

# HILLINGDON LOCAL DEVELOPMENT FRAMEWORK: PRE-SUBMISSION DRAFT CORE STRATEGY

<b>Cabinet Member</b>	Councillor Keith Burrows
<b>Cabinet Portfolio</b>	Planning, Transportation and Recycling
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<b>Papers with report</b>	<p>Appendix 1 - Schedule of Responses Received to the Consultation Draft Core Strategy Appendix 2 - Local Development Framework Pre-Submission Draft Core Strategy</p> <p><b>Due to size both appendices are circulated separately to Cabinet, Executive Scrutiny, Chief Officers only. Copies available for public inspection and in Group Offices</b></p>

## HEADLINE INFORMATION

<b>Purpose of report</b>	This report presents the results of consultations held earlier this year on the Local Development Framework Consultation Draft and seeks approval to publish the Pre-Submission Draft Core Strategy for the purposes of public consultation.
<b>Contribution to our plans and strategies</b>	The Pre-Submission Draft Core Strategy aligns closely with the Sustainable Community Strategy and contributes to delivering key plans and strategies and in particular the Council Plan.
<b>Financial Cost</b>	The cost of preparing and consulting on the Pre-Submission Draft Core Strategy can be met from existing revenue budgets for 2010/11.
<b>Relevant Policy Overview Committee</b>	Residents' and Environmental Services Policy Overview Committee.
<b>Ward(s) affected</b>	All

## RECOMMENDATION

That Cabinet:-

- Notes the schedule of responses received to the consultations held during June and July 2010 on the Local Development Framework Consultation Draft Core Strategy, as detailed at Appendix 1 (circulated separately).**
- Approves the Local Development Framework Pre-Submission Draft Core Strategy for public consultation (circulated separately as Appendix 2).**

3. **Grants delegated authority to the Director of Planning, Environment and Community Services to agree, in conjunction with the Cabinet Member for Planning, Transportation and Recycling, to make any minor editing and textual changes to the Pre-Submission Draft Core Strategy, before it is formally published.**
4. **Approves the Local Development Framework Pre-Submission Draft Core Strategy as a material consideration for the purposes of development management.**
5. **Instructs officers to carry out a minimum six-week public consultation on the Pre-Submission Draft Core Strategy in compliance with the adopted Statement of Community Involvement, and for officers to report back to a future meeting of Cabinet the outcome of public consultation and recommendations for changes to the Core Strategy prior to its formal submission to the Department of Communities and Local Government.**

## **INFORMATION**

### **Reasons for recommendation**

These recommendations are sought to enable the council to make meaningful progress on the Local Development Framework Core Strategy in order to meet targets approved by the Mayor of London in the council's Local Development Scheme.

The Core Strategy will in due course replace the Unitary Development Plan Saved Policies, 2007. Strategic policies in the Core Strategy are intended to provide a more up-to-date framework to determine planning applications forming a material consideration alongside the Unitary Development Plan and the London Plan, Consolidated with Alterations 2008, and the draft Replacement London Plan 2009.

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

The Cabinet may decline to approve the Pre-Submission Draft Core Strategy. Alternatively Cabinet may request officers to make significant changes to the Core Strategy for its subsequent approval prior to public consultation.

It is considered that these alternative options would prejudice progress on the preparation of the Local Development Framework as a whole, result in targets in the Local Development Scheme being missed, and fail to provide the council with an up-to-date statutory development plan in order to deal with major development proposals in the future.

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

The Residents' and Environmental Services Policy Overview Committee at various stages during the LDF process over the last few years have been both involved and consulted.

### **Supporting Information**

#### Background

1. The Core Strategy is a spatial plan, providing the strategic vision and direction for new development through to 2026. It aligns closely with the Sustainable Community Strategy and conforms to the Regional Spatial Strategy – i.e. the Mayor of London's London Plan.

2. The drafting of the Core Strategy has taken into account relevant planning legislation, national planning policy statements (PPS); on-going advice from the Government Office for London (GOL) and the Planning Inspectorate (PINS), and also from lessons learnt from professional planning bodies and agencies, in particular the Planning Advisory Service (PAS). In summary the Pre-Submission Draft Core Strategy has evolved from the following documents:

- Issues and Options (Spring 2005)
- Preferred Options (Autumn 2005)
- Revised Preferred Options (Spring 2007)
- Consultation Draft (June 2010)

### Public consultation

3. At the meeting on 27th May 2010, the Cabinet agreed to approve the Consultation Draft Core Strategy for public consultation and requested that the results of the consultation be reported to a future meeting. The Consultation Draft Core Strategy and accompanying Sustainability Appraisal were subject to public consultation from 16th June 2010 until 30th July 2010. The consultation period was advertised and notified in accordance with the Council's Statement of Community Involvement (SCI), as detailed below.

4. A statutory press notice appeared in the Hillingdon Leader, the Gazette series and the London Gazette on 16th June 2010. An article was placed in Hillingdon People in the July/August 2010 edition and an audio advertisement was placed in Hillingdon talking Newspaper for the visually impaired on 18th June. The consultation was also advertised on the Council's Twitter page on 18th June.

5. A total of 2970 letters/ emails were sent to a wide range of groups and individuals on the Local Development Framework consultation database. This included members of the Local Strategic Partnership (LSP) (total of 35); environmental groups (11); Chambers of Commerce (7); local businesses (514); community groups (92); conservation groups (32); conservation panels (7); consultants (146); developers (13); Planning and Transportation Customer Panel (7); estate agents (14); local agents (5); housing providers (36); health providers (7); other London boroughs (4); post offices (44); GP's (51); schools (60); transport providers (26) and other general groups/ individuals (124). Letters were also sent to 50 randomly selected residents per ward from the electoral register (1100) and to 197 randomly selected businesses from the 2008 Hillingdon Business Directory.

6. All elected members and local MP's were posted a letter explaining the consultation process and an invitation to a drop-in session, with a hard copy of the Consultation Draft Core Strategy delivered to the group offices, with additional hard copies delivered upon request. A letter and CD-Rom was sent to all statutory consultees (119). Residents Associations (115) were also sent a letter and CD-Rom, with an invitation to a meeting.

7. In addition, copies of the document were also placed at all borough libraries, Hayes One Stop Shop and the Civic Centre (Planning Information Services). The draft document was also placed on the Council's website with a facility to make on-line comments. Two public exhibitions were set up at Uxbridge Library and Planning Information Services from 16th to 30th July.

8. Drop-in sessions for the general public, with the opportunity to speak to council staff, were held at the:

- Ruislip Manor Library (Thursday 24 June 4pm - 7.30pm)
- Hayes Library (Saturday 26 June 10am - 1pm)

- Planning Information Services, Civic Centre, Uxbridge (Thursday 1 July 4pm – 7.30pm)
- Ruislip Manor Library (Saturday 3 July 10am - 1pm)
- Botwell Library (Thursday 15 July 4pm - 7.30pm)
- Planning Information Services, Civic Centre, Uxbridge (Saturday 17 July 10am – 1pm)

9. A drop in session for Council Members was held at the Civic Centre (4-7pm) on 13 July. A drop in session was also held for Residents Associations/community groups at the Civic Centre (6.30pm-8pm) on 14 July.

10. The following events and meetings were also attended by officers to raise awareness and encourage discussion about the consultation document:

- Mobility Forum, Accessibility Officer (11am, 14 June)
- Hayes Partnership Meeting, Hyde Park, Hayes (2pm, 21 June)
- Youth Council, exhibition stall set up (5pm, 21 June)
- Disabilities Assembly (21 June)
- Local Strategic Partnership Executive Meeting (22 June)
- Equalities and Diversity Forum (10.30am - 11.30am, 24 June)
- Residents Planning Forum (6pm, 24 June)
- Older Peoples Assembly (28 June)
- Member Briefing (7pm, 6 July)
- Hillingdon Chamber of Commerce, Novotel, Heathrow (7am breakfast meeting, 9 July)
- Residents' Environmental Services Policy Overview Committee (RESPOC) (29th July)

### Consultation responses

11. Appendix 1 lists a summary of all representations received as a result of the public consultation and the suggested response to each. The key issues raised during the public consultation include the following:

- Period for consultation:** various individuals and residents' associations expressed concern that the length of time for the consultations was too short. Two petitions were also received, the comments of which were discussed at a Petition Hearing on 13 October 2010. In response, it is noted that consultations were conducted in line with both the Development Plan Regulations (which sets down the six-week duration for development plan document consultations) and the Council's Statement of Community Involvement.
- Green belt designations:** some objectors from commercial organisations have pointed out that it is anomalous that the Green Belt designation continues to cover the Terminal 5 site at Heathrow and that designations in the north of the borough no longer fulfil a true Green Belt function and should be released for housing. In response, various detailed Green Belt designations will be reviewed along with a series of other site designations as part of work for the forthcoming Site Allocations development plan document. The Core Strategy only shows the broad extent of the Green Belt in the borough. It will be for subsequent more detailed documents to examine the case for their continuation.
- Heathrow Opportunity Area:** Various organisations have asked that the locations for growth within Heathrow Opportunity Area should be clarified. In response, it is proposed that the Key Diagram and Map 5.1 in the Core Strategy will be revised to clarify that growth will be focussed on sustainable locations such as town centres and areas with good access to public transport. A number of textual changes have also been made to the document, including paragraph 5.3 referring to Table 5.3.

- d) **Non-operational uses within Heathrow:** Some commercial interests have called for hotels and other non-operational uses to be allowed within the airport boundary. No revisions are proposed because the supply of airport land is finite and needs to be reserved for activity directly related to the airport.
- e) **Convenience Shopping Floorspace:** Three major supermarket chains have called for the Core Strategy to clarify the potential for the development of more convenience shopping in the borough. In response, the document has been revised to include a reference that potential only exists for an additional 415 m2 floorspace up to 2016.
- f) **Housing targets:** Some organisations have objected to the housing target figure in the Core Strategy being based on outdated information. The latest proposals for the latest Minor Alterations to the draft Replacement London Plan propose an annual housing target of 425 units (which has been reduced from 620 in the draft Replacement London Plan). Policies H1 and H2 are to be updated to reflect the latest evidence base data. The Council is currently preparing an economic viability assessment and Housing Market Assessment, to inform borough-wide affordable housing targets. The revisions to the draft Core Strategy include a target of 35% affordable housing, subject to viability because a target to provide 50% cannot be supported on economic viability grounds.
- g) **Gypsies & Travellers:** The Irish Traveller Movement in Britain together with various individuals have objected to the proposal to provide only seven new pitches in the borough over the Plan period. The policy is to be revised in the light of the latest Minor Alterations to the draft Replacement London Plan, which devolve the responsibility for setting a target to individual boroughs in consultation with the Mayor of London. Work on the Site Allocations development plan document will examine the potential for further pitches.
- h) **Environmental Character of the Borough:** English Heritage have objected that there is no evidence available as to the environmental character of the borough and therefore no basis for the spatial strategy and justification for locating tall buildings. In response the draft Core Strategy has been revised to acknowledge that a characterisation study be undertaken as part of evidence base work for the Core Strategy.
- i) **Lifetime Homes:** The Greater London Authority has requested that the Core Strategy should highlight that all new homes should meet the '*Lifetime Homes*' standard, and for 10% of these to be wheelchair accessible, or easily adaptable to wheelchair accessibility. Similarly, at least 10% of new hotel bedrooms are expected to be wheelchair accessible. Policy BE1 Policy is to be amended to include this requirement - i.e. that all new homes should be built to that standard and 10% of these should be wheelchair accessible including hotel bedrooms
- j) **Hayes:** Hayes Town Partnership has sought the release of canal side sites in Hayes to support regeneration and greater use of the canal environment. Given the Government's commitment to funding Crossrail and the subsequent economic regeneration opportunities that could arise in the Hayes to W Drayton canal corridor, paragraph 5.11 and Table 5.3 have been revised in order to allow a mix of economic development around Hayes station and on either side of the canal within the vicinity, so as to maximise the added value that Crossrail can bring to the town. Where appropriate, sites in Hayes along the canal frontage will be identified for housing led mixed use development through a review of the Employment Land Study and brought forward in the Site Allocations DPD.

- k) **High Speed 2 / Runway 3:** Various organisations and individuals have written to ask that relevant sections of the Core Strategy covering high speed rail and Heathrow Airport should be updated to reflect the Government decisions taken during this year. In response to these comments, the relevant sections of the Core Strategy have been updated.
- l) **Facilitating new schools:** There were concerns that sufficient community infrastructure should be provided to meet the additional requirements generated by new development. In light of the exceptional need for new school development, the draft Core Strategy has been revised to acknowledge that greenfield land may be released to meet the need for new schools, where this cannot be met elsewhere - see under paragraphs 3.3 (Community Facilities) and paragraphs 8.25; 9.43 and 9.44.

### Pre-Submission Draft Core Strategy

12. A number of revisions are proposed to the draft Core Strategy as a result of the following:
- The responses received during the public consultation
  - Revisions being proposed to the Replacement London Plan during its Examination in Public
  - Changes required due to other regional and national policy revisions.
  - Changes required due to the availability of updated information
13. The revisions to the consultation draft Core Strategy (June 2010) are set out in the Pre-Submission Draft Core Strategy, which has been circulated separately. This new version highlights the revisions by means of showing deletion of text by means of 'strikethroughs' and new text by 'underlining and highlighting in red'. References are also included to enable amendments to be associated with the relevant respondents.

### Consultation Arrangements

14. Consultation on the Pre-Submission Draft Core Strategy is planned for a period of a minimum of six weeks commencing in January. The manner of the consultation is prescribed by Regulation 27 of The Town and Country Planning (Local Development) (England) Regulations 2004 (as amended). Consultation is also required to comply with the council's Statement of Community Involvement adopted in November 2006.

### Local Development Scheme

15. The programme for the preparation of the LDF is contained in the Local Development Scheme (LDS), approved by the Council in December 2008, and endorsed by the former Government Office for London and the Mayor of London in April 2009. The programme has changed considerably over the last year, not only in relation to the preparation of the Core Strategy, but with regard to other key DPDs such as the Development Management DPD and Site Allocations DPD. Changes to the programme have largely been outside the council's control, for example awaiting the resolution of Runway 3 issues for the preparation of the Core Strategy. Whereas public consultation under Regulation 27 of the above Regulations for these Documents was originally programmed for June / July 2010, this stage is now scheduled for early next year.

16. Advice from the former Government Office for London is that only where the LDS is totally out of date should a council consider revising it. The priority is to ensure that the community are kept informed with real-time information about the programme on the council's web site, and therefore the website is being regularly updated.

## **Financial Implications**

17. The costs of producing the Pre-Submission Draft Core Strategy and carrying out public consultation is estimated to be £10,000 and will be met from the existing planning budget.

## **EFFECT ON RESIDENTS, SERVICE USERS & COMMUNITIES**

### **What will be the effect of the recommendation?**

The Core Strategy will provide the overarching long-term development framework for the development of the borough up to 2026. It will be the key delivery mechanism of the Sustainable Community Strategy and will provide the context for the preparation of further Development Plan Documents (DPDs) over the next few years, including the Development Management, Site Allocations and Heathrow Area DPDs. The Core Strategy will therefore have a significant impact, both short term and long term, upon residents, businesses, service users and all members of Hillingdon's communities.

### **Consultation Carried Out or Required**

Formal consultation was carried out in the draft Core Strategy in June/July 2010 as detailed above. The responses from the consultation are summarised at Appendix 1, and amendments have been made to the document accordingly. Further consultation will be carried out on the Pre-Submission Draft Core Strategy as outlined in paragraph 14 above.

## **CORPORATE IMPLICATIONS**

### **Corporate Finance**

Corporate Finance has reviewed this report and its recommendations and is satisfied, that the cost of preparing and consulting on the Local Development Framework Pre-Submission Draft Core Strategy, will be contained within the existing planning budget.

### **Legal**

Section 15 of the Planning & Compulsory Purchase Act 2004 places a statutory duty on the Council to prepare and maintain a Local Development Scheme ("the Scheme"). The Scheme will specify those documents that are Development Plan Documents. Regulation 7 of the Town and Country Planning (Local Development) (England) Regulations 2004 states that the Core Strategy will be a Development Plan Document.

When preparing the Core Strategy, the Local Planning Authority must comply with the consultation requirements found both in the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended) and the newly revised PPS 12 (Local Spatial Planning) which sets out government policy on Local Development Frameworks. This includes the duty to consult with the specific and general consultation bodies, the requirement to place an advertisement in the newspaper and the general duty to comply with the Council's Statement of Community Involvement.

The Town and Country Planning (Local Development) (England) Regulations 2004 require that any representations received must be fully considered by the decision maker, including those which do not accord with the proposals.

### **Corporate Landlord**

The consultation draft Core Strategy does not contain any specific Policy or site Proposals relating to council land or property. Strategic Policies apply generally to all land and property in the borough regardless of ownership. The Strategy, including the Infrastructure Plan, has been

prepared within the context of the council's asset management plan. In general terms the Plan aims to safeguard property assets in public service or community use. It also helps to identify opportunities where services need to expand, for example to respond to demographic changes. However in circumstances where community services need to be rationalised, the effect of planning policy may tend towards the retention of community facilities, which may at times restrict sales of surplus Council assets for residential development.

## **BACKGROUND PAPERS**

- Cabinet Report 27<sup>th</sup> May 2010 - Hillingdon's Local Development Framework Consultation Draft Core Strategy
- Cabinet Report 18<sup>th</sup> December 2008 - Hillingdon's Local Development Framework Revised Local Development Scheme.
- Statement of Community Involvement November 2006