



LONDON BOROUGH OF HILLINGDON

ENVIRONMENT OVERVIEW AND SCRUTINY COMMITTEE

2004/05 Report

**LOCAL DEVELOPMENT FRAMEWORK
Final Report**

Members of the Committee

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Chairman's foreword



The Environment Overview and Scrutiny Committee identified the development of the Local Development Framework (LDF) as one of its overview topics for the municipal year 2004/5.

The topic was selected for a variety of reasons. Firstly, there are strong public interests at stake. Throughout the review the Committee successfully identified areas where public involvement and interest in the LDF could be improved and the Committee proposed a series of enhancements.

Secondly, the LDF will have a significant impact on every resident in Hillingdon. The LDF will shape land-use in the borough over the next decade and therefore it will influence where we live and work and have a pronounced effect on transport provision within the borough.

Finally, the Committee were aware of new legislative requirements to prepare an LDF to replace the existing Unitary Development Plan. In this respect, consideration of the LDF provided an excellent opportunity to apply and incorporate our previous work on Air Quality and the development of the Borough Transport Strategy.

As the Hillingdon's LDF will take about two years to produce, the following document is the interim report of the Committee.

I would like to take this opportunity to thank the Committee for their input and also the officers for providing the information required to enable us to make our decisions.

Councillor Mike Cox

EXECUTIVE SUMMARY

In October 2004 the Environment Overview and Scrutiny Committee identified a review of the Local Development Framework as one of its overview topics for the municipal year 2004/2005.

Due to the wide scope of the LDF and the fact that Cabinet had not yet considered the contents of Hillingdon's submission LDF documents to Government, the Committee considered a series of briefing notes in parallel with the agreed Government timetable for the production of Hillingdon's draft LDF. The Committee focused on 4 core areas These were:

- (1) The Hillingdon Design and Accessibility Statement
- (2) Public Consultation and Statement of Community Involvement in the preparation of the Hillingdon Local Development Framework
- (3) Issues associated with Local Development Framework Supplementary Planning Documents on Air Quality, Noise, Live/Work Accommodation and Sustainable Design and Construction
- (4) Affordable Housing in Hillingdon

The Committee met on 11th January 2005, 1st March 2005 and 31st March 2005 to consider officer reports on these topics. Finally, the Committee will meet on 19th April to review all the evidence and agree its final recommendations to Cabinet.

This report will include a summary of the evidence considered during the review and a series of recommendations for Cabinet to consider when it agrees Hillingdon's final LDF document to be submitted to the Government's LDF inspectorate.

The Committee present the following recommendations to Cabinet:

Recommendations to Cabinet

1. That officers develop policy to secure mixed use development on major sites to provide supporting facilities
2. That the Local Development Framework Core Strategy includes a policy to address measures taken to under-develop or split up sites and reduce the likelihood of developments falling under affordable housing thresholds
3. That officers consider a broader definition of housing density, rather than relying solely on a maximum density or habitable rooms per hectare measure and that such a definition include amenity space, overlooking and quality of environment
4. That Cabinet note the Committee's view that the Design Guides on new homes could incorporate existing legislation, such as minimum floor size required for childminding, to ensure that a minimum standard for room size is introduced in new builds.
5. That Cabinet endorse the need for officers to investigate a mix of housing types for new development to promote family cohesion
6. That Cabinet note the disparity of consultation between Stockley Park and St Georges MoD land and to request that minimum quality standards be included in the Statement of Community Involvement to ensure a consistent approach, including minutes, so that future consultations are genuine and interactive.
7. That officers clarify the role of Houses in Multiple Occupation in the Local Development Framework core strategy
8. That Cabinet accepts the need for property developers to be required to allocate a proportion of residential care homes / sheltered accommodation to a variety of affordable housing tenures
9. That Planning Committees be given an opportunity to comment on the development of the Hilligndon Design and Accessibility Statement (HDAS) during the consultation phase
10. That Cabinet accept that there are many areas of conflict within the LDF, such as transport interchanges / towns and parking / town centres which need to be addressed by the Hilligndon Design and Accessibility Statement (HDAS)

11. That Cabinet give their support to the request that telecom mast emissions be included as part of the Air Quality Supplementary Planning Document
12. That Cabinet note the Committee's view that Hillingdon's Local Planning Authority should not be bound by the Association of London Government general guidance on air quality but should continue to use its own specific guidance
13. That Cabinet ensures both sustainable design and construction are fully recognised in the Local Development Framework requirements, including both the municipal and commercial sectors
14. That Cabinet acknowledge that the development of residential extensions and new residential layouts, along with compliance with the Disability Discrimination Act are key concerns to be addressed in the Local Development Framework
15. That Cabinet acknowledge that it is important that controls over shop fronts do not affect the viability of the businesses
16. That Cabinet accept the need that in order to improve the consultation process, officers be instructed to ensure that public consultations are staggered throughout the week and held at different times
17. That Cabinet endorse the need for Local Development Framework information to be distributed with Council Tax demands or with the Hillingdon People magazine to improve the consultation process

1. Introduction and Background

Issues to Address / Terms of Reference

1. The Environment and Overview Committee (OSC) chose the Local Development Framework as an area to be reviewed as a result of the strategic importance of the planning of the physical and spatial environment of the Borough. The Committee chose to review the development of the following key Local Development Framework documents and activities:

- The Hillingdon Design and Accessibility Statement
- Public Consultation and Statement of Community Involvement in the preparation of the Hillingdon Local Development Framework
- Development of Supplementary Planning Guidance for:
 - Air Quality
 - Noise
 - Live/Work Accommodation
 - Sustainable Design and Construction
- Affordable Housing

Outcomes of the Report

2. It was envisaged that by undertaking an overview of the issues associated with a number of key LDF topics this will enable Environment OSC:

- To engage in the process before formal LDF documents are submitted to Cabinet
- Consideration of issues will assist effective scrutiny of the LDF documents themselves, as and when required, by enabling an early focus on the key topics

Background

3. Central Government, in line with its 'Modernising Local Government'¹ agenda, has been undertaking an overhaul and reform of the planning system in the UK. The reforms seek to provide a more flexible and responsive planning system, in line with that sought by the Planning and Compulsory Purchase Act 2004

4. The Act introduced a new planning system for creating Local Development Frameworks (LDFs) in place of the Unitary Development

¹ The Local Government White Paper, Modern Local Government in Touch with the People – DETR 1998 and the Local Government Act 2000

Plan and other Local Plans. The main ideology behind the LDF is to speed up the preparation of plans, ensure that they are monitored/reviewed and kept up to date whilst “providing opportunities for local people to continually participate in the shaping of key decisions about their areas...”² through “...an accessible and transparent planning system”³.

5. The LDF will replace the existing Hillingdon Unitary Development Plan (UDP) adopted in 1998. Unlike the UDP, the LDF will comprise a folder of planning documents, both statutory and non-statutory, that will set out Hillingdon’s policies and spatial strategy for meeting the economic, environmental and social aims and aspirations of the existing and future communities of the Borough.

² Community Involvement in Planning: Government’s Objectives – ODPM 2004

³ Community Involvement in Planning: Government’s Objectives – ODPM 2004

2. Methodology and Research

6. The methodology adopted for the review reflects the need

- To identify methods for developing scrutiny that may advance the opportunities and level of public participation in the development of the LDF
- To implement successfully the reforms of the planning system and the various strategic planning objectives of Government and the Greater London Authority.
- The preparation of the LDF remains a statutory responsibility for the Council and it is important that the LDF is able to stand up to public scrutiny.
- The LDF will have a high impact on residents' lives as it will shape land-use in the borough over the next decade and there may be individual locations affected by LDF policies.
- The LDF will have a bearing on all sections of the community although many of the impacts on residents may be long term rather than immediate or predictable.
- The LDF system is brand new and hence there is relatively little good practice elsewhere.

7. Having regard to the above the Committee received reports and presentations from officers on key documents and processes. This enabled the Committee to determine where to recommend changes to current practices or amendments to developing Hillingdon's Local Development Framework.

3. Summary of the Local Development Framework Documents reviewed by the Overview and Scrutiny Committee / Findings

The Hillingdon Design and Accessibility Statement

8. The Committee Report for the Hillingdon and Design Accessibility Statement (HDAS) gave an overview of the need for developing the HDAS, its current position and its importance as forming part of the Hillingdon LDF.

9. In brief the development of the HDAS is important because the Borough's current guidance on Design and Accessibility is ten years old and has been superseded as a result of new legislation and guidance such as the Disability Discrimination Act 1995, the London Plan and Regional Supplementary Planning Guidance: Accessible London Achieving an Inclusive Environment. The need to update the guidance also responds specifically to the ODPMs request that Hillingdon updates its design guidance.

10. One of the key components for developing the HDAS is that it will contain a range of design and accessibility best practice tips for guiding new development across the borough. The HDAS will set the parameters for the design of residential (both householder and new house building), commercial, town centre, mixed use and transport interchange development and will include landscaping and accessibility guidelines that developers will need to adhere to in new developments.

11. The HDAS will comprise guidance on the following key topic areas that need to be addressed:

- Residential Extensions design guidance
- New Residential Layouts design guidance (e.g. garden space, overlooking distances)
- Accessibility requirements for residential developments (internal and external areas)
- Shopfront design guidance in Conservation Areas and Town Centres
- Urban design principles for town centres, mixed use development and the public realm
- Design and accessibility guidance in and around Transport Interchanges

12. In developing this document the HDAS will give guidance on design and accessibility that not only meets new legislation but also provide innovative and clear guidance, providing both officers and applicants with a robust set of parameters for ensuring the compliance of Disability Discrimination Act whilst ensuring Hillingdon has a high quality design Environment.

13. The HDAS will go to full Council Cabinet for approval in April and June in two stages, given the scope of the SPD.

Conclusions

14. Having considered the evidence, the Committee noted that residential extensions, new residential layouts and accessibility issues related to the Disability Discrimination Act were key issues for the LDF to address. The Committee agreed that residential extensions and guidance on new residential layouts required strong controls to ensure that the street scene was maintained and the character of the Borough was preserved. In addition, the Committee expressed concerns over the increasing number of family houses being replaced by blocks of flats, and requested that this key issue was given strong consideration when the final planning guidance notes are produced.

15. Furthermore, the Committee expressed concerns about the levels of crime within the Borough and the measure that were available through the planning system to reduce these. The Committee were reassured by officers that the

design guidance on designing out crime had been prepared in conjunction with the Police and will automatically form part of the LDF.

16. In respect of transport links within the borough, the Committee acknowledged that there are many areas of conflict such the role of transport interchanges within town centres and also parking restrictions and carparks which impact on the environment. The Committee were keen that these controversial aspects will be considered in the formulation of the LDF and measures proposed to improve these problems. Finally, the Committee discussed shop fronts in conservation areas and town centres and highlighted the potential economic consequences if expensive redesign is required to old property. The Committee were keen to ensure that the unique character of the borough was maintained through the careful management of the street scene.

Public Consultation and Statement of Community Involvement in the preparation of the Hillingdon Local Development Framework

17. The report informed the Committee of the progress to date on the Local Development Framework and specifically consultation on the LDFs. Issues and Options Paper and the Borough's Statement of Community Involvement. The Report requested that Members note the findings of the report and for Officers to Report back on the Consultation results of the Issues and Options Paper. This was done verbally at a subsequent Committee Meeting.

The LDF Issues and Options Paper

18. A main theme in the production of the LDF is the involvement of stakeholders and community groups to ensure that they are engaged in the production of the LDF from the outset and that consultation is 'front loaded' as sought in the new Planning and Compulsory Act 2004 and the accompanying Regulations. The Issues and Options Paper is the formal starting point of developing Hillingdon's LDF and one of many opportunities for stakeholders and communities to get involved.

19. The Issues and Options Paper "A New Dawn for Planning" was developed to give stakeholders and community groups an early opportunity to get involved in the development of the LDF. The Issues and Options Paper asks stakeholders and communities to consider 7 areas of planning that impact on the every day life to people in Hillingdon:

- Living in Hillingdon
- Working in Hillingdon
- Shopping in Hillingdon
- Travel in Hillingdon
- Open Space in Hillingdon
- Community Facilities
- Waste and Raw Materials in Hillingdon

20. This document was published and put on consultation for six weeks on the 21st February 2005. Almost 4,000 copies of the paper were sent out to various statutory bodies, community and hard-to-reach groups, Chamber of Commerce members and other local businesses and individuals for their consideration, along with 50 (randomly selected) households from each ward and 200 businesses (randomly selected) from across the Borough's Industrial and Business Areas. In addition to this a number of Consultation Workshops were arranged and held over 3 weekends during the 6 weeks consultation period. A week long display was also held in the Chimes Shopping Centre, whilst Officers went into various town centres to publicise the LDF.

21. The Consultation ended on the 4th April 2004, however the main findings were presented to the Committee on the 29th March. The full findings will be distributed to key stakeholders including Members of the OSC in due course, although it should be noted that at the close of the 6 week consultation around 250 written submissions and requests had been made.

Statement of Community Involvement

22. As part of the Council's commitment to maximising community and stakeholder engagement in the LDF process, a draft Statement of Community Involvement (SCI) was published in November 2004 for public comment.

23. Local Planning Authorities are required to produce an SCI that sets out how they intend to achieve continuous community and stakeholder involvement in the preparation of the LDF. The SCI also covers how people and the community can get involved in the decision making process on major planning applications.

24. Approximately 2,000 copies of the draft Hillingdon SCI were distributed to various statutory bodies, community groups, local businesses and individuals for their consideration. Over 100 responses have been received so far and the comments have been incorporated into the amended SCI, which will be considered by Committee and full Council in due course, prior to submission to the Secretary of State.

Conclusions

25. During discussion, the Committee identified a series of measures to improve the Public consultation process. Firstly, the Committee agreed that if officers planned staggered meetings throughout the week, rather than exclusively at the weekends, which is the current case this would enable a greater number of the Public to participate in the consultation process. Secondly, based on the Committee's experience of the disparity of consultation with regard to Stockley Park and RAF West Drayton, the Committee agreed that a consistent interactive approach was essential. It was agreed that this process should include minute taking to ensure that the concerns expressed became action points. Finally, the Committee proposed that information on the LDF should be distributed with Council Tax demands to improve the consultation process.

Issues associated with Local Development Framework (LDF)
Supplementary Planning Documents on Air Quality, Noise, Live/Work
Accommodation and Sustainable Design and Construction

26. As a part of the development of the LDF the Council is reviewing a number of its existing planning guidance notes and also introducing new ones. The Report for the above Supplementary Planning Documents (SPD) gave an overview of the main issues and reasons for their review and production. The report requested that the Committee noted the issues associated with the review and development of these SPDs.

Air Quality SPD

27. This report gave an overview of issues related to Air Quality and the need for developing a new SPD, the current position of local guidance and the importance of guidance particularly in relation to Heathrow Airport. The main issues highlighted for the preparation of the Air Quality SPD were:

- Ensuring that guidance developed is in line with European, National and Regional Policy Guidance and targets for the reduction of Air Pollution. The UK government has set targets for nine main air pollutants. Seven of these pollutants (nitrogen dioxide (NO₂), fine particles (or PM₁₀), sulphur dioxide (SO₂), carbon monoxide (CO), benzene, 1,3-butadiene, and lead) have to be addressed at the local level, while ozone and polycyclic aromatic hydrocarbons are being tackled through national and European Union measures.
- The current guidance seeks the reductions in pollutant emissions by ensuring that air quality is taken into account in the consideration of planning applications, particularly in the designated Air Quality Management Areas (AQMAs) such as the Heathrow area.
- Identify those circumstances when an air quality assessment will be required to accompany a development proposal.
- Provide technical guidance on the process of air quality assessment.
- Provide guidance on the circumstances when air quality conditions and S106 Planning Obligations will be sought in accordance with national guidance and Hillingdon's policies.

Noise SPD

28. It is intended that the LDF will contain an SPD on Noise. As a result of regional guidance on noise in the Mayor of London's Ambient Noise Strategy 2004 and the imminent review of national Planning Policy Guidance Note 24 on Noise. The development of a Noise SPD would provide useful and effective guidance within the current policy framework.

29. The main considerations for the development of the Noise SPD:

- Ensuring that guidance developed is in line with European, National and Regional Policy Guidance and targets for the reduction of Noise Pollution that impact on peoples' lives.
- Consider new ways of mitigating noise and noise sensitive development through the possible physical separation through the exercise of land use planning controls.
- Where suitable separation cannot be achieved, consideration of whether it is practicable to control or reduce noise levels or to mitigate the impact of noise, through the use of conditions or planning obligations.
- Promotion of better design to ensure it is also seen as a key consideration in the mitigation of noise.

30. The need for an updated planning policy document on noise in the Borough is clear from the wide variety of noise sources and in particular, aircraft operating out of Heathrow and Northolt and a number of motorways running through the borough.

31. Failure to provide specific and up-to-date guidance on noise is likely to reduce the Local Planning Authority's ability to control noise levels on new and existing development sites in the borough. The Noise SPD will provide a robust up-to-date guidance that will form the basis for the formulation of policies in the Core Strategy of the LDF.

32. The report also considered technical guidance recently published by the Association of London Government (ALG) which contained a lower air quality standard for London. This guidance has undermined Hillingdon's own SPG and officers are seeking, through the West London Alliance and Air Quality Steering Group for London, to encourage the ALG to either withdraw or update their guidance. The Committee resolved to support officers in their efforts to have the Guidance amended in favour of stricter controls for Hillingdon.

Live/Work Units

33. An important element of the emerging LDF for Hillingdon will be the preparation of an SPD on 'Live/Work' Accommodation. Live/Work is a new but important land-use in London and there has been a noticeable increase in the number of planning applications or pre-application queries containing Live-Work units.

34. There is currently no policy provision for Live/Work Development in the Borough and Live/Work applications are currently assessed by way of other policies contained within the adopted UDP of 1998.

35. Live/Work space is defined as property that is specifically designed for dual use, combining both residential and employment space. The concept began to develop in the 1990s in East London but has become popular across the whole of London. There are a number of key considerations

that need to be well thought-out to avoid the problems associated with Live-Work as experienced in some parts of London. The principle considerations are:

- The need to ensure that the development of Live-Work is not seen as an alternative means of developing designated Industrial and Business Areas (IBAs) for housing.
- Provision of robust guidance on the types of locations where Live-Work would be considered acceptable, given the need to retain viable employment areas to meet the economic needs of the borough.
- Whether Live-Work developments should have the greatest use emphasis within them being the employment component, in an attempt to reduce the likelihood of schemes being converted into residential development.
- The linking of Live-Work developments with academic or research institutions and where there are a sufficient number of units to maintain a critical mass.

36. The SPD will, therefore, need to provide detailed guidance on the design and layout 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
- a maximum area for residential floorspace within the unit
- a minimum number of Live-Work units on any single scheme

37. The degree of prescription required may be greater than would normally be found in typical housing or employment policies. However given the risks as well as the potential benefits associated with promoting 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 'back door' residential development.

Sustainable Design and Construction

38. In response to several World Summits on Sustainable Development, Central Government has introduced and adopted guidance that promotes a sustainable approach to development. Sustainability is broadly defined as 'development that meets the needs of the present without compromising the ability of future generations to meet their own needs'. The new overarching national Planning Policy Statement 1 'Delivering Sustainable Development' reiterates the four aims of sustainable development as:

- social progress which recognises the needs of everyone;
- effective protection of the environment;

- the prudent use of natural resources; and,
- the maintenance of high and stable levels of economic growth and employment.

39. The development of Hillingdon's Sustainable Design and Construction SPD will be concerned with creating buildings that not only meet the needs of building users but also are developed in search a way that they are healthier buildings. The SPD will be concerned with raising design and construction standards that ensure that developments are sustainable.

40. There are eight key areas that the Sustainable Design and Construction SPD should seek to address these are:

- Economy in the use of land
- Sustainable transport
- Efficient site and internal layout
- Sustainable use of building materials
- Energy efficiency and renewable energy
- Preservation and enhancement of water resources
- Sustainable management of waste
- Conservation and enhancement of biodiversity.

41. The benefits for Hillingdon of a specific Supplementary Planning Document would be to provide guidance for developers and decision makers on producing desirable, energy efficient and healthy buildings in a sustainable way.

42. Initial work on the SPD was put on hold whilst officers awaited the publication of the Greater London Authority's (GLA) 'Sustainable Design and Construction Supplementary Planning Guidance'. This has been published in the period since the Committee considered the topic and contains a great detail of specific guidance. Officers are now considering the content of the GLA Guidance prior to progressing work on the SPD.

Conclusions

43. Having considered the evidence, the Committee identified several shortfalls within the current planning guidance. Firstly, there is a need to include telecom mast emissions as part of the Air Quality supplementary planning document to address the current Public concerns about sites. Secondly, that Hillingdon's air quality standards are more stringent than the general guidance provided by the Association of London Government. The Committee considered that the close proximity of Heathrow Airport and cross-borough transport links meant that Hillingdon had to be more vigilant and impose its own specific guidance.

Affordable Housing in Hillingdon

44. A key component of the Local Development Framework (LDF) will concern the development of new policies relating to the provision of affordable housing through the planning system. It is envisaged that the LDF Core Strategy will contain key principles, policies and definitions on affordable housing provision with detailed guidance on affordable housing to be provided within a Supplementary Planning Document (SPD). The report provided an overview of the issues associated with the provision of affordable housing as part of new development in Hillingdon. The report recommended that the Committee noted progress to date.

45. Current housing and affordable housing policy in Hillingdon was adopted in 1998 and has since been superseded or complemented by more recent regional and national planning policy and legislation. In particular, the London Plan (2004), the Greater London Authority (GLA) Supplementary Planning Guidance (SPG) (2005), Planning Policy Guidance Note 3 (PPG3) and recent proposed amendments to PPG3 - Planning for Mixed Communities (2005) – have increased the need for Hillingdon’s affordable housing planning policies to be reviewed as part of the Local Development Framework.

46. The principal aim of the LDF in respect of affordable housing will be to provide both the strategic and detailed policy framework to guide the provision of affordable housing through the planning system in Hillingdon. It is intended to develop:

- a) evidence-based policy documents which maximises the provision of a range of affordable housing tenures through the planning system and which will stand up to scrutiny at Public examination; and
- b) policy documents which assist in the provision of affordable homes both for rent and sale for local people who would not otherwise be able to purchase a home at market value.

The key considerations are:

- *Percentage of affordable housing to be provided by new housing developments*

47. The precise percentage of affordable housing on private sites to be set in the LDF will need to balance the need to maximise affordable housing provision with the need to take account of local needs and circumstances. Consideration will need to be given to the Council’s Housing Needs Survey (and the update currently being prepared), responses to initial consultation on the LDF Issues and officers’ affordable housing technical study which is currently being prepared.

- *Affordable Housing threshold*

48. The LDF will need to consider the threshold at which affordable housing will need to be provided. Hillingdon’s current threshold for affordable housing applies to sites of at least 25 units/one hectare. The

revisions to PPG3 are seeking a reduction to sites capable of developing 15 units/0.5 hectares. LDF policy which does not broadly reflect any changes to PPG3 may well be challenged by the Secretary of State.

Work undertaken to date:

49. In summer 2004, officers commenced gathering baseline information which would provide the basis for a technical study to inform policy formulation. A Housing Needs Survey update was commissioned and a first draft submitted in January 2005. The study estimates an annual shortfall of 3,564 affordable homes in the borough for the next 5 years.

50. Local planning authorities are required to assess affordable housing provision against the likely development potential of sites. On this basis, officers commissioned consultants to undertake an economic analysis of the viability of providing affordable housing on private sites in Hillingdon. This work is currently in preparation.

51. A Draft Intermediate Housing Strategy is now being prepared by Housing Services in close collaboration with planning officers. This strategy will set the framework for sub-market, intermediate housing provision, where costs are above rents for social housing but low enough to be affordable by households on moderate to low incomes. Key workers are a target group (but not the only group) within this intermediate housing market.

The Draft SPD will be published for consultation in Summer/Autumn 2006.

Conclusions

52. Having considered the evidence the Committee expressed concern about overcrowding and how the lack of a minimum standard for room size impacts on resident's living conditions. The Committee agreed that a minimum standard should be introduced which incorporated existing legislation into the Design Guide. Moreover, the Committee considered that officers should define housing density differently, rather than by the 50 dwelling per hectare standard. The Committee were also concerned about family cohesion and how a mix of housing types on new developments could provide a solution. The Committee asked officers to investigate this aspect. The Committee concluded that property developer's should be required to allocate a proportion of any new housing site to meet affordable housing needs.

4. CLOSING WORD

53. The Committee's intention was to produce a report to Cabinet to satisfy the following requirements:

- Overview of issues associated with main LDF topics will enable Environment OSC to engage in the process before formal LDF documents are submitted to Cabinet
- Consideration of issues will assist effective scrutiny of the LDF documents themselves, as and when required, by enabling an early focus on the key topics

54. The recommendations included in this report are the outcome of the Committee consideration of the evidence provided on each of the key topics. The recommendations to Cabinet are that Hillingdon's LDF should incorporate the improvements and enhancements identified.

5. ACKNOWLEDGEMENTS

The Environment Overview and Scrutiny Committee sincerely thanks all those who participated in this review.

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Decision Sheets of the Environment Overview and Scrutiny Committee dated:

11th January 2005

1st March 2005

29th March 2005

19th April 2005

