



Report for: ACTION

Contains Confidential or Exempt Information	No
Title	Approval of the draft Local Plan for consultation, and submission to the Secretary of State subject to minor amendments following consultation
Member Reporting	Cllr Curran
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For Consideration By	Cabinet
Date to be Considered	11 February 2014
Implementation Date if Not Called In	March 2014
Affected Wards	All
Keywords/Index	Planning, regeneration, development, consultation.

1. Details of Recommendations

That Cabinet recommend to the Council meeting of 25 February that it:

- 1. Approve the Proposed submission draft of the London Borough of Hounslow Local Plan (attached at Appendix 1) for publication and subsequent submission to the Secretary of State for Communities and Local Government.**
- 2. Instruct officers to publish the Proposed Submission Version of the Local Plan and the accompanying Sustainability Appraisal and other supporting documents for no less than the statutory period of six weeks, inviting representations on the soundness and legality of the Plan, prior to its Submission to the Secretary of State for Communities and Local Government for formal examination.**
- 3. Delegate authority to the Director Regeneration, Economic Development and Environment in consultation with the Cabinet Member for Environment, to:**
 - a) Make minor revisions (where indicated) and editorial and presentational improvements to the consultation documents before publication;**
 - b) consider the representations made on the soundness and legality of the Proposed submission draft Plan**

- b) make such minor amendments to the final draft Plan as are necessary to make it sound; and
 - c) approve and submit the final draft Plan and any supporting documents to the Secretary of State for Communities and Local Government for the purposes of carrying out an Examination in Public. The Plan will include the existing proposal map designations retained subject to the revisions indicated in the attached map books.
4. Notes that the Submission draft of the Local Plan will become a material consideration for the purposes of development management decisions.
 5. That the Cabinet adopt the revised Local Development Scheme (attached at Appendix 2) and Consultation Statement (Appendix 3) and approve them for publication.

If the recommendations are adopted, how will residents benefit?	
Benefits to residents and reasons why they will benefit, link to Values	Dates by which they can expect to notice a difference
Public consultation on options for planning policy in the borough.	March 2014
Identifies priorities for regeneration and investment across the borough.	Over the next 15 years

2. Report Summary

1. This report deals with the Proposed Submission draft version of the new Local Plan and recommends that Cabinet agree to recommend to full Council (25th February) that it make the necessary resolutions to enable Submission of the draft Local Plan to the Secretary of State for an Independent Examination.
2. The report recommends that the Proposed Submission version of the Local Plan (after minor additions where indicated and editorial and presentational improvements) be made subject to public consultation for a minimum period of six weeks.
3. The report recommends submission of the Local Plan to the Secretary of State following any minor amendments made within the terms of Recommendation 3 following consultation.
4. The report recommends that Cabinet approve the revised Local Development Scheme work programme for publication – this does not require approval by full Council.
5. The cost of the Proposed Submission Local Plan consultation will be met from existing budgets.

3. Reason for Decision and Options Considered

- 3.1 These recommendations are sought to enable the Council to progress on the Local Plan. Once adopted by Borough Council, the new Local Plan together with the London Plan and any Development Plan Documents and Neighbourhood Plans subsequently adopted will form the *development plan* for the borough, to be used to determine planning applications. The Local Plan will also have the equally important

role of articulating the council's spatial vision for the development of the borough over the next 15 years highlighting the key areas for regeneration and investment.

- 3.2 The Proposed Submission stage is the final consultation stage in the Local Plan preparation process. The council has previously carried out consultations on the 'Policy Options for the Local Plan (in June/July 2013) and the 'Revised Site Allocations Policy Options for the Local Plan' (in October 2013), as well as two earlier consultations on its emerging Core Strategy (as predecessor to the Local Plan). These consultations have informed the development of the Proposed Submission document, this proposed is summarised in the Consultation Statement (Appendix 3). The next consultation will include seeking the Mayor of London's agreement that the Local Plan is in general conformity with the London Plan.
- 3.3 Following this consultation, it is proposed that authority be delegated so that minor amendments can be made to the document where required in response to an issue of 'soundness'. The amended Local Plan will then be submitted to the Secretary of State for an independent Examination in Public. The Planning Inspector appointed on behalf of the Secretary of State will examine the soundness of the Local Plan in terms of whether it has been positively prepared, justified, effective and consistent with national policy. The Inspector will then report their findings to the council recommending the adoption, amendment or withdrawal of the Plan. The proposed timetable for the stages outlined above is set out below and approval is sought for the adoption of these dates as part of the council's revised Local Development Scheme (a statutory project plan setting out the key milestones for the preparation of development plan documents):

Proposed Submission Local Plan consultation	Mar – Apr 2014
Submission of the Local Plan to the Secretary of State	Jun 2014
Examination of the Local Plan	Oct 2014
Adoption of the Local Plan	Mar 2015

- 3.4 The Proposed Submission document comprises a spatial vision for the borough up to 2030 and a series of spatial and thematic policies to implement this vision, with justification, and details on implementation and monitoring. As the policies and proposals are required to be deliverable, it also includes an Infrastructure Delivery Plan.

3.5 Consultation documents

- 3.6 Appendix 1 attaches the draft Local Plan reflected in four documents:

- Part A - The main Local Plan document and appendices
- Part B and BB – map books with the proposed site allocations
- Part C and CC – map books of town centre boundaries and policy designations (as published in June 2013 with minor revisions to be made as indicated), and
- Part D and DD – Green Belt and Metropolitan Open Land Background Paper (previously published in June 2013 and which details several very minor adjustments to be included into the proposals map).

The existing proposal map designations will be retained for the Local Plan with the revisions indicated in the map books above. Before publishing for consultation the documents and maps (attached at Appendix 1 (Parts A, B, C and D) will be amalgamated with editorial and presentational improvements and subject to minor revisions (where indicated in the documents). The draft Local Plan together with the

Sustainability Appraisal, consultation statements and other relevant supporting evidence and material will be available through a refreshed Local Plan webpage for the consultation which will commence on 28th February for six weeks.

3.7 Local Plan - Background

- 3.8 The drafting of the Proposed Submission Local Plan has taken into account relevant planning legislation, national planning policy, on-going advice from the Greater London Authority (GLA) and other statutory bodies, and also best practice lessons learnt from professional planning bodies and agencies.
- 3.9 Engagement in the preparation of the Local Plan has been a continuous process and is considered to meet or exceed statutory requirements and the standards set out in the council's Statement of Community Involvement. The consultation report attached to this report (see Background documents) details this process of continuous engagement. Details of key consultation stages that have informed the Proposed Submission Local Plan are provided below.
- 3.10 The council consulted on its 'Policy Options for the Local Plan 2015 - 2030' document in from 14 June 2013 to 26 July 2013 as part of the Regulation 18 informal consultation preparation for the new Local Plan. That 'Policy Options' document included 45 proposed site allocations across the borough, making provision for over 7,800 new homes and 200,000 sq m of additional office floorspace. In total, 126 responses were received. These included responses from the statutory consultees (including the Greater London Authority, the Environment Agency and Natural England), residents (both individuals and residents groups), land holders and businesses (both within the borough of with an interest in the borough).
- 3.11 Initial feedback on the consultation response to the Policy Options consultation was presented to Planning Committee on 3 October 2013. Since then, a detailed consultation report and schedule of responses has been produced (see Background documents).
- 3.12 Following from the 'Policy Options for the Local Plan', an additional consultation on a 'Revised Site Allocations Policy Options for the Local Plan' was carried out from 1 October 2013 to 28 October 2013. This addressed a number of additional requirements that emerged or became clearer following the 'Policy Options' consultation, including an anticipated increase in the annual housing completions target to arise in the Further Alterations to the London Plan to be published in early 2014. This increase arises from revisions in population projections following the 2011 Census and the need to house and otherwise provide for the growing population. Accordingly, the consultation provided a revised policy option Policy SC1 Housing Growth and the substantive set of 71 site allocations proposed (an increase from the 45 sites proposed in the 'Policy Options' consultation).
- 3.13 The consultation responses to the 'Revised Site Allocations' document were analysed and have resulted in some changes to the sites included in the Proposed Submission plan. The consultation report details these changes, and includes and schedule of responses (see Background document available on the Local Plan website).
- 3.14 The consultation report also details how earlier versions of Core Strategy, including the Issues and Options stage (May 2007) and Preferred Strategy stage (July 2011), informed the developed of the Local Plan.

3.15 Local Plan Members Working Group

3.16 A cross-party Local Plan Members Working Group has been established to advise the Cabinet Portfolio Holder and help deliver the Local Plan to timetable. There is a good consensus amongst the Members on the overall approach and programme of the Local Plan and on a range of key issues discussed. In summary the key issues raised by Members and incorporated by Officers into the draft Local Plan were:

- a) **Growth and infrastructure** – the Local Plan should explain why there is a need for more housing and provide assurance of the balanced delivery of additional housing and social and physical infrastructure for the both the existing and new populations.

Officer response: the draft Local Plan has been updated to further explain the context of the borough's increased housing target, which is provided in the Mayor's Draft Further Alterations to the London Plan, published January 2014. The housing target has also been reflected in the infrastructure delivery schedule and in policies covering specific forms of infrastructure (such as schools).

- b) **Supporting the young and older population** – the plan should recognise the need for facilities for the older population, as well as the young. For example, the need for supported older person housing, for new smaller housing suitable for older people to 'down size' to and live independently and thus release family sized accommodation, and the need to provide sites and assistance to guide the provision new school places.

Officer response: The housing policies make provision for specialist and supported housing (SC 8) and for a mix of housing sizes to meet need (SC 3). Provision for new school places is made under site allocations and policy CI 2.

- c) **Shopping parades** – many smaller and local parades (in particular the very long ones) could be usefully rationalised and reduced in response to changing shopping patterns. This would provide potential for conversion to new housing space. Local shops vital to serving more 'remote' residential and business locations areas should be protected.

Officer response: a review of town centre boundaries has been undertaken and the draft Local Plan proposes amendments to each of the four town centre designations.

Diversity of distinctive characters across the borough – it was important the plan recognises the distinctive physical characters and very different socio-economic demographics in the different parts of the borough. Planning policies and site allocations should be applied with sensitivity to this.

Officer response: the draft Local Plan has been developed alongside the emerging Character and Context Study, which comprehensively assesses the different physical characteristics of the borough, and an evidence base

which establishes the variations in demographics. These differences are reflected throughout the document.

- d) **Green Belt** – there is a need to address some areas that make little positive contribution to the Green Belt. There are opportunities to improve the visual appearance and openness of small parts of the Green Belt, and to improve public access for recreation. There was strong overall support for Green Belt principles and given the good availability of urban sites and land for regeneration, there is no need envisaged for wholesale release of functioning Green Belt to achieve development need.

Officer response: the draft Local Plan acknowledges variations in the quality of Green Belt and other open spaces, and promotes qualitative improvements, including improved accessibility.

- e) **Waterways** – large and small and the adjacent areas and setting must be valued. Environmental quality and public access should be enhanced and space important for water related uses protected.

Officer response: the draft Local Plan includes policy covering the entire Blue Ribbon Network, and access to the waterways has emerged as a policy priority in stakeholder consultation.

- f) **Affordable housing** – it is vital to create more affordable housing, a range of good quality housing that people want and that will enable / encourage people to stay in the borough long term.

Officer response: the draft Local Plan includes policy covering the entire Blue Ribbon Network, and access to the waterways has emerged as a policy priority in stakeholder consultation.

- g) **Larger shopping centres** – need to be more attractive places to visit and with convenient parking and public transport access. The quality of shops, cafes and services must be improved in many places to attract visits for shopping and business. Town centres are vitally important to meeting the need of local businesses as well as to residents.

Officer response: the draft Local Plan promotes the regeneration of Brentford and Hounslow town centres, a revisioning of Feltham town centre and qualitative improvements to all town and local centres. Improving the offer in town centres – including for businesses – is a priority.

- h) **Perceptions of environmental quality** – there was a perception that some local people have ‘lost interest’ in the quality of the local environment. This must be addressed.

Officer response: the draft Local Plan promotes qualitative improvements to the public realm and open spaces.

- i) **Visitors and tourism attractions** – more should be done to promote the attractions the borough has to offer visitors and tourists; this will contribute to the local economy and help improve local people’s own attitudes to and understanding of the borough of Hounslow. Inward investment must be encouraged and tourist attractions promoted.

Officer response: the draft Local Plan promotes qualitative improvements to the public realm and open spaces.

- j) **Site allocations** – it was important to utilise the local knowledge of Members in the preparation of site allocations, including the allocation of potential sites for new schools.

Officer response: support noted.

- k) **Local Plan making process** – the group requested early opportunity to see and comment on the emerging draft plan as it is submitted for Cabinet. The group was very supportive of cross-party working to help bring forward the plan in the proposed timescale and decision making route.

Officer response: support noted.

3.17 Duty to Co-operate

- 3.18 The Localism Act 2011 and the National Planning Policy Framework (NPPF) introduced a ‘Duty to Co-operate’, requiring certain public bodies to work together on cross-boundary strategic issues. Ongoing engagement combined with a series of meetings and discussions with neighbouring local planning authorities and other statutory bodies has taken place to ensure joint working on key issues as part of the preparation of the Local Plan. A statement setting out how the Council has addressed the Duty to Co-operate during the preparation of the Local Plan will be submitted for examination, along with the Local Plan itself.

3.19 Other statutory documents

- 3.20 The Sustainability Appraisal (incorporating Strategic Environmental Assessment) has been undertaken for the Proposed Submission Local Plan policies and this will be published as part of the Proposed Submission consultation documents. This includes a Habitats Regulations Assessment and Health Impact Assessment.

3.21 Local Development Scheme

- 3.22 The Local Development Scheme is a statutory document that sets out the Council’s programme for preparation of planning policy documents. This document now needs to be updated to reflect the current project plan for the remaining stages of the Local Plan and to reflect changes in the timetable for the West London Waste Plan and the Community Infrastructure Levy (CIL) Charging Schedule. Cabinet is asked to agree the revised Local Development Scheme at Appendix 2. This does not require the endorsement of full Council.

3.23 Next Steps

- 3.24 The remaining timetable for the preparation of the Local Plan will involve:

- a) a statutory minimum six-week period seeking representations on soundness (and legality) to take place during March – April 2014, to commence on February 28th.

- b) assessment of representations received and any further work to support the Plan prior to its submission to the Secretary of State for formal independent examination.
 - c) subject to minor amendments approved within the terms of Recommendation 3 above, submission of the Plan to the Secretary of State in (or prior to) June 2014.
- 3.25 Officers anticipate that an Examination in Public will be held during Autumn 2014. All being well, the Local Plan can then be adopted as part of the statutory development plan by a further resolution of full Council before April 2015.

4. Key Implications

- 4.1 The NPPF requires all Local Planning Authorities to have an up-to-date Local Plan consistent with the principles of the framework including the presumption in favour of sustainable development. The council's current development plan consists of the saved Unitary Development Plan policies (2007), the Brentford Area Action Plan (2009) and the Employment Development Plan Document (2008), and London Plan. Where these policies are not inconsistent with the NPPF they will continue to be used to determine planning applications until the new Local Plan is adopted. The council is seeking to prepare its Local Plan within an accelerated timeframe to ensure that the council's vision for the development of the borough is fully articulated as soon as possible. There will be no immediate impact on planning decision making but Recommendation 5 means that once the Local Plan is formally submitted to the secretary of State in June it will become a material consideration to become considered in dealing with planning applications and other day to day planning decisions.
- 4.2 The NPPF also states that where practical Community Infrastructure Levy (CIL) charges should be worked up and tested alongside the Local Plan. The CIL is a fixed local levy charged on a per sq m basis on all qualifying development. In accordance with the current statutory framework, it is anticipated that the CIL charge will replace the majority of infrastructure funding currently negotiated through S106 planning obligations, although it is anticipated that S106 agreements will continue to be used to secure affordable housing, and other site specific mitigation measures. As supported in the NPPF, the council is developing its CIL alongside the Local Plan. It is intended that this will result in the adoption of the borough's charging schedule before April 2015.

5. Financial Details

a) Financial Impact On The Budget (Mandatory)

The cost of the Proposed Submission Local Plan consultation will be met from existing budgets.

b) Comments of the Assistant Director Strategic Finance

There are no financial implications pursuant to the recommendations in this report.

6. Legal (to be completed in conjunction with the Legal Department)

a) Legal Details

The Local Plan is a part of the Council's development plan as described by section 38(2) of the Planning and Compulsory Purchase Act 2004 (as amended) and the NPPF. The Town and Country Planning (Local Plan) (England) Regulations 2012 set out the statutory requirements for the preparation of local plans. Specifically Part 6 (Regulations 17 to 31) set out the statutory requirements for the preparation, publication, submission, examination and adoption of a Local Plan. The Proposed Submission document has been prepared in accordance with Regulation 19 which requires the local planning authority to notify and seek representations on the proposed Local Plan from specific consultation bodies, other consultation bodies the council consider appropriate and residents or persons carrying out business in the borough. The council's revised Statement of Community Involvement identifies the specific and general consultation bodies referred to above, and the planning policy team hold a database of consultees who have expressed an interest in being consulted on planning policy issues.

b) Comments of the Assistant Director Corporate Governance

The Assistant Director Corporate supports the recommendations in this Report.

7. Value For Money

Not applicable.

8. Sustainability Impact Appraisal

The Local Plan is subject to a detailed Sustainability Appraisal to assess the impact of the proposed policies on key social, economic and environmental objectives. The Sustainability Appraisal is one of the key tests of soundness that will be explored at the Examination in Public by the Planning Inspector. The Sustainability Appraisal will also meet the requirements of a Strategic Environment Assessment as required by Directive 2001/42/EC of the European Parliament. The Sustainability Appraisal report will be published alongside the Proposed Submission Local Plan for consultation.

9. Risk Management

Please refer to section 4. It should be noted that the Local Plan is required to be in general conformity with both the NPPF and the regional plan – the London Plan. As part of the consultation a process will be undertaken to confirm the conformity of the Local Plan with the London Plan. However, the Mayor has just produced Further Alterations to the London Plan for public consultation (ending in April) and then examination later in 2014. The draft Local Plan has been produced in anticipation of the most significant proposed changes to the London Plan (the borough housing target) but there is potential risk of differences between with other aspects of the emerging draft Plans. Officers will work closely with GLA colleagues to mitigate any difficulties which can be resolved through the period of consultation in March / April.

10. Links to Council Priorities

Brighter futures for the borough's children and young people – Supporting the delivery of additional school places through the allocation of sites for school developments.

A thriving economy with more affordable housing – Contributing to delivery of additional affordable homes through the allocation of housing sites and setting an affordable housing delivery target. Protecting and allocating employment sites within the borough to maintain and attract new jobs to the borough. Supporting the regeneration of Hounslow town centre through the articulation of a vision and the allocation of development sites.

A cleaner greener borough – Reducing the number of trips made by cars by ensuring new development is allocated to sites with good public transport accessibility. Continuing the protection of the borough's nature conservation areas.

11. Equalities, Human Rights and Community Cohesion

The Local Plan is subject to Equalities Impact Assessment (EqIA). The council's Equalities Analysis form has been used to undertake EqIA and this will be consulted on alongside the Local Plan and other impact assessments. Accordingly, the development of the Local Plan will have regard to the Public Sector Equality Duty contained in section 149 of the Equality Act 2010 and it is, therefore, considered that in approving the recommendations in this Report, the Cabinet will be acting in compliance with the Public Sector Equality Duty.

12. Staffing/Workforce and Accommodation implications:

N/A

13. Property and Assets

The Proposed Submission document has been prepared in full consultation with the council's Property and Asset Management team as it may have implications for existing council land holdings and their allocation as potential development sites.

14. Any Other Implications

N/A

15. Consultation

See Part 3 above at paragraph 3.37 (Next Steps).

6. Timetable for Implementation

See paragraph 3.37.

17. Appendices

Appendix 1: Parts A, B, C & D - London Borough of Hounslow Local Plan 2015 - 2030 Draft Proposed Submission draft version, 2014

- Part A - The main Local Plan document and appendices.
- Part B and BB – Map books of the site allocations.
- Part C and BB – Map books of the town centre boundaries and policy designations.
- Part D and DD – Green Belt and Metropolitan Open Land Background Paper

Appendix 2: London Borough of Hounslow Local Development Scheme, 2014

Appendix 3: Consultation Statement

18. Background Information

Schedule of Responses to the Local Plan consultation, 2014

Various evidence base documents all published on the Local Plan website

(All available on the Local Plan web site)

REPORT ENDS