

London Borough of Hillingdon
LOCAL DEVELOPMENT FRAMEWORK

**LIVE/WORK SUPPLEMENTARY
PLANNING DOCUMENT (2006)**

**ADOPTION /SUSTAINABILITY
APPRAISAL STATEMENT**



Policy and Environmental Planning Team
Planning and Transportation Group
London Borough of Hillingdon
APRIL 2006

Table of Contents

	PAGE
1.0 INTRODUCTION	3
2.0 BACKGROUND <ul style="list-style-type: none"> - Key Land use issues for Live/Work - Key stages involved in the preparation of the Live/Work SPD 	4
3.0 CONSULTATION ARRANGEMENTS <ul style="list-style-type: none"> - Results of consultation process for the SPD (Table 1) 	6
4.0 SUSTAINABILITY APPRAISAL STATEMENT <ul style="list-style-type: none"> - How sustainable considerations have been integrated into the SPD? - How the sustainability appraisal report has been taken into account? - List of consultation bodies and the availability of relevant documents - How the results of any trans-boundary consultations entered into have been taken into account? - Reasons for choosing the SPD as adopted in the light of the other reasonable alternatives dealt with. - Measures that are to be taken to monitor the significant sustainable effects of the implementation of the SPD. 	7
5.0 OUTCOME	11
APPENDIX 1 - LIST OF CONSULTEES	13
APPENDIX 2 - SUMMARY OF REPRESENTATIONS	14

1.0 Introduction

- 1.1 The Live/Work Accommodation Supplementary Planning Document (SPD) was approved for adoption by the London Borough of Hillingdon's Cabinet on 20th December 2005 and was formally adopted and published on 24th May 2006. This statement outlines the consultation process that was undertaken during the evolution of the SPD and describes how the Sustainability Appraisal for the Live/Work SPD helped to create a more sustainable guidance document.
- 1.2 An important element of the emerging Local Development Framework (LDF) for Hillingdon is the preparation of a Supplementary Planning Document (SPD) on 'Live/Work' Accommodation. Live/Work is a new but increasingly important land-use in London, where buildings contain a dual use consisting of specific but separate floorspace for residential and employment purposes. There is currently no policy provision for Live/Work Development in Hillingdon with applications considered against a number of more general Housing and Economic policies in the current Unitary Development Plan (UDP). This SPD is intended to supplement these policies and provide greater clarity and guidance to those proposing the creation of Live/Work units in Hillingdon.
- 1.3 In accordance with Regulation 16(b) and 16(c) of the Town and Country Planning (Local Development) (England) Regulations 2004, any person aggrieved by this Supplementary Planning Document (SPD) may apply to the High Court for permission to apply for judicial review of the decision to adopt the SPD; and that any such application for leave must be made promptly and in any event no later than 3 months after the date on which the SPD was adopted.

2.0 Background

- 2.1 Live/Work space is defined as property that is specifically designed for dual use, combining both residential and employment space. It is regarded as Sui Generis rather than having a specific use class as defined in the Town and Country Planning (Use Classes) Order 1987 (as amended) and so the change of use of a building or site to create Live/Work units will always require planning permission.
- 2.2 The concept of Live/Work first developed in the 1990s in east London where properties were converted into Live/Work spaces. More recently, Live-Work has become popular as a result of the increased cost of acquiring or renting housing and business premises, which are particularly high within the London region. By living and working within the same space, it is possible to reduce expenditure on both work premises and house prices.

- 2.3 Whilst there are presently only four built, dedicated Live/Work units built in the borough, the Council has received a number of planning applications for Live/Work accommodation including around 5% of units on the approved Honeywell redevelopment scheme in West Drayton. 5% of units were also proposed as Live/Work as part of the redevelopment of RAF Eastcote. The Council has also received an increased number of pre-application enquiries in respect of Live/Work.
- 2.4 It is generally recognised that the greatest emphasis within Live/Work developments should be on the employment component, to reduce the likelihood of schemes being converted into residential development. Similarly, Live-Work developments are considered to work best where linked to academic or research institutions or where there are a reasonable number of units which can maintain a critical mass. The SPD has, therefore, sought to provide a necessary degree of detail and prescription on the provision of Live-Work units to ensure that they can remain viable in terms of:
- adequate separation of the uses within each unit
 - appropriate types of uses within the unit
 - appropriate locations for Live/Work development in the borough
 - a maximum area for residential floorspace within the unit
- 2.5 The degree of prescription required may be greater than would normally be found in typical housing or employment policies. Nevertheless, given the risks (identified in paragraph 31 of the supplementary planning guidance) – as well as the potential benefits – associated with this type of development, specific guidance is required. Failure to undertake this work is likely to reduce the Council's ability to maintain the function of Live/Work units as originally intended and protect industrial areas from a drift towards 'back door' residential development.
- 2.6 Officers completed an initial baseline assessment of Live/Work development which has been prepared as a background document to the SPD. A separate Sustainability Appraisal of the Live/Work has also been prepared which assesses the SPD against a number of key LDF Sustainability Objectives. The preparation of Sustainability Appraisals of each LDF document is a new requirement in the preparation of planning policy documents, as a consequence of the provisions of the Planning and Compulsory Purchase Act 2004. The Sustainability Appraisal is a technical report which will be published alongside the Live/Work SPD and is produced to assist in the consideration of the overall sustainability of the SPD in terms of its environmental, economic and social impacts. Detail on how the sustainability Appraisal has influenced the SPD is contained within section 4 of this statement.

2.7 Key Land use issues for Live/Work

The key components of the SPD are summarised as follows:

a) Finding the most appropriate employment activities for Live/Work Development

- 2.8 There is a clear need to restrict certain types of land use in Live/Work units. Live/Work has been successfully implemented for use by creative industries and IT related business and is considered to be suitable for class A2 (professional and financial services) and the full range of class B1 type activities, within the employment component of the Live/Work unit.
- 2.9 Some boroughs, including Hillingdon, have previously put conditions on Live/Work applications to restrict the use class within Live/Work schemes. The approval for the redevelopment of the Honeywell site in West Drayton, for example, included a condition to prevent B2 (light Industrial) and B8 (Storage and Distribution) within the Live/Work units.

b) Appropriate locations for Live/Work Development

- 2.10 The location of Live/Work can vary according to how appropriate a location is for a dual use scheme. Whilst the separate designation of areas for employment and residential areas remains a preferred method of land use planning control, Live/Work units do not conform to either use and can be deemed inappropriate in designated employment areas and many residential areas.
- 2.11 Live/Work could be permitted in both employment and residential areas and the majority of research undertaken to-date suggests that Live/Work can be successfully sited on different types of sites. For example, Live/Work could be located in or near to a town centre as part of a small development or as part of a larger mixed-use or residential-led scheme. However, evidence appears to show that the most 'sustainable', long-term format is as part of a business cluster with shared support services, which may be linked to a nearby academic, research or other type of institution.

c) Protection of employment land

- 2.12 The pressure to redevelop surplus suitable employment sites in the borough for housing purposes is likely to see an increase in proposals for mixed use and Live/Work schemes. Recent amendments to national planning policy (PPG3/PPS6) have sought to ensure that long term and genuinely surplus industrial land is brought into use for housing.
- 2.13 However, the introduction of Live/Work onto designated Industrial and Business Areas (IBAs) will need to be resisted, since they are likely to set a precedent for other non-employment uses on these locations. In addition,

most IBAs are likely to be inappropriate for any land use incorporating residential accommodation, given the type of surrounding business activities. Proposals for Live/Work on long-term vacant (at least five years) IBA sites will need to be considered against a set of criteria, as set out in the SPD. These criteria reflect the criteria set out in Policy LE2 of the UDP which considers the use of IBAs.

Residential Amenity within Live/Work units

- 2.14 Live/Work developments within existing industrial areas may create an inappropriate environment for residential use. Where Live/Work developments are considered appropriate in industrial/employment areas, a suitable environment for residential use will need to be provided.
- 2.15 The design of the Live/Work unit will be essential in providing adequate living facilities within the units. It will be necessary for all Live/Work development to take account of measures for sound-proofing, ventilation, natural light retention and maintaining privacy. The SPD stipulates that conditions may be attached to planning permissions requiring details of sound-proofing and other environmental mitigation to be submitted prior to the commencement of any Live/Work development.

Affordable Housing

- 2.16 The SPD provides guidance on a range of other Live-Work issues including the provision of affordable units. Notwithstanding the fact that Live/Work can provide a less expensive means of finding housing (and business) accommodation, the SPD emphasises that Live-Work units will not be regarded as affordable housing units in their own right; a proportion of units will need to be provided as affordable on qualifying sites, consistent with UDP affordable housing policy.
- 2.17 **Key Stages involved in the preparation of the Live/Work SPD and its Sustainability Appraisal.**

These are:

- Baseline research document for Live/Work Accommodation, June 2004
- Production of the draft Live/Work Supplementary planning Document - April 2005
- Production of Sustainability Appraisal of Draft Live/Work SPD - June 2005
- Consultation on the draft Live/Work SPD and Sustainability Appraisal – July/August 2005

- Cabinet Approval for formal adoption of the Live/Work SPD, December 2005
- Live/Work Accommodation SPD, Adoption/Sustainability Appraisal Consultation Statement - April 2006

3.0 Consultation Process

- 3.1 This statement sets out, in accordance with regulation 18 (4) (b) of the Town and Country Planning (Local Development) (England) Regulations 2004, the public participation and consultation process undertaken for the Live/Work SPD.
- 3.2 Formal public consultation on the Draft SPD ran for 6 weeks from 24th August to the 30th September 2005.
- 3.3 Copies of the draft SPD and the accompanying Sustainability Appraisal were sent to approximately 137 statutory bodies in electronic format on CDROM. Posters advertising the consultation were sent to GP's, post offices, community centres and higher and further educational establishments.
- 3.4 Approximately 1068 letters were sent to other individuals and organisations informing them of where the consultation documents could be viewed and where CD's and hard copies could be obtained. Hard copies of the consultation documents were made available at all 17 Hillingdon libraries, Hayes One Stop Shop and the Planning and Transportation Group reception in the Civic Centre. Appendix 1 of the report contains the full list of consultees for the Live/Work SPD which conforms to Hillingdon's Statement of Community Involvement.
- 3.5 Representations on the Live/Work SPD have been received from 6 organisations including Transport for London, The Countryside Agency and English Heritage. There were also representations from residents in the borough and the Hillingdon NHS Primary Care Trust.
- 3.6 The main issues raised during the public consultation on the draft SPD related to parking, affordable housing, road safety and residential amenity. For more information on the main changes to the SPD and the representations see Table 1 below and Appendix 2.

Table 1.0: Results of Consultation Process for the SPD.

Representation	Amendments to SPD	Implications for any further Sustainability Appraisal

Recommend the SPD be amended to include requirement for communal cycle spaces in Live/Work developments in accordance with LCN minimum standards for B1 & A2 uses.	Some detail on communal cycle parking has been added to the SPD.	No implications anticipated.
The key point on affordable housing should specify that affordable housing that includes Live/work units need not be Live/work units.	A clear statement on live/work and affordable housing thresholds has been incorporated into the SPD.	No implications anticipated.

4.0 Sustainability Appraisal Statement

4.1 A Sustainability Appraisal was prepared for the draft Live/Work SPD under the requirements of the Town and Country Planning (Local Development) (England) Regulations. This section provides the details of the consultation on the Sustainability Appraisal (SA) for the Live/Work Accommodation Supplementary Planning Document (SPD) including information on how the SPD was changed as a result of the Sustainability Appraisal, responses to consultation and any implications for the SA.

4.2 In addition, the ODPM guidance on Sustainability Appraisal for Regional Spatial Strategies and Local Development Documents, section 4.5.6 and Environmental Assessment of Plans and Programs Regulations 2004 (which covers the European Directive 2001/42/EC on Strategic Environmental Assessment) section 16.3-16.4, requires a Consultation Statement, after the adoption of the SPD, that lists the following information:

- How sustainable considerations have been integrated into the SPD?
- How the sustainability appraisal report has been taken into account?
- List of consultation bodies and the availability of relevant documents
- How the results of any trans-boundary consultations entered into have been taken into account?
- Reasons for choosing the SPD as adopted in the light of the other reasonable alternatives dealt with.
- Measures that are to be taken to monitor the significant sustainable effects of the implementation of the SPD.

4.4 How sustainability (environmental, social and economic) considerations have been integrated in to the plan or programme.

The Sustainability Appraisal for the draft Live/Work SPD was carried out in July 2005 and the following key sustainability issues were identified:

- Employment
- Vacant office/industrial premises
- Access to affordable housing
- Town centre regeneration
- Social deprivation
- Traffic congestion
- Amount of contaminated land

4.5 The following highlight the considerations for the SPD in order to address the above-mentioned sustainable issues.

4.6 Employment

Provision for new land use activities that sustain local business and commerce, which in turn will keep unemployment levels low.

4.7 Vacant office/industrial premises

Ensure that the provision of Live/Work development does not further reduce the viability of the IBA's.

4.8 Access to affordable housing

The provision of Live/Work development should include a provision for a proportion of affordable Live/Works units to be provided on major applications in line with the existing affordable housing ratios.

4.9 Town centre regeneration

To maintain and promote existing town centres by providing for Live/Work development in the borough in appropriate locations in close proximity to these centres.

4.9 Social deprivation

Policies across all land uses should ensure that social and economic sustainability objectives are fully taken into consideration, in order to reduce deprivation in key wards.

4.10 Traffic congestion

The provision of Live/Work development enables people to work where they reside and thereby reduces the need to travel. In addition, Live/Work development should be focused in areas of high accessibility to public transport.

4.11 Amount of contaminated land

The provision of Live/Work development should seek to encourage the use of urban brown-field land and, where appropriate, the remediation of contaminated land.

4.12 How the Sustainability Appraisal Report has been taken into account in the final Live/Work SPD

4.13 The sustainability appraisal identified some key areas where the inclusion of certain changes will help mitigate for some of the impacts identified. The following table identifies the recommendations made in the SA and the consequential changes (or otherwise) that were undertaken.

Table 2.0: List of the changes adopted in the final Live/Work and the Sustainability Appraisal recommendations

Sustainability Appraisal recommendations for the Live/Work SPD	Changes made to the draft Live/Work SPD or reasons why SPD was not changed.
Restrict B2 and B8 use classes within Live/Work units	The SPD was not changed but has a Key point restricting the types of use in Live/Work units to A2 and B1.
Define internal configuration of Live/Work units	The SPD was not changed, but has a key point which gives minimum and maximum thresholds for internal floorspace of Live/Work units.
Sound proofing and ventilation measures	Text has been added to the SPD to give detail on appropriate sound-proofing and insulation.
Avoid Live/Work development in areas at risk from flooding	No change to SPD, but UDP policies on flooding will apply to Live/Work units.
Live/Work development is likely to be unsuitable for family accommodation	The SPD was not changed but has a key point to restrict the number of bedrooms in Live/Work units.
More amenity space for occupants.	The SPD remains as before with no thresholds for amenity space provided. Amenity space standards have not been included in the SPD in order to discourage the occupation of Live/Work units by families.

4.14 How the results of any consultations relevant to the Sustainability Appraisal have been taken into account in the final Live/Work SPD

- 4.15 A detailed summary of all the responses made to the SPD and the comments on them can be found in Appendix 2 of this statement. No comments were received on the Sustainability Appraisal Report. However, comments on the SPD have been taken into account as part of the Sustainability Appraisal process which resulted in some of the amendments to the SPD, these are shown in table 2, section 3.
- 4.16 The reasons for choosing the plan or programme as adopted, in light of the other reasonable alternatives dealt with;**
- 4.17 Several options were considered as part of the sustainability appraisal of the Live/Work SPD. The production of a Live/Work SPD was considered to be the option most able to meet the sustainability objectives.
- 4.18 Option 1. Do Nothing. This option proposes that the Borough makes no provision for Live/Work development within the planning framework for Hillingdon. Live/Work Development is a proactive initiative to encourage integrated and affordable small business and residential development in the borough. The 'Do Nothing' option would not encourage such land use within Hillingdon. As mentioned in Section 3.1, the test of how well the Live/Work SPD contributes towards sustainable development depends on how well it fosters the "maintenance of high and stable levels of economic growth and employment". Making no provision for Live/Work development would significantly hinder the Borough's ability to promote a type of mixed-use development that would support new business and economic growth, and is therefore not considered as an appropriate or valid option.
- 4.19 Option 2 – The principal alternative to the implementation of the Live/Work SPD is to retain the status quo. The existing UDP makes no provision specifically for Live/Work development. Hence the 'Status Quo' option will result in the same outcome as the above 'Do Nothing' Option and is discounted for the same reasons stated.
- 4.20 Option 3 - Town centres are considered to be suitable locations for Live/Work on the basis that there is good access to public transport. However, the employment generating uses associated with Live/Work could cause possible conflict with retail uses in core shopping areas. There may also be possible conflict with the conservation of protected buildings and cultural features within town centre locations. A number of local centres have a conservation area designation. Therefore, it may be appropriate for Live/Work to only be considered in Town centres and Local centres, excluding the primary, secondary and core shopping areas.
- 4.21 The Council's employment policies seek to protect areas designated for Industrial and Business purposes. Live/Work units in employment

locations may be inappropriate for a residential environment given the proximity of industrial uses, including limited access to facilities and services. On this basis, most protected employment sites in Hillingdon are likely to be inappropriate for this type of development and should remain as purely employment use.

4.22 Option 4 -The residential part of a Live/Work unit is considered to be inappropriate for family accommodation. This is thought to be most prominent in employment areas where there is a reduced amount of amenity space and limited access to open space and recreational areas. To discourage Live/Work being used for family accommodation it is recommended that Live/Work development should contain no more than two bedrooms and that amenity space standards are met in line with Hillingdon's Design and Accessibility Statement.

4.23 The measures that are to be taken to monitor the significant sustainability issues of the implementation of the plan or programme

4.24 The significant issues discussed above, and given in detail in the Sustainability Appraisal, will be monitored as part of the Local Development Framework Annual Monitoring Report (AMR). The AMR includes monitoring of sustainability criteria including those indicators listed in the Sustainability Appraisal Report of the draft Live/Work SPD.

5.0 Outcome

The Live/Work SPD was approved for adoption on 20th December 2005 following Cabinet approval and was formally adopted and published on 24th May 2006. The accompanying Sustainability Appraisal was developed in tandem with the SPD and helped to establish stronger monitoring mechanisms and which re-emphasised the need to locate Live/Work development in appropriate locations and at sizes.

The Live/Work SPD will form part of the Local Development Framework (LDF), a new planning framework, which the Council is required to produce to promote and manage land-use within our area. The inclusion of the Live/Work SPD in the LDF ensures it will be integrated with, and make a contribution to, the new spatial planning system being developed in the borough.

The Live/Work SPD has been prepared in anticipation of the development of specific policies in the LDF 'Core Strategy'. In the interim period the SPD will be taken into account by the Council in determining planning applications as supplementary to relevant policies in the adopted Unitary Development Plan 1998.

Appendix 1: Consultation list for Live/Work Supplementary Planning Document

Chamber of Commerce

Eastcote Chamber of Commerce
Hayes Chamber of Commerce
Hillingdon Chamber of Trade Commerce & Industry
Northwood & Pinner Chamber of Trade
Ruislip Chamber of Commerce
Uxbridge & Drayton Chamber of Trade & Commerce

Community Groups

DASH
Hillingdon Association of Voluntary Services
The Hayes Town Partnership

Housing

Acton Housing Association
Airways Housing Association
Anchor Housing Association
Apex Housing Group
Bellway Homes
Catalyst Housing Group
Co-op Home Services
Ealing Family Housing Association Ltd
Fairview New Homes plc
Family Housing Association
Frays Charitable Housing Association Ltd
Home Group
Inquilab Housing Association
John Grooms Housing Association
Laing Homes Thames Valley
Metropolitan Housing Trust

Network Housing Association Ltd
Notting Hill Home Ownership
Notting Hill Housing Trust
Paradigm Housing Group Ltd
Pathmeads Housing Association
Shepherds Bush Housing Association
Slough Estates
Spelthorne Housing Association
Sutherland Housing Association
Thames Valley Housing Association
Warden Housing Association

Residents and Tenants Associations

Auriol Drive Residents Association
Avondale Tenants and Residents Association
Bell Farm Estates Residents Association
Botwell Common Area Tenants & Residents Association
Botwell Tenants and Residents Association
Bovis Residents Association Group
Braybourne Close Residents Association
Brearley Close Residents Association
Brook Green Residents Association
Chapel Lane Residents Association
Chiltern View Residents Association
Cleave and Savoy Residents Association
Cleveland Road Residents Association
Cobden Close Riverside Residents Association
Colham Green Road Residents Association.
Colham Manor Residents Association

Colham Residents Association
Connaught Residents Association
Court Drive Householders Association
Cowley Tenants and Residents Association
Crane Ward Residents and Tenants Association
Cranford Cross Residents Association
Croyde Avenue Residents Association
Dell Farm Residents Association
Dene Road Residents Association
Eastcote Residents Association
Eastcote Park Estate Association
Ferndale Area Residents Association
Frayslea and Cowley Road Residents Association
Friends of Hillingdon House Farm
Gatehill (Northwood) Residents Association
Gatehill Residents Association
Gledwood Residents Association
Grange Park Residents Association
Glebe Tenants and Residents Association
Harefield Tenants & Residents Association
Harlington Village Residents Association
Harmondsworth and Sipson Residents Association
Hayes Garden Village Residents Association
Hayes Park Residents Association
Hayes Town Centre Residents Association
Hercies Road Residents Association
Hill Road Residents
Hillingdon Council Tenants Federation
Hillingdon Court Park Residents Association

Hillingdon Disabled Tenants and Residents Association
Hillingdon Village Residents Association
Hobart Road Residents Association
Holloway Lane Residents Co. Ltd.
Home Farm Residents Association
Ickenham Residents Association
Lake View Estates Residents Association
Langworth and Forsters Residents Association
Laurel Lane Residents and Tenants Association
Longford Residents Association
Lych Gate Walk Tenants Association
Mayfield Close Residents Association
Nestles Avenue Action Group
North Hayes Residents Association
North Hyde Road Residents Association
North Uxbridge Residents Association
Northwood Hills Residents Association
Northwood Residents Association
Oakfarm Residents Association
Parkfield Road/Oak Avenue Petition Group
Pastures Mead Residents Association
Philpots Farm Residents Association
Pield Heath Residents Association
Robinwood Grove Residents Association
Rodwell Close Residents Association
Rose Park Residents Association
Ruislip Residents Association
South Ruislip Residents Association
St Laurence (Cowley) Residents Association
St Vincent's Tenants and Residents Association
Stockley Residents Association
The Association of the Residents of the Drive

The Avenue Residents Association
The Larches Residents Association
Townfield Residents Association
Tudor Way Residents Association
Uxbridge Common Residents Association
Uxbridge Moor Residents Association
Victoria Road Tenants and Residents Association
Vine Lane Residents Association
Violet Avenue Tenants and Residents Association
Waterloo Road Residents Association
Waye Avenue Residents Association
West Drayton Amenity Association
West Drayton Garden City Residents Association
West Drayton Initiative Group
West Drayton Residents Association
Whitehall Residents Association
Whitehorn Estate Residents Association
Willow Tree Lane Area Residents Association
Willows Residents Association
Wise Lane Residents Association
Yeading Residents Association
Yiewsley and West Drayton Town Centre Action Group

Statutory Agencies

British Telecom
Building Research Establishment
CAA
Commission for Architecture & Built Environment
Commission for Radical Equality
Countryside Agency
DASH
Disability Rights Commission
English Heritage
Equal Opportunities Commission

Estates and Wayleavers
GLA - Strategy Directorate
Government Office for London
Greater London Authority
Health and Safety Executive
Highways Agency LNCS Area 24
London Ambulance Accident & Emergency Service
London Ambulance Service West Sector HQ
London Borough of Ealing
London Borough of Harrow
London Borough of Hounslow
London Bus Service
London Fire & Emergency Planning Authority
London Fire Brigade
London Transport Planning
London Underground Limited
Metropolitan Police
Ministry of Defence
Network Rail
North London LDZ
Slough Borough Council
South Bucks District Council
Spelthorne District Council
Surrey County Council
Hertfordshire County Council
Buckinghamshire County Council
TFL Street Management
The Environment Agency
The Housing Corporation
Three Rivers District Council
Transport For London

Local Strategic Partnership

BAA (Heathrow Airport Ltd)
Brunel University
Chimes Shopping Centre
Connecting Communities
Ealing Family Housing
Groundwork Trust
Hillingdon Association of Voluntary Services
Hillingdon Chamber of Commerce
Hillingdon Fire Service
Jobcentre Plus

Metropolitan Police
Older Peoples Forum
Pensions Service
Primary Care Trust
Uxbridge College
Uxbridge Retailers Association
Uxbridge Town Centre Manager
West London Learning and Skills Council

Central Library
Hayes Library
Harlington Library
Harefield Library
Hayes One Stop Shop

Random Selection of Residents

50 random residents per ward
50 random businesses per ward

Parish Councils

Abbots Langley Parish Council - Three Rivers
Burnham Parish Council - South Bucks
Beaconsfield Town Council - South Bucks
Chorleywood Parish Council - Three Rivers
Croxley Green Parish Council - Three Rivers
Denham Parish Council Offices - South Bucks
Dorney Parish Council - South Bucks
Farnham Royal Parish Council - South Bucks
Fulmer Parish Council - South Bucks
Iver Parish Council - South Bucks
Sarratt Parish Council - Three Rivers
Stoke Poges Parish Council - South Bucks
Taplow Parish Council - South Bucks
Watford Rural Parish Council - Three Rivers
Wexham Parish Council - South Bucks

Libraries and Hayes One Stop Shop

West Drayton Library
Northwood Hills Library
Ickenham Library
Yeading Library
Hayes End Library
Oaklands Gate Library
Oak Farm Library
Kingshill Library
South Ruislip Library
Manor Farm Library
Eastcote Library
Yiewsley Library
Ruislip Manor Library

Appendix 2

COMMENTS RECEIVED ON THE LIVE/WORK SUPPLEMENTARY PLANNING DOCUMENT – AUG/SEPT 2005

Organisation	Number	Paragraph	Comment	Officer Responses
Goldcrest Homes	1	Paragraph 6.2	Live/work accommodation is described as legitimate hybrid use separate from C3 housing or B1business use, Paragraph 6.2 is meaningless since live/work units are not housing, affordable or otherwise.	The council notes the comments made and is seeking further advice on this issue
	2	Key point 7	Live/Work has no backing from central government policy and the SPD is used wrongly to introduce this policy.	The council notes the comments made and is seeking further advice on this issue
Harmondsworth and Sipson Residents Association	3	Section 10	Unsure how scheme would be monitored as more resources are needed. Concern that children wouldn't be allowed as this seems to deny scheme to families. Pleased with 2 parking spaces per unit.	Proposed monitoring of Live/Work accommodation is contained within the Live/Work Sustainability Appraisal. It is noted that where resources are insufficient some monitoring techniques may be difficult. Amenity space is not required as part of live/work proposals and the concept and likely location (town centres and employment areas) of Live/Work development is considered inappropriate for family occupancy.

Organisation	Number	Paragraph	Comment	Officer Responses
RPS Planning	4	Key point 4	Object to the requirements in key point 4 that all Live/Work units should have at least 65% internal floor area devoted to workspace and a maximum of 35% devoted to the residential element of the units.	The emphasis of Live/Work development is on the work element and it is considered necessary to provide a minimum and maximum guide for the amount of workspace and liveable floor space.
	5	Key point 6	Object to the requirement in key point 6 that Live/Work development should contain no more than two bedrooms.	A maximum number of bedrooms are considered necessary to prevent live/work units being used predominantly as residential units.
	6	Key point 7	Object to the requirement in key point 7 for the incorporation of 25% affordable and 10% intermediate units with qualifying Live/Work developments.	Disagree. It is considered appropriate to provide a proportion of affordable housing on larger schemes. The thresholds are consistent with the Council's affordable housing policy.
	7	Section 9	Require that the use of planning obligations for purposes set out in section 9 should conform to the guidance issued in ODPM circular 05/2005.	It is agreed that advice on planning obligations should conform to ODPM guidance. The existing text within section 9 is considered to fully conform to the guidance in circular 05/2005.
Internal-Transportation DC	8	Section 10	Limited data available on traffic generation from these sites. Difficult to prove or dispute detrimental impact on capacity &/or parking.	Agree that there is limited traffic data for Live/Work sites. However, the guidance in the SPD was based on existing live/work case studies.
Resident	9	Paragraphs 2.2, 5.8, 10.3	Not clear what position of the occupier would be if premises became vacant or breached condition 6 and continued to trade. Would they have to vacate the entire unit?	Given that Live/work occupiers will be required to pay business rates it is anticipated that they may well move on from a unit should their business cease to trade. There would be no immediate requirement for them to move out. The decision for vacating the unit should be made by the occupier.
English Heritage	10	General	Appreciate the concept of Live/Work but would seek to ensure buildings and areas of historic interest are not compromised.	Noted

Organisation	Number	Paragraph	Comment	Officer Responses
Transport For London	11	Section 8	Welcomes SPD on Live/Work and the intention to locate live/work developments close to public transport. Concerns over max of 2 parking spaces per unit plus visitor parking could result in a higher level of employment parking that would normally be acceptable. Transport for London request that an amendment of the parking standards so to reflect the London Plan parking standards, these are based on floor area and can be applied to Live/Work developments to provide a communal supply of employment parking, the standard should be strictly applied as a maximum limit and reduced levels of parking should be encouraged where located near town centres mixed use development or close to public transport, this should strengthen. Recommend the SPD be amended to include requirement for communal cycle spaces in Live/Work developments in accordance with LCN minimum standards for B1 & A2 uses.	Noted. The parking standards, however, are in accordance with London plan standards in respect of the dual use of Live/Work accommodation. The parking standards within the SPD take into account both the employment and residential London Plan parking standards. The standard of 2 spaces per unit is a maximum standard and reduced levels of parking will be encouraged where there is good access to public transport, as stated in the SPD. Communal cycle parking is noted and will be implemented into the SPD.
The Countryside Agency	12	General	The Agency is very pleased to see the links to the current UDP policies and the London Plan, links to National Guidance are also clear (PPG3, PPG4, PPG13). Clear indications of acceptable Live/Work use classes and the identification of possible land types are to be commended, linking to and strengthening earlier policy links, these provide clear criteria. The inclusion of Affordable Housing targets, in line with the Mayor's London Plan, are to be welcomed.	Support noted.

Organisation	Number	Paragraph	Comment	Officer Responses
Internal-Housing	13	Paragraph 4.13	Suggest the Live/Work internal floor space to be determined on a scheme-by-scheme basis with only suggested minimum floor space for the two elements, document doesn't provide justification for the 65% / 35% split. Live/Work split should be based on the most appropriate use of the site.	The emphasis of Live/Work development is on the work element and it is considered necessary to provide a minimum and maximum guide for the amount of workspace and liveable floor space
	14	Paragraph 5.8	What is the rational behind preventing live/work units being used as family accommodation? Parents in a family may choose live/work units to allow them more time with their children. Emphasis should be on providing a suitable environment for residential use alongside work use in Live/work schemes.	Amenity space is not required as part of live/work proposals and the concept and likely location (town centres and employment areas) of Live/Work development is considered inappropriate for family occupancy.
	15	Paragraph 6.1	Agree with the principle, a proportion of new homes should be provided as affordable housing on larger schemes. Larger schemes need to be defined in terms of unit's not total floor space.	Noted.
	16	Section 7	There is no evidence of demand for Live/work units from households on low income in the borough. We Suggest that research be carried out before it becomes a planning obligation and that there be a clear statement that the residential element of Live/work units, in a mixed development, will be counted as residential for the purpose of determining proportion of affordable housing as a planning obligation. The policy should specify that affordable housing that includes Live/work units need not be Live/work units.	Noted. A clear statement on this will be incorporated into the SPD.

Organisation	Number	Paragraph	Comment	Officer Responses
	17	Paragraph 7.1	Disagree that management of Live/work units are best undertaken by housing associations. Suggest we research housing associations willingness and ability to do so before introducing a policy. This contradicts key Point 8.1. Replace paragraph with one that requires details of management arrangements of L/W units be provided for local planning authority as part of planning application.	Baseline research on Live/Work accommodation, undertaken in 2004, found that some housing associations specialise in Live/Work units and would be willing to manage live/work schemes. Given that live/Work schemes are susceptible to be taken over as purely residential it is considered necessary that some details of management are provided at the application stage.
NHS Hillingdon Primary Care Trust	18	General	Car parking standards should not be applied so rigorously to community facilities like GP offices. Support the use of Green travel Plans.	Noted.