

## A NEW PLAN FOR LONDON – PROPOSALS FOR THE MAYOR’S LONDON PLAN

<b>Cabinet Member</b>	Councillor Keith Burrows
<b>Cabinet Portfolio</b>	Planning and Transportation
<b>Officer Contact</b>	Stephen Timms and Jales Tippell, Planning and Community Services
<b>Papers with report</b>	None

### HEADLINE INFORMATION

<b>Purpose of report</b>	This report outlines the Proposals for the Mayor’s London Plan and the suggested response to consultation from the London Borough of Hillingdon.
<b>Contribution to our plans and strategies</b>	Revisions to the London Plan will impact on planning and transportation within the Borough, and they are likely to have implications for the delivery of the objectives of the Sustainable Community Strategy and other corporate objectives.
<b>Financial Cost</b>	The recommendation of the report to endorse the consultation response has no direct financial implications. In terms of wider impacts on the Council’s resources, the content of consultation document will be developed further into a draft replacement London Plan which if taken forward into implementation as expected, and as described the report, may have a range of financial implications for Hillingdon both as a planning authority and as a major landowner, developer and stakeholder in the future development of the Borough.
<b>Relevant Policy Overview Committee</b>	Residents’ and Environmental Services
<b>Ward(s) affected</b>	All

### RECOMMENDATION

That Cabinet:

1. Notes the contents of this report regarding the Mayor’s Proposals for the London Plan.
2. Endorses the response on the Mayor’s Proposals for the London Plan as set out in this report for submission to the Mayor of London.

- 3. Instructs officers to work with the GLA and Outer London Commission to ensure that the following key aspects reflect Hillingdon's prospective:**
- a) support the desire to retain and improve the sense of place and character of our established town centre suburbs**
  - b) emphasise improvements to town centre public realm to improve the attractiveness for both residents and businesses**
  - c) improve transport capacity between the north and south of the borough, including the introduction of more Express bus routes such as the 607**
  - d) ensure considerations other than density and scale of development are taken into account, with more emphasis on the ratio of intermediate housing and elderly downsizing as demonstrated by the RAF West Ruislip planning application**
  - e) ensure parking standards reflect the importance of the car for people and the need to recognise the parking standards of planning authorities that border Hillingdon but are outside the Regional planning framework**
  - f) recognise the value of gardens and the 10% redevelopment policy in residential areas**

## **INFORMATION**

### **Reasons for recommendation**

The Mayor of London has set out how he intends to update the London Plan, and whilst this is primarily for consultation with the London Assembly and within the GLA, it is open for anyone to comment, by 30 June 2009.

This will be a comprehensive revision to replace the current London Plan, and not, as was suggested in the previous publication - 'Planning for a Better London' - an incremental approach to review the plan. The intention is that, in addition to providing certainty for boroughs and the development industry, the whole review approach will also ensure consistency and integration between the London Plan and the Transport and Economic Development strategies, which are being re-written at the same time.

The Mayor's Proposals for the 'new' London Plan will have significant implications on the land use planning system and the influence that local councils and communities will have on future developments within their areas. These concerns warrant the officers response being considered and endorsed by Cabinet.

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

The Cabinet may influence the Mayor's proposals by:

1. Agreeing the proposed response to the Mayor in full or in part; or,
2. Making any amendments to the response that are considered appropriate.

Alternatively Cabinet may make no response to the Mayor's proposals.

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

None at this stage.

## Supporting Information

### Summary

1. The Mayor of London has set out how he intends to update the London Plan in the document published April 2009 titled *A new Plan for London – Proposals for the Mayor's London Plan*. This has been published for consultation, with a deadline of 30 June 2009 for responses. The Mayor states that: *although this document is primarily intended to form the basis for consultation with the London Assembly and the GLA functional bodies (the London Development Agency, Transport for London, the London Fire and Emergency Planning Authority and the Metropolitan Police Authority), it is open to anyone to send in comments, which will be considered carefully in writing the new Plan.*
2. It is considered important to respond to consultation at this stage to ensure the views of the Council are considered in the preparation of the Mayor's proposals for the London and incorporated into the revisions of the London Plan.

### Next Steps

3. The next stages in the process for reviewing the London Plan are:
  - Public consultation on a full draft new London Plan – **autumn 2009**
  - An examination in public, led by a panel of independent inspectors – **summer/autumn 2010**
  - The examination panel will submit a report to the Mayor, indicating what changes, if any, they would recommend are made to the draft Plan – **spring 2011**
  - The Mayor then decides which of these recommendations he is minded to accept – **summer 2011**
  - He then gives notice of his intention to publish to the Government Office for London, and there is a period of time for ministers to consider whether they want to direct any changes – **autumn 2011**
4. It is intended that the new Plan will be **published in the winter of 2011-12**, and it will apply through to 2031.

### Background

5. The Proposals for the Mayor's London Plan identifies the following trends, challenges and opportunities that the Plan will have to address:
  - Continued population growth
  - The changing composition of the population with increasing numbers of both younger and older people and an increasingly diverse population
  - The need to support and plan for continued economic growth and success
  - Poverty, deprivation and inclusion
  - The challenge of a changing climate, both in terms of adaptation and mitigation
  - Ensuring a high and improving quality of life
  - Realising the benefits of 2012
6. Six key over-arching objectives set out in more detail how this over-arching vision should be implemented:

- A city that meets the challenges of economic and population growth
- An internationally competitive and successful city
- A city of diverse, strong, secure and accessible neighbourhood
- A city that delights the eye
- A city that becomes a world leader in improving the environment
- A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities

7. Officer views on the details contained in the Proposals for the Mayor's London Plan are set out below.

## **Chapter 1 - A changing London**

### The Mayor's new approach to planning

8. Officers support and welcome the Mayor's more consensual approach to planning and the proposal to work with all the agencies with a role in planning for the capital and with the neighbouring regions. This is likely to give boroughs more local control and flexibility in preparing local policies.

9. The Mayor's proposals to ensure the London Plan policies are *effective development management tools* is strongly supported by officers, as this will provide a more robust policy framework to assist councils in making planning decisions, and especially in supporting such decisions at planning appeals. The necessity for policies that are worded in a coherent and defensible manner at appeal cannot be underestimated. Officers recognise that there must be a balance between the London Plan's role as a strategic, visionary document and a development control tool at the local level. However, there are a number of policies that officers consider should be improved to support decision-making, and these have been outlined under the relevant headings through this submission.

### The key trends

10. The Mayor acknowledges that a growing population is both a challenge and an opportunity, as a well-managed growing population will support a growing economy. The manner in which London accommodates the increase in population will determine the success or otherwise of the future of this globally important city. Officers consider that the statement at paragraph 62 of the Mayor's Proposals for the London Plan is at the crux of whether the process of revising the London Plan is a success or not. For that reason the statement that: *'The most successful cities in the world are those that have been able to accommodate growth, but in ways that do not damage the environment or reduce quality of life'* vastly undersells the importance of planning for growth and the Mayor's vision for London. The new growth, both in terms of population, economic activity and social opportunities, must happen in a way that substantially improves the quality of life of existing and future residents of London, and significantly improves the natural and built environment, and the ecological, amenity, aesthetic and intrinsic qualities of the city. Accommodating growth should not be about minimising impacts on the environment, but should instead be about seizing the opportunity to improve it, particularly given the current starting point in some parts of London.

11. The significant increase in population will mean that London's population will be higher than it has been in history, increasing from 7.56 million at present, to between 8.79 million and 9.11 million in 2031. Accommodating that growth, whilst decreasing greenhouse gas emissions by around 60%, and improving quality of life is a unique, once in a generation opportunity.

12. Officers welcome the Mayor's acknowledgement of an ever-increasing diversity in London's population. Harrow, Ealing and Hounslow will have over 50% population from black, Asian and other ethnic communities by 2031. This will impact on Hillingdon and this will need to be properly managed to ensure positive outcomes for all. Social infrastructure to support a diverse population must be a priority, and a plan-led approach should be supported at the strategic level.

## **Chapter 2 - London's places**

### Looking beyond London

13. As Hillingdon lies on the western edge of London, officers strongly support the Mayor's proposals to work closely with neighbouring regions, local authorities and other organisations. The proposals to support (and where appropriate lead) work with authorities and agencies covering areas adjoining London on particular issues of concern should be expanded in the draft London Plan. Greater recognition of the influence of areas to the west of London on the functioning of London, particularly with regard to transport, employment opportunities, demands on public services, waste disposal, and others should be recognised in the London Plan. An acknowledgement of the realistic car parking requirements for outer London is also supported.

14. The Mayor's support for continued development of corridors of city significance, including the 'western wedge' is strongly supported. However, whilst the current policy framework gives sufficient strategic guidance, it seems it has not resulted in a co-ordinated approach or benefits for the people within this area, 'on the ground'. A stronger emphasis on working together with the GLA taking a lead role is considered to be necessary. It is considered necessary for the GLA to support the preparation of planning documents that can help realise the Mayor's vision for the 'western wedge'.

### Outer London

15. Officers strongly support the Mayor's initiative of the Outer London Commission and welcome the opportunity for the Council to play a greater role in the work of the commission in addressing the challenges and capitalising on the opportunities of Outer London. The proposals to substantially strengthen appreciation of the social, environmental, transport and other quality of life opportunities and challenges facing outer London, including greater geographic sensitivity to the way these vary locally is strongly supported. However, this vision needs to be reflected in key policy documents, backed up by robust evidence, to help support planning and decision-making in these areas. We would like to see, for example, further support for the development of our town centres based on the Hillingdon model deployed in Northwood and now being rolled out to other centres. The desire to retain and improve the sense of place and character of many established suburbs in Hillingdon may contrast with the need to significantly encourage growth and opportunities in other outer London areas. Policies that clearly reflect these differences are considered to be essential for plan making and development control, and to help realise the vision set out by the Mayor.

### Opportunity areas

16. The Mayor will continue to support measures to improve the social, economic and environmental conditions of the Opportunity Area around Heathrow (Hayes, West Drayton, Southall, Feltham, Bedfont Lakes and Hounslow). Officers would however encourage a more concerted approach by the GLA to support the realisation of such a policy. The Mayor's

proposal to provide pro-active encouragement, support and leadership for partnerships preparing and implementing Opportunity Area Frameworks (OAPF) is strongly encouraged. In particular, officers welcome the Mayor's support for an integrated approach to the distinct environmental and growth issues facing the area around Heathrow.

### Town centres

17. Officers consider that the proposals to review the existing town centres classifications should be undertaken in conjunction with boroughs and local communities. Officers agree there should be a greater emphasis on improvements to the public realm to improve their attractiveness for local residents, as well as to business. Detailed policy support in the London Plan is considered necessary to ensure the highest quality development and necessary improvements to town centres, including through s106 contributions. This needs to be set out at the strategic level to provide the necessary policy support for local boroughs.

18. Hillingdon proposes to create a cultural quarter within Uxbridge and would welcome the support of the Mayor to endeavour to manage *strategic clusters of night time economic activity*. However, greater recognition of the importance of cultural and entertainment opportunities, and the social infrastructure necessary to support these would also be welcomed.

19. Officers agree with the Mayor's proposals to firmly resist out of centre development and would welcome clear policies for this in the revised London Plan.

### Strategic Outer London Development Centres

20. The new focus on outer London to attract employment and development is encouraged. The suggestion for enhanced accessibility – whether from increasing capacity or making better use of what already exists is also strongly supported. However, the suggestion that improved accessibility can automatically support higher density development, needs to be tempered by considerations of the specific locality, and the character and unique circumstances of the area. Officers consider that these details should be clarified in the draft London Plan.

21. Officers agree that Transport for London should be directed to explore how different types of improvements to orbital public transport capacity might support greater economic growth. Specific improvements, particularly to Uxbridge bus station, could unlock the potential for greater economic growth through accessibility improvements and improved quality of life and public realm.

### Strategic and other industrial locations

22. The Mayor's proposal to provide more effective guidance on management of strategic, important local and smaller industrial sites is considered to be important. Again, clearly worded policies that can assist boroughs at appeal are critical to the success of this objective.

### Network of open and natural spaces

23. Open spaces and natural spaces are considered to be essential to the future of London and the quality of life of residents. Officers recognise the critical role that green spaces provide, for a host of reasons including for aesthetics and amenity, but also to encourage recreation and exercise to improve the health of Londoners, to limit the 'heat island' effect that will become more apparent as the climate continues to warm, and as space for entertainment, recreation, relaxation and other pursuits. Natural spaces are also essential to preserve and enhance

biodiversity and if planned properly, will act as wildlife corridors and they have value for improving water quality, flood storage, and a range of other benefits. In planning for the protection and enhancement of open and natural spaces, the existing and expected uses and users must be considered carefully to ensure they are complimentary and not mutually exclusive.

24. Officers also support the provision of generic policy guidance to ensure that development incorporates green infrastructure. However, any such policy should be worded to support decision-making for development control purposes.

**In reviewing the London Plan policies in relation to London's places, the initial proposals document seeks feedback in particular on the following questions:**

Question

25. To make the Plan more useable, would it be better only for the general principles guiding development in Opportunity and Intensification Areas to be set out in the body of the text together with a development capacity table, and more detailed guidance for individual Areas to be set out in an Annex of the Plan?

Officer response

26. More guidance for the Heathrow opportunity area would be welcomed, and this could be included as a separate Annex to allow for more detail than may otherwise be the case.

Question

27. The Mayor is currently carrying out informal consultation with boroughs on proposed revisions to the Town Centres Network and Strategic Industrial Locations. Are there any further refinements you think should be made to these, or to any of the other elements of London's strategic spatial structure?

Officer response

28. The revisions to the Strategic Industrial Locations will not result in any changes within Hillingdon, and the review of the Town Centres Network is also unlikely to result in any further changes. However, the work of the Outer London Commission should be closely aligned with any reviews of the town centres network, including town centre health checks, retail assessments and the like.

### **Chapter 3 - London's people**

London's housing quality

29. Officers strongly support the intention to place an even greater emphasis on the quality of new homes, including the principle of internal space, and other design standards for all new housing which can provide the functional basis for a new London vernacular in housing. Hillingdon has invested considerable time in developing robust policies to ensure the highest quality of new housing, including satisfactory internal space standards, and policy support in the London Plan is strongly encouraged. Where people live is the main determinant of their quality of life and has a myriad of impacts on the economic, social and environmental success of the city.

30. Officers strongly support the emphasis on the important and varied roles of garden space and to seek a presumption against its loss. Back gardens are a critical attribute in all successful suburbs. With the disappearance or minimisation of the private space to the rear of dwellings,

all the functions and advantages associated with it also disappear. These include reduced aesthetics; little or no biodiversity; poor microclimate and the 'heat island' effect; and increased run-off in wet weather. The residents themselves may also lack the space for sitting out in private; secure outdoor children's play spaces; lack of space for relaxing, entertaining friends and family; drying laundry and other components of a sustainable lifestyle. Residents are also likely to suffer from a lack of pleasant outlook from windows; dark interiors; lack of natural ventilation and increased electricity consumption. Research in Australia suggests that the loss of back gardens and increased dwelling to plot ratio has led to an increase in rates of obesity and a range of social and health problems for children and a changing lifestyle for adults, to the detriment of the wider society.

31. Likewise, there should be strategic direction on the importance of front gardens to the streetscape within London, particularly in well established areas. Hedgerows and front gardens are such important features of suburban streets, and are being lost wholesale. The importance of good design of our streets, and the public realm generally, and the need to make it accessible for disabled people, should also be highlighted properly in the London Plan and supported by robust policies.

32. Officers agree with the sentiments expressed that: *On too many occasions in the past the clamour to achieve permissible densities has been the overriding concern for many new developments, sometimes to the detriment of their surroundings, existing environments and social infrastructure.* Officers strongly support the Mayor's intention to refine London Plan policies to ensure housing densities are optimized across London by taking more sensitive account of the need to enhance the quality of development, and to respect its context. This will require a clear statement that considerations other than density should dictate the form and scale of development. The existing London Plan Policy 3A.3 and its commentary, along with Table 3A.2 - the density matrix, place too much emphasis on a numerical requirement to maximize the yield of sites for housing. Although there are a number of existing policies that require quality housing, the overriding consideration in designing schemes and at planning appeals has been the density matrix. Officers would question the need for a density matrix. A clearer direction to ensure consideration of the needs of local communities and specific circumstances is warranted.

33. Officers support the focus on intermediate housing and family sized housing in London. The Strategic Market Housing Assessment and the Strategic Market Housing Land Assessment will go some way in providing evidence on needs and capacity which should inform the new London plan. However, the move to provide more family housing could be a challenge as grant rates are set to be cut in the near future. Likewise, the most successful product in the intermediate market is "My Choice Homebuy" which seems to be significantly lacking in funds at present.

34. The removal of the London wide 50% affordable housing target, and provision of a numeric London target, with local numeric targets to be derived collaboratively with the boroughs reflecting their local circumstances, is welcomed. However, undesirable impacts of this approach may see developers refusing to provide affordable housing on more expensive sites. The review of the 70:30 target for social rented and intermediate housing in order to provide more people with a path onto the housing ladder, and the review of the income threshold for determining eligibility are also very welcome.

35. Officers support the development of a new Housing Design Guide to ensure the highest design standards, including minimum internal space standards, the greening of new homes and



accessible housing standards. These high standards should apply to both market and affordable housing.

36. As land values recover, and as the population increases, there is likely to be a need to achieve higher densities and this will need to be managed appropriately. Officers believe that this should first be directed to areas where regeneration is occurring and where areas are in need of economic stimulus. New developments of higher density should not be imposed on more successful suburban areas.

37. It is considered necessary to provide strategic guidance and targets for the provision of sites for gypsies and travellers in London. This should be clear and useable, and prepared with the support of boroughs and local communities.

#### London's Communities and social infrastructure

38. The focus on social infrastructure and a recognition that 'it is the glue that can bind and strengthen local communities, creating a sense of belonging, and turning residential areas into sustainable neighbourhoods and communities' is warmly supported. How such vision is translated into policy, and more importantly how those policies are implemented will determine the success or otherwise in creating sustainable communities.

39. A renewed focus on the delivery of social infrastructure is strongly supported, as is the focus on health and creating a 'healthy city' to promote healthy lifestyles and healthier communities. There is an urgent need to clarify and expand the definition and requirements for cultural facilities, including arts, entertainment, cultural quarters, and the like.

40. The provision of places of worship, particularly to meet the needs of a more diverse London, will need strategic guidance and a careful, integrated approach. It is assumed that work will build on the GLA commission report - Responding to the Needs of Faith Communities: Places of Worship. However, interim guidance or direction to boroughs on this topic is also considered necessary, given the void in the policy guidance at present.

**In reviewing the London Plan policies in relation to London's people, the initial proposals document seeks feedback in particular on the following questions:**

#### Question

41 Are there further ways in which the longer term London Plan can usefully complement the shorter term Housing Strategy?

#### Officer response

42. The London Plan should provide a realistic and flexible approach to reflect housing needs. A numerical requirement for 50,000 affordable homes London wide and yearly targets for individual boroughs are inflexible and are not currently being achieved due to the economic climate. The requirements should be more dynamic to reflect the current economic climate, and more inventive ways to secure affordable housing will need to be pursued, particularly as the population continues to increase.

#### Question

43. Is there an area of social infrastructure not covered here that needs to be?

### Officer response

44. The Mayor's proposal appears to list the most important ones, however it is requested that this is elaborated upon in the draft London Plan. A clearer direction to boroughs on the importance of certain social infrastructure is required. There have been instances where the LDA have supported certain proposals for strategic sites that are not supported by the GLA or other decision makers. The London Plan should therefore set out a list of priorities that more clearly incorporates social infrastructure.

### Question

45. Is the proposed approach to social infrastructure right? Is there a better approach?

### Officer response

46. The current London Plan and the Mayor's proposals do not clarify the requirements for social infrastructure or the way that boroughs should go about funding those. It is suggested that the Mayor should provide more detailed guidance, in close co-operation and agreement with the boroughs and key stakeholders, on whether s106 contributions can be directed to social infrastructure, where there are considered to be overwhelming needs, or where this is deemed to be of greater priority than affordable housing, public transport or other requirements as set out in Policies 6A.4 and 6A.5 of the current London Plan. The GLA should work with the government to resolve the best ways to provide social infrastructure and provide policy guidance in a robust and informed manner that can assist boroughs. The emerging London Plan should address this issue in a comprehensive manner, emphasising the partnership approach required to develop sound Infrastructure Plans. A separate section in the London Plan may be required to address this wide-ranging topic area. Significant changes to the way this issue is addressed will have implications for resources at a borough level, and assistance from the GLA in the transition period for enacting new policies and legislation will be required.

## **Chapter 4 - London's economy**

### Developing London's economy

47. The work of the Outer London Commission will be key to promoting Outer London as an attractive business location. We would like to see, for example, further support for the development of our town centres based on the Hillingdon model deployed in Northwood. The encouragement of mixed-use development and supporting renewal of existing office space is supported. However, this needs to be set out in a clear and concise manner. A more rigorous, managed approach to the future release of surplus industrial capacity is also supported. It is agreed that there is a need to clarify the approach to be taken to office markets in different parts of London. This needs to be supported by detailed studies and robust evidence.

### The visitor economy

48. Officers support the Mayor's intention to take a more co-ordinated approach to tourism. In Hillingdon, given the importance of the visitor economy and that Heathrow is the gateway to London and the UK, specific policies should be developed to ensure the highest standard of design around the airport, particularly for hotels and the public realm in and around the airport.

49. Any new standard for availability of wheelchair accessible hotel rooms should be supported by robust evidence and a needs assessment, along with consultation with key stakeholders, including hotel owners. Hillingdon is aware of the approach to insist on 10% of all rooms being wheelchair accessible, which may have some detrimental economic impacts.

## Arts, culture and entertainment

50. Officers strongly support the Mayor's vision to identify and clarify policies on strategic cultural areas, cultural quarters and cultural facilities, and to provide principles to protect and enhance them and encourage their development in outer London. This would lend support to the council's efforts to improve cultural/entertainment opportunities within the borough, particularly in the metropolitan town centre of Uxbridge, and proposals for the RAF Uxbridge site. There is support for the sustainable management of the night-time economy,

51. Officers agree with the intention to set out proposals for use of the planning system to secure affordable small shop units in major retail developments. How such a policy is prepared and implemented will be important to the success of many town centres, and the importance of achieving diversity and economic and social activity. However, a realistic assessment of the need for small shops (and indeed larger retail outlets) will need to inform their provision.

52. The Mayor's proposals to set out a clear spatial context for the work of the London Development Agency and the London Skills and Employment Board is considered to be a necessary development to provide clarity and leadership on this issue.

53. The Mayor intends to support development of a Green Enterprise Zone in the Thames Gateway. Officers believe that this should be extended to other areas and the GLA should examine whether there should be a Green Enterprise Zone in the Heathrow area.

## Sports facilities

54. Officers support the proposal to identify and support the delivery of sporting and recreation facilities. This should be specific enough to support decision-making and to assist in defending decisions at planning appeals. In particular officers consider that the London Plan policies should be strengthened with respect to retaining existing playing fields and sports grounds, whether in private or public use.

## The 2012 Games

55. Policies required to support the delivery of a successful Olympic and Paralympic Games in 2012 and ensure the games provide a substantial and lasting legacy are generally supported. However there is a need to ensure there is investment across London, including within west London and in particular Hillingdon, given that it includes Heathrow airport and Brunel University.

## Additional issues

56. Despite the significant 'Heathrow effect' on west London, London and the UK economy, officers note that there is no reference to Heathrow in this chapter. Officers would expect that the revised London Plan would refer to the on-going role of Heathrow airport on the economy of London.

## **Chapter 5 – London's response to climate change**

57. Officers strongly support the Mayor's vision for a City that becomes a world leader in improving the environment. Throughout history London has set the trends for the world to follow, and the London Plan and best practice in London place the UK as a world leader on this topic, as have the Climate Change Act, 2008, and the Planning Act, 2008. There will be a lot of

synergy between efforts to mitigate and adapt to climate change, and the wider efforts to improve the quality of life of residents and sustainability objectives. Climate change can be an important catalyst for action on these issues, such as improving air quality, access to open space, improving biodiversity, reducing flood risk, and a plethora of other issues. By improving London's environment, this will continue to attract global financial institutions, the most highly skilled business people and motivated workers that London needs to continue its role as a world city.

### Climate change mitigation

58. Officers support the proposal to adopt a CO2 emissions reduction target for London set at 60% below 1990 levels by 2025. Guidance to set out how this will be realised is necessary, particularly to support boroughs in their efforts to assist the Mayor achieve this target.

59. The Mayor's proposal to strengthen the policy approach to energy efficiency and conservation in the design of new buildings is very much needed. Although there must be some flexibility, the current approach does not always result in the desired net decrease in greenhouse gas emissions or buildings that are resilient to a changing climate. Efforts to ensure more sustainable buildings through the design process should be supported by robust policies.

60. The Mayor's proposal to require an energy assessment with all planning applications to demonstrate adherence to the energy hierarchy needs some clarification. Should this apply to all developments, including minor additions, single dwellings and other 'minor' applications? The previous requirement applied only to 'major' applications above 10 units and perhaps the required information to support different types of planning applications needs more clarification.

61. The Mayor's intention to give strong support to the development of alternative fuel sources, such as infrastructure for electric vehicles and hydrogen is supported. The Mayor's proposal to strengthen the policy approach to promote area based heating networks is also supported in principle.

### Climate change adaptation

62. There is strong support for the proposals to encourage and support the promotion of urban greening through development, and enhancement of open spaces, green infrastructure and living (green) roofs and walls.

63. Proposals to strengthen policies to minimise and manage flood risk in London are supported. The Mayor's proposals to explore the concept of water neutrality are also welcomed.

### Waste

64. This section should refer to Planning Policy Statement 10 and the need to follow the 'waste hierarchy', particularly as the Mayor's proposals do not seem to include any measures to reduce the generation of waste in London.

65. Officers disagree with the Mayor's approach to not re-open the debate on apportionment methodology, although the commitment from the Mayor to update data on projected waste arisings is welcomed and is considered to be critical to determining how waste is managed within London. New independent, up to date borough level projections must inform the revised London Plan, and will also be required for boroughs in undertaking their LDF and Waste DPD's.

66. Proposals to adopt a 'zero waste to landfill outside London' aspiration, are generally supported, but this must be a balanced approach that should not be dictated by artificial administrative boundaries, particularly in relation to waste management in outer London. The waste management facilities at Colnbrook are in close proximity to Hillingdon and such facilities should be taken into account in identifying the need for future sites within London. The proposal to move towards fewer, larger waste sites is encouraged particularly given the commitment by the Mayor to work with boroughs to identify strategic sites for waste management facilities.

**In reviewing the London Plan policies in relation to London's response to climate change, the initial proposals document seeks feedback in particular on the following questions:**

Question

67. The Mayor is committed to achieving significant reductions in energy demand and CO2 emissions from new development in London; however, do you find the existing policies related to sustainable energy in the London Plan easy to understand? Are there any areas that require clarification or improvement?

Officer response

68. New technologies are constantly evolving and the development industry and local government planners are generally keen to learn and implement new ideas, although that is not always possible given limited resources. Officers generally agree that the wording of these policies is satisfactory and easy to understand. However, given the number of emerging technologies, the constant changes in the industry and best practice, and the specialist knowledge required of these technologies, the design and construction implications, the best outcomes are not always realised. The GLA should provide greater support to the boroughs in these instances where disagreements arise over policy implementation, particularly at appeal. The London Plan should clarify which 'renewable' technologies are considered to be acceptable, and which are not, particularly with regard to biomass. The London Plan should also set out instances where certain technologies are not appropriate, with regard to air quality, design, or other implications. It is considered that the London Plan should provide more detail on sustainable design and construction and insist that this is fully explored in the design of all buildings. A great deal may be achieved through better design of buildings, reducing energy usage and other measures, rather than searching for expensive renewable energy opportunities.

Question

69. What do you see are the biggest challenges to the use of renewable energy in new development in London? How can the London Plan help overcome these challenges? Should the London Plan outline a preference for onsite over offsite renewable energy in new development? Or should no preference be shown at all?

Officer response

70. The biggest challenge is usually the cost and understanding of 'new' technologies. It is not uncommon for developers to argue that economic reasons should rule out renewable technologies for some developments. There is a lack of co-ordination in the approach to renewable technologies, which could otherwise result in district heating and cooling systems or economies of scale for other renewable energy initiatives. Boroughs and developers spend a great deal of time and effort exploring ways to meet the targets, during the planning application process and at appeal and sometimes the outcomes do not result in a significant decrease in CO<sub>2</sub> emissions. One idea for the Mayor to investigate would be setting standards by building

type for the efficiency savings (eg. a percentage reduction). This part of the policy is currently rather ambiguous and many developers do not have a full understanding of it. This can cause developments not to meet their full potential and proposals to incur unnecessary costs for renewables.

#### Question

71. In situations where new development falls short of meeting policy requirements for the use of sustainable energy, do you support the use of financial contributions as an alternative? All contributions would be pooled and used to support other sustainable energy initiatives to benefit London?

#### Officer response

72. A more co-ordinated approach could work and if the end result is a decrease in greenhouse gas emissions then this should be supported.

#### Question

73. Do you have any suggestions for how new development could better deal with overheating given London's changing climate?

#### Officer response

74. The Mayor's proposals for 'urban greening', improving open spaces and natural areas, strengthening policies on green roofs and walls, increased planting of trees, and improvements to the green/blue network will all assist with efforts to reduce overheating in London. The suggestion for a cooling hierarchy should also be elaborated upon in the revised London Plan.

#### Question

75. Some towns and cities have minimum targets for increasing urban greening, including green space, living roofs and vegetation in their central areas as a way of offsetting rising temperatures due to climate change (Manchester, for example, has identified the need for a 10 per cent increase in green space cover). Would such an approach be appropriate for central London?

#### Officer response

76. Targets may help in achieving certain goals, although this needs to be supported by detailed policy guidance that can be implemented by boroughs and defended successfully at appeal.

#### Question

77. What can the London Plan do to better promote the uptake of living roofs and walls in new development across London?

#### Officer response

78. This is another initiative that is relatively new to the development industry. The current policy is worded in a manner that does not make it possible to enforce in reaching decisions on planning applications. As more products and building techniques become recognised it is expected that the uptake of green roofs and walls will increase. However, it is considered necessary to set targets and for the London Plan policy to set out in what instances green walls and roofs must be provided, and in which cases they may not be required. This policy direction from the GLA, and assistance to boroughs where requested in implementing these policies would no doubt see an increase in the prevalence of green walls and roofs in London.

## Chapter 6 – London’s Transport

### Transport and spatial development integration

79. Officers strongly support the Mayor’s proposal to *support the provision of transport infrastructure and services to support regeneration in outer London*. How this is carried through to policy formulation and what resources will support such initiatives will be critical to the continued success of outer London boroughs.

### Connecting London

80. Hillingdon strongly agree with the Mayor’s firm opposition to the current plans for a third runway at Heathrow. Hillingdon will continue to oppose any proposals for a 3rd runway at Heathrow to ensure that it does not proceed.

81. Officers would challenge the presumption expressed in the Mayor’s proposals that the London Plan will recognise that further runway capacity will be needed in the South East to meet London’s needs. Whilst the Mayor’s view on the third runway at Heathrow is supported, it is also the view of officers that alternatives to further airport development not only at Heathrow but also across the south-east have not yet been fully explored. Officers question whether additional airport capacity is, in fact, required. Alternatives, such as High Speed Rail could encourage a modal shift from air and cars with the additional benefits of reducing congestion on local roads and associated environmental impacts as well as having potential to release capacity on the local rail network for freight. This would have a number of other benefits to the local community also, by limiting impacts on air quality and noise and other environmental outcomes. It is critical therefore, that airport development is not considered in isolation but is part of an integrated approach to addressing London’s future transport needs. The prospect of a decreasing desire to travel by air, for many reasons, also needs to be acknowledged.

### Public transport

82. The proposals to better integrate public transport is supported as well as the development of freight distribution in a way that minimises congestion and any adverse environmental impacts. Support for rail development, including high speed rail is encouraged and officers are keen to work with key stakeholders to facilitate the development of high speed rail.

83. The intention to match development to transport capacity is also critical, and the phasing of improved public transport, cycle and pedestrian facilities in tandem with new development proposals will also be important.

84. Officers support the proposals to substantially strengthen policy on walking and put in place strong policies supporting cycling. Given that the current standards are overly generous, officers support the proposal to put in place new cycle parking standards. Officers welcome new standards for charging points for electric vehicles and have already inserted these requirements into supplementary planning documents, such as the RAF Uxbridge SPD.

85. The Mayor’s proposals to support improved public transport, including increasing the capacity, quality, accessibility and integration on rail services, bus priority and busway schemes, and public transport security are all supported. Improvements to public transport capacity will also be critical to support increased economic activity, and other developments in outer London.

## Parking

86. Officers strongly support the Mayor's acknowledgement that many people will continue to travel by car in outer London, which should influence new parking standards. A realistic approach to use of the private car in outer London, particularly where this is influenced by the population outside of London, is vital. The Mayor's support for electric and hydrogen vehicles, and the lack of funding available to significantly improve public transport in some areas will mean the continued use of the private car is inevitable. This should be reflected in policy and economic and regeneration strategies for outer London.

87. Officers generally agree with the proposal to develop a new, criteria based approach to road schemes which would allow them to go ahead if overall congestion reduces and there is local economic benefit and improvements for pedestrians, cyclists and public transport.

## Freight

88. Proposals to improve strategic rail services and access to airports is strongly supported. Such initiatives have the potential to reduce congestion around Heathrow airport, improve local air quality, and improve accessibility to the airport, particularly for people coming from outside of London.

89. Officers generally agree with the proposals to promote strategic rail freight interchanges to reduce lorry movements and emissions. However, there are concerns about the likelihood of accepting that, given their size, these are likely to be located in the green belt. Although such initiatives may qualify for 'exceptional circumstances', rail freight interchanges would be incompatible with the character and important amenity, ecological, and range of attributes of the green belt.

**In reviewing the London Plan policies in relation to London's transport, the initial proposals document seeks feedback in particular on the following questions:**

### Question

90. Is the suggested approach to airport policy reasonable?

### Officer response

91. As outlined above a presumption that more air travel in inevitable needs further explanation and should not be assumed to be the case. More detailed studies will reveal if an airport in the Thames Estuary is reasonable or not.

### Question

92. Given financial constraints, what else can the Mayor do to boost public transport?

### Officer response

93. The Mayor should prioritise certain infrastructure improvements that are critically needed, such as relocating Uxbridge bus depot to enable improvements to be made to the Uxbridge town centre public transport interchange. A more co-ordinated approach and greater commitment to certain projects from TfL, and within the TfL organisation, would assist in realising many of the Mayor's objectives, particularly for outer London.

### Question

94. Is the approach to walking and cycling feasible / workable?



#### Officer response

95. The Mayor's approach to walking and cycling will only be feasible if it is supported by appropriate resources and robust policy guidance. The design of new developments, and infrastructure must ensure that in trying to accommodate cars, public transport, pedestrians and cyclists, that these are not mutually exclusive.

#### Question

96. Do you support the new approach to road schemes?

#### Officer response

97. The new approach to decision-making with regard to road schemes is generally supported.

### **Chapter 7 – London's Quality of Life**

#### Building London's neighbourhoods and communities

98. Officers strongly support and welcome the Mayor's proposals to protect what is valued and distinctive about London and its neighbourhoods while enabling growth and change only where it appropriate.

99. Officers suggest that policy guidance in the new London Plan is required to help support boroughs in identifying, protecting and enhancing the local architectural, social and cultural character that contribute to the local context of places, and that this needs to be considered alongside the broader economic and physical development objectives of the London plan. Hillingdon has a number of very successful neighbourhoods, particularly within the suburban context. Officers see no reason why the functioning and fabric of these successful communities should be disrupted by unsympathetic developments that change the character and make-up of those areas.

100. Hillingdon has adopted Supplementary Guidance to resist insensitive redevelopment and it is suggested that the draft London Plan should incorporate a similar requirement to protect established areas, particularly where these areas are not suitable for higher density development. In particular the London Plan should reflect Hillingdon's Design and Accessibility statement (HDAS) SPG which states that: 'The redevelopment of more than 10% of properties on a residential street is unlikely to be acceptable, including the houses which have been converted into flats or other forms of housing.'

101. Officers consider that the term "lifetime neighbourhoods" requires elaboration and detailed guidance to support implementation of this initiative. The Mayor's proposals to develop 'Lifetime Neighbourhoods' is encouraged although a balanced approach underpinned by evidence would be necessary. In many cases improvements to accessibility, varied services, and increased opportunities will benefit everyone in the community, although a cost-benefit analysis would be necessary to ensure interventions and new developments are compatible with the needs of the local community.

#### Protecting London's open and natural environment

102. Officers strongly support the Mayor's intention to develop a policy framework that allows the physical environment to play its part in facilitating community health and cohesion, taking into account air quality, acoustics, personal safety, security and accessible and inclusive design.

103. Officers welcome measures that ensure Green Belt and Metropolitan Open Land policies continue to give very strong protection against inappropriate development and promote positive uses of the countryside and urban fringe.

104. Officers support the principle to promote urban greening and urban agriculture, for a number of reasons that correlate with previous comments on retaining open spaces and natural areas. In addition to those the importance of urban agriculture and providing food for London within close proximity is important in reducing food miles, educating the public about food production, improving London's resilience to variable world food prices, and maintaining allotments and other agricultural land that plays an important role in the character, social fabric and aesthetics of London.

105. In order to further support urban agriculture, and sustainable food production, a policy to encourage farmer's markets and similar offerings would be supported.

106. The extension of 'green grid' principles from East London to a London wide project will have benefits for the whole of London, although specific local geography will obviously dictate the type of developments encouraged.

107. Officers strongly support the Mayor's proposals to address deficiencies of open space, green corridors and green chains, in particular supporting regional and metropolitan park opportunities.

108. The proposals to protect, promote and enhance biodiversity and set out policies to protect street trees and secure tree planting in new development is also supported.

#### Blue Ribbon Network

109. Officers support the Mayor's intention to promote the active use of waterways, in particular for transport purposes. This will need to be undertaken in close consultation with British Waterways and other key stakeholders. Officers consider that the implementation of existing London Policies has not been successful in some cases. A more robust policy framework, together with a more focussed approach to using existing waterways as a unique asset is considered to be necessary.

**In reviewing the London Plan policies in relation to London's quality of life, the initial proposals document seeks feedback in particular on the following questions:**

#### Question

110. The Mayor has accepted that the City, Canary Wharf, Croydon and other locations can provide areas and local context where tall buildings are appropriate. Currently the London Plan identifies a number of criteria to be used in assessing tall building proposals – whether they are landmarks enhancing London's character, in a coherent location for economic clusters and a catalyst for regeneration, as well as impacts on surroundings. Are there specific contextual factors that the London Plan could use to identify where tall buildings are appropriate? How should this be achieved? Should tall buildings outside these designated areas be restricted? Are all the opportunity areas identified in the London Plan suitable locations for tall buildings? Or should the aim be to achieve high densities without tall buildings in these areas?

#### Officer response

111. The Heathrow opportunity area is not considered suitable for tall buildings, given the proximity of Heathrow Airport and resulting safeguarding requirements. Landmark buildings and buildings of exceptional design do not necessarily have to be tall buildings.

#### Question

112. Should the London Plan policy protection be strengthened for local open spaces outside the strategic spaces that are designated Green Belt or Metropolitan Open Land? Or should the current position be maintained of asking Boroughs to designate locally important spaces through their LDD?

#### Officer response

113. Additional support at the strategic level is considered to be necessary, particularly as this would provide additional policy guidance and support for boroughs at appeal.

#### Question

114. The London Plan sets benchmarks for the provision of public open space through Borough Open Space Strategies. Should this position be maintained or should the London Plan seek to establish minimum standards?

#### Officer response

115. It may be helpful to consider minimum standards for public open space within the London Plan if this would assist boroughs in negotiating for additional open space.

#### Question

116. The law on the reuse of burial spaces has recently changed, so is this an issue on which London Plan policy is no longer needed? Should the principle of proximity to local communities be maintained in the London Plan or can this issue be left to Boroughs to address in LDDs?

#### Officer Response

117. The London Local Authorities Act, 2007 now enables boroughs to re-use burial grounds in accordance with that Act. However, a London wide strategic approach to this issue may be considered helpful.

### **Chapter 8 – Implementation, Monitoring and Review**

118. Officers believe there must be a balanced approach to prioritising planning obligations for a range of local needs. The Mayor's proposals set out the importance of social infrastructure, public realm improvements, green infrastructure, and a range of other issues critical to the success of London, although this is not reflected in the implementation policies. The priority order is for Crossrail, affordable housing, public transport projects, and then tackling climate change, learning and skills, health facilities and childcare facilities. This however, omits a range of other considerations that may be critical at the local level.

**In reviewing the arrangements for the implementation, monitoring and review of the London Plan, the initial proposals document seeks feedback in particular on the following question:**

#### Question

119. How can the Mayor most effectively secure commitment from utility and other infrastructure providers to ensure adequate provision is made to meet current needs and support future growth?

### Officer response

120. The Mayor must work with utility companies and other providers to take a strategic approach to managing growth and ensure infrastructure will be provided. Where shortages or significant upgrades are required these need to be planned for. A significant increase in population over the next 20 years, together with ageing Victorian infrastructure will mean that the supply of water, dealing with wastewater, energy demands, telecommunications equipment, transport and a host of other basic needs will require detailed consideration. The Mayor must show a commitment to engage with all stakeholders to ensure that Londoners continue to be provided with these services.

### **Conclusion**

121. Council officers are generally very supportive of the Mayor's intention to produce a 'new London Plan'. The proposals provide greater scope to take account of local issues and provide a more robust policy framework to achieve the Mayor's objectives for London. However, there will be implications on the resources of local boroughs, various agencies and the development industry. This needs to be acknowledged, but should not act as a barrier to taking forward many of the good ideas set out in the Proposals for the Mayor's London Plan. At this stage the proposals lack details, and officers look forward to commenting on the policies of the draft London Plan when they emerge.

### **Financial Implications**

The scope of the Mayor's Proposals are quite broad at present, however when the new plan is adopted this may have some implications for the council. Whilst it is not possible to assess any likely financial impact at this stage of the process, this will be revisited when the draft London Plan is issued in the autumn for formal consultation.

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

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

It is considered that the Proposals for the Mayor's London Plan will have significant implications on the land use planning system and the influence that local councils and communities will have on future developments within their areas. Until the draft London Plan is available it is hard to determine the precise implications.

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

No external consultation was carried out by officers. The consultation is open to the public and the document is available on the web for residents and other interested people to submit their views directly to the Mayor.

This phase is for initial consultation and the Borough and others will be consulted again in the autumn of 2009. The draft London Plan will gain more weight when it is endorsed for public consultation in the autumn, however the current London Plan will hold precedence until after the Examination in Public.

## **CORPORATE IMPLICATIONS**

### **Corporate Finance**

The recommendation of the report to endorse the consultation response has no direct financial implications. In terms of wider impacts on the Council's resources, the content of consultation document will be developed further into a draft replacement London Plan which if taken forward into implementation as expected, and as described the report, may have a range of financial implications for Hillingdon both as a planning authority and as a major landowner, developer and stakeholder in the future development of the borough.

### **Corporate Procurement**

Not applicable.

### **Legal**

There are no special legal implications for this consultation by the Mayor of London. In considering the consultation responses, the Mayor must ensure there is a full consideration of the representations from this Council, including those which do not accord with the proposals.

### **Corporate Property**

No comments to add at this stage.

### **Relevant Service Groups**

N/A.

## **BACKGROUND PAPERS**

A new Plan for London – Proposals for the Mayor's London Plan April 2009 – published for initial consultation with the London Assembly and the GLA Group

The London Plan (Consolidated with alterations since 2004) 2008

Planning for a Better London