Local Plan and is carried out in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012, Part 6, Regulation 18. In this first stage stakeholders are asked what a Local Plan ought to contain.

Why is it important to get involved?

You can make your voice heard and help shape planning policy in Hillingdon by participating in the Local Plan consultations. Your views can help create a shared vision for the future of our borough and help make Hillingdon a better place to live, work in and visit.

How to get involved

You are invited to respond to this consultation using forms below. You may also email or write to the Council.

By email: localplan@hillingdon.gov.uk

By post: Planning Policy, Civic Centre, High Street, Uxbridge Middlesex UB8 1UW

Responses must be provided by (date to be provided).

Representations will be published for public viewing on the Council website. Contact information will be redacted.

Corporate privacy statement: www.hillingdon.gov.uk/privacy

Hillingdon today

The London Borough of Hillingdon is the second largest by area and westernmost borough in London. It covers a wide range of different areas, each with their own particular origins and character. This range of character stretches from the Victorian development of the canal and railway corridors with their strong industrial character, through the varied development along the Uxbridge Road and into the lower density suburbs in the northern part of the borough, which give way to the countryside beyond. Mingled in with this are substantial features including Heathrow Airport, fragments of farmland and the hamlets which pre-existed the urban growth.

Between 2011 and 2021, the population of Hillingdon increased by 11.7%, from just over 273,900 to around 305,900 (Census 2023). That was a greater increase than London (7.7%) and the overall population of England (6.6%). The average median age is 36 years, which is slightly higher than the London Average (35) but lower than the average for England (40). Hillingdon has a higher proportion of economically active people (59.0%) than the England average (57.4%).

The London Borough of Hillingdon is home to the Metropolitan Town Centre of Uxbridge and five District Town Centres. It also contains one of the busiest airports in the world, Heathrow Airport and an active Royal Air Force base called RAF Northolt. Just outside of Uxbridge is the campus for Brunel University and further south is Stockley Park business park. Hillingdon has access to central London via the Metropolitan, Piccadilly, Central and Elizabeth Lines, as well as national railway services. There is also direct access to the M4, M40 and M25 motorways.

Where can I learn more about the information gathered on Hillingdon?

The Council is publishing its Local Plan evidence base as it is being completed. The following evidence base documents are available for download on the website:

- Integrated Impact Assessment (IIA) Scoping Report
- Hillingdon Townscape and Character Study 2023 (Urban Initiatives)
- Hillingdon Employment Land and Capacity Study 2023 (Avison Young)
- West London Town Centre Study 2023 (urban Foresight)

How the consultation is formatted

The 10 topic area pages broadly follow the following format:

Topic area title

A summary of the policy areas in this section.

Existing Local Plan approach

This section selects key objectives and policy approaches from the adopted Local Plan. It is not an exhaustive list but aimed to provide both an overview and focus on policy areas which exist, but could be subject to change. Full versions of the adopted Local Plan remain available at the Council's website for reference: Local Plan - Hillingdon Council

Key challenges

Key town planning challenges identified to date. These have been collated from the adopted the Council Strategy, national and regional policy, as well as from emerging evidence.

What the Local Plan could achieve

General and specific policy objectives identified to date that could be taken forward. Collected from the Council Strategy, national and regional policy, and broader sustainable development goals.

Prompt questions to assist stakeholders in providing effective and focused representations. A general question has also been included to ensure stakeholders can add any other responses related to this topic area.

1. Objectives and vision

The existing Hillingdon Local Plan Strategic Policies identify key challenges, issues and objectives for development in the borough.

There have been significant changes since the Local Plan was adopted which need to be considered as part of the review.

As part of the Local Plan Review the Council will need to create a new shared vision for Hillingdon.

Existing approach

The existing Local Plan Strategic Policies, which were adopted in 2012 contains a seven-point vision for the borough, with the following headlines:

- Hillingdon is taking full advantage of its distinctive strengths with regard to its places, communities and heritage.
- The social and economic inequality gaps in Hillingdon are being closed.
- The improved environment and infrastructure is supporting healthier living and helping the borough to mitigate and adapt to climate change.
- Economic growth has been concentrated in Uxbridge, Heathrow and the Hayes/West Drayton Corridor, without ignoring local centres.
- Improved accessibility to local jobs, housing and facilities is improving the quality of life of residents.
- Hillingdon has a reliable network of north/south public transport routes and improved public transport interchanges.
- Hillingdon has continued to prosper from the presence of Heathrow.

Key challenges

The Council Strategy 2022-26 outlines its vision of putting residents first and was adopted in November 2022, following public consultation. It sets 5 commitments:

- Safe and strong communities Hillingdon is a safe place with resilient, strong communities with access to good quality, affordable housing.
- Thriving, healthy households Children, young people, their families and vulnerable adults and older people live healthy, active and independent lives.
- A green and sustainable borough Hillingdon will be a sustainable, carbon-neutral borough, protecting Hillingdon's heritage, built environment and valued green spaces. Residents will live in pleasant neighbourhoods with access to sustainable waste management and transport.

• A thriving economy

We are actively working with local businesses and partners to create a borough where businesses grow within a strong economy and local people can improve their skills and enjoy good quality jobs.

• A digital-enabled, modern, well-run council We are a well-run, sustainable council with sound financial management, achieving positive outcomes for residents.

What the new Local Plan could achieve

The Local Plan will be a key mechanism for delivering the Council Strategy. The existing Local Plan vision will need to be reviewed and updated. The vision and objectives for the new Local Plan should be based on current evidence and priorities and reflect the views of the people who live, work, and visit Hillingdon.

Do you agree that the five commitments of the Council Strategy should inform the Local Plan Y/N

Do you have any comments on the Local Plan's existing approach, including the challenges, vision, and objectives?

Are there any objectives which are missing or deserve greater emphasis?

Building on the Council Strategy, are there further strategic issues which you would like the Local Plan to address, including issues in specific places?

Does the Local Plan need a vision in a single sentence, if so, what could that be?

2. Growth and spatial strategy

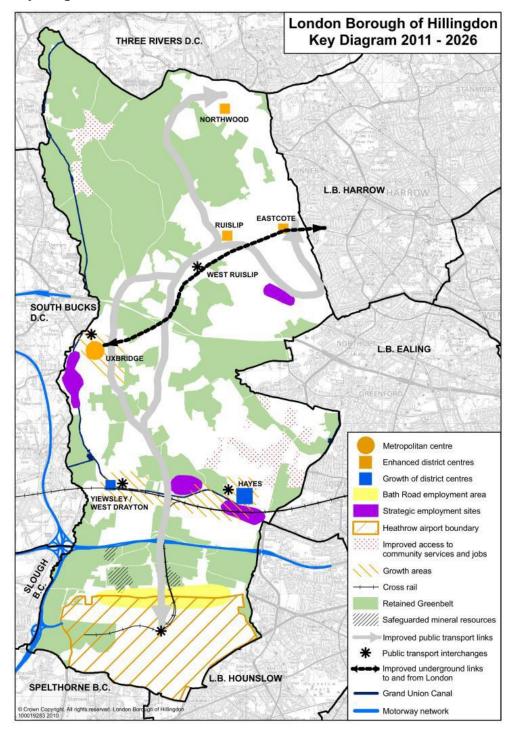
The existing Hillingdon Local Plan sets out the Council's spatial strategy, which includes:

- Setting out where new homes and new employment floorspace will be developed,
- · Designating industrial areas to be retained and improved,
- Designating/retaining areas to be protected from inappropriate development, such as Green Belt, Metropolitan Open Land (MOL) and Open Space, and
- Identifying corridors where public transport links should be improved.

Existing approach

The Key Diagram sets out the existing overall growth strategy for Hillingdon. The spatial strategy of the existing plan includes:

- **Uxbridge** as the main urban centre and an aim for this role to be strengthened. Growth of retail, leisure, and employment uses are encouraged. The Town Centre was expanded to include former RAF Uxbridge (now St Andrew's Park) and part of the Uxbridge Industrial Estate, within which more homes have and are being built.
- The role of **Heathrow Airport Opportunity Area** as an employment area is to be strengthened, provided environmental conditions are improved. More hotels, office space, industrial and commercial uses are to be developed within the Heathrow Opportunity Area.
- The **Hayes and West Drayton Corridor** will be a key location for employment growth in the Heathrow Opportunity Area, and some employment sites have been released for residential led mixed use development.
- To tackle deprivation in **Hayes End and Yeading**, the Local Plan targets improving access to open spaces, key employment areas and community facilities in these areas.
- Stockley Park is currently designated as a strategic employment site.
- The green and open character of the area to the **north of the A40** will be enhanced.



Key Diagram

Map 4.1 Local Plan (2012)

The existing Local Plan includes 32 strategic policies. Policies of particular importance to the overall strategy and those related to employment growth and the Green Belt are:

- Employment growth is directed to the Heathrow Opportunity Area, Strategic Industrial Locations, Locally Significant Employment Locations, Locally Significant Industrial Sites, Uxbridge Town Centre and Hayes Town Centre (Policy E2).
- The Council seeks to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains (Policy EM2).

Key challenges

The key challenges for the new Local Plan are thought to include:

- Making the best use of previously developed land by enabling brownfield development and utilising existing and planned infrastructure to optimise density,
- Protecting valued open spaces from inappropriate development, including Green Belt land, Metropolitan Open Land (MOL) and Local Open Spaces,
- Building a range of market and affordable homes of different types,
- Providing sufficient employment and industrial space in the right locations to allow businesses to grow,
- Ensuring a town centre first approach is taken to certain types of development and reviewing the potential of the borough's only Metropolitan Town Centre (Uxbridge),
- Reviewing the growth potential of the Hayes and Heathrow Opportunity Areas and
- Managing the impacts arising from Heathrow Airport.

What the new Local Plan could achieve

The Local Plan needs to accommodate new development, including homes and space for businesses to grow, while protecting the green open spaces that are highly valued in Hillingdon.

The plan needs to respond to emerging issues, like the changing office market, data centres, and the impacts of any new major infrastructure projects.

Do you have any comments on the Local Plan's current spatial strategy?

What changes, if any, should be made to Hillingdon's Spatial Strategy?

Are there any locations where a change in development priorities is justified?

3. Design

The existing Hillingdon Local Plan sets out the Council's policy approach to:

- The design of new buildings and spaces,
- Creating high quality, safe, inclusive and welcoming places for everyone,
- The location and design of tall buildings,
- Alterations to existing buildings,
- Crime prevention through urban design, and
- The design of shopfronts and advertisements.

Existing approach

A strategic objective of the Local Plan is to create sustainable neighbourhoods of high quality design, that have regard for their historic context and use, address environmental issues and which are sensitive and responsive to the significance of the historic character, are distinctive, safe, functional and accessible.

Relevant existing development management policies include:

- Policy DMHB 11 seeks quality contextual design in all development,
- Policy DMHB 10 set out where tall buildings may be located and how they should be designed,
- Policy DMHB 12 relates to the design streets and the public realm,
- Policy DMHB 13 and 13A controls the design of shopfronts and advertisements,
- Policy DMHB 14 protects trees and seeks landscaping, trees, green roofs and walls in development,
- Policy DMHB 15 seeks to prevent crime through urban design measures,
- Policy DMHB 16 sets minimum housing standards and DMHB 17 requires that development considers the London Plan Residential Density Matrix, and
- Policy DMHB 18 requires provision of private outdoor amenity space in new housing.

Key challenges

The new Local Plan needs to ensure good design in buildings and the public realm that is not only attractive, but also highly functional. This may include design that helps mitigate the effects of climate change, encourages active travel (walking and cycling), and is accessible, adaptable, healthy and safe.

Key challenges to delivering high quality design in Hillingdon are thought to include:

- Improving the design quality of new development,
- Ensuring design responds to environmental issues including flooding, noise, urban heat island effect, and air pollution,
- Exploring opportunities for new public realm and ensuring it is inclusive, and places can be accessed by all residents,
- Proactively planning for appropriate tall buildings, while addressing local constraints such as context, airports and the desire for an interesting skyline,
- Accommodating the desire to extend and alter properties, whilst ensuring harmful externalities are avoided, such as those related to loss of privacy, daylight, basements and urban greening.
- Creating streets which are pleasant, attractive, safe, healthy and which mitigate climate change impacts,
- Ensuring development strengthens waterways such as canal edges and rivers,
- Ensuring new development strengthens and integrates built heritage, and
- Creating distinct public places, where identity is inspired by local cultural heritage.

In line with the NPPF, the Local Plan should help create places which are high quality, beautiful and sustainable.

A key commitment from the Council Strategy is for a green and sustainable borough, where Hillingdon will be a sustainable, carbonneutral borough, protecting Hillingdon's heritage, built environment and valued green spaces. Residents will live in pleasant neighbourhoods with access to sustainable waste management and transport.

The Local Plan needs to ensure that the buildings and spaces have high quality contextual design, both in appearance and by being designed to create social, economic and environmental value over time. Good design should create civic pride, vitality, community, social inclusion, safety, better health and access to education and employment.

The Local Plan could also implement the Mayor of London's Good Growth by design agenda by ensuring that development is high quality and is more inclusive. Good design is about creating social benefits which include the promotion of identity and civic pride, vitality, community, social inclusion, safety, better health and access to education and employment.

Do you have any comments on the Local Plan's current approach and policies on design quality?

What should our future Local Plan policies on design include?

How can the Local Plan deliver more distinctive places?

4. Housing

The existing Hillingdon Local Plan sets out the Council's policy approach to:

- Maximising housing supply,
- Provision of affordable housing,
- Protecting existing homes,
- Meeting housing needs in terms of type and size,
- Providing housing for different groups including older people, student housing, homeless, and gypsy and traveller sites, and
- Accessible and adaptable housing.

Existing approach

Housing is a key priority in the existing Local Plan. The existing Local Plan sets out where housing is to be developed. Most delivery is in large sites below the A40 including in the areas of Uxbridge, the Hayes / West Drayton Corridor, the Heathrow Opportunity Area, with a smaller proportion in sites north of the A40. Key housing policies include:

- Strategic Policy H1 states that the Council will meet and exceed its minimum strategic dwelling requirement, where this can be achieved, in accordance with other Local Plan policies,
- Policy DMH7 requires a minimum 35% affordable housing on all selfcontained housing developments of 10 units or more, as well as a preferred tenure split,
- Policy DMH 4 sets limits on the conversion of homes into flats to protect the supply of large family homes,
- Policy DMH 5 sets limits on houses in multiple occupation, and
- Policy DMH 6 controls garden and backland development to protect garden space and impacts on character and amenity.

Key challenges

Key challenges to delivering housing are thought to include:

- The constrained supply of land for development and high demand for homes of a sufficient quality and type.
- The cost of housing in Hillingdon is high and increasing and there are more than 3,400 households on the social housing register. The ratio of median earnings to house prices in Hillingdon is 11.95 which is significantly higher than the England average at 7.8.
- Hillingdon's population is growing at a higher rate than the London average. Between 2011 and 2021, the population of Hillingdon increased by 11.7%, from just over 273,900 to around 305,900 (Census 2023). That was a greater increase than London (7.7%) and the overall population of England (6.6%).

- The London Plan 2021 sets a new, higher housing target of 1,083 homes per year, with 295 homes stated to be achieved on small sites (<0.25ha). There is also a strategic target for 50 per cent of all new homes to be genuinely affordable, which consists of both low-cost rented homes and intermediate housing products. The viability of delivering this often needs to be balanced against the need for additional considerations, such as different housing sizes, types, design and new infrastructure.
- While Hillingdon is a large borough, there are significant constraints on development, such as local character, airports, and large quantities (42%) of Green Belt.

A key commitment from the Council Strategy is for safe and strong communities, where Hillingdon is a safe place with resilient, strong communities with access to good quality, affordable housing.

The Local Plan will need to be updated to meet the new London Plan housing targets and to identify new locations for development.

The new Local Plan will also need to seek a range of housing types, sizes, accessibility and affordability to meet the needs of different groups.

New housing will help tackle inequality and overcrowding, create sustainable and resilient neighbourhoods, improve health and wellbeing and secure homes suitable for individuals and families on low and middle incomes.

The Local Plan needs to work towards meeting the London Plan strategic target for 50% of all new homes across London to be genuinely affordable.

Do you have any comments on the Local Plan's current approach and policies on housing delivery?

What should our future Local Plan policies on housing delivery and housing need cover?

How can the Local Plan deliver more homes and make sure they meet the needs of residents in terms of housing type, size, accessibility and affordability in Hillingdon?

Do you have any comments on the Council's approach to infill and backland housing developments?

Do you have any comments on the London wide goal of 50% affordable housing in new development and its implementation in Hillingdon?

5. Social infrastructure

The existing Hillingdon Local Plan sets out the Council's policy approach to:

- Developing, retaining and enhancing important social infrastructure,
- Protecting public and private open space,
- Providing new open spaces and play spaces in major developments,
- Protection and provision of leisure and indoor sports facilities, and
- Protection and provision of play spaces.

Existing approach

Community facilities, culture and leisure is a key priority in the existing Local Plan. Key policies include:

- Policy DMCI 1 protects existing community facilities from redevelopment unless the use or site is no longer needed,
- Policy DMCI 1A supports the development of new schools subject to their impacts including on open space, character, accessibility and the environment,
- Policy DMCI 2 supports development of community infrastructure where it is close to the community it supports, is accessible and inclusive and directs large uses to Town Centres,
- Policy DMCI 3 protects public open space from development and sets the rules for development next to open spaces,
- Policy DMCI 4 requires major new residential development to provide or enhance open space, and
- Policy DMCI 5 requires major housing developments to provide children's play areas.

Key challenges

Key challenges for the new Local Plan are thought to include:

- Defining what is meant by Social Infrastructure. The London Plan (2021) says it should include health provision, early years provision, schools, colleges and universities, community, recreation and sports facilities, places of worship, policing and other criminal justice or community safety facilities, children and young people's play and informal recreation facilities.
- Ensuring the social infrastructure needs of the borough are taken into account when meeting growth targets and working with infrastructure providers to meet any new needs.
- Maximising social infrastructure by allowing new models of public and community provision and co-location.

- Hillingdon is home to many valued sports and leisure facilities, including playing fields. These types of uses and spaces are often under pressure and can be at risk of redevelopment for higher value uses, in particular housing.
- The borough is home to educational facilities including Brunel University, Uxbridge College and Buckinghamshire New University. The plan should protect these uses and facilitate their economic potential in clustering knowledge economy uses.
- The borough has a large amount of highly valued parks and opens spaces, covering approximately 1,800 acres. These spaces need to be protected and enhanced while ensuring development helps improve open space provision and biodiversity value.
- Improving health is a key priority and the plan should help promote active and healthy lifestyles through provision of community facilities, quality accessible open space and a range of sports facilities and play spaces.
- The need to ensure provision is made for the different burial needs and requirements of all communities.
- The new Local Plan will need to reflect the limitations of the new Use Class Order and permitted development rights, which makes protection of certain types of infrastructure less achievable through the planning system.

The Council Strategy set ambitions for residents including that they:

- live active and healthy lives,
- enjoy access to green spaces, leisure activities, culture and arts, and
- achieve well in education, with opportunities for learning at all ages.

The Local Plan will need to promote social interaction and enable and support healthy lifestyles in line with national policy and the London Plan.

The Local Plan will also need to protect and enhance existing social infrastructure within the borough to develop inclusive and strong communities which brings people together and provides opportunities for social, educational, health, recreational and cultural activities.

Do you have any comments on the Local Plan's current approach and policies on social infrastructure provision and delivery, including what constitutes social infrastructure?

What should our future Local Plan policies on social infrastructure and open space cover?

What should our future Local Plan policies on culture and leisure spaces and facilities cover?

How can the Local Plan protect open space and ensure that there is sufficient sport, recreation, health and leisure facilities for the residents?

Do you consider the loss or reprovision of social infrastructure, culture and leisure uses can be justified in certain circumstances? If yes, what circumstances would you consider as justifiable?

6. Economy

The existing Hillingdon Local Plan sets out the Council's policy approach to:

- Promoting economic development and employment in Hillingdon,
- Supporting businesses of a range of sizes to grow and invest,
- The provision and protection of employment premises and sites,
- Supporting job creation and opportunities for training and skills development,
- Supporting tourism and providing visitor accommodation, and
- Protecting the vitality and viability of town centres, high streets and local parades.

Existing approach

Key policies include:

- Policy DME 1 protects industrial uses in Strategic Industrial Locations, Locally Significant Industrial Sites and Locally Significant Employment Locations,
- Policy DME 2 facilitates the reuse of employment land outside of designated areas subject to certain criteria,
- Policy DME 3 supports and protects offices in preferred locations, including town centres, Uxbridge and Stockley Park and establishes a sequential approach for office development outside of these locations,
- Policy DME 4, 5, and 6 sets out where visitor attractions and accommodation should be located, limiting impacts, and ensuring accessibility,
- Policy DMTC 1 directs retail and town centre uses to Hillingdon's network of town centres and high streets,
- Policy DMTC 2 balances the mix of uses in primary and secondary frontages in designated centres, with DMTC 3 protecting local centres and parades, and
- Policy DMTC 4 protects the amenity of town centres by controlling uses with potential negative externalities such as hot food takeaways, night clubs, and betting shops.

Key challenges

Key challenges for the new Local Plan are thought to include:

- The office market has changed following the COVID-19 pandemic, with businesses seeking less floorspace overall, located in highly accessible locations and in high quality buildings.
- Understanding and accommodating any new and evolving needs for commercial, business and service floorspace.

- Hillingdon has a large amount of industrial land with relatively low vacancies, which should be protected and intensified in accordance with the London Plan.
- Data centres are an essential piece of digital infrastructure to support the UK's service-based economy. Demand for data centres has increased in recent years in Hillingdon, with impacts on industrial sites, character and amenity, and the energy network.
- Demand for serviced accommodation linked to Heathrow Airport is strong, with impacts on the transport network and land for other uses.
- Ensuring town centres and high streets are vital and viable places for certain uses against out of centre retail competition, changing consumer preferences and the rise of online shopping.
- Managing town centres so they can host daytime, evening and nighttime activities when appropriate.
- Reviewing the role of local parades, local and district town centres to ensure they remain important destinations for residents, who may otherwise face poor access to services.

One of the commitments of the Council strategy is for a thriving economy, where businesses grow within a strong economy and local people can improve their skills and enjoy good quality jobs.

The Local Plan could:

- Protect offices in key locations to support the economy, while proactively allowing some locations to change to other uses where justified,
- Protect and intensify industrial floorspace in the borough where beneficial,
- Ensure that data centres and other unique uses are located and designed appropriately, so that nuanced impacts are mitigated, such as impact on the power grid and utilisation of waste energy are considered,
- Manage the development of tourist accommodation, particularly around Heathrow Airport, and
- Protect and enhance town centres, ensuring they remain busy, vibrant and valued centres of the community.

Do you have any comments on the Local Plan's current approach and policies on economic development?

How can the Local Plan deliver a strong, sustainable and inclusive local economy?

Would you like to see more spaces to support start-ups, small and medium enterprises, emerging sectors, and cultural and creative industries (considering this could reduce some flexibility in development)? Y/N

Would you like to see a broader range of uses in town centres to promote their long-term vitality and viability? Y/N

Are there any particular uses in town centres that you believe should be limited? If so please state and explain why.

Do you agree that some offices should change to other uses in response to changing market conditions? Y/N

Do you have any views on the development of data centres in Hillingdon?

7. Heritage and culture

The existing Hillingdon Local Plan sets out the Council's policy approach to:

- Conserving and enhancing historic assets, including listed buildings, conservation areas, archaeological priority areas, areas of special local character, registered parks and gardens, ancient monuments and war memorials,
- The role of heritage is to inspire new development with distinctive appearance and character, and
- How community facilities, including cultural uses (relating to recreation such as sport, performance, religion, art, music or food) are protected from loss, and where new community facilities may be developed.

Existing approach

Key policies include:

- Policies DMHB 1 to 9 protect heritage assets, including listed buildings and conservation areas, locally listed buildings, areas of special local character, registered historic parks, gardens and landscapes, and war memorials.
- Policy DME 4 supports development of visitor attractions, subject to criteria, and
- Policy DMCI 1 protects existing community facilities, including cultural uses, and Policy DMCI 2 directs new cultural facilities to town centres.

Key challenges

Key challenges to support built historic heritage in Hillingdon are thought to include:

- Protecting heritage assets, including preventing any incremental harm that could arise over time,
- Strengthening Hillingdon's unique built heritage relating to industrial, transport, communication, educational, cultural, civic, retail, faith and technical infrastructure,
- Encouraging restoration of heritage assets at risk,
- Protecting locally significant views, particularly those which positively frame historic assets, and
- Protecting valued cultural facilities where viable, such as public houses and theatres, from loss and developing new facilities to boost the cultural offer of Hillingdon.

A key commitment of the Council Strategy is for a green and sustainable borough, where Hillingdon will be a sustainable, carbon-neutral borough, protecting Hillingdon's heritage, built environment and valued green spaces.

The Local Plan should set out a positive strategy for the conservation and enjoyment of the historic environment, as required by the NPPF (Chapter 16).

In line with guidance from Historic England, conservation should not be a passive exercise, but be integrated with the plan, considering how the historic environment can assist delivery of a positive strategy and the economic, social, and environmental objectives of the plan area (Historic England – The Historic Environment in Local Plans).

The Local Plan should follow London Plan Policy HC1 by setting a vision for development informed by the heritage significance of the area and by requiring that development integrates conservation with innovative and contextual architecture that contributes to significance and sense of place.

Do you have any comments on the Local Plan's current approach and policies on historic assets?

Do you have any suggestions on how Hillingdon can integrate heritage led regeneration into the Local Plan?

Do you have any suggestions on where changes to heritage policy could unlock potential and contribute to sustainable development in Hillingdon?

8. Green infrastructure and natural environment

The existing Hillingdon Local Plan sets out the Council's policy approach to:

- Protecting the Green Belt and Metropolitan Open Land,
- Protecting green and blue infrastructure and securing new areas of urban greening in development,
- Protecting open space and securing new open spaces in development,
- Protecting ecological sites and securing net biodiversity gain in developments,
- Protecting trees of value and requiring new trees in development,
- Protecting agricultural land, allotments and geodiversity.

Existing approach

The protection and enhancement of green infrastructure and the natural environment is important nationally, regionally and locally. The existing Local Plan affords significant protection to the existing green infrastructure network and natural environment. Key policies include:

- Policy DMEI 1 requires all major development proposals are required to incorporate living roofs or walls into the development unless there is suitable justification.
- Policy DMEI 4 protects against inappropriate development in the Green Belt or Metropolitan Open Land, unless very special circumstances apply.
- Policy DMEI 5 sets out that development in Green Chains, which provide physical links between wildlife and recreation sites in the borough, are only supported if they conserve and enhance the visual amenity and nature conservation value of the landscape.
- Policy DMEI 6 seeks that development at Green Edge locations (adjacent to the Green Belt, MOL, Green Chains, SINCs, nature reserves, countryside, green spaces or the Blue Ribbon Network) is landscaped to assimilate into the surrounding area.
- Policy DMEI 7 protects and enhances biodiversity value in development.
- Policy DMEI 8 sets out a range of measures to protect watercourses by controlling waterside development.
- Policy DMEI 10 requires development to control water run-off, including incorporating Sustainable Urban Drainage Systems (SUDS).
- Policy DMHB 11 requires that development is of the highest standards of design including landscaping and tree planning to enhance amenity, biodiversity and green infrastructure.

Key challenges

Key challenges for the new Local Plan are thought to include:

- While the borough has a good supply of brownfield sites to deliver new development, there remains pressure to develop on previously undeveloped land, such as Green Belt and Metropolitan Open Land.
- Air quality has improved significantly over the last few decades, however Hillingdon's air still does not meet WHO guidelines for some pollutants. Water quality too needs to be improved. Green infrastructure can play an important role in filtering pollutants from the air and ground.
- Green infrastructure and the natural environment are valuable in storing carbon, cooling the climate and filtering the air and water. A key challenge is building for a growing population whilst also improving on the network of green infrastructure, including through urban greening.
- Health issues such as diabetes, obesity and heart disease, which can be significantly influenced by lifestyle and the environment, are prevalent in the borough. Spaces for physical activity and relaxation are not spread equally around the borough, with some areas deficient in these types of spaces.
- Access to nature and open space is unequal in the borough, with some areas enjoying good access while others are deficient. There is a need to improve the quality of and access to open spaces, rivers and canals for all groups of people in the community.
- Biodiversity may suffer because of urban activity, climate change, and new development if left unmitigated. The Council needs to meet the needs of a growing population whilst protecting wildlife habitats and enhancing biodiversity.
- Recognising existing geodiversity within the borough and ensuring planning decisions protect and enhance this.
- Ensuring the number and quality of trees in the borough increases in order to increase the extend of London's urban forest.
- Exploring the viability and need for greater food production in the Borough.
- There is significant pressure on water resources which will increase as the population grows.

A key commitment from the Council Strategy is for a green and sustainable borough, where Hillingdon will be a sustainable, carbonneutral borough, protecting Hillingdon's heritage, built environment and valued green spaces.

Green infrastructure is instrumental in tackling the effects of climate change, providing habitat for biodiversity, and improving health and mental wellbeing. The Local Plan should:

- Seek the maximum practical provision of green infrastructure from new development,
- Be updated to include the Biodiversity Net Gain requirement,
- Protect existing ecological sites and seeking other opportunities to create new habitats, and
- Provide strong protection for trees and require new development to provide additional trees where possible, and
- Continue to implement the Urban Greening Factor in development.
- Reduce water run-off from developments by requiring Sustainable Urban Drainage Systems (SUDS) to tackle flooding and climate change impacts.

Do you have any comments on the Local Plan's current approach and policies on the protection and enhancement of green and blue infrastructure and the natural environment?

How can the Local Plan improve the natural environment?

How can the Local Plan increase the amount of green infrastructure (both publicly accessible and not) in the borough?

Should there be a policy in the Local Plan requiring all roofs of new developments to be green roofs, where it is possible to accommodate this? Y/N

9. Sustainable infrastructure

The existing Hillingdon Local Plan sets out the Council's policy approach to:

- Ensuring new buildings are energy efficient and low carbon,
- Expanding decentralised energy networks,
- Minimising flood risk, and reducing water run off through Sustainable Urban Drainage Systems (SUDS),
- Protecting ground water, remediating contaminated land, managing waste and improving air quality, and
- Controlling mineral extraction, aggregates, landfilling, and telecommunications infrastructure.

Existing approach

Key elements of the Local Plan policies on sustainable infrastructure include:

- Policy DMEI 2 requires that new developments to reduce carbon emissions in line with London Plan targets and seeking offsite contributions if required.
- Policy DMEI 3 requires major developments to be designed to be able to connect to a decentralised energy network, with those within 500 metres of an existing network required to connect.
- Policy DMEI9 requires developments within flood risk zones 2 and 3a demonstrate there are no suitable sites in areas of lower flood risk, and no development is permitted within flood risk zone 3b.
- Policy DMEI 10 requires all new development to use SUDS, and all major development and all minor development in Critical Drainage Areas or areas at risk of surface water flooding to reduce surface water run off to greenfield rate in a 1:100 year storm scenario, with allowance for climate change.
- Policy DMEI 11 requires development within a Source Protection Zone, Safeguard Zone or Water Protection Zone to assess and protect against harm to groundwater resources.
- Policy DMEI 12 requires development to mitigate or remediate contaminated land.
- Policy DMEI 13 controls developments that import waste.
- Policy DMEI 14 seeks that development is air quality neutral.

Key challenges

The challenges for sustainable infrastructure are very significant and are thought to include:

• In 2020, Hillingdon declared a climate emergency and set ambitious targets to become carbon neutral by 2030. There is also a need for

buildings to be designed to adapt to climate changes, such as managing the risk from rising heat levels.

- Air pollution is a major health challenge. Two thirds of the borough have been designated an Air Quality Management Area (AQMA) since 2003 due to high levels of nitrogen dioxide. Despite measures to reduce pollution, in parts of the borough, particularly close to Heathrow, level remain above legislative air quality limits.
- Hillingdon has large areas at risk of flooding, including from watercourses and surface water. Several critical drainage areas have also been identified. Flood events will worsen due to climate change.
- Parts of the borough have a known issue with obtaining electricity connections and infrastructure requirements are needed to facilitate growth in certain locations.
- The need for digital infrastructure will likely continue to ensure global competitiveness, however this need must be balanced against any harm arising, particularly to the existing local context.
- The borough will continue to be required to supply aggregates to support construction, both in terms of hosting land-won aggregate sites and the facilities required to process and transport aggregates.

A key commitment from the Council Strategy is for a green and sustainable borough, where Hillingdon will be a sustainable, carbonneutral borough, protecting Hillingdon's heritage, built environment and valued green spaces.

The Local Plan should:

- Help meet net zero carbon targets by lowering the carbon impacts of the built environment,
- Improve the energy efficiency of both new and existing buildings,
- Set out a positive framework for generation of sustainable energy including solar and air and ground source heat pumps, and encouraging use of decentralised energy networks,
- Meet new London Plan requirements, including for zero carbon, carbon offsetting, whole life-cycle carbon assessments on development referrable to the Mayor of London, and encouraging use of BREEAM targets for carbon reduction in development, and
- Continue to direct new development away from high flood risk areas and require sustainable urban drainage in new developments.
- Ensure that development is located and designed to improve air quality.

Do you have any comments on the Local Plan's current approach and policies on sustainable infrastructure?

What should our future Local Plan policies on sustainable infrastructure cover?

What should we be doing to reduce emissions created by new development in Hillingdon?

Should Hillingdon encourage achieving BREEAM standards? Y/N

10. Transport

The existing Hillingdon Local Plan sets out the Council's policy approach to:

- Promoting walking and cycling,
- Reducing car dependency,
- Improving the north-south connections in the borough,
- Managing car parking in development, and
- Managing the impact of Heathrow Airport on road networks and air quality.

Existing approach

Key transport policies include:

- Policy DMT 1 requires most development to be accessible by public transport.
- Policy DMT 2 controls impacts on the highway including amenity and congestion and requires provision of access for cyclists and pedestrians.
- Policy DMT 4 requires developers mitigate impacts of their scheme by improving local public transport facilities.
- Policy DMT 5 ensure that development provides safe, direct and accessible links for pedestrians are provided in development.
- Policy DMT 6 sets parking standards for developments the criteria for considering any variation from the standard. A minimum of 5% of car parking should provide electric vehicle charging points.
- Policy DMT7 that developments which generate freight movements are well connected to the strategic road network.
- Policy DMAV 1 relates to airports and protects against development that is hazardous to aircraft and stops development where potentially it poses a risk to safety or is significantly impacted by noise.

Key challenges

Key challenges for the transport policies are thought to include:

- The need to consider the Mayor of London's strategic target of 75% of trips in Outer London to be undertaken by walking, cycling and public transport by 2041.
- How to balance this target with the low levels of public transport accessibility for large areas in Hillingdon, with 86% of the population in an area of PTAL 2 or lower, significantly lower than the average for London (49%).
- Some parts of the borough are remote and do not benefit from existing or planned public transport, potentially making the inappropriate from some uses.

- Levels of walking and cycling are low in Hillingdon, with only 2.4% of journeys to work by walking and 0.5% by bicycle.
- While connections to Central London are good, public transport connections within the borough and north and south are limited.
- Traffic congestion and its impacts on pollution, amenity and journey times are problematic in many areas.
- In addition to the movement of people, the borough needs to accommodate freight movement by both rail and road.
- There are areas of poor air quality, focused on the road network and Heathrow Airport.
- There are significant challenges with children's health, with 1 in 3 children living with overweight or obesity by year 6 of school. Active travel options (walking and cycling) can help reduce levels of overweight and obesity.

A key commitment from the Council Strategy is for a green and sustainable borough, where Hillingdon will be a sustainable, carbonneutral borough, protecting Hillingdon's heritage, built environment and valued green spaces. Residents will live in pleasant neighbourhoods with access to sustainable waste management and transport.

- Development should be integrated with transport access and capacity.
- The Local Plan needs to make better use of land, reduce car dependency, improve urban greening and biodiversity.
- In line with the London Plan, the Local Plan should seek to rebalance the transport system towards walking, cycling and public transport. The Mayor of London has set out an ambitious target for Hillingdon for 75% of all trips to be by public transport, cycling or walking by 2041.
- Following the London Plan 'Healthy Streets' approach, the Local Plan should deliver patterns of development which allow short journeys by walking and cycling and create streets which are safe and pleasant to use.
- The Local Plan will need to respond to new London Plan priorities to seek lower provision of car parking in new development where alternatives allow.
- New development should provide charging facilities for electric vehicles where car parking is provided. The current target of 5% of parking spaces is below the 20% outlined in the London Plan.
- Managing overspill traffic from motorway impacting on local neighbourhoods

Do you have any comments on the Local Plan's current approach and policies on transport?

Should the Local Plan reduce the amount of car parking required on site, with developments in the most accessible locations being 'car free' with no on-site parking provided? Y/N

TfL has ambitious targets for share of trips by public transport, walking or cycling. Do you have any comments related to the challenges of meeting these targets with specific reference to Hillingdon and its places?

11. Any other comments

You may use this section to respond to with comments related to:

- Any topics not covered in the preceding sections, or
- Any matter related to a specific location not covered above.

12. Call for open space evidence

Background information (not for publication):

The Council is reviewing open spaces in the borough. This open space review will be an evidence document for the Local Plan.

As part of the Regulation 18 consultation, the Council proposes to invite residents and stakeholders to submit open spaces to the review for assessment. This will improve the study quality by taking advantage of local knowledge to supplement the other data sources being used in the review.

In the following stages of the Local Plan, the Council may utilise the review to designate additional open spaces for protection.

Draft text (for consultation)

The Council is reviewing open spaces in the borough. This open space review will be an evidence document for the Local Plan. The review builds upon the <u>Hillingdon Open Space Strategy 2011–2026</u>.

The scope of the open space review is open spaces that fall within the typologies set out in Figure 1 below.

Figure 1. PPG17 open space typologies

PPG17 Typology

Primary purpose

	Parks and gardens	Accessible, high quality opportunities for informal recreation and community events
	Natural and semi-natural greenspaces, including urban woodland	Wildlife conservation, biodiversity and environmental education and awareness
	Green corridors	Walking, cycling or horse tiding, whether for leisure purposes or travel, and opportunities for wildlife migration
	Outdoor sports facilities	Participation in outdoor sports, such as pitch sports, tennis, bowls, athletics or countryside and water sports
Greenspaces	Amenity greenspace	Opportunities for informal activities close to home or work or enhancement of the appearance of residential or other areas.
	Provision for children and young people	Areas designed primarily for play and social interaction involving children and young people, such as equipped play areas, ball courts, skateboard areas and teenage shelters
	Allotments, community gardens and urban farms	Opportunities for those people who wish to do so to grow their own produce as part of the long term promotion of sustainability, health and social inclusion
	Cerneteries, disused churchyards and other burial grounds	Quiet contemplation and burial of the dead, often linked to the promotion of wildlife conservation and biodiversity
Civic spaces	Civic and market squares and other hard surfaced areas designed for pedestrians	Providing a setting for civic buildings, public demonstrations and community events

The current open space evidence base framework map is set out in Figure 2 below.

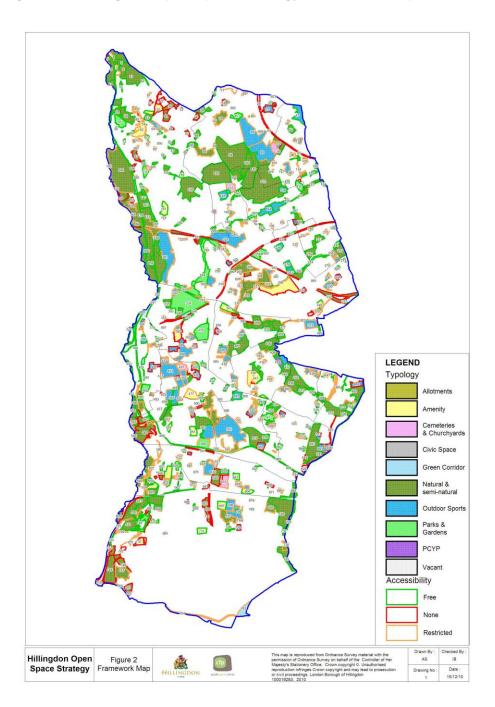


Figure 2. Hillingdon Open Space Strategy Framework Map 2011-2026

The Council will be reviewing a range of data sources to update this evidence base. You are invited to contribute to the open space review suggesting updates to the open spaces identified on the framework map, above. Your submission should include a description explaining how a space meets the typology and supporting information including relevant photos and maps. Submissions will be reviewed by the Council and new open spaces will be added to the evidence base only if they meet the PPG17 criteria.

13. Call for Sites – additional consultation

Background

The council undertook a call for sites exercise to gather information on land that individuals or organisations may consider to have development potential. This exercise ran from Friday 26 May to Friday 29 September 2023. The results of this exercise will form part of the evidence gathering for the review of the Local Plan. The council received a number of submissions and is now in the process of reviewing and assessing these sites.

The Council will open the call for sites again as part of the Regulation 18 consultation. The scope and process is the same as the previous exercise. This is to allow for new stakeholders to submit sites where they were unable originally. There is no need to resubmit sites that have already been submitted to the Council in the previous exercise. Where significant new information has arisen since the previous exercise, this can be added, although this is not expected to be the case for most sites.

Scope and process

The Council is seeking the submission of sites that meet the following criteria:

 The site is wholly or partially within the London Borough of Hillingdon; and

The site meets one of the following:

- It is greater than or equal to 0.25 ha; or
- It could accommodate 10 or more self-contained dwellings; or
- It could accommodate 1,000 sqm or more of non-residential floorspace;

Anyone can submit a site as part of the exercise, subject to it meeting the requirements above. One does not need to own the land or have a financial interest in it, however the form will require you to establish your relationship with the land, so that the Council can distinguish who has submitted the site.

Each site submission will require the completion of a separate return. We encourage those submitting large, strategic scale sites to work collaboratively with adjoining landowners or their agent, where appropriate, to ensure that a coordinated and comprehensive approach is taken in establishing their development potential. Please note that all submissions will in time be made public, as their appropriateness is assessed by officers in the Council. This document will form part of the publicly available evidence base for the Local Plan. Whilst contact details will be removed, information on who submitted the site and their relationship to it will need to be published in the final document.

Assessing sites

Please note that the submission of a site does not automatically mean that it will be allocated in the Local Plan or receive planning permission for development. All sites submitted in response to the exercise will subsequently be assessed by the Council. If they are considered potentially suitable for an allocation within the Local Plan, they will then be subject to public consultation and, if necessary, further scrutiny during the public examination stage.

Officers will not be able to assess submissions that contain missing or inaccurate information. Please read the questions carefully and respond to the best of your ability. If you have any concerns, please contact localplan@hillingdon.gov.uk

Note not for publication:

Stakeholders will be directed to a separate webpage to submit sites.

14. Integrated Impact Assessment

The Local Plan will be subject to Integrated Impact Assessment (IAA), which combines Sustainability Appraisal, Equalities Impact Assessment, Health Impact Assessment, and Community Safety Impact Assessment. The IIA process is carried out alongside the plan production process and helps direct the plan toward achieving sustainable development.

The first stage of the IIA is the preparation of a scoping report which sets the context, objectives, establishes baseline information, and sets sustainability issues and the appraisal framework. The IIA Scoping Report has been consulted on by statutory consultation bodies.

The IIA Scoping Report is available for view here: (link to be added).

You are invited to comment on the report.

15. Glossary

Glossary

A glossary has been added utilising the latest definitions held within the adopted Development Plan. The aim is to provide definitions for key terms used within the consultation to improve public engagement. The Council is not bound by these definitions when drafting policies and it may be beneficial to utilise alternatives at that stage. **Affordable housing:** homes based on social rent levels, including Social Rent, London Affordable Rent, London Living Rent and London Shared Ownership as defined in the London Plan.

Air Quality Neutral: An Air Quality Neutral development is one that meets, or improves upon, the air quality neutral benchmarks published in guidance from the GLA. The benchmarks set out the maximum allowable emissions of NOx and Particulate Matter based on the size and use class of the proposed development. Separate benchmarks are set out for emissions arising from the development and from transport associated with the development. Air Quality Neutral applies only to the completed development and does not include impacts arising from construction, which should be separately assessed in the Air Quality Assessment.

Air Quality Management Area: An area which a local authority had designated for action, based upon a prediction that Air Quality Objectives will be exceeded.

BREEAM: Refers to the Building Research Establishment Environmental Assessment Method which are a set of sustainable design and construction standards. The London Plan states that Local Plans should encourage that development achieves carbon reductions beyond Part L of the Building Regulations from energy efficiency measures alone to reduce energy demand as far as possible. Achieving energy credits as part of a Building Research Establishment Environmental Assessment Method (BREEAM) rating can help demonstrate that energy efficiency targets have been met. The London Plan states that residential development should achieve 10 per cent and non-residential development should achieve 15 per cent over Part L. The London Plan encourages boroughs to include BREEAM targets in their Local Plans where appropriate.

Biodiversity: This refers to the variety of plants and animals and other living things in a particular area or region. It encompasses habitat diversity, species diversity and genetic diversity.

Data centre: A building used to house computer systems and associated components, such as telecommunications and storage systems. Data centres are generally developed in industrial premises and locations.

Digital Infrastructure: Infrastructure, such as small cell antenna and ducts for cables, that supports fixed and mobile connectivity and therefore underpins smart technologies.

Geodiversity: The variety of rocks, fossils, minerals, landforms, soils and natural processes, such as weathering, erosion and sedimentation, that underlie and determine the character of our natural landscape and environment.

Green infrastructure: Comprises the network of parks, rivers, water spaces and green spaces, plus the green elements of the built environment, such as street trees, green roofs and sustainable drainage systems, all of which provide a wide range of benefits and services.

Heritage assets: Valued components of the historic environment. They include buildings, monuments, sites, places, areas or landscapes positively identified as having a degree of historic significance meriting consideration in planning decisions. They include both designated heritage assets and non-designated assets where these have been identified by a local authority (including local listing) during the process of decision-making or plan making.

Permitted Development Rights: A general planning permission granted not by the local authority but by Parliament. Legislation (currently the Town and Country Planning (General Permitted Development (England) Order 2015) sets out classes of development for which a grant of planning permission is automatically given, provided that no restrictive condition is attached or that the development is exempt from the permitted development rights.

Previously Developed Land: Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

Public realm: Publicly accessible space between and around buildings, including streets, squares, forecourts, parks and open spaces.

Public Transport Access Levels (PTALs): Public Transport Access Levels (PTALs) are calculated across London using a grid of points at 100m intervals. For each point walk time to the public transport network is combined with service wait time (frequency) to give a measure of public transport network density.

Strategic Industrial Locations: London's largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London's economy.

Urban greening: Describes the act of adding green infrastructure elements Due to the morphology and density of the built environment in London, green roofs, street trees, and additional vegetation are the most appropriate elements of green infrastructure in the city.