

REVISED LOCAL DEVELOPMENT SCHEME

Cabinet Member & Portfolio	Cllr Steve Tuckwell – Cabinet Member for Planning, Housing and Growth
Responsible Officer	Daniel Kennedy – Corporate Director Residents Services
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Papers with report	Appendix 1: Local Development Scheme

HEADLINES

Summary	In accordance with Section 15 of the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011) the London Borough of Hillingdon ('Hillingdon') must prepare and maintain a Local Development Scheme (LDS). The LDS is a three-year project plan for the preparation of new planning policy documents. The Council is updating its LDS to reflect an updated programme for the Local Plan.
Putting our Residents First Delivering on the Council Strategy 2022-2026	This report supports all our ambition for residents. This report supports our commitments to residents.
Financial Cost	The cost of the Local Plan Review will be met from existing service budgets and an established earmarked reserve.
Select Committee	Residents' Services
Ward(s)	N/A

RECOMMENDATION

That Cabinet:

- 1) **Endorse and recommend the revised draft Local Development Scheme (LDS) (Appendix 1) for adoption by Full Council.**
- 2) **Note that following adoption of the LDS the Planning Policy team will notify stakeholders, including updating the Planning Policy pages of the Hillingdon website, and emailing contacts on the Local Plan mailing list.**
- 3) **Note that if new planning regulations are introduced prior to Full Council, that the LDS would be adopted as a Local Plan timetable under the new plan-making system.**

Reasons for recommendations

The Cabinet is asked to make this decision to take account of a revised Local Plan programme. The delivery of a sound plan in accordance with the current programme is considered undeliverable due to changes to the planning policy context which are beyond the council's control. Consequently, this report proposes a revised programme that shifts the main stages of production and consultation for the Local Plan into 2026 and beyond.

Alternative options considered / risk management

Officers considered progressing a Local Plan comprising Strategic and Development Management policies and brownfield site allocations on the current programme. This would be accompanied by a commitment to undertake an early-stage review under the emerging plan system to identify Green Belt sites to meet the housing shortfall.

Officers do not consider this to be a viable alternative for the following reasons:

- There is significant risk that this would not be found sound due to the housing shortfall, failure to consider impacts of the Heathrow Airport expansion and incompatibility with national Development Management policies.
- The Local Plan would not address key issues of meeting housing needs or provide a planned approach to development in the Green Belt to guide Development Management decisions.
- It would require two sets of public engagement and examination, leading to additional cost and resource use, whilst diverting resources from the tasks of identifying the most suitable additional housing sites and putting in place protections for other land.

Democratic compliance / previous authority

The current Local Development Scheme was adopted by Full Council on Thursday 27 February 2025. The Local Plan review has been proceeding under this authority to date. As a policy framework document, Cabinet is required to recommend its formal adoption to the full Council, which is scheduled to consider this at its meeting on 22 January 2026.

Select Committee comments

None at this stage, though the select committee will be engaged as part of the Local Plan's development as a policy framework document.

SUPPORTING INFORMATION

Local Development Scheme

The English planning system is plan-led, whereby planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Local Plan forms the key component of the Development Plan for a local planning authority and establishes the local planning policies that shape how places evolve over time.

The Local Development Scheme (LDS) sets out the documents that the council, as the local planning authority, intends to prepare as part of its Development Plan, together with the programme for their production. Under Section 15 of the Planning and Compulsory Purchase Act 2004 (as amended), all local planning authorities are required to maintain an up-to-date LDS. Failure to do so may result in the Government or the Mayor of London directing or imposing an LDS on the authority.

The council's current LDS proposes publication of a Draft Local Plan in January 2026, followed by a finalised plan in Summer 2026 and submission to the Government before the end of 2026. This timetable was originally established to ensure that the council could progress and submit the Plan under the existing plan-making regime, by a nationally set deadline of December 2026.

However, the Levelling Up and Regeneration Act 2023 introduces a fundamentally new system for preparing Local Plans, including revised legal requirements, new statutory "gateway" assessments, mandatory consultation stages, and a new suite of national Development Management policies. Crucially, any Local Plan submitted from January 2027 onwards must be prepared entirely under this new framework; transitional arrangements do not allow plans part-prepared under the old system to be carried forward. This means that the council can only submit a Local Plan under the current system if it is fully prepared, consulted upon, and submitted before the end of 2026.

Current Local Development Scheme and Emerging Issues

The council's Planning Policy team have been working in accordance with the current LDS timeline with the intention of producing a draft Local Plan for consultation in January 2026. However, as the development of the document internally has progressed in a timely manner, officers have become increasingly aware of the need to address a number of external challenges that will impact the emerging policy framework. The three most significant emerging issues can be summarised as follows:

1. New increased housing targets through the London Plan

Hillingdon's housing targets are set by the London Plan, which acts as the Spatial Development Strategy (SDS) for Greater London. Under the NPPF, where a SDS is in place and is less than five years old, it continues to provide the housing requirement for emerging Local Plans. The

current London Plan will reach its five-year point in March 2026. Once it is considered out of date, Local Plan housing need will revert to the Standard Method set out in NPPF paragraph 62.

Following the updated Standard Method published in December 2024, Hillingdon's Local Housing Need is now calculated at 2,292 homes per year—more than double the London Plan target of 1,067 homes per year. In addition, the Mayor is expected to consult on a new London Plan in Spring 2026, which is likely to propose new, significantly higher housing targets. Whilst the Mayor has stated that the overall target for London will be based on the Standard Method, each borough's target will be an apportionment of it based on a methodology set by the Mayor through the SDS.

Under the current timetable, these changes would arise after consultation on the Draft Local Plan, potentially requiring substantial revisions and further consultation. Given the imminent timing of these expected changes, and their implications for the borough's spatial strategy, it is considered prudent to delay publication of the Draft Plan so that the forthcoming externally derived housing targets can be considered.

2. National Planning Reforms

The government has announced that it will consult on new national Development Management policies in December 2025. These were originally expected to carry significant weight, although the government has more recently indicated that they may be advisory rather than mandatory. Even so, the Council will need to ensure that Hillingdon's emerging Local Plan policies operate effectively alongside whatever national policies are ultimately introduced. Publishing the Draft Plan before these national policies creates a risk that parts of the Local Plan are immediately inconsistent and require early review.

3. Proposed Expansion to Heathrow Airport

A revised Airports National Policy Statement (ANPS) for Heathrow Airport is anticipated for publication in Q2 2026. This document will define the Government's strategic direction for Heathrow, including the proposals for a third runway. As currently framed, the third-runway scheme represents the largest infrastructure project in Europe and would generate profound and far-reaching implications for Hillingdon. These include the loss of at least 750 homes, substantial incursions into designated Green Belt, and major effects on local infrastructure, transport networks, and industrial land. The proposals also carry significant environmental considerations, particularly relating to air quality, noise, and the scale of construction activity.

The timing of the ANPS review and any Government decision on Heathrow's expansion are matters wholly outside the Council's control. It is, however, unavoidable that the Local Plan will require comprehensive review to respond to the form and extent of development set out in the final ANPS. Proceeding to establish a spatial strategy in advance of clarity on the land-use consequences of the third-runway proposal would therefore be premature and risk undermining the robustness of the Plan.

Implications for Local Plan Preparation

It has become increasingly apparent that it is neither practical nor possible to continue with the current LDS programme for the production of the Local Plan. The existing timetable is no longer deliverable in the context of substantial, externally driven changes to national, regional and local planning policy that will fundamentally reshape the borough's development context over the coming years. Emerging Green Belt evidence, significant anticipated increases in housing requirements arising from both the Standard Method and the next London Plan, the introduction of new national Development Management policies, and the far-reaching land-use implications of the revised Heathrow ANPS together create a level of uncertainty that cannot be reconciled within the current programme.

Continuing without clarity on these matters would place the Council at a high risk of preparing a Plan that is immediately out of date, unable to meet statutory tests of soundness, and highly vulnerable to challenge. A revised LDS is therefore required to provide a more realistic and robust pathway that aligns the Local Plan with the timing of these external policy changes, ensuring that the emerging Plan is supported by complete evidence, a credible spatial strategy and meaningful engagement with residents and stakeholders. In determining the most appropriate course of action, officers have also sought advice from the LGA's Planning Advisory Service and an Examiner from the Planning Inspectorate, and this professional guidance has informed the recommendations for the revised programme.

Finally, as set out in the introduction, the Levelling Up and Regeneration Act introduces a new statutory plan-making system that will apply to any Local Plan submitted from January 2027 onwards. If the current LDS timetable cannot be met and submission does not occur before the end of December 2026, the Local Plan will be required to transition to the new system. This has significant implications for the overall work programme, particularly as no transitional arrangements exist to allow plans part-prepared under the current framework to be completed under it.

The Planning Advisory Service has indicated that the government have not foreshadowed any plans to extend the deadline for Local Plans submitted under the current system. Should this situation change, for example by the government allowing a one-off 6 month extension to allow Local Plans at a late stage of production through under the current system, then we would reconsider our position, with a view to completing under the current system.

Revised LDS Programme

The new plan-making legal framework is provided by the Levelling up and Regeneration Act 2023 and is expected to commence toward the end of 2025. The new plan-making system will be underpinned by new primary and secondary legislation. Plans prepared under the new system will need to comply with the new legal requirements from start to finish. Statutory consultation under the existing system cannot be used under the new system.¹

We have prepared this revised LDS programme based on the information that has been made available to date. However, we may need to make further changes as the new legislation is published.

¹ https://assets.publishing.service.gov.uk/media/68a4873df49bec79d23d29cc/Chief_Planners_Newsletter_19_August_2025.pdf

The proposed programme takes into account the Local Plan work undertaken to date. This comprises evidence gathering and plan preparation which includes:

- A call for views consultation
- A call for sites consultation
- Evidence gathering, including:
 - Strategic Housing Land Availability Assessment,
 - Strategic Housing Market Report,
 - Employment Land and Capacity Study,
 - A Townscape and Character Study,
 - Local Infrastructure Study,
 - Ecology Study,
 - Open Space Assessment,
 - Tall Buildings topic paper, and
 - Integrated Impact Assessment scoping.

This preparatory work will reduce the time required between formal stages, compared to councils that would be starting the programme from the beginning. A detailed programme timetable is provided below. This timetable is informed by information provided in the Government consultation: Levelling-up and Regeneration Bill: consultation on implementation of plan-making reforms². The LDS (Appendix 1) provides a concise version of this timetable.

Indicative timetable

Provide notice for the start of plan making	January 2026
Prepare Project Initiation Document (PID), draft vision, Strategic and Development Management policies, and Site Allocations	January 2026 to June 2026
<i>Gateway 1</i>	June 2026
Cabinet to approve first consultation	June 2026
First mandatory consultation	June to August 2026
Refine vision, Strategic and Development Management Policies and Site Allocations	August 2025 to February 2026
<i>Gateway 2</i>	December 2026
Cabinet to approve second consultation	February 2027
Full Council to approve second consultation	March 2027
Second mandatory consultation	March - May 2027
Make modifications	May - September 2027
<i>Gateway 3</i>	September 2027
Submission to the Secretary of State	September 2027
Examination	October to March 2027
Adoption	April 2027

² [Levelling-up and Regeneration Bill: consultation on implementation of plan-making reforms - GOV.UK](https://www.gov.uk/consult/consultation/levelling-up-and-regeneration-bill-consultation-on-implementation-of-plan-making-reforms)

Following this decision, if supported officers will:

- Progress this decision to Full Council for approval.
- If approved, publish a new LDS which sets out that the Council will undertake the Local Plan under the new planning system, commencing in 2026 as soon as practical under the regulations, in accordance with the timetable set out in the LDS.
- Continue to develop the Local Plan throughout 2026, with a focus on site selection for housing in the Green Belt, prioritising previously developed land and Grey Belt first.
- Inform stakeholders of the revised programme and update the Hillingdon website.

The Council has prepared an evidence base for the Local Plan, with many studies completed and others underway. The details of the evidence requirements for the emerging regime are not available. However, the broad scope of Local Plans, including the need to provide for housing, commercial, community and infrastructure needs will continue. It is likely that much of the evidence can be used or adapted under the new regime. If costs are incurred through new evidence requirements, we have sources of funding to cover this, including government funding for Local Plan preparation, remaining funding from the Local Plan earmarked reserve, and the annual Planning Policy evidence budget. Costs for consultation should remain comparable. Both the existing and new plan making systems require two time-bound opportunities for consultation.

Progressing under the new system is likely to be a significant cost saving strategy by allowing the Council to prepare a single, thoroughly evidenced plan that goes to examination with key issues resolved as far as possible. This minimises opportunities for legal challenge, the need for further stages of consultation, and reduces the length and complexity of examination.

Local Development Scheme changing to Local Plan Timetable under the new plan-making system

Ahead of the commencement of the new plan-making system early next year the government prepared this explainer document which describes what they intend to set out in regulations. The government have announced that under the new plan-making system Local Development Schemes will no longer be required. The Local Development Scheme requirement will be replaced with a requirement to publish a Local Plan timetable, which should be updated live and prepared in a prescribed format. The timetable would be published when notice of plan preparation is given³. This change is anticipated to be set out in regulations in December 2025. If these regulations are in place prior to the next Full Council we propose to adopt this revised timetable not as a Local Development Scheme but as a Local Plan timetable under the new plan-making rules.

Financial Implications

There are no direct financial implications from the recommendations in this report. However, it is anticipated that all costs incurred from adopting the Local Development Scheme will be covered through secured government grant funding, remaining earmarked reserves and the current consultants' budget. The grants received carry no published repayment conditions, and the MHCLG has confirmed that this funding is intended to support the timely progression of Local Plans and Green Belt reviews.

³ [Plan-making regulations explainer - GOV.UK](#)

RESIDENT BENEFIT & CONSULTATION

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

1. As set out in previous decisions, the Local Plan is a key mechanism for delivering for those living, working in and visiting Hillingdon. It provides a strategic vision for development in Hillingdon over the next 15 years. It provides the planning policies to help build homes, provide space for businesses to grow, improve transport, green spaces, infrastructure, and a wide range of other planning benefits.

Consultation & Engagement

2. No additional public consultation is required for these decisions.

CORPORATE CONSIDERATIONS

Corporate Finance

Corporate Finance have reviewed this report and concur with the Financial Implications set out above, noting that there are no direct financial implications associated with the recommendations within this report.

Furthermore, it is noted any future impacts arriving from adopting the Local Development Scheme will be met from government grant funding, existing approved budgets and the remaining balance of the Local Plan earmarked reserve, with this being monitored through the regular monthly monitoring cycle and as part of the wider MTFS.

Legal

Section 15 of the Planning and Compulsory Purchase Act 2004 (PCPA 2004) (as amended) sets out every Local Planning Authority (LPA) must prepare and maintain a Local Development Scheme (LDS).

The LDS plays a vital role in informing the local community and stakeholders about the status of an LPA's planning policy documents; therefore, LPAs must make available to the public the up-to-date version of the LDS, and the Planning Practice Guidance advocates for publication of the LDS on the LPA's website.

In preparing and adopting the LDS, it is no longer necessary to submit this document to the Secretary of State or Mayor of London, and in order to effect the LDS, LPAs must '**resolve**' that the LDS is to have effect from a specific date.

BACKGROUND PAPERS

NIL